PLANNING APPLICATION FOR

Waste & Recyclables Transfer Station and Depot, Freshfields Road, Pebsham

PART OF THE INTEGRATED WASTE MANAGEMENT SCHEME FOR EAST SUSSEX COUNTY COUNCIL AND BRIGHTON & HOVE CITY COUNCIL

November 2006

VEOLIA
ENVIRONMENTAL
SERVICES

WASTE & RECYCLABLES TRANSFER STATION AND DEPOT, FRESHFIELDS ROAD, PEBSHAM

Planning Application

November 2006

Jacobs, School Green, Shinfield, Reading, Berkshire, RG1 9HL

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Supporting Statement

WASTE & RECYCLABLES TRANSFER STATION AND DEPOT, FRESHFIELDS ROAD, PEBSHAM

Planning Application Supporting Statement

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Jacobs, School Green, Shinfield, Reading, Berkshire, RG1 9HL

	Prepared by	Reviewed by	Approved by
FINAL ISSUED	NAME	NAME	NAME
DATE			
November 2006	**Jon Jarman**	**Pat Haran**	**Andrew Wooddisse**

PLANNING SUPPORTING STATEMENT

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1. INTRODUCTION

Summary of the Proposal

1.1 Veolia Environmental Services South Downs Ltd is seeking permanent planning permission to change the use of the former Reprotech waste treatment facility at Freshfields Road, Pebsham, St Leonards on Sea, to a waste and recyclables transfer station (WRTS), depot and ancillary uses.

1.2 The WRTS is required to assist in diverting waste away from landfill and to achieve the recycling/recovery targets set out within UK and European legislation as well as the policies of East Sussex, Brighton & Hove. The existing local arrangements for waste disposal is currently reliant on the two landfills at Beddingham, nr Lewes and Pebsham, St Leonards, which are both expected to close in the near future. As a result, there is now increasing pressure on East Sussex, Brighton & Hove to minimise current levels of landfill disposal, through increased waste recycling, and energy recovery, activities that need WRTS availability for onward transportation purposes.

1.3 The proposal forms part of an Integrated Waste Management Solution (IWMS) for East Sussex and Brighton & Hove to be provided by Veolia on behalf of East Sussex County Council and Brighton & Hove City Council under the terms of a 25 year contract related to the management and disposal of municipal and household waste arisings within the joint council's area.

1.4 The overall aims of the Council's strategy, in line with government targets, are to;

- reduce the quantities of waste generated;
- extract useful materials from waste;
- generate energy from remaining waste and, by these means,
- to significantly reduce the quantity of waste disposed of to landfill sites.

1.5 The IWMS seeks to address this by providing a network of new facilities to meet the above aims and objectives efficiently and cost effectively. This planning application is a key component in the achievement of those objectives.

1.6 The proposed development will make use of the existing buildings on the site which benefits from an extant planning consent for a Waste Treatment Plant and Household Waste Site (application ref RR/84/2375).

The Applicant

1.7 The planning application has been prepared by Jacobs on behalf of Veolia Environmental Services South Downs Ltd (hereinafter referred to as 'Veolia'), one of the leading UK waste management organisations that provide a spectrum of services in waste management and cleaning. This includes the operation of a network of transfer stations, materials recovery facilities, civic amenity sites, energy recovery facilities, compost sites and landfills.

The Planning Supporting Statement

1.8 The purpose of this Supporting Statement is to provide the planning authority and planning consultees with sufficient background and technical information to allow the application to be determined. It also provides local people with an overview and explanation of what the development involves and why it is required. The Statement covers:

- a description of the site and the proposed WRTS and depot use;
- the need for the development and an assessment of relevant planning policy; and
- an assessment of the potential environmental impacts of the proposed change of use, including a Transport Assessment and separate sections on noise and air quality.

1.9 Under changes to the Development Control System, effective from 10th August 2006, there is now a requirement for a Design & Access Statement to be submitted with most planning applications, except for developments involving engineering/mining operations, changes of use (where no building works are proposed) or for householder developments. In this instance, there is no specific requirement for such a Statement, although it should be noted that the guiding principles related to access and design have been reflected in the layout and operational considerations applied to the proposals.

Pre-application Consultation

1.10 As part of the process of preparing this planning application, a formal screening opinion has been sought from East Sussex County Council, as a means to establish whether or not the application should be subject to the full process of an Environmental Impact Assessment (EIA). In a screening opinion letter dated 19 October 2006 (see **Appendix 1**), the Council confirmed that the proposals do not require an EIA.

Other Regulation

1.11 The application for planning permission is being made under the Town and Country Planning Act 1990. This is concerned above all with the land-use implications of the proposed development. Other aspects of the development are dealt with by other relevant legislation.

1.12 Under the Environmental Protection Act 1990, the responsibility for regulating the treatment and disposal of waste rests with the Environment Agency. If Planning Permission is granted, a Waste Management Licence (WML) would be required from the Agency before the site could operate. This Licence would include conditions to address detailed site working methods and the control of pollution, which fall outside the remit of the town and country planning regime.

1.13 Veolia will make an application for a WML shortly after the submission of this application for planning permission. The planning and pollution control regimes are complementary and duplication of control should be avoided. The government provides clear guidance on this matter in Planning Policy Statement (PPS) 10[1] and PPS23[2]. For example, PPS10

[1] Planning Policy Statement 10 Planning for Sustainable Waste Management, ODPM, July 2005.

[2] Planning Policy Statement 23 Planning and Pollution Control, ODPM, November 2004.

states that, "*In considering planning applications for waste management facilities, waste planning authorities should concern themselves with implementing the planning strategy in the development plan and not with the control of processes which are a matter for the pollution control authorities"*. PPS 23 provides similar advice, with the comment that *"the controls under the planning and pollution control regimes should complement rather than duplicate each other*".

1.14 In this regulatory context, this Supporting Statement does not seek to duplicate the technical assessments presented in the WML application. Specifically, this Supporting Statement provides information on potential surface and groundwater impacts, and litter and vermin control, as far as is required by the Planning Authority to determine the land use implications of the proposed change of use. This approach avoids duplication of information and allows a comprehensive assessment of the land use and pollution control impacts of the proposal, for consideration and determination by the appropriate regulatory authority.

Supporting Plans

1.15 The plans submitted as part of the planning application are listed below.

Drawing Number	Size	Scale	Title
PA 01	A4	1:25,000	Site Location
PA 02	A3	1:1250	Site Application Boundary and Land in Applicant's Control
PA 03	A1	1:500	Existing Site Layout
PA 04	A1	1:500	Layout of Proposed Use

2. DESCRIPTION OF APPLICATION SITE AND SURROUNDING AREA

Site Location

2.1 The development site lies on the outskirts of St Leonards on Sea, approximately 5 km west of Hastings, at Grid Reference TQ769089. More immediately the site is located to the South West of the Pebsham Landfill and Civic Amenity Site, about 600m north of the A259 (Bexhill Road). Access to the site is via the landfill haul road which connects to the A259, the main route between Hastings and Bexhill.

2.2 The location of the site is shown on **Plan PSS 01** Site Location Plan (**Appendix 2**).

Site Description

2.3 The proposed WRTS and depot site is approximately 2.2ha in size, enclosed on all sides by security fencing. Currently occupying the site is a centrally located metal framed industrial building of some 2,875 sq m with a height of 15m together with a 40m high chimney stack. The principle building comprises of 3 interlinked buildings, all of which are of similar high bay portal framed construction with a floor to eaves height in excess of 7m. In addition, a detached workshop building and a series of single storey portacabins also occupy the site, providing office space, a workshop and a mess room with showering facilities. The main existing buildings are shown in figure 2.1.

Figure 2.1 Application site viewed from north

2.4 The site also provides weighbridge facilities together with administrative, depot and mess room accommodation, parking and container storage areas. The site is hard surfaced across much of its area with drainage controlled via a network of gullies, drains and interceptors to the foul and surface water drainage systems. **Plan PSS 03** (**Appendix 2**) illustrates the existing site layout.

Surrounding Land Uses

2.5 The site is bounded to the north by a high embankment, a former Gypsy site and beyond, land forming part of the Pebsham landfill site. To the east it is bounded by a vegetated strip of land, including a hedgerow, either side of Pebsham Stream. Further east, adjacent to the stream, lies the Pebsham landfill and household waste recycling site (HWRS) access road (Freshfields Road). Beyond the landfill access road to the east are playing fields and the HWRS. The west and south of the site is bounded by a high

embankment with fields beyond. The primary site access and egress is via double width gates at a bell-mouth junction with the landfill haul road.

2.6 The nearest concentration of residential properties is located some 500m to the South in the settlement of Bulverhythe, with some further isolated properties approximately 550m to the North West (Pebsham Farm) and 240m to the South West. To the north of the site, adjacent to the Pebsham landfill, is a large Water Treatment Works operated by Southern Water and to the south, near the entrance of the access road, are a Garden Centre and a small shed retail outlet. Figure 2.2 shows the position of the Water Treatment Works from the embankment to the north of the application site.

Figure 2.2 Water Treatment Plan (Southern Water)

2.7 Views in and out of the site are restricted by the high embankment, which forms around the perimeter of the proposal site. As a result the main visible part of the site is the chimney stack.

Site Planning History

2.8 The existing site benefits from an extant planning consent for a Waste Treatment Plant and Household Waste Site, issued in 1988 under planning consent RR/84/2375. During a two year period following a fire at the plant in August 2002, the site operated purely as a waste recycling transfer station for the receipt and onward transfer of recyclable and non-recyclable wastes. This took place within the reception hall of the Waste Treatment Plant.

2.9 Planning permission RR/84/2375 was granted on the basis of the Waste Treatment Plant handling approximately 85,000 tpa of domestic and other suitable waste, together with provision for a Household Waste Site. The permission limited power-driven site operations to between the hours of 6am and 10pm, Monday to Saturday inclusive.

2.10 The site previously operated under a number of Environment Agency authorisations issued from 1993 to 1998 that were revoked in 2004 at the request of the former site owners. These authorisations previously established a framework of conditions and operational good practice for the protection of the environment and avoidance of pollution. The previous authorisations encompassed not only the operation of the Waste Treatment Plant, but also authorised the use of the facility for the receipt, handling and transfer of recyclable materials delivered to the site by the Waste Collection Authorities.

3. THE DEVELOPMENT PROPOSAL

Introduction

3.1 This chapter describes the key features of the proposed WRTS and Depot at Pebsham. It includes details of the types of waste to be handled, traffic movements to and from the site, and related operational issues.

Site Operation

3.2 The proposal seeks to use the existing site and buildings for the receipt of recyclable and non-recyclable waste materials and their bulk transfer to recycling and recovery/disposal facilities elsewhere. Part of the site and building will also be used as a depot for a fleet of waste collection and street cleansing vehicles.

There will be no material change to the site layout, physical form of the buildings, site fencing or means of access. All of the proposed operations will operate within the existing parameters of the site thereby avoiding the need for any site clearance. The proposals will not impose on or cause damage to the surrounding embankments.

The facility will have car/van parking facilities for 35 staff, 10 of which will be located in front of the administration buildings at the site entrance, with the remainder being the vehicles of the RCV/fleet operatives which will be parked in the RCV spaces at the start of the daily shift and removed to make way for the RCV fleet at the end of the shift. All fleet vehicles will be parked at the site overnight.

WRTS Facility

3.3 This activity will be undertaken under cover, within the existing waste reception hall located within the north central part of the premises (**Plan PSS 04, Appendix 2**). Waste collection vehicles would enter the site via the 'in' weighbridge and enter the WRTS building. Collected waste and recyclables would be tipped onto the internal floor, in separate areas, and would be loaded into an articulated bulker vehicle by a Fuchs mobile grab or similar, fitted with a 'smart' vehicle reversing alarm (that adjusts to the ambient noise level). Waste collection vehicles would then exit the WRTS building and the site, via the 'out' weighbridge. Articulated vehicles, containing either collected waste or recyclables, would exit the site via the 'out' weighbridge, and traverse Freshfields Road to its junction with the A259. It is anticipated that until the Newhaven Energy from Waste facility becomes operational, the majority of residual waste loads would be directed to the Allington Energy Recovery Facility in Kent, in order to acheive a reduction in local landfill disposal rates and a corresponding increase in "recovery" rates. Articulated bulkers would transport recyclable materials to various reprocessing or market destinations.

Depot

3.4 In addition to the Waste & Recycling Transfer Facility, it is intended to increase the previous depot usage (which previously included parking provisions for up to 15 HGV's) to provide overnight parking for up to 40 Refuse Collection Vehicles (RCVs)/ Street Cleansing Vehicles associated with the site and its operations (principally for Hastings Borough Council and Veolia). As illustrated on **Plan PSS 04, Appendix 2**, the depot facility would be located on the existing area of hardstanding at the southern end of the

site, and within the southern part of the existing main waste management building. An existing covered area adjacent to the part of the building to be used for depot activities will be used for the storage of waste and recyclables collection containers and skips.

Workshop, Office, Weighbridge Office, Shower and Canteen Facilities

3.5 Staff facilities, office space and workshop facilities would be provided in the existing prefabricated buildings at the northern end of the site, as they were for the previous site use, as shown on **Plan PSS 04 (Appendix 2)**. The existing refuelling and vehicle washing facility would be re-commissioned. There is no requirement for vehicles leaving the site to undergo routine wheel washing, as the entire internal vehicle circulation path is of concrete hardstanding construction. All internal tipping and external circulation roads would be routinely swept to minimise dust and debris contamination of vehicle wheels, and hence the spread of such materials onto the public highway.

The Amount and Type of Materials to be Accepted

3.6 The WRTS facility will handle up to 85,000 tonnes per annum of non-hazardous municipal solid waste (MSW) and commercial and industrial (C&I) waste, collected recyclables and some material from surrounding household waste recycling sites (HWRS). The extant planning permission for the Pebsham Waste Treatment Plant envisaged a throughput of around 85,000 tpa of MSW and other suitable wastes, in addition to materials delivered to the site by members of the public related to the establishment of a replacement Household Waste Site. The proposed Waste and recyclables transfer station will therefore operate well within the limits previously considered acceptable at the site under the existing permission.

Vehicle Movements and Access

3.7 Anticipated vehicle flows (vehicles movements per day) associated with this site are shown in Table 3.1 below. A detailed transport assessment (TA) is included within this Supporting Statement at Chapter 6. The TA demonstrates that the proposed change of use of the site will result in an overall reduction in vehicle movements on the A259.

Table 3.1. Proposed average daily vehicle movements

Vehicle Type	Number of vehicles	Number of Vehicle movements per day
Hastings Municipal Refuse Collection Vehicle Fleet [2 loads/day Mon-Fri only]	29	116
Hastings Municipal Fleet [2 loads/day Sat-Sun only]	7	28
Veolia Commercial Refuse Collection Vehicle Fleet [1 load/day Mon-Fri only]	5	10
Bulk Transport Vehicles [approximate average based on annual 85,000 tonnes of waste transferred]	11	16
Staff Cars [Weekday max.]	35	70

3.8 The internal layout of the facilities and internal site circulation roads are designed to enable safe vehicle movements to and from the WRTS and depot. Road and pedestrian access routes will be appropriately marked to ensure safe vehicular and pedestrian circulation.

3.9 The WRTS is designed to operate with separate designated entrance and exit ways, allowing vehicles to safely enter the building, offload and exit. This will act to reduce risk of traffic collisions and improve the efficiency of internal traffic circulation. All vehicles entering and exiting the WRTS will be required to pass over the weighbridge. The weighbridge operator will control the opening and closing of the doors to ensure traffic management internally and outside the building.

Hours of Operation

3.10 The hours of operation for the proposed Waste and recyclables transfer station and Depot are 06:00hrs to 22:30hrs, 7 days a week as detailed in Table 3.2 below. The operating times of the existing permission currently allow operations from 06:00hrs to 22:00hrs, Monday to Saturday. Whilst the proposals seek to operate to a greater extent on weekends they remain fairly consistent with already agreed hours. The extended hours on weekends are necessary to allow the efficient operation of the facility in meeting the needs of the municipal collection fleet and operational requirements of the facility as well as to ensure that materials are received and removed from the site over short timeframes and that traffic volumes are more widely distributed.

Table 3.2 Proposed Hours of Operation

	Mondays – Fridays	Saturdays	Sundays
Operational Hours	06:00 – 22:30	06:00 – 22:30	06:00 – 22:30

Number of Employees

3.11 Approximately two staff will be based at the WRTS facility, one machine driver, and one weighbridge operator. There will also be frequent visits from a Veolia mobile supervisor. Approximately eight staff associated with the Hastings municipal contract will be based at the site office.

