AC ENVIRONMENTAL CONSULTING

Waste Development Statement



Application for a temporary change of use to allow for the processing of fly-tipped baled wastes to facilitate clearance and remediation of land at Rowley Gate Farm

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This Waste Development Statement accompanies a planning application for the proposed change of use to allow for the processing of fly-tipped baled wastes to facilitate clearance and remediation of land at Rowley Gate Farm.

The Waste Development Statement has been written to support the Planning Application and is not intended to be an Environmental Impact Assessment as set out in the Environmental Impact Assessment Regulations 1999.

1. Introduction

1.1. AC Environmental Consulting Ltd have been instructed by Rose Cottages (Endon) Ltd to apply for the temporary processing of fly-tipped baled wastes to facilitate clearance and remediation of land at Rowley Gate Farm.

1.2. The property has been subject to flytipping and applicant purchased the property at auction following the flytipping incident. This proposal aims to enable the applicant to process the flytipped wastes prior to facilitate removal from site and remediation of the land. It is anticipated that this process will take no more than 6 months.

1.3. The site is part of a farm and buildings adjacent to the proposed operating area, within the ownership of the applicant are listed.

1.4. The Site is situated within an entirely rural area to the west of Leek. There is ancient woodland and a site of biological importance within 500m but no protected sites immediately adjacent to the site.

1.5. The Site is bounded to the north, west and east by fields and to the south by Rowley Gate farm and outbuildings, with fields beyond.

1.6. The nearest residential housing is a single farmhouse some 280m away from the site to the north. Other neighbouring properties are in excess of 300m distant.

1.7. The site is currently unused due to the presence of flytipped baled wastes. This reason for this development will allow for the processing of this waste and for its removal to other permitted sites, facilitating the remediation of the land.

1.8. The proposal therefore seeks to;

- to create a temporary recycling facility that will accept only already present flytipped wastes, with the purpose of facilitating the removal of wastes and remediation of the land.
- to improve the aesthetics of the temporary operation by enclosing all operations within an existing outbuilding. This will make the site more visually appealing to neighboring residents.
- to mitigate the potential for issues arising from noise, dust and odour by;
    - carrying out all of the waste operations within the outbuilding which will act as a noise barrier and screen.
    - installing temporary Legio block concrete firewalls to contain wastes which will also significantly reduce noise levels.

- The design approach which was used in formulating the proposals demonstrates how the constraints and opportunities on the site have been considered, as well as the general character and key features of the surrounding area.

1.9. Overall the proposals will achieve the aims and will mitigate any potential impacts upon neighbours and enable the applicant to renovate Rowley Gate Farm.

1.10. This statement has been produced to demonstrate the methods by which the proposed operation will be managed to mitigate its effect on the local environment.

1.11. The key issues relating to this operation are;

- Dust
- Dust/Mud on Highway
- Drainage
- Noise
- Odour
- Litter
- Pests
- Traffic
- Storage
- Contaminated Land
- Other

Each of these issues is considered and the methods to be used to mitigate their impacts have been outlined in this application.

2. Waste Development Statement

The applicant has considered a number of options for the removal and disposal of flytipped wastes from his site, from direct landfill as proposed initially bye the Environment Agency, through to the current proposal to carry out primary processing at site prior to removal of recycled and residual wastes to other suitably permitted sites.

The proposals seek to limit the waste sent to landfill to a minimum in accordance with the waste hierarchy and very many policies both national and local. The proposals also seek to reduce road transport, enabling all wastes to be recycled or disposed of within North Staffordshire.

The proposals also, quite reasonably, seek to reduce the applicant's costs in removing these illegally deposited wastes from his land and enable him to target monies at remediation and renovation of this Grade 2 listed site.

The waste types treated at the site shall be only the previously tipped flytipped wastes, which are mainly contained within plastic wrapped bales. No wastes shall be brought onto site. The application is temporary in nature as it only seeks to permit the processing of those pre-existing wastes to facilitate their removal to other permitted sites for downstream recycling and to clear the land to allow for its remediation.

