

# Need Statement (Waste Management)

Hooklands Farm  
Final

August 2023

Prepared for:  
Penfold Verrall

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# Contract

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This report describes work commissioned by Penfold Verrall Limited, by an instruction dated 9th May 2023. The Client's representative for the contract was Mark Nunn of Penfold Verrall Ltd. Sheena Peat of JBA Consulting carried out this work.

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## Abbreviations

NPPW	National Planning Policy for Waste
WLP	Waste Local Plan
WSCC	West Sussex County Council

## Definitions

**Inert waste:** Waste that does not undergo any significant physical, chemical, or biological transformations. Inert waste primarily arises from construction, demolition, and excavation activities.

**Inert waste disposal:** An operation where the primary purpose of depositing the inert waste is to manage that waste.

**Net zero:** The balance between the amount of greenhouse gas produced and the amount removed from the atmosphere.

**Recovery:** An operation where the principal result is that the waste is serving a useful purpose by replacing other materials which would otherwise have been used to fulfil a particular function, or waste being prepared to fulfil that function, in the plant or in the wider economy<sup>1</sup>.

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<sup>1</sup> Council of the European Union, 2008. Directive 2008/98/EC - Waste Framework Directive. [Online] Available at: <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A02008L0098-20180705> (accessed 06/06/2023).

# 1 Introduction

## 1.1 The Proposed Development

This Need Statement supports a planning application to West Sussex County Council (WSCC) for land raising and regrading of agricultural land to alleviate perceived noise and air pollution from the A24 for the receptors at Hooklands Farm, London Road, Ashington, RH20 3AT.

The proposed development site covers approximately 4.5ha and consists predominately of grassland, a hardstanding access track, and surrounding deciduous woodland. Two land raising areas are proposed along the south eastern boundary of the site, adjacent to the A24. To facilitate the works, 110,230m<sup>3</sup> of inert material will require importation to the site. Following importation, the land will be regraded and replanted with a suitable planting mix.

The proposed site boundary is shown on Plan Ref: HF/150/101.

The applicant, Penfold Verrall, are an earthworks contractor specialising in landfill restoration, site clearance, and aggregate recycling.

This Need Statement demonstrates the requirement for the relevant waste stream including:

- The type and origin of the waste.
- The existing / permitted operating capacity within the plan area.
- The levels of waste arisen within the plan area.
- The potential shortfall in capacity that the land raising activity will address.

This document has been prepared with reference to the following documents:

- The National Planning Policy for Waste (NPPW)
- West Sussex Waste Local Plan (WLP) 2014
- Review of the West Sussex Waste Local Plan 2019
- West Sussex Monitoring Report 2021/22

## 1.2 Type and Origin of Waste

To facilitate the works, 110,230m<sup>3</sup> of inert waste will require importation to the site. The inert waste will comprise soil and mineral material from the applicant's transfer station in Horsham, of which the material generally comes from within a 10-mile radius of the transfer station. The waste that will be used for the land-raising will be recovered from greenfield sites where new housing and industrial sites have been approved for development in the Hayward's Heath / Horsham region. The material will be brought to site under the Definition of Waste: Development Industry Code of Practice (DoWCoP).

## 2 Need

### 2.1 Planning Policy

#### 2.1.1 National Planning Policy for Waste (2014)

The following statements in Paragraph 7 of the NPPW are relevant to the proposed works:

*"When determining waste planning applications, waste planning authorities should:*

- *consider the likely impact on the local environment and on amenity against the criteria set out in Appendix B and the locational implications of any advice on health from the relevant health bodies. Waste planning authorities should avoid carrying out their own detailed assessment of epidemiological and other health studies.*

[...]