Description of buildings

3.12 The proposals will make use of the existing buildings on the site which comprise of a centrally located metal framed industrial building of some 2,875 sq m with a height of 15m. The principle building comprising of 3 interlinked buildings, all of which are of similar high bay portal framed construction with a floor to eaves height in excess of 7m. In addition, a detached workshop building and a series of single storey portacabins also occupy the site, providing office, shower and canteen facilities.

3.13 As the previous Waste Treatment Plant processes conducted by Reprotech will no longer be a feature of the site there is no requirement for the existing 40m circular steel chimney that was associated with the previous use. Accordingly should planning permission be granted for this change of use, the chimney will be removed by qualified steeplejacks within six months of the new use commencing.

3.14 All of the buildings and hardstanding / internal circulation roads within the site will be retained, with some refurbishment to be carried out before occupation. **Plan PSS 04 (Appendix 2)** illustrates the location of the buildings described below.

WRTS Building

3.15 Internal pushwalls, internal bays for segregation of recyclables, and fast acting transfer hall doors will be installed in the WRTS building. The reception hall would be fitted with high level rotary atomisers for dust and odour suppression purposes. A fire detection system linked to an external monitoring station will be in place. The proposed change of use will not involve the generation of significant quantities of demolition or construction waste materials. However, the removal of the chimney and any other steelwork will be undertaken by appropriately qualified contractors and with a view to the recovery/recycling of reusable materials wherever practical.

Depot Accommodation

3.16 No material changes are proposed to the existing buildings to accommodate the depot activities.

Existing prefabricated buildings at the northern end of the site

3.17 These buildings will be retained for similar office, weighbridge office, workshop and staff facility uses to those associated with the previous use.

Noise, Odour, Air Quality and Drainage Control

3.18 Dust and odour will be minimised at the site, as all waste handling operations will occur within an enclosed building and the WRTS reception hall would be fitted with high level rotary atomisers for dust and odour suppression purposes.

3.19 All vehicles with open containers containing waste or recycled materials will be sheeted before leaving the site.

3.20 Noise impact will be reduced by waste handling (loading and unloading) operations occurring within the WRTS building. The Fuchs type waste handling plant will be fitted with a “low noise” reversing alarm so as to minimise noise associated with conventional reversing “bleepers”. The WRTS building would be fitted with fast acting doors, which would remain closed other than when vehicles enter or leave the building. The weighbridge operator will have the ability to open and close the doors to allow vehicle to enter and exit thereby minimising the periods the doors are open. Fuller consideration of noise issues is given in Section 8 of this Statement.

3.21 Surface water from the roof run off and hardstanding areas first flows through an oil interceptor prior to being discharged to the Pebsham stream via the existing discharge channel. Foul from the office /welfare buildings and vehicle wash area is pumped from a central point to the neighbouring Southern Water sewage works.

Lighting and Security

External lighting

3.22 Existing external lighting will be refurbished where necessary. The design of all external lighting will be in line with the guidance given by the appropriate guidance document produced by the Chartered Institute of Building Services Engineers (CIBSE), and recommended by British Standards. The lighting levels will be selected to be the minimum appropriate to the function/operation to which the areas of the site are put.

3.23 The site will not be 'over-lit'; lights will be switched off when not required for safety or security. All luminaires selected will be specifically designed to minimise the upward spread of light to near, or above the horizontal. Glare from installed lighting installation will be kept to a minimum by ensuring that the main beam angle of all luminaires directed towards any potential observer is kept below 70°, high mounting heights will allow this to be achieved.

3.24 Lighting attached to the building will be low brightness and downward pointing.

Lighting within the building

3.25 The main WRTS/Depot building on the site will have few windows, and therefore light pollution from this source will be kept to a minimum. Vehicle accessing the building will use rapid operating doors, thereby reducing the time the doors are actually open, and hence minimising the emission of light from within the building.

Security and Signage

3.26 The site area is fully enclosed with a site security fence of steel palisade construction, to prevent unauthorised access. The site access point is fitted with security gates. The access gates will be locked whenever the site is unmanned.

3.27 The site will either be subject to manned security patrols or monitored via an infra-red CCTV system currently in use at a number of other Veolia facilities.

3.28 A site entrance board will be secured to the site fence/access gates, in accordance with Environment Agency regulations. All visitors entering the facility will be required to sign-in at reception before being directed to their required destination. Safe and efficient pedestrian walkways will be provided from the main admin buildings to the operational areas, vehicle depot parking, WRTS building, refuelling/wash down area.

3.29 Signage will be provided to ensure vehicles entering the WRTS/Depot enter via the 'in' weighbridge and exit via the 'out'. Additional signage will be provided throughout the site to inform site users of the site speed limit. Clear road marking arrows, parking bays and keep clear areas will be provided to ensure safe and efficient traffic management.

3.30 Designated doors will be used for entering and exiting the WRTS building, and appropriate signage will be in place to enable drivers to distinguish between the two.

4. PLANNING POLICY – KEY ISSUES

Introduction

4.1 The purpose of this chapter is to briefly outline the planning policy context to this development proposal, and to identify the key issues that need to be addressed. These issues are then considered in more detail in Chapter 5. The main relevant national planning policy and development plan documents are identified below, and a tabulated summary of the key relevant policies within these documents is set out in the following pages.

National Planning Policy

4.2 **Policy Planning Guidance Notes (PPGs) and Planning Policy Statements (PPSs)**

PPGs and PPSs provide government guidance and policy on particular planning issues. PPSs will progressively replace PPGs as they are reviewed, in accordance with the Planning and Compulsory Purchase Act 2004. The PPGs and PPSs that are most relevant to this proposal are summarised below.

- PPS1 Delivering Sustainable Development.
- PPS10 Planning for Sustainable Waste Management.
- PPG13 Transport.
- PPS23 Planning and Pollution Control
- PPG25 Planning and Flood Risk.

The Development Plan

4.3 Section 36 of the Planning and Compulsory Purchase Act 2004 introduced a new system of development plans whereby the Regional Spatial Strategy and Local Development Frameworks form the development plan and replace the old system of regional planning guidance (RPG) and structure and local plans. Under the 2004 Act, existing RPG becomes RSS, and there are transitional arrangements for adopted and emerging local development plans.

4.4 In Pebsham, the development plan comprises the following documents.

- Regional Planning Guidance for the South East (RPG9) (2001) and Regional Planning Guidance for the South East (RPG9) – Waste and Minerals (2006)
- East Sussex and Brighton & Hove Structure Plan (2002)
- East Sussex and Brighton & Hove Waste Local Plan (2006)
- Rother District Local Plan (2006)

4.5 In March 2006, the South East England Regional Assembly (SEERA) published a proposed review of RPG9, which is to be subject to Public Examination in late 2006 – early 2007, with adoption expected some time in 2008. Its proposed policies for waste management are largely the same as those in the new text for RPG9 minerals and waste, with some amendments to figures on, for example, waste management capacity

requirements. These changes are not considered significant for the purposes of this planning policy assessment and are not included in the table below.

Summary of Key Planning Policy Issues

PLAN LEVEL	POLICY	POLICY REQUIREMENTS
NATIONAL POLICY / GUIDANCE		
PPS1	N/A	Identifies the Government's key aims for sustainable development, including social progress which recognises the needs of everyone; effective protection of the environment; prudent use of natural resources; and the maintenance of high and stable levels of economic growth and employment. Paragraph 20 identifies that development plan policies should take account of environmental issues such as the management of waste in ways that protect the environment and human health, including producing less waste and using it as a resource wherever possible.
PPS10	N/A	Key objective of delivery of sustainable development through driving waste management up the waste hierarchy, communities taking more responsibility for their own waste, and waste management without endangering human health and harming the environment, via the nearest appropriate installations. A set of decision making principles for local authorities, including considering waste management alongside other spatial planning concerns, and, in determining planning applications, avoid duplication with the pollution control regime, and considering PPS10 policies as material considerations that may supersede policies in existing development plans.
PPG13	N/A	The main policy objectives include a reduction in

		growth in the length and number of motorised journeys and encourage the location of new industrial development on sites that are well served by existing transport infrastructure.
PPG25	N/A	The guidance requires flood risk to be considered at all stages of the planning and development process. The susceptibility of land to flooding is a material planning consideration and the PPG advises that the precautionary principle be applied to the flood risk issue.
REGIONAL SPATIAL STRATEGY		
RPG/RSS9	INF3	Requires adequate provision to be made for the management of the region's waste within its own boundaries wherever possible; that waste planning authorities should aim to make provision for a sufficient range and number of facilities for the re-use, recovery and disposal of waste that will need to be managed in their areas; and that every effort should be made to minimise waste.
Changes to RPG9 Waste Policies (RPG9 2006)	W4	Requirement for Waste Planning Authorities to provide for waste management capacity equivalent to the amount of waste arising and requiring management within their boundaries.
	W5	Targets for diversion of waste from landfill: 52% of MSW by 2010 rising to 84% in 2025, and 65% of C&I in 2010, rising to 84% in 2025.
	W6	Regional recycling and composting targets: 40% MSW in 2010 rising to 60% in 2025 and 50% C&I in 2010, rising to 65% in 2025.
	W7	Requirement for local authorities to provide for a mix of development opportunities to support the facilities needed to meet targets of waste to be managed (1.13 million tonnes of MSW and C&I waste in East Sussex in 2025).

	W16	Waste Development Documents should identify infrastructure facilities, including sites for waste transfer and bulking facilities, essential for the sustainable transport of waste materials. These sites and facilities should be safeguarded in Local Development Documents. Policies should aim to reduce the transport and associated impacts of waste movement.
	W17	Advice on suitable locations for facilities, including giving priority to safeguarding and expanding suitable existing waste sites and identifying existing industrial land use as being compatible with waste use.
East Sussex and Brighton & Hove Structure Plan (1999)	S1	Criteria for development decisions, including meeting needs for facilities, minimising environmental impact, not creating or perpetuating unacceptable traffic conditions, re-use of existing premises, protecting water quality, avoiding development of land at risk of flooding, protecting air quality, managing waste in an environmentally acceptable way and avoiding unnecessary noise.
	TR30	Lorries should use the strategic road network where possible.
	EN1	Development should sustain the character of the built environment.
	EN7	The landscape character of urban fringe areas will be subject to positive measures to improve landscape character.
	EN15	Requirement for proposals to include measures to minimise noise.
	W1	Proposals should include an assessment of gains and losses in environmental quality and any necessary mitigation measures, including pollution prevention, and demonstrate that options for re-use and recycling have been

		considered.
	W2	Accordance with the waste hierarchy and best practicable environmental option (BPEO).
	W3	Promotion of county self sufficiency.
	W4	Transfer stations for transport of waste outside the county will be supported were there is an unavoidable need.
	W5	Support for proposals that minimise the need for transportation of waste.
	W6	Support for a strategic network of facilities.
	W9(a)	Transfer stations should be located within urban and industrial areas.
	W9(g)	Proposals should not have unacceptable impacts on settlements and sensitive land uses.
	W9(h)	Proposals with inadequate access arrangements or unacceptable traffic impacts will not be allowed.
	W13	Support for proposals that contribute to meeting the government's waste management targets.
	W19	Sites identified in waste local plans will be safeguarded against non-waste development.
East Sussex and Brighton & Hove Waste Local Plan (Adopted February 2006)	WLP1	Aims to ensure that waste is recovered or disposed of without endangering human health and without using processes or methods which could harm the environment. Promotes accordance with the BPEO, waste hierarchy, proximity principle, precautionary principle, the elimination of disposal of untreated waste to landfill, contribution to an integrated strategy to achieving recycling and recovery targets and the objectives of designated sites and areas of environmental importance.
	WLP2	Proposals should be located close to sources of waste and designed to minimise the length and number of road traffic movements.

	WLP6 (a-c)	Proposals for expansion or alterations to existing waste management facilities will be permitted, subject to other relevant plan policies where it is demonstrated that: …… (c) or the development would contribute towards achieving net self-sufficiency of the Plan are in waste management facilities.
	WLP8	Proposals for material recovery facilities/ waste transfer facilities will be supported at Pebsham WDF plant and adjoining land.
	WLP35	All proposals shall satisfy the following criteria: a) the development is of a scale, form and character appropriate to its location; and b) there is no unacceptable adverse effect on the standard of amenity appropriate to the established, permitted or allocated land uses likely to be affected by the development; and c) adequate means of controlling noise, dust, litter, odours and other emissions are secured; and d) there is no unacceptable adverse effect on the recreational or tourist use of an area, or the use of existing public access or rights of way; and e) there is no unacceptable adverse effect on areas or features of demonstrable landscape, archaeological, architectural, geological, ecological, or historical importance.
	WLP36	Proposals will not be permitted where: a) access arrangements are inadequate for the volume and nature of traffic generated by the proposal; b) unacceptable safety hazards for other road

		users, cyclists or pedestrians would be generated; c) the level of traffic generated would exceed the capacity of the local road network; d) an unacceptable adverse impact upon existing highway conditions in terms of traffic congestion and parking would arise; e) there are inadequate arrangements for on site vehicle manoeuvring, parking and loading/unloading areas; and f) adverse traffic impacts that would arise from the proposal cannot be satisfactorily mitigated by routing controls or other highway improvements.
	WLP38	Planning permission will not be granted for development which would: a) cause unacceptable risk to the quality of surface and groundwater (including reservoirs); and b) cause changes to groundwater levels, which would result in an unacceptable adverse impact upon adjoining land, the quality or potential yield of groundwater resources, river flows or natural habitats; and c) result in work being undertaken below the water-table, unless the proposal includes a suitable comprehensive groundwater management scheme, running throughout and after the life of the proposal.
Rother District Local Plan (2006)	DS1	Principles for determining whether development is appropriate in a particular location, including prioritising the use of previously developed land/buildings, access to a good level of services by public transport, avoiding prejudicing the character and qualities of the environment

		and ensuring development is safe from flooding.
	GD1	Sets out the criteria for all development including, meeting the needs of future occupiers, is in keeping with and not harming the amenities of adjoining properties, providing for adequate and safe access by all relevant modes of transport, not detracting from the character and appearance of the locality, and ensuring the infrastructure and facilities necessary to serve the development are available.
	GD2	Development will only be permitted when it is satisfactorily demonstrated that the infrastructure and facilities required to serve the development are available or will be provided.
	DS5	Development in identified strategic gaps will be carefully controlled and only in exceptional circumstances will development be permitted therein. Any development must be unobtrusive and not detract from the openness of the area. Identifies area between Bexhill and St. Leonard as a strategic gap.
	BX4	Policy identifies area between Bexhill and St. Leonards as a Countryside Park, but excludes the areas allocated in the East Sussex and Brighton & Hove Waste Local Plan.

Key planning issues relevant to the proposal

4.6 In the light of the content of relevant planning policies contained within the above documents, the main planning issues relevant to this proposal are identified as being these:

- Need for the development: Why is the development required, and what benefits can it provide?
- Sustainable development: Has the proposal taken into account the principles of sustainable development, including in particular the waste hierarchy, waste management without endangering human health and harming the environment, and communities taking more responsibility for their own waste?
- Suitability of the site: Is the site suitable for the development proposed, having regard to prevailing planning policies both on issues of principle and on specific environmental and amenity issues?

4.7 Decisions by planning authorities as to whether to grant planning permission must be made in accordance with the relevant development plan unless material considerations indicate otherwise. In this case, the development plan currently comprises of RPG9, the adopted Structure Plan (1999), the adopted Waste Local Plan (2006) and the adopted Rother District Local Plan (2006). National policy statements are a material consideration when planning applications are being decided, and in this case the draft RSS 9 (The South East Plan) is the main emerging part of the development plan that would be given significant weight in the decision making process.

4.8 An assessment of the proposal against the specific requirements of the policies in these plans is provided in the following section of this Supporting Statement.

5. ASSESSMENT AGAINST KEY PLANNING ISSUES

5.1 Chapter 4 reviewed the planning policy relevant to the proposal and identified three main planning issues that are common to national policy and the development plan for the area. These are listed below.

A. Need for the development: Why is the development required, and what benefits can it provide?

B. Sustainable development: Has the proposal taken into account the principles of sustainable development, including in particular the waste hierarchy, waste management without endangering human health and harming the environment, and communities taking more responsibility for their own waste?

C. Suitability of the site: Is the site suitable for the development proposed, having regard to prevailing planning policies both on issues of principle and on specific environmental and amenity issues?

5.2 In this chapter, the proposals are assessed against each of these key planning policy issues in turn.

A. Need for the Development

Planning Policy

Government Policy and the Development Plan

5.3 The County Council (as 'Waste Disposal Authority') and the District Councils (as 'Waste Collection Authorities') are required to meet statutory targets for recycling an increasing quantity of waste, and for reducing the amount of household waste that is disposed of by landfilling. These targets are set out in Waste Strategy 2000[3], and include recovery of value from 47% of municipal waste by 2010 and 67% by 2015.