3. The Proposals

3.1. The proposed development is to:

- To create a temporary waste management recycling facility for processing of flytipped baled wastes.
- To improve the aesthetics of the site by enclosing all of the waste operations (excluding Inert Waste) inside the existing building, whilst also acting as a noise barrier.
- To mitigate the potential for issues arising from noise, dust and odour by;
    - Using an existing outbuilding for treatment of flytipped wastes, which will act as a noise barrier and screen.
    - installing a Legio block concrete wall along sections of the eastern and western site perimeter adjacent to the outbuilding to create an enclosed space, which will significantly reduce n potential noise levels heard by residents on Longport Road.
- The design approach which was used in formulating the proposals demonstrates how the constraints and opportunities on the site have been considered, as well as the general character and key features of the surrounding area.

3.2. The proposal has several advantages;

- It will remove a blight on the landscape in this rural area, enable the remediation of Rowley Gate Farm and allow the applicant to develop other opportunities at this location.
- The proposals will effectively screen the site and site operations from neighbouring properties/businesses, managing potential issues such as noise, dust etc and maintaining the visual amenity of the area;

3.3. ***Waste Building***

3.4. The applicant seeks to use an existing outbuilding for the waste processing operations. This building will serve a number of purposes but is primarily designed to screen waste handling operations to reduce and prevent issues arising from noise, dust, odour and amenity for local residents.

3.5. The waste building is a typical farm outbuilding constructed of Steel RSJs with steel panelling to sides and roof. This will provide noise reduction and screen operations from neighbouring residents and businesses. The only doors face to the south into the enclosed area created by the Legio block walls.

3.6. *Process*

Operation:

3.7. The development involves creating a temporary recycling facility for processing of only those previously deposited flytipped baled wastes. No wastes will be brought onto site.

The overall throughput for the site would therefore be around 6,500 bales, estimated to be a maximum of around 8,000 tonnes in total:

Baled wastes shall be moved from their current location as required by telehandler. Care will be taken to ensure that bales remain intact and processing of baled waste shall take place within the outbuilding.

Processing consists of cutting open the bales, shredding and screening of the wastes to create various recyclable fractions which are stored in designates concrete bays prior to despatch off site for further recycling.

A full description of the process and mitigation measures is contained within the following documents:

- RGF.PT.FPP.1901- Fire Prevention Plan v1.3
- RGF001 - Environmental Management System

3.8. *Operating Hours*

Waste Management Facilities:

The operating hours shall be:

07.00 – 18.00 (Monday to Friday)
07.30 – 13.00 on Saturday

3.9. *Traffic*

Waste Management Facilities:

3.10. Maximum daily traffic movements for this site will vary and have been estimated as 20 two-way movements by artic, plus two two-way movements for staff cars.

3.11. *Vehicle and Mobile Plant Storage*

3.12. The area to the south side of the waste building will be used to park all mobile plant when not in use. No LGVs shall be parked at site.

3.13. The open area to the south side of the farmhouse is currently informally used as a car park and will continue to be used for staff and visitor parking. Due to the temporary nature of this application no formal car parking spaces are to be set out.

4. Potential Issues

4.1. The potential issues relating to the development are discussed below. These issues have already been mitigated and this development improves the site and mitigates any of the potential issues even further.

4.2. Dust

- The wastes to be processed are baled wastes, handling of which will not give rise to dusts. Processing of these wastes would be enclosed and screened by the waste building. The potential for dust from these site operations is therefore considered to be low.

- However, a dust management procedure is in place which will be effective in preventing dust from site operations becoming a nuisance. The following procedures are in place to mitigate this:
    - *Processing to be carried out within a building.*
    - *Stockpiles will be dampened down when necessary using a hose, and/or covered using tarpaulins*
    - *The site will not operate in windy conditions.*
    - *Misters units will be deployed where necessary.*

- The measures put in place to prevent dust becoming an issue are such that it is not believed that the proposal will have any impact on neighbouring properties or the Highway.