- *ensure that land raising, or landfill sites are restored to beneficial after uses at the earliest opportunity and to high environmental standards through the application of appropriate conditions where necessary."*

The Locational Criteria, as set out in Appendix B in the NPPW, relevant to this application are the protection of water quality; land instability; landscape and visual impacts; nature conservation; traffic and access; air emissions; noise, and light and vibration, and are addressed in the relevant assessments, which accompany this Planning Application. This is necessary to ensure there are no unreasonable detrimental impacts from the development, and any potential adverse effects are sufficiently mitigated.

The site sits within Flood Zone 1. However, as the site is greater than 1ha, a Flood Risk Assessment and Surface Water Drainage Assessment for the proposed works has been produced to accompany this planning application.

#### 2.1.2 West Sussex Waste Local Plan

Policy W8 of the WLP concerns the recovery of operations involving the depositing of inert waste to land. Part (c) states that proposals will be permitted provided that "there is a genuine need to use the waste material as a substitute for a non-waste material that would otherwise have to be used". This supports the Strategic Objectives of the WLP as discussed below.

The WLP's second strategic objective is to enable the progressive movements of non-municipal waste up the waste hierarchy away from landfill. As shown in Figure 2-1, 'recovery' is a step up the waste hierarchy where waste would be serving a useful purpose by replacing materials that would have been used regardless.

As the proposed development is intended to alleviate perceived noise and air pollution from the adjacent A24 on receptors of the farm, Air Quality and Noise Assessments were undertaken by Temple Group. The noise assessment concluded the land raising would result in a reduction of road traffic noise levels at Hooklands Farm of approximately 1 dB



(Temple Group, 2023a). The Air Quality assessment concluded the land raising would have a negligible impact on air quality; however, it also states that the perceived benefits to residents at Hooklands Farm is unquantifiable and the reduced visibility to the A24 for residents 'would have perceived benefits of not viewing vehicles and hence reduced emissions from the vehicles' (Temple Group, 2023b). It is therefore considered that the 'perceived benefits' and general experience of the farm would be improved for the residents. Furthermore, the land would be seeded with a wildflower mix to promote biodiversity, and visual amenity on the farm, as recommended in the Preliminary Ecological Appraisal for the proposed development.

The works would therefore be carried out using non-waste as it is serving a useful purpose, which is to preserve the perceived good quality of the local environment for residents and positively enhance visual amenity for residents.