5.4 PPS10 contains policy aimed at the implementation of these targets, including the requirement for regional planning bodies and planning authorities to plan for identified waste management needs. In turn, themes and objectives common to all elements of the development plan are:

- the need to divert waste from landfill, including ambitious targets that are substantially higher than the levels of diversion currently being achieved, and which are the same as or higher than those set by Waste Strategy 2000;
- provision to be made for the management of the region's / county's waste within its own boundaries; and
- provision for a sufficient range and number of and range of type of waste management facilities.

5.5 The East Sussex and Brighton & Hove Wastes Local Plan considers these objectives in a local context and identifies a specific local need for additional waste management

[3] Waste Strategy for England and Wales (DETR 2000)

capacity to be identified in the eastern part of the plan area (Hastings, Bexhill, Battle and the rural hinterland).

The Issues

5.6 There are currently only two landfills serving the needs of East Sussex, (Beddingham nr Lewes and Pebsham, St Leonards), both of which are expected to close in the next few years. The Pebsham landfill site is expected to be full by the end of 2007, and there is therefore an urgent requirement for an alternative facility to deal with waste generated in the eastern waste local plan area.

5.7 Veolia has been chosen by East Sussex County Council and Brighton & Hove City Council to provide an integrated municipal waste management service, which is designed to deliver the facilities required for the area in order that they may be self sufficient in meeting statutory waste management targets. Whilst planning permission for much of the infrastructure has now been granted, the main waste recovery component of the service (which is intended to be an energy from waste (EfW) facility located at Newhaven), is awaiting planning determination and is not expected to be operational until around 2010. From 2010, the EfW facility will (subject to planning permission) play a key part in meeting the statutory waste recovery targets, but in the interim period, in order to meet the targets, alternative waste recovery arrangements are required.

5.8 Additionally, depot facilities are required for waste collection vehicles. Currently the fleet servicing the Hastings and surrounding area is located at the Bulverhythe Depot. This depot is shortly expected to be redeveloped for non-waste management uses, so an alternative depot location is urgently required.

Relationship to the Proposal

5.9 The proposed WRTS and depot at Pebsham is an important part of Veolia's long term strategic integrated municipal waste management service to East Sussex County Council and Brighton and Hove City Council.

5.10 This service is dependant upon the provision of a range of new waste management facilities (supported by a network of household waste recycling sites and waste collection authority initiatives), which are designed to divert waste away from landfill and to achieve the recycling/recovery targets set out within UK and European legislation. As part of this network, the proposed WRTS and depot at Pebsham will play an important role in helping to meet Waste Local Plan and wider objectives for delivering waste targets, and thus achieving more sustainable waste management. In particular, it will provide an urgently needed WRTS facility ahead of the construction of other key facilities, assisting the Councils to make an early contribution to recycling and recovery targets.

5.11 Specifically the WRTS and depot will allow the bulk transfer of municipal solid waste to waste recovery facilities. In the short term these will be outside East Sussex, but in the longer term this will be the Newhaven EfW facility. The proposed WRTS, as part of a wider waste management strategy, is therefore vital in enabling statutory waste recycling and recovery targets to be met. The WRTS will enable the recycling and recovery of value from up to 85,000 tonnes per annum of waste, ahead of the proposed EfW facility at Newhaven becoming operational.

5.12 Further, if planning permission were not to be granted for the proposed facility, refuse collection vehicles would have to travel long distances after each collection round, to deliver waste to alternative facilities, generating a significant increase in journey lengths and frequency of daily trips to reach alternative disposal sites. Additionally, the co-location of the depot and WRTS facilities would result in reduced vehicle trips (when compared to current arrangements), as there will be no requirement for refuse collection vehicles to make an additional 'return to base' trip following the last waste delivery of the day (see Section 6).

5.13 The WRTS will also enable the receipt and bulking, for onward transport to markets, of recyclables, which will significantly reduce the need to travel longer distances to alternative facilities.

5.14 In summary, the former Reprotech site is well located to provide urgently needed facilities and capacity for waste and recyclables transfer. There are clear synergies and environmental benefits arising from the co-location of the depot with the transfer uses, as well as to the existing nearby HWRS and landfill activities. The proposed development will form part of the integrated waste management facilities that will enable East Sussex, Brighton & Hove achieve their landfill diversion targets, whilst allowing an earlier contribution to recycling and recovery targets than would otherwise occur.

B. Sustainable Development

Planning Policy

5.15 PPS1 sets the context for government sustainable waste management objectives as part of its overall sustainable development objectives, taking account of the management of waste in ways that protect the environment and human health, including producing less waste and using it as a resource wherever possible. PPS10 and the revised Waste Strategy 2000 (2005) set out a series of key objectives specifically for sustainable waste management, and those most relevant to this proposal may be summarised as follows.

- Meeting the Waste Hierarchy, which is a framework guiding the development of waste management options in accordance with the principle of minimising environmental impacts.
- Undertaking waste management without endangering human health and harming the environment, taking account of feasibility and cost.
- Communities taking more responsibility for their own waste, and the provision of necessary facilities to meet requirements.

5.16 The policies of RPG9 and the East Sussex and Brighton & Hove Waste Local Plan are broadly compatible with these PPS10 objectives. The Waste Local Plan includes a policy requiring waste management proposals to represent the best practicable environmental option (BPEO), having regard to the waste hierarchy, proximity principle and the precautionary principle.

5.17 Earlier waste planning guidance in PPG10 and the original version of Waste Strategy 2000 referred to the principles of self sufficiency, proximity and the BPEO. However, these principles are now effectively subsumed in the restated principles set out in revised

national policy of PPS10, as summarised above, and for the purposes of this policy assessment can be considered as broadly interchangeable with the new policy principles.

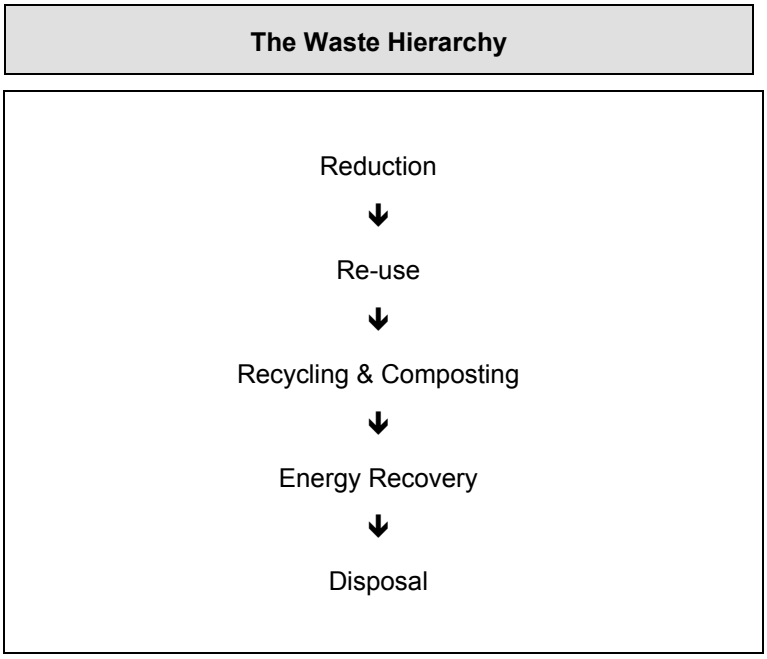
5.18 The government's Companion Guide to PPS10[4] contains advice on the relevance of waste local plan policies requiring BPEO compliance, specifically stating that there is no legal or national policy requirement for the application of BPEO policies in extant local plans.

The Issues

5.19 A brief summary of the scope of the three key sustainable waste management objectives is set out below.

(i) Waste Hierarchy

5.20 Waste Strategy 2000 and PPS10 state that the waste hierarchy should be used as a guide for considering the most appropriate waste management option. The waste hierarchy sets out the preferred solutions for future waste management practices, with the most preferred solution at the top of the hierarchy and the least preferred at the bottom.



5.21 The policies of the East Sussex and Brighton & Hove Structure Plan and Waste Local Plans are premised in part on the waste hierarchy. Both include policies to promote re-use and recycling by seeking the provision of permanent waste recovery and/or recycling and transfer facilities. In addition, the Waste Local Plan was itself based on a quantitative BPEO assessment that has been updated and extended to demonstrate compliance in the context of the various planning applications submitted by Veolia.

[4] Planning for Sustainable Waste Management: Companion Guide to Planning Policy Statement 10 (DCLG) 2006

(ii) Waste management without endangering human health and harming the environment, taking account of feasibility and cost

5.22 The original version of Waste Strategy 2000 stated that the BPEO should establish "the option that provides the most benefits, or the least damage to the environment as a whole, at acceptable cost, in the long term as well as the short term". The revised policy principle, set out in the above heading, covers much of this ground, and as with a BPEO assessment, judgements on health and environmental impacts, feasibility and cost can be resolved by analysing trade-offs between different objectives and criteria that form part of the assessment.

5.23 In light of policy in Waste Strategy 2000 and PPS10, the assessment of the proposal in terms of performance against the above principle considers the following issues:

- The need for the scheme;
- The other key waste management principles;
- Environmental issues, including traffic, air quality and other issues.

(iii) Communities taking more responsibility for their own waste, and enabling waste management in nearby appropriate installations

5.24 Achieving waste management in accordance with the proximity principle was a key objective of PPG10 and Waste Strategy 2000, and was based on the general requirement for waste to be managed as near as possible to the place of production, because the process of transporting waste itself has an environmental impact. Although the proximity principle is no longer referred to as such in PPS10 and the latest version of Waste Strategy 2000, the provision of facilities relatively close to the sources of waste is clearly in accordance with sustainability principles, not least because it helps to minimise the transportation of waste. Policy WLP1 of the Waste Local Plan includes a requirement for proposals to accord with the proximity principle.

5.25 Previous national policy also sought to secure regional self-sufficiency in waste treatment, and RPG9 and the Waste Local Plan endorses this approach in policy. Again this is no longer expressly referred to in national advice, but - like the proximity principle - it may be seen as being subsumed within the new principle of ensuring that communities take responsibility for their own waste.

5.26 The planning policy background in East Sussex reflects the national policy principle of community responsibility for waste management and of providing facilities that are, in general terms, located to match the pattern of population distribution and thus relatively accessible from the places where the waste is created. There is therefore a requirement for a network of waste management facilities that allow waste to be dealt with close to its source, and to ensure that sufficient waste management capacity exists so that a given area can contribute to meeting waste recycling and recovery targets.

Relationship to the proposal

5.26 The provision of a WRTS at the Pebsham site forms an important component of a network of integrated municipal waste management facilities. The proposal will therefore

make a major contribution to achieving sustainable waste management in accordance with the **waste hierarchy**.

5.27 In terms of **achieving waste management without endangering human health and harming the environment, whilst taking account of feasibility and cost,** the need for the scheme is established in the above sections. As indicated by the examination of key potential environmental impacts in other sections of this Supporting Statement, the proposal is not considered likely to endanger human health or cause harm to the environment. In this case, the proposals involve the use of existing buildings and infrastructure that are already fundamentally suitable for the uses proposed, whilst handling an equivalent annual tonnage and with no additional increase in traffic movements on the A259.

5.28 The proposed development therefore presents a feasible and cost-effective solution as the site is well located to serve the eastern part of the waste local plan area, (being close to population centres and the strategic highway network) and will assist in reducing distances required for the transport of resource materials. The recycling and recovery facilities will also help the council in achieving its recycling and recovery targets and divert waste from landfill, therefore minimising the risk of financial penalties to the Council for failing to meet targets.

5.29 When considering **opportunities for communities to take more responsibility for their own waste, and for enabling waste management in the nearest appropriate facilities,** Veolia's network of facilities in East Sussex will ensure that this objective is met. The Pebsham WRTS and depot is an important part of this network, both in terms of its strategic location and role in the network, relative to the main sources of waste in the Plan area and minimising transportation distances, and in terms of its overall contribution to ensuring the area can become self sufficient in meeting waste management targets.

5.30 In summary, the proposed scheme at the Pebsham WDF plant has been developed to accord with the following objectives:

- to contribute to moving the treatment of waste materials up the waste hierarchy;
- to be located at a site which has been identified by the County Council as suitable for the location of a Waste Transfer Facility, is ideally configured for waste management operations with minimal environmental or health impacts;
- to accord with the County Council's planning and waste management strategies for meeting waste recovery targets and minimising financial penalties.
- to accord with the nearest appropriate installation principle and aims for regional and county self-sufficiency; and
- to help to keep overall traffic movements associated with the transportation of waste to a reasonable minimum.

5.31 Overall the Veolia proposal is considered to fully accord with the main sustainable waste management principles adopted in national planning policy and the development plan, and represents a sustainable and practicable means of dealing with the types of waste to which it relates.

C. Suitability of the Site

Planning Policy

The Development Plan

5.32 The proposed WRTS and depot lies within the site identified in East Sussex and Brighton & Hove Waste Local Plan Policy WLP8 as being suitable for waste transfer facilities.

Paragraph 6.27 of the East Sussex and Brighton & Hove Waste Local Plan identifies that "the existing WDF facility at Pebsham has planning permission to continue until beyond the Plan period, and that any proposals for modernisation or expansion would be supported by Policy WLP6. To reflect its continuing strategic role, it has been identified under Policy WLP8. However the Local Plan indicates that any increase in vehicle movements along the A259 would be unacceptable until the strategic road network in the area has been improved".

5.33 Policies WLP35 – WLP40 of the waste Local Plan set out the general environmental / development control policy considerations against which proposals will be assessed, having regard to a number of environmental issues, including general amenity considerations (WLP35), transport considerations (WLP36), flooding (WLP37) and design and environmental improvements. Policy GD1 of the Rother District Local Plan also contains development control criteria.

5.34 Further, whilst site is allocated for long-term waste management uses, the area surrounding it has also been identified as a future Country Park. Accordingly the Waste Local Plan requires that future proposals for the allocated waste site should assist in reducing visual impact.

The Issues

5.35 Proposals at sites identified in Policy WLP8 will be supported by the planning authority, subject to consideration of potential environmental impacts under Policies WLP 35-40.

5.36 Inset Map 9 of the Waste Local Plan is accompanied by an assessment of the environmental issues requiring consideration under any proposed redevelopment of the site or change of use. The key issues identified are the generation of additional traffic, nuisance issues such as odour, noise and litter, landscape issues and flood risk.

Relationship to the proposal

5.37 The proposals are specifically supported in principle by Waste Local Plan Policy WLP8.

5.38 The proposals will involve a reduction in the number of vehicle movements on the A259 when compared to the use permitted under the existing planning permission and the current depot arrangements.

5.39 The fully enclosed nature of waste handling operations will ensure potential amenity / nuisance impacts due to odour, noise and litter are minimised to acceptable levels. This supporting statement includes specific sections that assess these environmental issues. The removal of the chimney stack and discontinuation of the waste treatment operations

under the existing planning permission will eradicate odour problems thought to be associated with the previous use.

5.40 The site is relatively well contained visually by the bunding surrounding the site. The chimney stack is however the main cause of visual impact associated with the site. It is therefore proposed as part of this planning application that the chimney be removed, as this will significantly reduce the visual impact of the site from the surrounding area. The benefits of such an action were recognised in the Waste Local Plan Inspector's Report[5], and will clearly improve the compatibility of the site to the setting of the proposed Pebsham Country Park.

5.41 The site lies adjacent to an area defined by the Environment Agency as indicative flood risk zone 3. The Environment Agency was consulted by East Sussex County Council on a screening opinion request made by Veolia in October 2006. The Agency confirmed that the proposals are unlikely to give rise to significant environmental effects in relation to flood risk.

[5] East Sussex and Brighton & Hove Waste Local Plan Inspector's Report 2004

6. TRANSPORT ASSESSMENT

Introduction

6.1 This Transport Assessment (TA) forms part of the supporting information for the application for planning permission to change the use of the former Reprotech facility at Freshfields Road, Pebsham, St Leonards, East Sussex, to a waste and recyclables transfer station (WRTS) and depot. This TA evaluates the likely transport impacts associated with the establishment of a WRTS on the site.

Existing Conditions

6.2 The site is located on the outskirts of St Leonards on Sea between Bexhill and Hastings and approximately 600 metres north of the A259. Access to the site is via Freshfields Road which is a cul-de-sac providing dedicated access to a landfill site, a household waste recycling site (HWRS) and a water treatment plant. **Plan PSS 01** shows the location of the site (at **Appendix 2**).