4.3 Dust/Mud on Highway

- Due to the measures described above and the distance from operational areas of the site to the public highway, dust/mud is unlikely to become an issue, However, specific procedures are in place to minimise the risk in the event that the issue may arise.

- As previously stated, the building will keep operations inside which prevents any opportunity for dust and mud to be spread onto the surrounding highways.

- The proposed storage areas will be on concrete, which can be easily swept to avoid a buildup of mud and dust. All vehicles leaving this area will be sheeted and have their wheels inspected before exiting the site. If necessary wheels will be cleaned with brush and hose to remove mud to ensure that no mud is carried on to the surrounding highways.

- The site has a management procedure in place for the control of dust/mud on the Highway and the proposals will not affect this in any way.

- As part of the management procedure daily inspections shall take place and where necessary, road sweepers shall be employed to sweep the access road and Highway.

- Therefore, it is considered that the proposals do not present a risk of dust/mud on the Highway becoming an issue.

4.4 Noise

- As the site is currently not operational actual measurements of noise levels from the process cannot be made. However, noise levels from similar operations have been taken and provide an indication of the likely noise levels.
- Operations of process plant of the type proposed typically produce LAeq of between 70 and 80 db. Operations carried out inside the waste building will further reduce noise levels and it is considered that this type of building could provide 13dBA reduction. Taking worst case scenario with 80dBA internally, this produces an estimated noise level outside building @3m LAeq, 1 hour = 80.0 (inside) – 13.0 (building attenuation) = 67dBA.
- **Distance Correction for plant operations – 80dBA (from Building)**

  20log (r1/r2)
  At 3m from building Correction = 20log (r1/r2)
  r1 = Distance from building (3m)
  r2 = Receiver distance approximately (280m)
  = - 27.6dBA
  Resultant levels at Receptor = 39.4dBA

- **Distance Correction for LGV – 80dBA (from junction of access road and highway)**

  20log (r1/r2)
  At 3m from building Correction = 20log (r1/r2)
  r1 = Distance from building (3m)
  r2 = Receiver distance approximately (127m)
  = - 27.6dBA

Resultant levels at Receptor = 47.4dBA

- **Ground Absorption**

  We also need to consider the attenuation from ground absorption due to the soft intervening ground between the site operational area and nearest receptors (farmhouse to the north). ***Ground absorption:*** Soft sites are sites that have an absorptive ground surface (e.g., grass, or soil) and receive an excess ground attenuation value of approximately 1.5 dBA per doubling of distance, which will further reduce the noise levels experienced by the nearest residents.

- **BS8233:2014 / WHO Guidelines**

  To achieve the desirable external levels at the nearest residences, external levels should not exceed LAeq 50-55dBA. Calculations indicate that this desirable range would not be exceeded.

4.5 Odour

- Baled wastes in situ are unlikely to become an issue in relation to odour, however, the potential to create odours when handling and processing does exist. Specific procedures are put in place to minimise the risk in the event that the issue may arise. An odour management plan will be put in place to manage wastes to prevent odours forming. All operations will also be subject to an Environmental Permit issued by the Environment Agency and will be carried out in accordance with the Environmental Management System approved by them.

- If odours develop malodorous wastes will be removed from the site at the earliest opportunity. Equipment shall also be deployed to deodorise wastes, such as mister units with deodourising sprays.

4.6 Ecology

- A check of the MAGIC website was carried out to ascertain if there were any features of interest in the wider landscape.
- There is one site of interest within 500m of the site:
  - Cowley Wood is a Local Wildlife Site and is an Ancient Woodland. This lies some 400m from the proposed site.
- The proposed development involves very limited construction works consisting of construction of a concrete surface and creation of temporary concrete block walls.
- The operations carried out on site have no potential to impact in any way on the local wildlife site or species which may use that site.