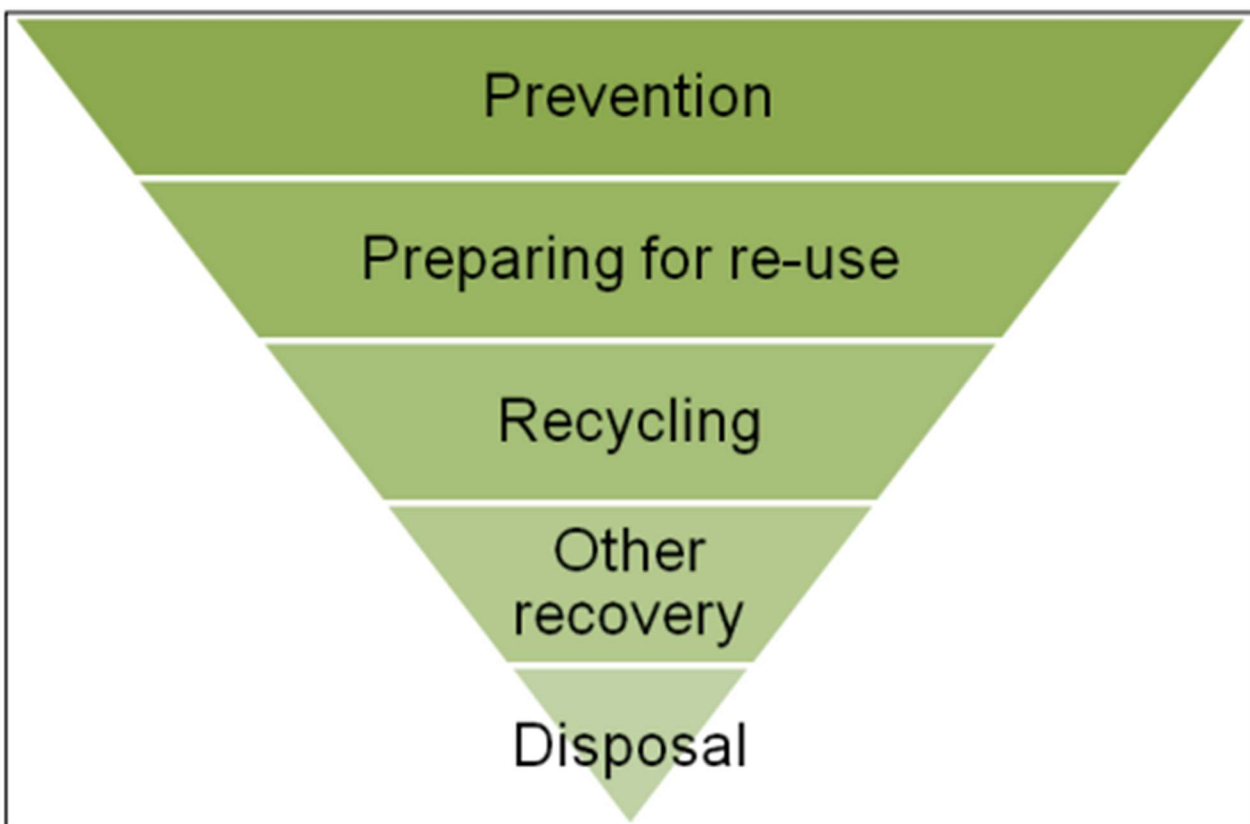


Figure 2-1: Waste Hierarchy (Source: NPPW, 2014).

The WLP's sixth strategic objective is for West Sussex to achieve 'zero waste to landfill by 2031', particularly concerning non-inert waste. The council states that inert waste will continue to be deposited on land when it is being reused for beneficial purpose, such as engineering schemes or agricultural improvement. The accompanying Deposit vs Recovery Statement, submitted with this planning application provides justification that the waste is a recovery operation, as it is serving a useful purpose that would be carried out using non-waste, and that the proposed development is compliant with Policy W8 of the WLP.

A review of the West Sussex Waste Local Plan (WSCC, 2019) revealed a general decline in total recovery capacity with large scale inert recovery (e.g., restoration of mineral sites) in the South East declining. However, other recovery operations such as land raising continue to be brought forward.

The 2019 review concluded that there was sufficient inert recovery capacity in the Plan area up to 2024. However, WSCC, together with the South Downs National Park, as the Waste Planning Authorities (WPA) for West Sussex, are required to prepare Authority Monitoring Reports under the Planning and Compulsory Purchase Act 2004 (as amended by the Localism Act 2011) and the Town and Country Planning (Local Planning) (England) Regulations 2012. The most recent monitoring report (WSCC, 2022), which covers the period from 1st April 2021 to 31st March 2022 states the following, regarding recovery capacity of inert material:

"The total amount of 'recovery capacity' is 3.25mt. It is estimated that the remaining inert 'recovery' capacity will run out in 2025/26 but generally new permissions are granted to meet demand."

It is therefore considered that the proposed development is one of these new permissions being brought forward and would help meet the predicted inert recovery capacity demand.

Policy W9 (Disposal of Waste to Land) is not considered applicable to the proposed development as the accompanying Deposit vs Recovery Statement demonstrates that the proposal is a recovery operation and the works would be carried out using non-waste.

### **3 Conclusion**

As detailed in this Need Statement, it is considered that there is a demonstrable need for the proposed inert recovery activity, as this will help meet the predicted shortfall in demand for the inert material waste stream in the coming years. Furthermore, the proposed development is compliant with the Development Plan and meets the requirements of Policy W8 of the West Sussex Waste Local Plan and meets the locational criteria for land raising activities as specified in the National Planning Policy for Waste.

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