6.3 The East Sussex County Council Local Transport Plan 2006-2011 identifies the A259 between Bexhill and Hastings as the most congested stretch of this particular road within the county, with an annual average daily traffic (AADT) flow of approximately 32,000 vehicles.

6.4 Restrictions are caused by several minor junctions along the route, and on-street parking along its length. One indicator of congestion is when peak traffic levels extend beyond traditional peak hours, with peak hour traffic levels remaining static at the operating capacity of the congested road link. These conditions are now commonplace on this stretch of the A259 and have led to it being designated an air quality management area.

Proposed Development

6.5 On commencement of operations at the proposed WRTS, a proportion of the HGVs that currently deliver waste to Pebsham landfill will divert to the WRTS. The proposed WRTS will permit the diversion from landfill of approximately 85,000 tonnes of recyclable and non-recyclable waste per annum and for the bulk transfer of these materials to recycling and recovery facilities elsewhere.

6.6 Associated with the above is a vehicle depot for overnight parking for up to 40 HGVs associated with the site and its operations. These vehicles are to be relocated from the Bulverhythe depot which is situated to the south of the A259 just east of the junction with Freshfields Road.

6.7 The site also has existing facilities to support the above operations including maintenance, administration, welfare and mess facilities as well as staff parking, workshop, refuelling and vehicle washdown facilities.

Access

6.8 The site is accessed via Freshfields Road, which is a dedicated access for the landfill, the HWRS and a Water Treatment Plant extending north about 600 metres from its junction with the A259. The road provides a good quality two lane access to the proposed waste

recycling transfer site. The site entrance is just south of the entrance to the landfill and HWRS. A 'yellow box' ensures that the road immediately in front of the gates is kept free of traffic.

6.9 The site is well located for access to the primary road network. The A259 is the primary route through Hastings and Bexhill and runs along the south coast. It also links to the A2036 and A27 to the West and to A21 and A28 trunk roads to the East, providing good access to the north of the county and into Kent.

Base Traffic

6.10 A fully classified 12 hour traffic count was commissioned for the junction between the A259 and Freshfields Road to establish current base traffic levels. A further supplemental classification was also requested to distinguish refuse collection vehicles (RCVs), skips and tankers, the latter accessing the water treatment facility.

6.11 Counts were undertaken on Thursday 19th and Saturday 21st October 2006.

Table 6.1 shows the breakdown of traffic for Freshfields Road on the two days of the survey. As can be seen the majority of traffic accessing Freshfields Road during both weekends and weekdays are cars using the HWRS and light goods vehicles. Whilst HGVs are significant during the week, they are noticeably reduced at weekends.

Table 6.1. Freshfields Road – All traffic weekday and weekend

Thursday 19th	Car	Light goods	HGV	Other	Totals
Total movements	1009	178	305	11	1503
Percentage	67%	12%	19.5%	1.5%	100%

Saturday 21st	Car	Light goods	HGV	Other	Totals
Total movements	1395	184	29	11	1619
Percentage	86%	11%	2%	1%	100%

Table 6.2 below summarises the results of traffic counts carried out on the A259.

Table 6.2 A259 12 hour counts.

Location	12 hour total (Thur)	12 hour total (Sat)	% HGV (Thur)	% HGV (Sat)	Observed peak hours
A259 eastbound at junction with Freshfields Road	12,853	11,870	5.5	5.5	14:30 – 17:30

A259 westbound at junction with Freshfields Road	11,463	10,991	3.2	5.5	15:30 – 17:30

6.12 The survey confirms that the road accommodates high levels of traffic with extended peak hours in the afternoon. The proportion of HGVs using the A259 is seen to be consistent during both weekday and at the weekend.

6.13 The East Sussex Local Transport Plan 2006 - 2011 contains details of a scheme to build a Bexhill to Hastings Link Road designed to provide an alternative to the A259 and to relieve congestion and air quality at Glyne Gap. Current information indicates that the scheme is being progressed through the statutory planning process, which may include a public inquiry and it is hoped that the link will be open to traffic in 2010.

Traffic Impacts of the Proposed Development

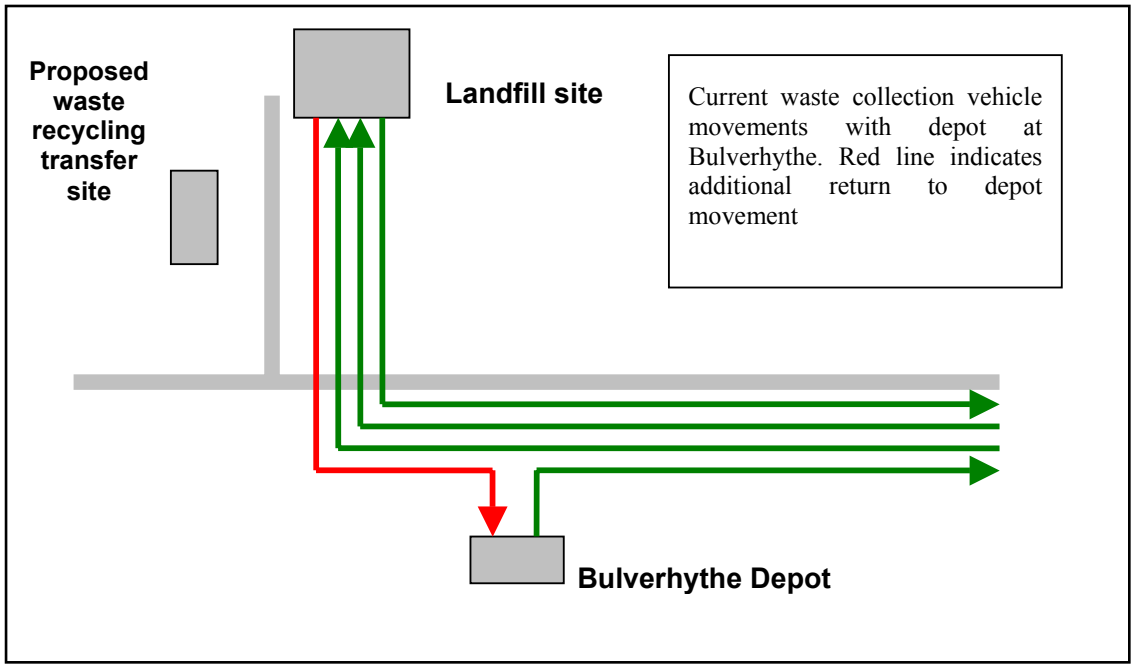
6.14 The traffic impacts associated with the development can be described as follows;

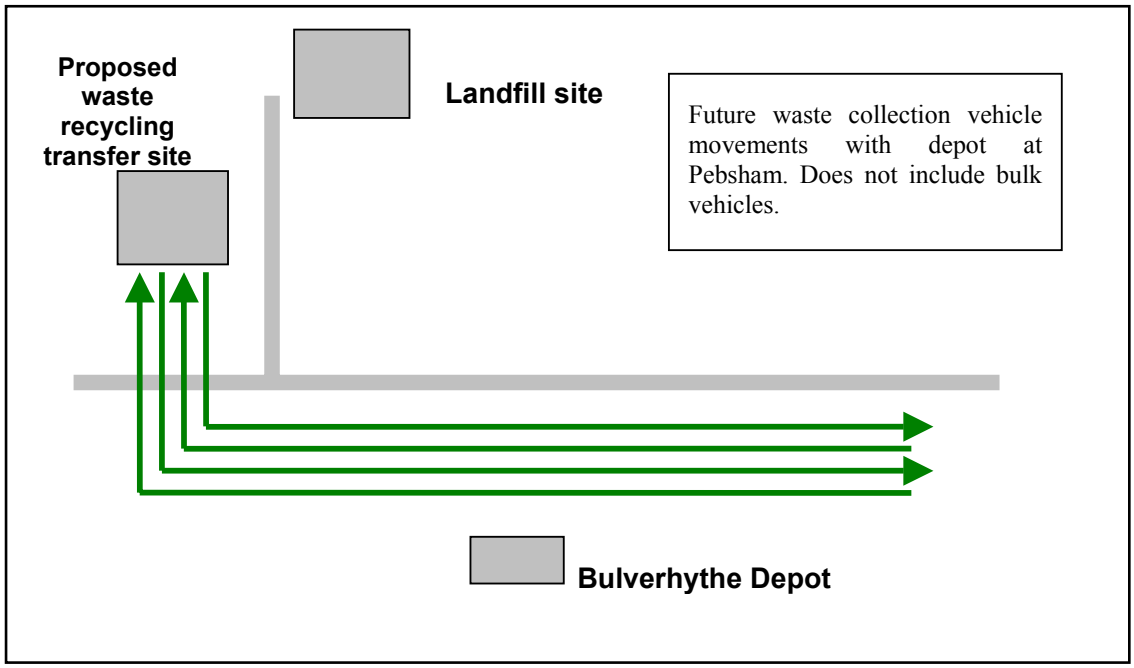
- A reduction in trips on the A259 associated with the relocation of vehicles from the current depot at Bulverhythe to the WRTS.
- Additional trips generated by the requirement to move consolidated waste from the WRTS to recovery/disposal or recycling sites elsewhere.

Trip Reduction

6.15 Currently the Hastings Municipal Fleet of refuse collection and other waste collection vehicles operated by Veolia are based at the Bulverhythe depot which is situated to the south of the A259 and about 500 metres to the East of the Freshfields Road junction. With the opening of the WRTS these vehicles will be relocated to the proposed facility.

6.16 Currently these vehicles make a return journey to the Bulverhythe depot at the end of each day. With the establishment of the waste recycling transfer facility and associated vehicle depot these return to depot trips will be removed from the A259. This equates to an overall reduction in vehicle trips per week. The current and proposed typical daily movements of a refuse collection vehicle is shown graphically below.





Trip Generation

6.17 Additional vehicle trips are generated by the need to remove consolidated waste to other sites for further processing/recycling. The number of bulk vehicle trips generated is assessed on the basis that the WRTS will handle 85,000 tonnes of waste per annum from inception and that bulk vehicles carry 21 tonnes of waste per trip on average. It is also assumed that the site will operate seven days a week. A comparison of existing and proposed average weekly vehicle movements is set out in Table 6.3 below.

Table 6.3 Changes to vehicle movements associated with the proposed WRTS and Depot on A259 per week

	No. of vehicles in fleet	Current vehicle movements per week (Bulverhythe WTS)	Proposed WRTS & Depot movements From 1/4/07	Post landfill closure	Change +/-
Hastings Municipal Fleet Mon - Fri	29	725	580	580	
Hastings Municipal Fleet Sat-Sun	7	70	56	56	
Veolia Commercial Fleet Mon-Fri	5	75	50	50	
Total		**870**	**686**	**686**	**- 184**
Bulk Vehicles	11	0	78	78	**+78**
Staff cars	35	400	400	400	**0**
				Net change	**-106**

6.18 The table above is based on site operational data supplied by Veolia and includes the following assumptions;

- Current vehicle movements for the Hastings Municipal fleet are based on two return trips from depot per day. This currently accounts for 5 movements on the A259 per vehicle per day i.e.29x5x5 =725
- Future vehicle movements for the Hastings Fleet are based on the depot being co-located with the waste transfer facility and account for 4 movements per vehicle per day on the A259.
- Veolia commercial fleet make only one return trip per day which currently equates to 3 movements and will reduce to 2 with the relocation of the depot.
- Bulk vehicle movement figures are weekly averages based on the number of 21 tonne vehicles required to deal with an annual throughput of 85,000 tonnes at waste transfer facility.
- 35 staff vehicles currently based at Bulverhythe will transfer to Pebsham with no net increase in the number of vehicle trips. Estimate of weekly movements assumes a reduced number of staff working at weekends.

Future Traffic Growth

6.19 Assessment of future traffic growth has been carried out using National Road Traffic Forecast estimates. The figures are reproduced in Table 6.4 below. The growth estimates have been applied to both Freshfields Road and the A259 traffic.

Table 6.4 Traffic growth 2006 -2011

	Cars	LGVs	HGVs	Buses	Total Traffic
A259					
Eastbound flows 2006	10309	1811	411	182	12759
Westbound flows 2006	9128	1600	350	183	11331
Growth to 2007					
Eastbound	**10467.00**	**1854.00**	**417.00**	**184.00**	**12952.00**
INCREASE	**158.00**	**43.00**	**6.00**	**2.00**	**193.00**
Westbound	**9268.00**	**1638.00**	**355.00**	**185.00**	**11503.00**
INCREASE	**140.00**	**38.00**	**5.00**	**2.00**	**172.00**
Growth to 2011					
Eastbound	**11096.00**	**2022.00**	**438.00**	**189.00**	**13724.00**
INCREASE	**787.00**	**211.00**	**27.00**	**7.00**	**965.00**
Westbound	**9825.00**	**1787.00**	**369.00**	**190.00**	**12188.00**
INCREASE	**697.00**	**187.00**	**19.00**	**7.00**	**857.00**
Growth to 2016					
Eastbound	**11882.00**	**2261.00**	**468.00**	**196.00**	**14797.00**
INCREASE	**1573.00**	**450.00**	**57.00**	**14.00**	**2038.00**
Westbound	**10521.00**	**1997.00**	**390.00**	**197.00**	**13141.00**
INCREASE	**1393.00**	**397.00**	**40.00**	**14.00**	**1810.00**
Freshfields Road	Cars	LGVs	HGVs	Buses	Total Traffic
Average one way flow 2006	505	89	60	2	752

Growth to 2007	**513.00**	**92.00**	**62.00**	**3.00**	**764.00**
INCREASE	**8.00**	**3.00**	**2.00**	**1.00**	**12.00**
Growth to 2011	**544.00**	**100.00**	**64.00**	**3.00**	**809.00**
INCREASE	**39.00**	**11.00**	**4.00**	**1.00**	**57.00**
Growth to 2016	**583.00**	**112.00**	**68.00**	**3.00**	**873.00**
INCREASE	**78.00**	**23.00**	**8.00**	**1.00**	**121.00**

6.20 There are certain factors which may impact the achievement of these levels and these are detailed below;

1. The A259 is already congested. There is evidence of peak spreading and the road operating at capacity for extended hours during the day. The roads ability to handle forecast growth is limited and this may act as a significant constraint on traffic growth along the A259 prior to the completion of the Bexhill to Hastings Link Road which is not expected before 2008/9 at the earliest.

2. Although standard growth figures have been applied to traffic on Freshfields Road, the results of this scaling are unlikely to be representative of future traffic on this road. The traffic on Freshfields Road is only there to access the various waste facilities. It is unlikely therefore to grow in line with national forecasts. There will be a reduction in commercial waste traffic when the landfill site closes sometime between 2008 (as currently planned) and 2011 (should a further extension by landfill operators BIFFA be permitted) and this is estimated to be in the region of 60 trips per day. At the same time however there may be increased demand for access to the HWRS as pressure to recycle more waste grows. The figures for car and LGV growth therefore may be underestimates.

Junction Assessment

6.21 The junction of Freshfields Road with the A259 is a T junction with priority to the traffic on the A259. A ghost island is provided for traffic turning right from the A259 into Freshfields Road.

6.22 There is a zebra crossing on the A259 just to the west of the junction. This helps to create gaps in the traffic flow for vehicles waiting to turn right out of Freshfields Road.

6.23 Just prior to it meeting the A259, Freshfields Road is joined on the right by Pebsham Lane. This is a lightly used road giving access to a garden centre and some houses. For the purposes of this traffic assessment the traffic from Pebsham Lane has been combined with that from Freshfields Road. A plan showing the location and layout of the junction can be found at Appendix 2, Plan PSS02.

6.24 Capacity analysis of the junction between Freshfields Road and the A259 was carried out using PICADY software. Assessment has been carried out for the current year and for 2007 (the opening year of the WRTS) for 2011 and 2016. Program outputs have been included at Appendix 3a and 3b.

6.25 Because there were observed peaks at both the landfill and on the A259 that fell outside normal peak hours a series of analysis were carried out. Full details of the time periods examined in the analysis are detailed in Table 6.5 below.

Table 6.5 Analysis of junction capacity.