- No lighting is proposed which could adversely affect species such as bats.
- The site does not currently provide any suitable habitat for any protected species and the proposals will not create any suitable habitat.
- The operations carried out on site are sufficiently far away from any areas of interest and are so limited in scope in terms of level of activity and permanence that no impact is expected.
- It is proposed to provide biodiversity enhancement through the planting of mixed native hedging in two locations adjacent to the operating area, as shown on drawing number RGF.PL.1904SLA. The hedging shall consist of the following, planted in a double row, offset at 1m centers and protected by tubex type rabbit guards:

    - 70% Hawthorn
    - 10% Hazel
    - 10% Field Maple
    - 10% Blackthorn

4.7 Litter

- The baled wastes are unlikely to generate litter, however the handling and processing of these does have the potential to do so.

- To mitigate this, the processing operations will be carried out inside a building which will contain any potentially escaping litter.

- Additionally, litter picking will be carried out daily to ensure that any escaping litter is controlled and unable to leave the site.

- The risk of litter contamination is minimal and can be easily and effectively controlled.

4.8 Pests

- The types of wastes accepted on site have the potential to provide habitats for pests of not adequately controlled. However, the site will be operated in accordance with the Environmental Management System which forms part of the Environmental Permit issued by the Environment Agency, which details the measures to be taken to prevent pests and control any issues with pests.

- If a waste is deemed to be causing the problem, it will be removed from site at the earliest opportunity.

- Where pests are identified, the services of a third party accredited organisation shall be used to control them.

4.9 Traffic

- Access to and from the site is off Devils Lan, via School Lane and the A53. The site has a 12m bell mouth entrance, measured 3m back from the highway. The boundary (dry stone walls) is set back to create visibility splays of in excess of 150m in each direction.

- The related daily trips are estimated as follows:
    - Staff Vehicles x 2 – 2 two-way movements per day.
    - Waste Collection Vehicles (artics & 8-wheeler) – 10 two-way movements per day.

- This equates to a maximum of 2 movements per hour which cannot be considered severe.

4.10 Storage

- The proposed site layout will mean that the waste on site will be handled and processed within a building. Processed Wastes will be stored in loose stockpiles within concrete legio block bays.

- There will be no storage of LGV vehicles or skips on site.

4.11 Contaminated Land

- The proposal involves very limited construction works. These are;
    - Construction of a concrete pad to the south of the waste building bordered by the building and the Legio block walls of approximately 600m^2.
    - Cpnstruction of temporary Legio block walls, placed onto the above concrete pad, which are to be removed on completion of the waste processing works.
- No ground penetrations, excavations or other construction works will be carried out on the site.
- A check of historical data for the site shows no uses other than agriculture from 1880 onwards. As such contamination is not suspected at this site.
- A further check of British Geological Survey borehole logs show that no made up ground or evidence of contamination was found in any of the three nearest boreholes at Lapwing Farm and Great Longsdon Farm.

- Given that the only construction is to create an impermeable surface creating a potential pollution pathway receptor barrier and that there is no evidence of historical contaminated uses or contamination with the nearest boreholes it is considered that an intrusive contaminated land survey is not necessary at this stage.

- An assessment of likely contamination can be made in those areas currently covered by baled wastes but in order to carry out such an investigation it is necessary to first remove those wastes from that area, which is something this application seeks to achieve.

4.12 Heritage

A heritage Statement has been produced by David Proudlove of URBME. This concluded;

"Although the impact associated with the proposed operations at Rowley Gates Farm are temporary in nature and minimal, a number of mitigation measures are proposed in order to minimise these.