Year				
2006 Thursday	07.45-09.15	10.45-12.15	14.45-16.15	16.45-18.15
RFC (max)	**0.134**	**0.276**	**0.396**	**0.232**
2006 Saturday	09.45-11.15	11.45-13.15	13.45-15.15	15.45-17.15
RFC (max)	**0.329**	**0.246**	**0.407**	**0.298**
2007 Thursday	07.45-09.15	10.45-12.15	14.45-16.15	16.45-18.15
RFC (max)	**0.145**	**0.289**	**0.152**	**0.430**
2007 Saturday	09.45-11.15	11.45-13.15	13.45-15.15	15.45-17.15
RFC (max)	**0.355**	**0.263**	**0.433**	**0.331**
2011 Thursday	07.45-09.15	10.45-12.15	14.45-16.15	16.45-18.15
RFC (max)	**0.190**	**0.331**	**0.560**	**0.522** (see note below)
2011 Saturday	09.45-11.15	11.45-13.15	13.45-15.15	15.45-17.15
RFC (max)	**0.455**	**0.322**	**0.588**	**0.475**
2016 Thursday	07.45-09.15	10.45-12.15	14.45-16.15	16.45-18.15
RFC (max)	**0.341**	**0.420**	**1.076**	**1.055**
2016 Saturday	09.45-11.15	11.45-13.15	13.45-15.15	15.45-17.15
RFC (max)	**0.767**	**0.478**	**1.189**	**1.385**

Note: PICADY reports over capacity on the junction during the period 16.45-18.15 Thursday 2011. The value produced is so extreme (4.088) and at such variance with all other values calculated by the program during this time period and has been discounted as a possible program error.

6.26 The analysis shows that the junction operates within capacity at the peak times assessed for the base year, for the opening year and for 2011. With unconstrained growth the junction becomes over congested in 2016. However, this is taking a worst case scenario and the factors mentioned above are likely to ration the traffic growth. In addition it is

reasonable to assume that by 2016 the Hasting to Bexhill link road will have relieved congestion on the A259.

Queuing

6.27 Traffic queuing for the household waste site can often extend back down Freshfields Road. This can prevent easy access to the landfill site for municipal and other vehicles which resort to using the wrong side of the road to queue jump. Given the low traffic volumes on the road however this does not currently seem to cause major problems.

Accidents

6.28 Accident data was obtained from East Sussex County Council and the Police. Analysis of the recorded accident data for the A259 in the vicinity of the junction with Freshfields Road reveals that since August 2001 there have been three injury accidents at the junction with Freshfields Road. No details about the type of vehicles involved are available however all were classified as slight with only one involving a right turn movement from Freshfields Road.

Parking

6.29 Previous planning consent for the site allowed for 15 HGV to be parked overnight at the site. The current planning application will seek overnight parking for up 40 HGVs. Provision for daytime parking of up to 35 cars is also included. **Plan PSS 04** at **Appendix 2**, provides details of where this parking will be located. It should be noted that the overnight parking of HGVs does not adversely impact upon the operational aspects of the site.

Summary and Conclusions

6.30 This assessment has considered the traffic implications associated with the establishment of a waste and recyclables transfer facility on an existing site at Freshfields Road, Pebsham and the transfer to this site of the locally based Hastings Municipal and Veolia waste collection fleets, together with other vehicles associated with waste processing including the transfer of consolidated waste to other waste processing sites elsewhere.

6.31 The results of this assessment are summarized as follows:

- Existing access to the site via Freshfields Road is of a standard suitable for the anticipated traffic associated with the development.
- The proposal will facilitate an overall reduction in waste related traffic on the A259 of 106 movements per week.
- Although traffic growth has been assessed on the basis of National Road Traffic Forecasts, the uncharacteristic nature of the traffic using Freshfields Road may make these forecasts unrealistic.

- The A259 is already at capacity and is unlikely to accommodate further growth. Future developments such as the Hastings-Bexhill link road and the anticipated closure of the landfill site (currently planned for 2008, and 2011 if a future proposed extension were to be permitted) will further help to alleviate congestion on this road.

- The current priority junction between the A259 and Freshfields Road has been assessed and is capable of handling the expected traffic growth to 2011. Beyond this time and without the measures to reduce congestion described above (particularly the provision of the Hastings-Bexhill link road), the junction will reach capacity.

- Queuing is evident along Freshfields Road. This is caused by cars queuing to use the household waste site. There is plenty of space to accommodate this queuing and although it causes some obstruction to traffic entering the landfill, traffic levels are such that it does not seem to cause a particular problem.

- Accident analysis has revealed no inherent problems associated with the junction at the A259.

7. AIR QUALITY

Introduction

7.1 This chapter discusses the results of the air quality assessment of the proposed Waste & Recyclables Transfer Station (WRTS), Pebsham, Hastings.

7.2 The assessment has been carried out in accordance with guidance given in the Minerals Policy Statement 2 (MPS 2) March 2005, and the Design Manual for Roads and Bridges, Volume 11, Section 3, Part 1, Air Quality, February 2003 (DMRB 11.3.1).

Air Quality Objectives and Criteria

7.3 The Environment Act 1995 (Part IV), sets out a requirement for a National Air Quality Strategy to be developed. The strategy sets health-based standards for a number of pollutants of concern (benzene, 1-3 butadiene, carbon monoxide, lead, nitrogen dioxide, ozone, particles and sulphur dioxide).

7.4 These criteria are defined in Regulations SI 2000/928 and SI 2002/3043. The standards define the level of pollution below which health effects are unlikely to be experienced even by the most sensitive members of the population. These are based upon recommendations of the Expert Panel on Air Quality Standards (EPAQS). The objectives are targets for air pollution concentrations which take account of the costs and benefits of achieving the standard. Local authorities have a responsibility, under the Environment Act 1995, to review and assess local pollution concentrations of seven of these pollutants against these objectives. Low level ozone emissions are not considered as the direct emissions are not significant compared with photochemical formation of ozone in the air from ozone precursor pollutants. Ozone is of concern on a regional scale and as such, the Government has taken responsibility for assessing its concentrations. The objectives for the purposes of local air quality management are listed in the Air Quality Strategy (AQS) are reproduced in Table 7.1.

Table 7.1 Air Quality Objectives (England)

Pollutant	Air Quality Objective		Strategy Compliance Year
	Concentration	Measured as	
Benzene (C_6H_6)	16.25μg/m^3	Running annual mean	31/12/2003
	5.0 μg/m^3	Annual mean	31/12/2010
1,3-Butadiene ($CH_2CHCHCH_2$)	2.25μg/m^3	Running annual mean	31/12/2003
Carbon monoxide (CO)	10mg/m^3	Running 8-hour mean	31/12/2003
Lead (Pb)	0.5μg/m^3	Annual mean	31/12/2004
	0.25μg/m^3	Annual mean	31/12/2008
Nitrogen dioxide (NO_2)	200μg/m^3	1 hour mean; not to be exceeded more than 18 times per year	31/12/2005
	40μg/m^3	Annual mean	31/12/2005
Particles (PM_{10})	50μg/m^3	24 hour mean; not to be exceeded more	31/12/2004

(gravimetric)		than 35 times per year	
	40μg/m^3	Annual mean	31/12/2004
Sulphur dioxide (SO_2)	350μg/m^3	1 hour mean; not to be exceeded more than 24 times per year	31/12/2004
	125μg/m^3	24 hour mean; not to be exceeded more than 3 times per year	31/12/2004
	266μg/m^3	15 minute mean; not to be exceeded more than 35 times per year	31/12/2005

7.5 An addendum to the AQS was published by the UK Government and devolved administrations in February 2003 which gives an additional, more stringent, objective for benzene that are included in new regulations. A tighter objective for PM_{10} and a new objective for polycyclic aromatic hydrocarbons were also announced, although these are yet to be included in regulations. The provisional PM_{10} objectives relevant to this assessment are presented in Table 7.2.

Table 7.2 Air Quality Objectives (England)

Pollutant	**Air Quality Objective**		**Strategy Compliance Year**
	Concentration	**Measured as**	
Particles (PM_{10}) (gravimetric)	50μg/m^3	24 hour mean; not to be exceeded more than 7 times per year	31/12/2010
	20 μg/m^3	Annual mean	31/12/2010

7.6 The significance of both existing and changes in future pollutant concentrations are best assessed by reference to the national air quality standards and objectives, established by the Government to protect human health. Under Part IV of the Environment Act 1995, the Government introduced the concept of local air quality management and placed duties on all local authorities to undertake periodic reviews of air quality in their areas to assess present and likely future air quality against prescribed objectives for a number of pollutants. These objectives incorporate the European Union limit values, and in some cases are more stringent.

7.7 The Air Quality Strategy for England, Scotland, Wales and Northern Ireland 2000 and its 2003 Addendum set out how different sectors can contribute to achieving the National Air Quality Objectives (AQOs). Local Authorities play a particularly important role, with every authority having to carry out a review and assessment of the local air quality in its area, in order to identify whether the objectives will be achieved by the relevant date. If this is not expected to be the case, the Authority must declare an Air Quality Management Area (AQMA), and prepare an action plan in pursuit of the necessary improvements in air quality in order to achieve the objective. The AQMA can be larger than the area of actual exceedence if the Local Authority believes that this is beneficial.

7.8 The air quality objectives only apply at locations where members of the public are likely to be exposed to air pollution for the time period specified in the objective. Thus, for the

annual mean and 24-hour objectives that are the focus of this assessment, the primary receptors will be residential properties. However, in order to ensure that all potentially sensitive locations are accounted for, if locations such as recreational facilities and schools are near to the road alterations, they have also been included. The 'standards' are set as concentrations below which effects are unlikely even in sensitive population groups, or below which risks to public health would be exceedingly small. They are based purely upon the scientific and medical evidence of the effects of each individual pollutant. The 'objectives' set out the extent to which the Government expects the standards to be achieved by a certain date. They take account of the costs, benefits, feasibility and practicality of achieving the standards.

Air Quality Pollutants

7.9 The key pollutants to be considered in this assessment are nitrogen dioxide (NO_2) and particulates (PM_{10}). These two pollutants are of the most concern with regard to their likelihood of compliance with the National Air Quality Objectives and their effects on human health within the urban environment.

Nitrogen Dioxide (NO_2)

7.10 Nitrogen dioxide is a secondary pollutant produced by the oxidation of nitric oxide (NO). Nitric oxide and nitrogen dioxide are collectively termed nitrogen oxides (NO_x). Approximately half of the UK NO_x emissions are from road transport. The majority of NO_x emitted from vehicles is in the form nitric oxide, which oxidises rapidly in the presence of ozone to form nitrogen dioxide. In high concentrations, nitrogen dioxide can affect the respiratory system.

Particulate Matter (PM_{10})

7.11 Particulate matter can classified as either primary or secondary. Primary particles may be emitted from vehicles exhausts, through the re-suspension of road surface dust and are generated as abrasion products from tyre, brake and road surface wear. Secondary particulates are generally derived as a result of atmospheric oxidation process. Particles with a median diameter of less than 10 micrometers (μm) are referred to as PM_{10}.

7.12 The objectives for nitrogen dioxide had to be achieved in 2005 as well as in each subsequent year. The current objectives for PM_{10} had to be achieved by 2004 and will continue to apply in each subsequent year. The current PM_{10} objectives are, however, supplemented by a set of more stringent objectives to be applied from 2010. Patterns across the United Kingdom have shown that the 1-hour nitrogen dioxide objective is unlikely to be exceeded unless the annual mean nitrogen dioxide concentration is greater than 60 $\mu g/m^3$. Therefore, 1-hour mean nitrogen dioxide concentrations will only be considered if the annual mean concentration is likely to be above this level.

7.13 The European Union has also set limit values for both nitrogen dioxide and PM_{10}. Achievement of these values is a national obligation rather than a local one. The UK has a legal obligation to meet these limits. The EU limit value for nitrogen dioxide is the same level as the UK objective but is to be achieved by the later date of 2010. The EU limit values for PM_{10} are the same level as the 2004 UK objectives, and had to be achieved by 2005.

7.14 In additions this assessment also considers dust in term of re-suspended PM_{10}.

Dust

7.15 The BS 6069 (part 2) describes dust as particulate matter in the size range 1-75 µm in diameter. It may be produced at waste sites during the handling and movement of waste off and onsite. If mitigation methods are not sufficient then soil can be deposited from site to access roads via the wheels of HGVs. Soil on the access road is a source of road surface dust which can become re-suspended by vehicles using the road.

Methodology

Baseline Methodology

7.16 The baseline air quality has been determined from three sources:

- the local authority's review and assessment of air quality;
- monitoring data from the National Air Quality Information Archive[6]; and
- estimations of traffic derived pollutants along the A259 and Freshfields Road have been calculated in the base year (2006) in accordance with the DMRB 11.3.1.

7.17 Information gathered identifies the nature and location of AQMAs declared within the Pebsham area. The existing local air quality has been considered by examining air quality monitoring data collected and modeling carried out as part of the local authorities review and assessment process.

Operational Phase

Emissions from Site

7.18 Vehicles entering the site carrying waste will be weighed as they enter, they will then pass on to access the main building to discharge their load. In the building the waste is transferred to bulk containers by type and bulked up for transfer off site; waste is held on site for a maximum period of 48 hours. All openings in the building have closeable shutters and the building is fitted with an odour and dust suppression system.

7.19 Air from the building will not affect the local amenity and emissions from the proposed depot will be limited to those from the vehicles utilizing the depot.

Emissions from Operational Traffic
Re-Suspension of PM_{10}

[6] www.airquality.co.uk

7.20 There are no prescribed methodologies to model the distribution of re-suspended PM_{10}. Therefore a qualitative assessment has been made based upon guidance on dust assessments described in the Minerals Policy Statement 2 (MPS 2).

7.21 The MPS 2 guidance includes four stages to be carried out in an assessment of dust:

- Stage 1 Establish Existing Baseline Conditions
  This includes examining existing ambient conditions and existing sources of dust. The location of sensitive receptors should be identified in relation to the site. If available data on meteorological conditions should be considered as they are likely to influence patterns of dispersal.

- Stage 2 Identify Site Activities that could lead to Dust Emissions without Mitigation

  Potential dust sources should be identified and their potential to emit dust assessed with respect to the duration of the activity of the potential of dust to become airborne.

- Stage 3 Identify Site Parameters which may Increase Potential Impacts from Dust.

  Data collected during stages one and two will be examined to inform a qualitative assessment of the scheme.

- Stage 4 Recommend Mitigation Measures

  Measures to control dust will be specified and described in terms of their potential to reduce dust and consequent impacts.

Local Air Quality

7.22 Estimates of pollutant concentrations have been made at a number of properties which are representative of areas that may be affected by a change in local air quality due to the proposed WRTS. The assessment has been carried out in accordance with methods prescribed within DMRB.

7.23 The DMRB screening method estimates concentrations of nitrogen dioxide (NO_2), particulate matter (PM_{10}), carbon monoxide (CO), benzene (C_6H_6) and 1,3-butadiene (C_4H_6). The key pollutants to be considered in this assessment are NO_2 and PM_{10}. These two pollutants are of the most concern with regard to their likelihood of compliance with the Air Quality Strategy (AQS) Objectives and their effects on human health within the urban environment.

7.24 Estimated concentrations have been compared with AQS objectives. If the screening method results suggest that the criteria would be exceeded then the DMRB advises that detailed modelling should be carried out.

7.25 Pollutant concentrations have been estimated with and without the Waste recycling transfer Site (WRTS). The years selected for the assessment are the base year (2006),

the opening year (2007) and 2011 (to allow comparison with Provisional Limit Values for PM_{10}).

7.26 The screening method takes the following into account:

- annual average daily vehicle flows (AADT) and speeds;
- the proportion of heavy duty vehicles (HDVs), which consist of any vehicle with a gross weight greater than 3.5 tonnes thus including heavy goods vehicles (HGVs) and coaches;
- changes in future exhaust emissions due to legislation; and
- road type

7.27 The screening assessment has been carried out at 3 properties (termed receptors) within 200 meters of the access roads to the WRTS. Access roads are considered to be Freshfields Road and the A259.

7.28 Properties used within the assessment were considered to represent the worst case due to their close proximity to the affected roads. In addition properties which contain sensitive occupants (i.e. schools) have also been included if they are within 200 metres of relevant roads.

7.29 Details of the receptors used within the assessment are presented in Table 7.3.

Table 7.3 Receptors used in Local Air Quality Assessment

Receptor Name	Grid Reference		Distance to Road
	Easting	Northing	
A259 east property	577358	108549	15 m A259
Property on the corner of A259/Freshfields Road junction	577141	108446	10 m Freshfields Road 20 m A259
A259 west property	577068	108343	10 m A259

7.30 Background concentrations were obtained from the National Air Quality Information Archive[7] for the one kilometre grid square covering the proposed study area. Concentrations were obtained for 2005 and 2010 for NO_2 and NOx and for 2004 and 2010 for PM_{10}. These concentrations were subsequently factored up to 2006, 2007 and 2011, in accordance with Defra's Technical Guidance[8], to take account of overall changes in UK emissions. The annual mean background concentrations used in the assessment are shown in Table 7.4.

Table 7.4 Background Concentrations used in Local Air Quality Assessment

Pollutant	2004	2005	2006	2010	2011
NOx	-	15.3	14.7	12.7	12.3

[7] www.airquality.co.uk

[8] Defra, Local Air Quality Management Technical Guidance, LAQM TG(03) and amendments

NO_2	-	12.0	11.7	10.0	9.8
PM_{10}	20.5	-	20.5	18.7	18.5

Baseline Conditions

Air Quality Review and Assessment

7.31 The first round of the local authority review and assessment process was completed in 2003. The first round consisted of four stages of increasing complexity that enabled local authorities to identify any areas where objectives were unlikely to be achieved.

7.32 During the second round, local authorities are required to reassess the local air quality through an Updated Screening Assessment (USA). The USA is used to identify matters that have changed since the first round of review and assessment and to identify sources that may lead to an air quality objective being exceeded. A detailed assessment is required where there is a possibility of AQS objectives being exceeded.

7.33 Air quality review and assessment is a rolling process which requires periodic updating due to the changing nature of air quality with time. A USA is produced every three years. Annual progress reports are produced in intervening years if no exceedences are identified during the USA.

7.34 The WRTS lies within the boundaries of Rother District Council (RDC) and approximately 0.2 kilometres north of Hastings Borough Council (HBC) boundary. Access roads to the site are within HBC.

Rother District Council Local Air Quality

7.35 In general air quality within RDC area is good. No AQMAs were declared following the review and assessment process.

7.36 Defra carries out a nitrogen dioxide diffusion tube survey throughout the district. Diffusion tubes are a passive method of monitoring. Tubes are exposed for a month at a time and due to their low cost monitoring can be conducted at a large number of locations. Surveys are usually conducted over a period of a year in order for results to be compared to the annual mean objectives. Results from the survey between 2003 and 2005 are presented in Table 7.5.

Table 7.5 Annual Mean Concentrations of Nitrogen Dioxide Measured as Part of Defra's Survey (µg/m^3)

Site Name	Grid Reference		2003	2004	2005
	Easting	Northing			
Bexhill 5N	5740	1074	44	30	37
Bexhill 6N	5735	1078	19	17	22
Bexhill 7N	5739	1082	n/a	17	24
Bexhill 8N	5763	1081	40	28	n/a

7.37 Results show that concentrations throughout RDC were below AQS objectives in 2005.

Hastings Borough Council Local Air Quality

7.38 HBC carried out detailed modelling along Bulverhyth Road (A259) following the USA. The detailed assessment concluded that an AQMA should be declared for PM_{10} along this section of the A259.

7.39 A further assessment was carried out in November 2004 which included modelling of the source apportionment of PM_{10} in the AQMA. A comparison of monitoring results from the automatic analyser located along the A259 with other analysers throughout Sussex was carried out. Results showed that the Hastings A259 analyser was the only site within Sussex to measure exceedences of the daily mean objective.

7.40 In addition monitoring was also carried out along the access road to the Pebsham Household Waste site using a mobile monitoring unit. Data from this site were compared to wind direction. The analysis found that concentrations of non-tail pipe PM_{10} arose from the re-suspension of materials on the road and directly from dirty vehicles using the Pebsham site. The distribution patterns of non-tail pipe PM_{10} showed that concentrations were elevated during the waste sites operating hours.

7.41 The source apportionment monitoring found that the main contributors to concentrations at the Hastings A259 analyser were background secondary and natural sources (sea spray).The second largest source was the atypical re-suspension of particulates from the A259. The atypical re-suspended particulates from the A259 contributed to 24% of the total concentrations compared to 9% from vehicle exhausts.

7.42 Modelling was carried out which removed the atypical component from the total concentrations. Results showed that without the atypical re-suspended particulate concentrations at the Hastings site were similar to those measured at other Sussex coastal sites.

7.43 Data from the mobile site located along the access road is not available. Concentrations from the Hastings (A259) site are presented in Table 7.6. Concentrations in 2005 are below the AQS objectives; however information provided through discussions with the Environmental Health Officer at HBC show that concentrations have increased again through 2006.

Table 7.6 Concentrations of PM_{10} Measured at the Hastings A259 Roadside site ($\mu g/m^3$) Grid Reference (577633, 108726)

Statistic	2003	2004	2005	Objective
Annual Mean	38	30	30	40 $\mu g/m^3$
No. of exceedences of the 24 hr mean	62	20	22	Less than 35 exceedences of 50$\mu g/m^3$

7.44 In addition Defra carry out a nitrogen dioxide diffusion tube survey throughout the

borough. Concentrations for the period between 2003 and 2005 are presented in Table 7.7. Results show that concentrations are well below the annual mean objective.

Table 7.7 Annual Mean Concentrations of Nitrogen Dioxide Measured as Part of Defra's Survey (µg/m^3)

Site Name	Grid Reference		2003	2004	2005
	Easting	Northing			
Hastings 1N	5800	1109	n/a	18	31
Hastings 3N	5823	1105	n/a	13	25
Hastings 4N	5836	1113	n/a	23	n/a
Hastings 5N	5767	1081	n/a	35	n/a

AQS objective annual mean objective of 40 µg/m^3

Summary

7.45 Air quality in the district in which the WRTS is proposed to be located is good with air quality objectives being met for all pollutants. The access roads into the proposed WRTS are within an area of poor air quality with the A259 being declared an AQMA for PM_{10}.

7.46 Hastings BC review and assessment of the AQMA has found that the second main contribution to the exceeded concentrations of PM_{10} is associated with atypical re-suspended particulates. The atypical particulates are found to be from the re-suspension of materials deposited on the road surface and directly from dirty vehicles using the access road.

7.47 Changes in movements of HGVs using the access road may impact on the concentrations of re-suspended particulates and may have implications for the AQMA, unless mitigation measures are introduced.

Results

Re-suspended PM_{10}

Stage 1

7.48 Section 3 of this document describes the existing baseline conditions within the area of the WRTS. Results from monitoring and modelling carried out by HBC shows that there is a local dust problem. This has been attributed to the re-suspension of road surface dust by the bulky vehicles travelling to and from the landfill site.

7.49 The MPS 2, Annex 1 A, paragraph 1A.5, states that the PM_{10} proportion of dust emissions are deposited slowly, but may travel up to one kilometer from the source. Therefore properties within one kilometer may potentially be affected by the re-suspended PM_{10} emitted from the access road. There are approximately 486 properties within a kilometer of the access road which could potentially be affected by the re-suspended PM_{10} emissions.

7.50 No real time meteorological data is available for the Pebsham area. Typically winds across the UK are from a south-west direction.

Stage 2

7.51 Currently the source of atypical re-suspension of PM_{10} is associated with operations at the Pebsham landfill site. Observations of the distribution of soil on the access road show that the northbound approach carriageway is clearer than the southbound exit carriageway. This suggests that soil from the landfill is being deposited onto the access road via the wheels of HGV's using the site. Site visits confirm that whilst on the landfill site the HGV's travel over low quality un-surfaced roads.

Stage 3

7.52 Properties located within one kilometre of the site are located mainly to the south and west of the site. These are unlikely to be affected during typical climatic conditions with winds coming from the south-west.

7.53 Waste recycling transfer processes at the proposed WRTS will be carried out within an enclosed building. This will reduce impact from dust emitted from handling and transfer of waste.

7.54 Roads within the WRTS site are all hard surfaced. All refuse vehicles will be delivering waste to the WRTS instead of the landfill. This will reduce the amount of soil being deposited onto the access road surface; thus reducing the source of re-suspended PM_{10}. Soil will still be deposited on the road from commercial vehicles using the landfill until its imminent closure. However the number of vehicles using the landfill will be reduced considerably compared to the current situation.

7.55 As a result, a reduction in the amount of soil being deposited on the road could contribute to reducing local PM_{10} concentrations within the AQMA.

Stage 4

7.56 Dust emission impacts from vehicles travelling to and from site will be reduced due to the change in road surface. However impacts from dust emissions can be further reduced through the implementation of mitigation methods. Annex 1 B of MPS 2 presents mitigation measures for controlling dust, those relevant to this site are as follows:

- restrict vehicle speed (both onsite and along access road);
- wheel or body wash at an appropriate distance from site entrance. (This should always be within the site and the roadway from the washing facility to the highway should be hard-surface);
- sheet or cover loaded vehicles;
- use water sprays/spray curtains to moisten material; and
- sweep/wash paved roads.

Local Air Quality

7.57 Estimated concentrations of NO_2 and PM_{10} calculated at receptors within 200 metres of the A259 are presented in Tables 7.8, 7.9 and 7.10.

Table 7.8 Estimated Annual Mean Concentrations of Nitrogen Dioxide (µg/m^3)

Receptor	2006	2007	
	Base	With WRTS	Without WRTS
A259 east property	25.31	23.02	23.02
Property on the corner of A259/Freshfields Road junction	26.42	24.33	23.48
A259 west property	26.84	24.36	24.36

AQS annual mean objective of 40 µg/m^3

7.58 Results in Table 7.8 show that estimated concentrations of NO_2 are well below the AQS objective in 2007 both with and without the WRTS. Concentrations at the junction of Freshfields Road and the A259 are expected to decrease by 0.85 µg/m^3. This is considered to be a negligible change.

Table 7.9 Estimated Annual Mean Concentrations of PM_{10} (µg/m^3)

Receptor	2006	2007*		2011**	
	Base	With WRTS	Without WRTS	With WRTS	Without WRTS
A259 east property	27.23	25.54	25.54	**22.24**	**22.24**
Property on the corner of A259/Freshfields Road junction	28.03	26.35	25.88	**22.75**	**22.51**
A259 west property	28.23	26.35	26.35	**22.80**	**22.80**

*AQS Annual Mean Objective of 40 µg/m^3

** Provisional Objective of 20 µg/m^3

Table 7.10 Estimated Annual Mean Concentrations of PM_{10} (µg/m^3)

Receptor	2006	2007*		2011**	
	Base	With WRTS	Without WRTS	With WRTS	Without WRTS
A259 east property	18	14	14	**7**	**7**
Property on the corner of A259/Freshfields Road junction	21	16	15	**8**	**7**
A259 west property	21	16	16	**8**	**8**

* AQS Objective of Less than 35 Exceedences of a 24 hour Mean of 50 µg/m^3

** Provisional Objective of Less than 7 Exceedences of a 24 hour Mean of 50 µg/m^3

7.59 Annual mean results of PM_{10} presented in Table 7.9 show that concentrations are well below current AQS objectives in 2007 both with and without the WRTS. Concentrations are estimated to decrease by 0.47 µg/m^3 with the WRTS in 2007. Changes in concentrations are attributed to the decrease in HDV trips due to the closure of the existing Bulverhythe depot.

7.60 The number of exccedences of the 24 hour mean are well below the current AQ objective of 35 in 2007. Exceedences are expected to decrease by 1 with the WRTS operating.

7.61 Concentrations and exceedences estimated in 2011 are compared to provisional 2010 objectives for PM_{10}. Results in Tables 7.9 and 7.10 show that estimated concentrations are expected to exceed the provisional objectives both with and without the WRTS. Concentrations estimated east and west of Freshfields Road are expected to remain the same with the WRTS operating. A negligible decrease is expected at the junction of Freshfield Road and A259 with the WRTS operating.

Conclusions

7.62 The proposed WRTS site is located in an area of good air quality; however access roads to the site are within an AQMA. The AQMA was declared for PM_{10} along the A259 following Hasting Borough Councils review and assessment. The major source of the exceeded concentrations of PM_{10} was found to be a local source of atypical re-suspended dust. The dust is attributed to the soil being deposited onto local roads (A259 and Freshfields Road) principally from HGVs using the landfill site.

7.63 A number of properties that may potentially be affected by re-suspended PM_{10} were identified within one kilometre south and south-west of the access road. Typical prevailing winds in the UK are from the south west; therefore properties would only be affected during atypical climatic conditions.

7.64 Currently HGV's travelling to and from the landfill site are depositing soil from the landfill onto access roads. This is due to the low quality roads within the landfill site itself. Once the WRTS is open a number of those vehicles previously visiting the landfill will instead be travelling over paved roads which will reduce the amount of excess soil being deposited on Freshfields Road and the A259. This reduction in soil deposition may lead to a reduction in re-suspended PM_{10} which may lead to an improvement in local air quality.

7.65 Concentrations were estimated at local receptors in accordance with the DMRB 11.3.1. Results showed that concentrations of NO_2 and PM_{10} were below current objectives in the opening year (2007) both with and without the WRTS. Negligible decreases in both pollutants were expected at the junction of Feshfields Road and the A259 due to a decrease in HDV trips with the WRTS operating.

7.66 It is considered that the regular use of a sweeper brush along Freshfields Road during periods of dry/dusty conditions will mitigate these levels further, ahead of the expected closure of the landfill, currently planned for 2008.

8. NOISE

Introduction

8.1 This assessment of potential noise impacts forms part of the statement in support of a planning application for a waste & recyclables transfer station and depot (WRTS) at Freshfield Road, Pebsham.

8.2 The operation of the proposed WRTS has the potential to result in additional noise emissions to nearby sensitive receptors. The potential noise impacts from the development are:

- Operational noise from plant on site; and
- Noise from road traffic through the proposed development's operation.

8.3 This assessment looks at the potential noise impacts in terms of the existing noise climate. Existing ambient noise levels for potentially sensitive receivers in the vicinity of the proposed development have been used in the assessment.

8.4 Details of the predicted noise impact at the nearest noise sensitive receivers to the proposed development have been made based on equipment information provided by Veolia ES South Downs Ltd (Veolia). Impacts have been assessed in terms of nationally adopted acoustic guidance.

Methodology

Noise Monitoring

8.5 Noise measurements have been undertaken at No 2 Pebsham Lane, Bulverhythe (Grid Ref TQ767087), the closest noise sensitive receiver, to obtain existing noise levels for the area. These were taken over several days to cover day, evening and night time periods, and included a weekend in order to assess the impact of weekend working.

Legislation and Guidance

8.6 Noise from the operation of the waste management site has been assessed following advice and methodologies laid out in the following guidance documents.

Planning and Noise

8.7 Planning Policy Guidance: Planning and Noise (PPG 24)[9] was published by the Department of the Environment in 1994 and suggests mechanisms and guidelines for local authorities to adopt in considering noise in the planning context. General principles on how noise should be taken into account in the planning process are suggested. Examples of planning conditions are given and various statutory and other noise controls listed.

8.8 PPG 24 acknowledges that the impact of noise can be a material consideration in the determination of planning applications. It states that the local planning authorities must

[9] Department of the Environment, HMSO. Planning Policy Guidance Note 24: Planning and Noise (PPG24), September 1994

not place unjustifiable obstacles in the way of development, but equally that they must ensure that any development does not cause an unacceptable degree of disturbance.

8.9 Annex 3 of PPG 24 gives guidance on the assessment of noise from different sources. For the control of noise from industrial and commercial developments it suggests that the guidance in British Standard 4142[10] is used.

British Standard 4142

8.10 BS 4142 provides a method for rating industrial noise affecting mixed residential and industrial areas. The standard advocates the use of L_{Aeq}, a level which is directly measurable and termed the Specific Noise Level.

8.11 BS 4142 requires the addition of a 5 dB correction, to be applied to the Specific Noise Level, if the noise contains:

- a distinguishable, discrete, continuous note (whine, hiss, screech, hum etc);
- impulsive characteristics (bangs, clicks, clatters, or thumps); and/or
- the noise is irregular enough in character to attract attention.

The Specific Noise Level then becomes the Rating Level.

8.12 When used to assess industrial noise, the Rating Level is determined and the L_{A90} background level is subtracted from it. A difference of around 10 dB or higher indicates that complaints are likely. A difference of around 5 dB is of marginal significance and a difference of -10 dB is a positive indication that complaints are unlikely.

8.13 The Rating Level of the noise source under investigation is determined by the measurement or calculation of the specific noise level, along with an adjustment for the characteristic of the noise if necessary.

Minerals Planning Statement 2: Annex 2 Noise[11]

8.14 Further appropriate guidance and methodology is also found in MPS 2, Annex 2 Noise. Although MPS 2 Annex 2 has been issued primarily for surface mineral operations, it includes waste disposal and recycling activities that form an integral part of such operations. Paragraph 2.4 states that "*It* [MPS 2 Annex 2] *is not framed with direct reference to other waste disposal and recycling operations. Since these share many operational features with surface mineral operations, waste management operators and waste planning authorities should take account of this annex…*" Therefore for some operations within the site, MPS 2 Annex 2 may be a more suitable assessment methodology to follow.