- A significant stand-off between the heritage assets and the area of operations is proposed, which will ensure that sufficient protection.
- The biggest risk is fire although the risk of fire is considered to be small â€“ and this will be addressed in the following ways:
    - Location of the operations as far away from the heritage assets as possible;
    - Provision of a 6m fire break between the quarantine area
    - Installation of fire alarm and sprinkler systems within the outbuilding that will house the processing operations prior to commencement;
    - Location of the operations immediately off the main access route into the site to allow easy access to emergency vehicles in the event of a fire; and
    - Location of the operations alongside the eastern pond which would provide swift access to water for fire services in the event of an emergency."

4.13 Rights of Way

The proposed development does not affect the Public Right of Way which runs alongside the private track which gives access to the site from Devils Lane, however, the applicant is aware of the existence of the footpath and that this

application does not seek the right to divert, extinguish or obstruct any part of the public path.

4.14 Tree Protection

There are no trees within the proposed site and none bordering the areas of the site where the concrete pad is proposed to be constructed. It is therefore considered that a tree survey is not required, and no tree protection measures are necessary in relation to the proposed construction.

4.14 Flood Risk

The site is not within Flood Zone 2 or 3, has no history of flooding and sits atop a hill. The site area is less than 1 hectare and the development are considered to be minor. It is therefore considered that a Flood Risk Analysis is not required.

4.16 Lighting

Due to the temporary nature of the development, no lighting is proposed.

5 Planning Policy

Following a re-application process Staffordshire County Council advised that he relevant policies pertaining to this application are as follows:

- The Staffordshire and Stoke-on-Trent Joint Waste Local Plan: particularly policies 1.1, 3.1, 4.1 and 4.2.

- The Staffordshire Moorlands District Local Plan: particularly policies SD1, SD4, DC1, DC2, DC3, NE1 and T1.

- National Planning Policy Framework – updated 24 July 2018 (NPPF): particularly sections 12 (design), 13 green belt), 15 (natural environment) and 16 (historic environment).

- Planning Practice Guidance (PPG): particularly guidance on air quality, conserving and enhancing the historic environment, land affected by contamination, natural environment, noise, transport and waste.

- National Planning Policy for Waste (NPPW) - paragraphs 6 and 7 and Appendix B

Each of these are discussed in the following pages.

5.1 Staffordshire and Stoke Joint Waste Local Plan (2010-2026)

Policy 1.1 General principles

Planning permission for the development of new sustainable waste management facilities will be granted where the applicant can demonstrate that the proposal accords with the principles listed below:

i. Waste is minimised;

ii. Waste is used as a resource, including the formation of waste synergies, for example through the creation of resource recovery parks;

iii. The proposals represent the most sustainable option for management of waste as high up the "waste hierarchy" as feasible (Refer to Appendix 4: The Waste Hierarchy);

iv. Protection of human health and the environment.

v. Unacceptable adverse impacts, including cumulative effects, should be avoided and adverse impacts minimised and mitigated as part of the proposals;

vi. The overall (economic, social and environmental) benefits outweigh any material planning objections.

- The requirements of this policy have been met as;

  - The proposal allows for several different waste streams to be recycled and treated further up the waste hierarchy. In particular, the proposed operations will enable preliminary recycling of wastes into recyclables for movement onwards to permitted sites further up the waste hierarchy.
  - The design of the site will offer good protection to human health whilst also minimizing all potential impacts on the surrounding environment.
  - The impacts from the operation, the containment of wastes and the location mean that the potential impacts are minor, already mitigated, and the advantages largely outweigh any potential impacts.
  - The proposals will facilitate the further remediation and development of the larger site.