8.15 MPS 2 Annex 2 gives advice with regard to the concept of maximum acceptable noise levels at noise sensitive receivers. It recommends setting absolute limit values for day time, evening and night time working. MPS 2 Annex 2 defines day time as 07:00 hours - 19:00 hours, evening as 19:00 hours – 22:00 hours and night-time as 22:00 hours –

[10] BS 4142 Rating Industrial Noise affecting Mixed Residential and Industrial Areas

[11] Minerals Policy Statement 2: Controlling and Mitigating the Environmental Effects of Minerals Extraction Annex 2: Noise

07:00 hours.

8.16 During daytime hours and evening hours, MPS 2 Annex 2 recommends that noise levels should not exceed the background noise level by more than 10dB (subject to a maximum noise level of 55dB L_{Aeq} for day time). MPS 2 recognises that, in many circumstances, this will be difficult to achieve without imposing unreasonable burdens on the mineral operator. In such cases the limit should be set as near to that level as practicable (to a maximum of 55dB L_{Aeq}). A significantly lower level of 42dB L_{Aeq} is recommended for night time working.

8.17 MPS 2 Annex 2 makes reference to British Standard 5228[12] and suggests its use for generalised noise data of various plant and noise prediction calculations for the noise sensitive receivers.

British Standard 5228

8.18 Noise and Vibration Control on Construction and Open Sites: Part 1 (BS 5228) sets out a methodology for predicting noise levels arising from a wide variety of construction and related activities. It can be used to predict noise levels arising from the operations of proposed open sites.

8.19 BS 5228 also sets out tables of noise levels generated by a wide variety of mobile equipment. This, together with a combination of manufacturer's data and the recent Defra publication "Update of Noise Database for Prediction of Noise on Construction and Open Sites"[13], have been used to provide noise level data for equipment to be used on site.

8.20 BS 5228 also provides guidance on possible noise mitigation measures.

Noise Change

8.21 An approach for determining the magnitude of noise impacts that has been used In the UK over a number of years is based on the premise that subjective response to noise from a new source is proportional to the change in overall noise level as a result of the development.

8.22 The Institute of Acoustics and Institute of Environmental Assessment have produced draft guidance on noise impact assessment[14]. According to this guidance, the noise impact at a property/location may be categorised according to the changes in noise level as shown in Table 8.1 below:

Table 8.1: Noise Change Criteria

[12] BS5228 Part 1: Noise and Vibration Control on Construction and Open Spaces, 1997

[13] Update of Noise Database for Prediction of Noise on Construction and Open Sites, 2005

[6] Design Manual for Roads and Bridges, Volume 11, Department of Transport, 1994

14 *Guidelines For Noise Impact,* Consultation Draft, Institute of Environmental Management and Assessment, Institute of Acoustics, Draft- 10/04/02 – expected to be issued as a final document in the second quarter of 2006.

Noise Change (dB)	Category
0	No Impact
0.1 – 2.9	Slight Impact
3.0 – 4.9	Moderate Impact
5.0 – 9.9	Substantial Impact
10.0 or more	Severe Impact

8.23 From a summary of the effects at relevant receptors, a judgement is made of the overall noise impact. In environmental assessment terms, a change of 3dB or more is generally considered a significant impact.

Baseline Conditions

8.24 The closest noise sensitive receivers are sited 240m to the south-west of the site in Pebsham Lane, Bulverhythe. A location near to the southern elevation of the property was taken as being representative of the existing noise climate.

8.25 Measurements were taken over a 5 day period at No 2 Pebsham Lane from Friday 10th November to Tuesday 14th November 2006 inclusive. Free-field noise levels were measured at a height of 1.5m, using a RION NL-32 (serial number 630461), Class 1 sound level meter. The noise units L_{Aeq}, L_{A10}, L_{A90} and L_{Amax} were measured in 15 minute intervals for the duration of the noise monitoring period.

8.26 The sound level meter was calibrated before and after measurements using a RION NC-74 calibrator (serial number 830793), and showed no significant change.

8.27 Weather conditions during the weekday periods of the survey were at times unfavourable with rain. Road traffic noise from the A259, considered to be the dominating noise source in this area, would be elevated when there is rain. Weekend data though is known to be unaffected due to favourable weather conditions. By comparing weekday noise measurements, collated when there was no rain, against the measurements during the weekend, it is observed that Saturday data is similar, if not slightly lower to the weekday data.

8.28 The assessment has therefore focussed on weekend noise data to ensure a worst case baseline has been adopted.

8.29 A summary of the noise level data collected for Saturday/weekdays and Sunday are detailed in Table 8.2, with the full set of noise readings provided in tabular format in **Appendix 4B**.

Table 8.2: Noise Survey Results

Saturday[1] (06:00-07:00)	**$L_{Aeq,15min}$**	**$L_{AMAX,15min}$**	**$L_{A10,15min}$**	**$L_{A90,15min}$**
MAX	47	64	48	42
MIN	42	46	43	41
AVG	44	56	45	42

Saturday[1] (07:00-19:00)	$L_{Aeq,15min}$	$L_{AMAX,15min}$	$L_{A10,15min}$	$L_{A90,15min}$
MAX	49	81	53	43
MIN	39	52	40	36
AVG	45	60	46	41

Saturday[1] (19:00-23:00)	$L_{Aeq,15min}$	$L_{AMAX,15min}$	$L_{A10,15min}$	$L_{A90,15min}$
MAX	66	94	66	44
MIN	45	66	44	40
AVG	61	85	51	42

Sunday (06:00-07:00)	$L_{Aeq,15min}$	$L_{AMAX,15min}$	$L_{A10,15min}$	$L_{A90,15min}$
MAX	45	62	50	35
MIN	32	41	34	30
AVG	41	54	41	33

Sunday (07:00-19:00)	$L_{Aeq,15min}$	$L_{AMAX,15min}$	$L_{A10,15min}$	$L_{A90,15min}$
MAX	48	73	50	43
MIN	38	49	40	35
AVG	43	62	44	38

Sunday (19:00-22:30)	$L_{Aeq,15min}$	$L_{AMAX,15min}$	$L_{A10,15min}$	$L_{A90,15min}$
MAX	43	71	43	41
MIN	41	46	42	39
AVG	42	56	43	40

[1]Representative of weekdays

8.30 Properties adjacent to Freshfields Road have the potential to experience adverse noise impacts as a result of vehicles from the WRTS. These properties are situated close to the A259. The A259 is a heavily trafficked road and properties in close proximity to it will

currently experience high noise levels throughout the day. In addition, current planning permission allows for site operational hours of 06:00 to 10:00, Monday to Saturday, and overnight parking of up to 15 refuse vehicles. These vehicles may use Freshfields Road from 06:00 hours Monday to Saturday. Therefore these properties have the potential to currently experience elevated noise levels from 06:00 hours Monday to Saturday from these permitted vehicle movements.

Potential Impacts

Waste Transfer Station

8.31 Veolia has provided information on the proposed equipment to be used on site. This plant, as detailed in Table 8.3, has been used in modelling potential noise emissions from the operation of the site. As the length of operating time for each piece of equipment is currently unknown, a 100% on-time per hour has been assumed as a worst case scenario.

Table 8.3: Proposed Equipment to be used at the proposed Waste Transfer Station

Equipment	% on-time	Power Level, L_{WA} (dB)
Volvo Wheeled Loader L90D	100	104
Fuchs Terex MHL 320	100	102

8.32 It is estimated that there will be approximately 50 refuse vehicles a day visiting the WRTS. The refuse vehicles will unload inside the existing building on site and then depart. The plant detailed in Table 3 will be used within the existing building to distribute the deposited waste.

8.33 The WRTS will operate from 06:00 hours – 22:30 hours Monday to Sunday inclusive. It is not anticipated, however, that refuse vehicles will deliver waste to site between 06:00 hours – 07:00 hours on any day. It is understood that all waste transfer activities will be enclosed within the building and operations will be undertaken with doors closed, with the exception of refuse trucks accessing/egressing. This assessment predicts noise levels emanating from the WRTS for the following times:

- 06:00 hours to 07:00 hours – Only plant detailed in Table 8.3 operating within the building with access doors closed.
- 07:00 hours to 22:30 hours – The plant detailed in Table 8.3 and refuse vehicle movements within the building. An assumed refuse truck operation time of 50% has been assumed during these periods with access doors remaining open. In reality, however, the operational time of the refuse trucks will be significantly less than 50% and doors would remain closed between refuse trucks visits. It is considered that this scenario allows for a worst case assessment.

8.34 A noise level of 28 dB $L_{Aeq,T}$ is predicted at the nearest residential property between

06:00 hours – 07:00 hours, from activities of the proposed WRTS.

8.35 A noise level of 33 dB $L_{Aeq,T}$ is predicted at the nearest residential property between 07:00 hours – 22:30 hours, from activities of the proposed WRTS.

8.36 Detailed calculations demonstrating these noise emissions are shown in **Appendix 4C**. Noise levels emanating from the building structure have been predicted at the nearest residential property in Pebsham Lane. Calculations include, the reverberant noise levels produced within the building structure; the noise reduction afforded by the building structure itself; and noise reduction between the building structure and the residential property in Pebsham Lane through distance attenuation. Information on the building construction, such as transmission and absorption coefficients of individual building components, have been assumed to enable such predictions.

BS 4142

8.37 It is considered that noise emanating from the WRTS will contain tonal or distinguishable characteristics. Therefore, as prescribed in BS 4142 the addition a +5 dB correction is applied to the predicted noise level to provide a Rating Level.

8.38 Table 8.4 compares the predicted Rating Level against the background noise levels for those times of day it will be operating. All scenarios demonstrate that noise levels do not exceed the existing average background noise level so that the assessment is at the lower end of being of marginal significance and indicates that complaints are unlikely.

Table 8.4: Predicted Noise Levels and Existing Background Noise Levels from Waste Management Site

	Average Background Noise Level ($L_{A90,15min}$) dB	Predicted Noise Rating Level ($L_{Aeq,T}$) dB
Saturday (06:00-07:00)	42	33
Saturday (07:00-19:00)	41	38
Saturday (19:00-22:30)	42	38
Sunday (06:00-07:00)	33	33
Sunday (07:00-19:00)	38	38
Sunday (19:00-22:30)	40	38

MPS 2

8.39 A predicted worst case noise level emanating from the WRTS is below the existing measured background noise levels at the nearest residential properties. This therefore meets with the recommended criteria set by MPS 2 Annex 2 to not exceed the background noise level by more than 10dB.

Noise Change

8.40 The ambient noise change at the nearest residential property as a result of the proposed WTS is provided in Table 8.5. The Table indicates that an ambient noise increase of 0.5 dB is predicted. In terms of the noise change criteria provided in Table 1 an increase of 0.5 dB represents a slight adverse impact. Such a small increase in ambient noise level, however, is not considered significant.

Table 8.5: Predicted Ambient Noise Levels at Nearest Residential Property to WRTS

	Existing Average Ambient Noise Level $L_{Aeq,T}$	**Predicted Noise Level from WRTS $L_{Aeq,T}$**	**Resultant Ambient Noise Level $L_{Aeq,T}$**
Saturday (06:00-07:00)	44	28	44.1
Saturday (07:00-19:00)	45	33	45.3
Saturday (19:00-23:00)	61 (42)[1]	33	61.0 (42.5)[1]
Sunday (06:00-07:00)	41	28	41.2
Sunday (07:00-19:00)	43	33	43.4
Sunday (19:00-22:30)	42	33	42.5

[1]From observing the measured noise data there would appear to be an abnormal noise event occurring during this time. The number in bracket therefore represents the measured noise level from Sunday evening.

8.41 Reversing alarms on vehicles are known to be subjectively most annoying. It has therefore been decided to make use of 'smart reversing alarms' on this site. It is understood that at least 80% of the refuse collection vehicles proposed to operate from the WRTS are currently fitted with 'smart reversing alarms'. Furthermore, it is also understood that as the remaining 20% of vehicles are updated, the new vehicles will also be fitted with 'smart reversing alarms'. It is proposed that suitable site management will be undertaken for the vehicles without 'smart reversing alarms' to ensure no detrimental impacts at the closest noise sensitive properties occurs. This may include ensuring as

far as possible that such vehicles do not reverse during the most sensitive hours, in terms of existing noise levels, or restricting reversing manoeuvres within sensitive hours to within the depot building where possible.

Refuse Vehicle Depot

8.42 It is intended to park 40 refuse vehicles at the site overnight. Whilst there may not be a noise issue with them parking on site, it is their movements along Freshfields Road early in the morning that may have the potential to cause a noise disturbance. It is understood that a maximum of 5 refuse collection vehicles and 16 street cleansing vehicles will leave the site between 06:00 hours – 07:00 hours Monday to Saturday and a further maximum of 29 refuse collection vehicles will leave the site between 07:00 hours – 08:00 hours on these days. On Sundays a maximum of 11 vehicles are proposed to leave the site between 06:00 hours – 07:00 hours.

On-site Vehicle Movements

8.43 The vehicles are to be parked mainly at the southern end of the Waste Management Building, some 240m from the nearest noise sensitive receivers at 2 Pebsham Lane, Bulverhythe.

8.44 The most appropriate assessment guidance for this aspect of the proposals is MPS 2 Annex 2. This guidance considers noise from vehicles up to 10dB above the background noise level to be acceptable.

8.45 Table 8.6 shows predicted noise levels at the nearest residential premises to the site, on Pebsham Lane, due to vehicles leaving the site between 06:00 hours – 07:00 hours daily and between 07:00 hours – 19:00 hours Monday to Saturday. Detailed calculations for this are shown in Appendix D. These predicted noise levels are compared against the existing measured noise levels for this property.

Table 8.6: Predicted Noise Levels from Vehicles leaving the Waste Management Site versus Existing Background Noise Levels

	Average Background Noise Level ($L_{A90,15min}$) dB	**Predicted Noise Level ($L_{Aeq,1hr}$) dB**
Saturday (06:00-07:00)	42	31
Saturday (07:00-19:00)	41	35
Sunday (06:00-07:00)	33	31

8.46 Predicted noise levels for all time periods are shown to be less than the existing background noise levels at the nearest residential property. In addition, predicted noise levels are 10 dB below that which MPS 2 Annex 2 would allow (up to 42dB L_{Aeq} between 06:00 hours – 07:00 hours on Sundays; 52dB L_{Aeq} between 06:00 hours – 07:00 hours on

Saturdays; and between 07:00 hours – 19:00 hours on Saturdays). It is therefore considered that noise emanating from vehicles leaving the site would not result in adverse noise impacts at the nearest property at any time.

8.47 As mentioned above it is anticipated that at least 80% of the refuse collection vehicles proposed to operate from the WRTS are currently fitted with 'smart reversing alarms'. Furthermore, it is also understood that as the remaining 20% of vehicles are updated the new vehicles will also be fitted with 'smart reversing alarms'. It is proposed that suitable site management will be undertaken for vehicles without 'smart reversing alarms' to ensure no detrimental impact at the closest noise sensitive properties occurs.

Vehicle movements on Freshfields Road

8.48 The closest noise sensitive receivers to Freshfields Road, the access into the site, are situated adjacent to the A259. The A259 is a heavily trafficked road and properties in close proximity to it will currently experience high noise levels throughout the day.

8.49 Existing noise levels at these properties have been calculated using the prediction methodology in Calculation of Road Traffic Noise[15] (CRTN) and existing traffic flows on the A259. The impact of noise from the vehicles leaving the proposed WRTS on the closest properties with elevations onto Freshfields Road has been undertaken using the mobile plant calculation in BS 5228. Prediction of noise from these vehicles using CRTN was not possible as vehicle numbers are to low for which CRTN is valid.

8.50 To allow comparison, existing road traffic noise levels derived through CRTN and predicted levels using BS 5228 are provided in $L_{Aeq,1hr}$ format. This has been undertaken using a conversion formula provided in Appendix 1 of the Irish National Roads Authority Guidance Notes on EIA [16]. This guidance allows for conversions from $L_{Aeq,1hr}$ to $L_{A10,1hr}$ and vice versa.

8.51 Table 8.7 compares predicted existing noise levels against noise levels following the introduction of vehicles movements from the WRTS, at the nearest residential property to Freshfields Road. Predicted noise levels are provided for time periods where there is potential for the greatest noise impact due to greatest vehicle activity.

8.52 As discussed previously, the current planning permission allows for up to 15 refuse vehicles to use Freshfields Road from 06:00 hours Monday to Saturday, which is a similar level of activity to that proposed. Therefore, under the current proposal, an maximum of 11 additional vehicles may be present on Freshfields Road between 06:00 hours – 07:00 hours on Sundays.