Policy 3.1 General requirements for new and enhanced facilities

Within the broad locations set out in Policy 2.3, proposals for new and the expansion of existing waste management facilities should:

i. Be fully contained within well designed purpose built or appropriately modified existing buildings or enclosed structures appropriate to the technology or process. Where this is not practicable or environmentally acceptable, the applicant must clearly demonstrate that any environmental impacts can be effectively mitigated by alternative means;

ii. Include a programme of phased improvements, which are proportionate to the nature of the application, in order to bring the whole site up to modern standards, if the proposal relates to an existing facility which is to be extended or enhanced.

iii. Be compatible with nearby uses, and appropriate in scale and character to their surroundings giving careful consideration to any cumulative effects that may arise (Refer to 'Policy 4: Sustainable design and protection and improvement of environmental quality')

iv. Complement existing or planned activities or form part of an integrated waste management facility and demonstrate an overall enhancement of the site; and,

v. All proposals should be submitted together with details on the annual throughput and waste stream that the site would handle

- The requirements of this policy have been met as;

  - The above policy describes aims and requirements that are clearly intended for long term or permanent developments. This development is unusual in that it seeks permission for as very short timescale to enable removal of fly tipped wastes from site to facilitate the remediation of the site. Much of the policy is not designed ot deal with such an unusual and specific proposal
  - Most of the activities of the development, including all treatment of wastes, will be carried out and contained within the existing building structure. Wastes outside of a building will be stored on concrete pads, within Legio block wall concrete bays to contain the wastes and ensure that they have no environmental impacts.
  - The use of the existing farm building and Legio block bays (similar in construction to silage clamps) make the development compatible in these terms with the wider farm landscape.

Policy 4.1 Sustainable design

All proposals for waste management facilities should be designed and operated to high environmental standards. They should avoid unacceptable adverse impacts and minimise adverse impacts, taking particular account of climate change implications. Where practicable they should positively contribute to the character and quality of the local natural, historic and built environment and amenity, and provide safe and convenient access for all potential users.

In particular the proposal should:

i. Be compatible with adjoining land uses and the locality, taking into account national and local policies for building design, landscape character, ecology, historic environment and sport and recreation;

ii. Provide measures to minimise greenhouse gases associated with the construction, and operation of the facility, and where relevant, the decommissioning and reinstatement of the site.

iii. Provide measures to adapt to climate change;

iv. Consider design and environmental performance of the facility from the design stage and as a minimum standard should aim to achieve a BREEAM 2011 rating for industrial buildings of "very good" or higher;

v. Be supported by a site waste management plan;

vi. Provide a sustainable drainage system, unless it can be shown to be impractical to do so, to manage clean uncontaminated roof and surface run-off, with a focus on filtration techniques to improve the quality of the water environment;

- The requirements of this policy have been met as;

  - The development is designed and operated to a high environmental standard. Machinery will be operated inside the building which will significantly reduce any noise and vibration levels. Additionally, all waste is stored on concrete pads within concrete walled bays which ensures waste are well contained and have no impact on the surrounding environment.
  - The site has an Environmental Permit approved and issued by the Environment Agency each with an approved waste management plan (Environmental Management System) in place which will ensure that the site is run efficiently.

Policy 4.2 Protection of environmental quality

The development of waste management facilities will be supported provided that the proposals would not give rise to materially harmful impacts, except where the material planning benefits of the proposals outweigh the material planning objections.

Where proposals have an unavoidable adverse effect on these natural and cultural assets, impacts should be minimised by design and layout. Residual impacts should be mitigated or compensated for, either on or off site

In determining the impact of the proposed development, consideration will be given to the effect of the proposals on the following:

i. People and local communities, including the potential health effects;

ii. The highway network and other public rights of way;

iii. Historic environment;

iv. Natural environment features and landscape networks important for wildlife and amenity;

v. Sites, habitats and species of importance for biodiversity or geodiversity;

vi. The Landscape;

vii. Cannock Chase Area of Outstanding Natural Beauty and the setting of the Peak District National Park;

viii. The Green Belt;

ix. The Countryside;

x. Trees, hedgerows and woodland;

xi. Agricultural land;

xii. Open space (including recreational and sporting facilities)

xiii. Protection of air, soil and water and reduction of flood risk;

xiv. Any other interests or acknowledged importance

- The requirements of this policy have been met as;

  - The development will not give rise to any potential harmful impacts. There will be no potential health effects on nearby people and local communities. Additionally, no protected sites, habitats or species will be impacted by the proposed development.
  - The site will not adversely affect the highway network as vehicle movements to and from the site will be limited. There will be minimal vehicle movements into the site as baled wastes already exist at the site. Therefore, vehicle movements will be predominantly from wastes leaving the site.