8.53 All predicted noise levels include contributions from road traffic on the A259 for which traffic count data was provided. Detailed calculations for this are shown in **Appendix 4E**.

[15] Calculation of Road Traffic Noise, Department of the Environment, 1988

[16] Irish National Roads Authority National Roads Authority Practical Guidance Notes on EIA, September 2003

Table 8.7: Predicted Noise Levels at the nearest Residential Property to Freshfields Road

	Predicted Existing Noise Level ($L_{Aeq,1hr}$) dB	**Noise Level from WRTS Vehicles ($L_{Aeq,1hr}$) dB**	**Resultant Predicted Noise Level including WRTS vehicles ($L_{Aeq,1hr}$) dB**
Saturday (06:00-07:00)	65	61	66
(07:00-08:00)	67	66	69
Sunday (06:00-07:00)	58	61	63

8.54 Noise increases are predicted for the nearest property to Freshfields Road on both Saturday and Sunday mornings. However, in accordance with criteria described in Paragraph 8.30, only the noise increase between 06:00 hours – 07:00 hours on Sunday is considered significant. At this time the predicted noise level from the WRTS vehicles are +3 dB $L_{Aeq,1hr}$ greater than the existing predicted noise levels. This results in an +5 dB $L_{Aeq,1hr}$ increase in ambient noise level. Using the noise change methodology described in Table 8.1 an increase of +5 dB is considered to be on the boundary of a moderate and substantial adverse impact.

Waste Transfer and Refuse Vehicle Depot Together

8.55 The worst potential impact for those properties located closest to the WRTS on Pebsham Lane will occur when the WRTS is operating and refuse vehicles are starting up and leaving in the morning periods.

BS 4142

8.56 Table 8.8 compares the predicted Rating Level (+5 dB for tonal characteristics) against the background noise levels with both operations occurring.

Table 8.8: Predicted Noise Levels and Existing Background Noise Levels from Waste Management Site

	Average Background Noise Level ($L_{A90,15min}$) dB	**Predicted Noise Rating Level ($L_{Aeq,T}$) dB**
Saturday (06:00-07:00)	42	38

Saturday (07:00-19:00)	41	42
Sunday (06:00-07:00)	33	38
Sunday (07:00-19:00)	38	42

8.57 With both operations occurring simultaneously the Rating Level is predicted to exceed the existing background noise levels by 5 dB at the nearest residential property between 06:00 hours and 07:00 hours on Sundays. In accordance with BS 4142, noise emanating from the WRTS is predicted to be of marginal significance at this time.

8.58 The predicted Rating Level with both operations at other times is predicted to be at the lower end of marginal significance and it is considered that the noise is unlikely to give rise to complaints.

MPS 2

8.59 A predicted worst case noise level emanating from the WRTS is equal or below the existing average measured background noise levels (L_{A90}) at the nearest residential properties. Therefore this meets with the recommended criteria set by MPS 2 Annex 2 to not exceed the background noise level by more than 10dB.

Noise Change

8.60 Predicted ambient noise change at the nearest residential property as a result of both operations occurring are provided in Table 8.9. The Table indicates that a ambient noise increase of 0.9 dB is predicted. In terms of the noise change criteria provided in Table 1 an increase of 0.9 dB represents a slight adverse impact. Such an increase in ambient noise level, however, is not considered significant.

Table 8.9: Predicted Ambient Noise at Nearest Residential Property to WRTS

	Existing Average Ambient Noise Level $L_{Aeq,T}$	**Predicted Noise Level from WRTS with all operations $L_{Aeq,T}$**	**Resultant Ambient Noise Level $L_{Aeq,T}$**
Saturday (06:00-07:00)	44	33	44.3
Saturday (07:00-19:00)	45	37	45.6
Sunday (06:00-07:00)	41	33	41.6
Sunday (07:00-19:00)	43	37	43.9

Conclusions

8.61 Potential noise impacts from the proposed WRTS have been assessed in accordance with nationally recognised guidance. The assessment demonstrates that the on-site use of the WRTS is likely to be acceptable at the nearby noise sensitive receivers in accordance with appropriate and applicable guidance.

8.62 Properties with elevations facing onto Freshfields Road have the potential to experience moderate/ substantial adverse impacts between 06:00 hours – 07:00 hours on Sundays, assuming a worst-case scenario of all 11 heavy vehicles leaving the site and using Freshfields Road during these hours.

9. OTHER ENVIRONMENTAL ISSUES

Archaeology and Cultural Heritage

9.1 The proposals involve the use of the existing buildings and hardstanding on the site. No new building construction works are necessary and potential archaeological deposits will not be disturbed as a result of the proposed change of use.

9.2 There are no other cultural heritage features - listed buildings, conservation areas, historic parks, etc - on or in the vicinity of the site.

Ecology and Nature Conservation

9.3 A walk-over survey of the site was undertaken by a qualified Jacobs ecologist on 16 November 2006. The findings of the survey, and proposed measures to minimize potential ecological impacts to acceptable levels, are summarised below.

Site Habitats

- Rough grassland with mainly grasses, dock (*Rumex sp*), plantain *(Plantago* sp), and other species from the umbelifer and legume families.

- Perimeter of the site is surrounded by scrub: bramble (*Rubus fructicosus*), hawthorn (*Crategus monogyna*).

Surrounding Habitats

9.4 A basic assessment of surrounding habitat was undertaken from within the site, with restricted views due to the perimeter embankment.

- **North:** Pebsham landfill site and further north Southern Water "Water Treatment Works"
- **East:** a vegetated strip of land with mown grassland and a hedgerow consisting of bramble, hawthorn, field maple (*Acer campestre*) and occasional oak (Quercus sp) along either side of the ditch (north/south) related to the landfill access road.
- **West:** arable field and Pebsham Farm 550m to the northwest
- **South:** arable field and residential properties 500m to the south (Bulverhythe)

Bats

9.5 No trees are affected by the proposals and bat roost potential for all of the buildings is categorised as low, and no further survey work is required. However, during removal of the chimney stack, a watching brief in respect of bats would be maintained, and the advice of a professional ecologist sought if bats are discovered.

Water voles

9.6 Pebsham Stream, along the eastern boundary of the site, offers potential habitat for water voles. Water vole places of shelter and protection (burrows) are legally protected

from disturbance (Wildlife & Countryside Act 1981 (as amended)). No works are proposed that would adversely affect the potential habitat of the stream banks.

Breeding birds

9.7 Removal of the chimney would be timed to avoid the bird nesting season (March-August inclusive). Such careful timing will avoid the need for survey of nesting habitat (industrial buildings, trees and scrub). If works were required to take place between March and August, a search for active nests should be made, and if found, would be left undisturbed until the young have fledged.

Reptiles

9.8 Reptiles are protected by law against killing or injury. No works are proposed as part of the development that are likely to impact on areas of potential reptile habitat. Care will be taken to ensure that none of the rough grassland and/or scrub around the perimeter of the site will be affected by the proposals.

Summary

9.9 Physical development or alteration of the site is limited to the removal of the chimney stack and the addition of new doors to the main building(s). Therefore, the only need for further ecological work is likely to be in respect of **breeding birds** if nesting areas in the buildings are to be disturbed March-August inclusive. This work, and any necessary mitigation measures, would be designed and implemented to current ecological good practice guidance as summarised above. Subject to these measures, the proposals are unlikely to give rise to any significant ecological impact.

Water Environment and Pollution Control

9.10 As described in Chapter 1, pollution control matters are regulated by the Environment Agency under the pollution control regime. The WRTS will require a waste management licence (WML) from the Agency, and Veolia will apply for this licence broadly in parallel with this planning application. The licensed area will include the depot area and the WML application will contain details of the measures to be implemented at the site to ensure that there is no unacceptable pollution of surface or ground water.

9.11 Potential sources of surface and groundwater pollution include the waste being handled at the site and the plant and vehicles and associated fuel, or other polluting materials that could be washed into surface waters or find pathways to ground water.

9.12 The existing site operated until 2004 under the benefit of a number of Environment Agency authorisations.

Existing and Proposed Drainage System

9.13 The site benefits from a comprehensive drainage system incorporating gulleys, drains and interceptors. The access road and internal and external operational areas are all hard-surfaced to facilitate material delivery, handling and surface water management.

9.14 All waste handling operations will take place in the enclosed WRTS building, thus minimising the potential for pollution of surface and groundwater. Liquids from the waste storage areas will be discharged into a holding tank and then pumped via pipework to the neighbouring sewage treatment facility

9.15 Rain water from the roof and surface water from the external hard surfaced areas will be discharged via an oil interceptor to the adjacent drainage swale.

9.16 The surface water interceptor will be visually inspected on a monthly basis or after any spillage on site and will be emptied at regular intervals to prevent pollution of underground strata and surface waters.

9.17 Liquids from the vehicle wash are routed directly to the foul pumping pit and discharged to the sewer.

9.18 The fuel tank has been designed to meet the standards of the oil storage Regulations and incorporates a leak detection system.

Landscape and Visual Impact

9.19 The site is identified in the adopted Rother Local Plan, policy DS5, as being located within the strategic gap between Bexhill and St. Leonards, where development will be carefully controlled. Any development must be unobtrusive and not detract from the openness of the area. The proposal involves a change of use of the existing buildings / site. The site is visually contained by an embankment on three sides (north, west and south) and a hedgerow consisting of small trees to the east. The embankment will be retained, and the existing buildings, internal access roads and hard standing will be used as they are, with the addition of new roller-shutter doors to the main buildings. It is proposed to remove the 40m high chimney stack from the main building, and it is therefore considered that the visual impact of the proposed use will be significantly less than that of the buildings permitted and existing under the extant planning permission.

9.20 Approximately 1km to the north of the site is the High Weald AONB. Any distant views of the site from the AONB would be reduced significantly with the removal of the chimney stack.

9.21 In addition to the above a Country Park is being planned for the land immediately adjoining and beyond the site, details of which are discussed under 'Community Impacts' below. The removal of the existing chimney will have positive benefits for the setting of any future Country Park. There are no other sensitive landscapes or visual issues affecting the site.

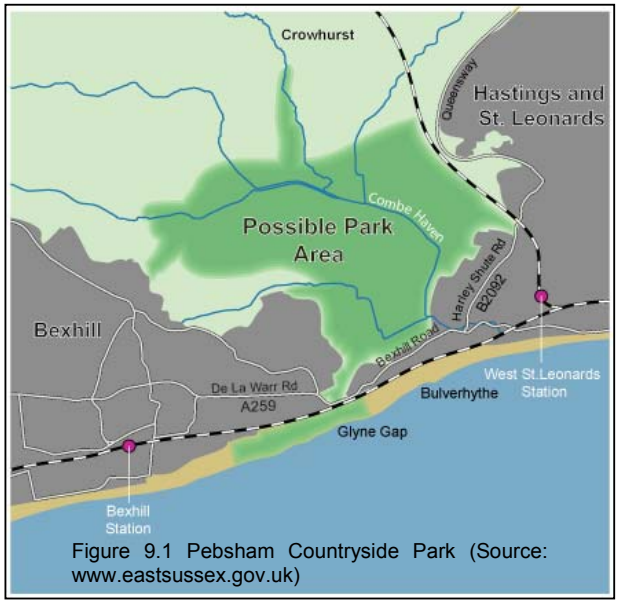


Figure 9.1 Pebsham Countryside Park (Source: www.eastsussex.gov.uk)

Community Impacts

9.22 There are no community buildings, such as schools, churches or hospitals, in the near vicinity of the

application site. The closest is Pebsham Community Primary School, which is about 1.5km to the west of the site. To the east of the site access road is an extensive area of playing fields.

9.23 There is a long term proposal for the creation of a Countryside Park on the land immediately adjacent to the site designed at enhancing the green space between Hastings, Bexhill and Crowhurst. Policy BX1 of the Rother District Local Plan allocates an area for the Park, which excludes the application site.

9.24 A development strategy for the Park is currently being prepared and was the subject of recent public consultation. The proposed strategy includes around 600 hectares (1480 acres) of land, aimed at delivering a sustainable, multi-functional area with space for leisure, relaxation, sport, ecology and education[17].

9.25 Veolia has given careful consideration of the proposals in the light of the East Sussex and Brighton & Hove Waste Local Plan. The main buildings of the site are relatively well visually screened from the surrounding area, and the proposals include the removal of the existing chimney stack. It is considered that the proposals would improve the compatibility of the site with a future Countryside Park in the surrounding area, in accordance with the requirements of the Waste Local Plan, especially those set out in paragraph 6.27.

Litter, Pests and Vermin Control

Litter

9.26 The control of litter is an important consideration. Accordingly, almost all operations at the site will be undertaken within the WRTS building, therefore containing litter internally where it can be easily managed. In addition, the perimeter fence will act as further protection against litter escaping from the confines of the facility. Any litter escape from the operational area will be collected on a daily basis, and vehicles arriving at or leaving the site will be adequately sheeted, as necessary, to avoid littering.

Control of Pests

9.27 The potential for pests and vermin will be minimised through careful management and procedures. Waste handling operations will be enclosed within the WRTS building, on the basis of a rapid throughput of material, therefore minimising the conditions which encourage the breeding of vermin or insects on the site. In addition, a specialist contractor will be employed to carry out inspections for vermin or insect infestation on a monthly basis (or more frequently if necessary) and will implement any necessary remedial action should it be required.

9.30 Should pests persist at the site, further advice will be sought from a specialist contractor and any recommendations will be implemented as soon as possible. The risk of infestation by pests and vermin is therefore minimal.

[17] Source: Pebsham Countryside Park consultation page (www.eastsussex.gov.uk).

10. SUMMARY AND CONCLUSIONS

10.1 The case in support of the planning application by Veolia for the change of use of the former Reprotech facility to a waste and recyclables transfer station and depot is compelling. The proposals are urgently needed to provide interim and long-term waste management capacity for the local area. The development will reuse existing buildings and infrastructure that already has the benefit of a permanent planning consent for waste management uses. The site is allocated for continued waste uses in the adopted Waste Local Plan and the development will bring about the removal for the existing 40m high chimney stack to the benefit of the local landscape.

In conclusion, it is considered that the proposals are fully in accordance with the development plan, and that there are no other material considerations that would prevent the approval of this planning application. A brief summary of the key issues is provided below.

Need

10.2 East Sussex and Brighton & Hove Councils must meet statutory waste recovery targets set by government. Veolia's network of waste management facilities will ensure that the councils meet these targets, and the proposed Pebsham WRTS and Depot is an essential component of that network. The facility will enable value to be recovered from waste generated in the Hastings area in advance of the Newhaven EfW becoming operational in 2010, thus making an important contribution to meeting 2010 recovery targets. After 2010, the WRTS will facilitate efficient transfer of waste to Newhaven for local recovery.

10.3 The proposed WRTS is also required to provide bulking and onward transfer facilities for the recyclable materials collected in the Hastings area. The facility will therefore significantly reduce the journey lengths associated with achieving recycling and recovery targets in East Sussex.

10.4 Further, a new depot facility is required for the Hastings waste collection fleet to replace the current Bulverhythe depot site, which is due to be sold for redevelopment.

Planning Policy

10.5 The proposals are fully in accordance with the key sustainable waste management policies that underpin national waste planning policy (PPS10) and the waste planning policies of the development plan.

- The proposed WRTS will help to move waste management in East Sussex and Brighton & Hove up the waste hierarchy, by helping to facilitate recycling and recovery and meet targets for these activities.
- This supporting statement demonstrates, through a number of technical assessments, that the WRTS will not endanger human health or harm the environment. Re-use of the existing buildings on site is an efficient way of delivering the required facilities, and the facility will make a significant contribution to a cost-effective waste management

solution, particularly in minimising the risk of financial penalties to the Council and reducing transport costs.

- The proposed WRTS has an important strategic position within Veolia's network of waste management facilities. It is strategically well located in relation to sources of waste and will provide a local facility for the community to take more responsibility for its own waste.

Site Suitability

10.6 The proposals are also in accordance with site specific and development control policies of the development plan. The site is identified, and therefore supported in principle, for waste recycling transfer uses in the adopted East Sussex and Brighton & Hove Waste Local Plan. The site will handle the same amount of waste and will operate well within the environmental limits considered acceptable under the existing planning permission. The potential environmental and amenity impacts of the proposed activities will be controlled by the full enclosure of waste handling operations within the waste recycling transfer building. A significant reduction in visual impact will derive from the proposed removal of the 40m high chimney stack.

10.7 The proposals will involve a reduction in the number of vehicle movements on the A259 when compared to the currently permitted use, and will also result in significant reduction in the traffic mileage associated with waste management in the area compared to other options for the future, and an overall reduction in the environmental impacts associated with waste management in East Sussex and Brighton & Hove.