- The development has involved creating a layer of concrete over areas of the site to ensure that wastes are stored appropriately and within concrete Legio block bays.
- The concrete creates a barrier between soils and waste and therefore prevent the creation of dust from soils.
- The proposal is for a time limited operation designed to facilitate the removal of illegally deposited wastes from the site and to allow the further remediation of the site. Everything about the proposal is designed to improve the current situation, to remove any risk to human health, to the historic Grade 2 listed buildings, to remove the risk to topsoil and groundwater from leachates, to remove the impact on the landscape and local amenity by removing baled waste piles and to do so in a way which accords with the waste hierarchy.

5.2 Staffordshire Moorlands Local Plan

Policy SD 1

Sustainable Use of Resources

The Council will require all development to make sustainable use of resources and adapt to climate change. This will be achieved by:

1. Having regard to the BMV agricultural classification of the land, with a preference for the use of lower quality over higher quality agricultural land. Development should also aim to minimise soil disturbance and to retain ecological connectivity as far as possible

2. Supporting or promoting proposals that remediate brownfield sites affected by contamination.

3. Re-use of sites affected by mining activity will be supported, provided that any mining legacy is appropriately addressed, and it can be demonstrated that the site is safe and stable for the development proposed.

4. Supporting development that is located and designed to minimise energy needs and to take advantage of maximised orientation (subject to design and landscape policies) to achieve energy savings in line with Policy SD3.

5. The Council will require applicants for all major-scale planning applications (10 or more residential units or 1,000+ square metres floor area) to demonstrate that they have considered the energy efficiency, water conservation, sourcing of construction materials, and site orientation aspects of the scheme, and where possible the feasibility of integrating micro-renewables. The degree of detail expected will depend on the scale/complexity of the proposal.

6. The Council will encourage developers to investigate the potential for re-using construction or construction waste materials, especially those sourced locally (which can include those minerals available on site, as appropriate) and integrates where possible on-site waste management facilities.

- This Policy is largely irrelevant to this unusual set of proposals as;

  - No agricultural land is to be used in the proposals, but rather illegally deposited baled wastes are to be removed from land.
  - No brownfield land is to be used, however, the presence of contamination underneath the bales cannot be ruled out and one purpose of the proposals is to remove the bales to enable further remediation of the land on which they currenty sit to be carried out.
  - There is limited construction taking place, and no opportunity for the use of recycled materials. However, Legio blocks have been selected for use as concrete walls to enable re-use elsewhere.

Policy SD 4

Pollution and Water Quality

The Council will protect people and the environment from unsafe, unhealthy and polluted environments by ensuring proposals avoid potential adverse effects; and only permitting proposals that are deemed (individually or cumulatively) to result in pollution (including air/ water/ noise/ vibration/ light/ ground contamination) if after mitigation, potential adverse effects are deemed acceptable. This may be achieved by the imposition of planning conditions or through a planning obligation.

When considering planning applications, the Council will require developers to have regard to the actions and objectives of all relevant River Basin Management Plans and related Plans affecting the District in striving to protect and improve the quality and capacity of water bodies in or adjacent to the District. Planning permission shall only be granted where the proposal makes provision for the protection (and where feasible, enhancement) for water quality and waterside habitat, and water resources where applicable. In the case of development within Groundwater Source Protection Zones (SPZs) applicants should demonstrate how site layout has sought to mitigate potential pollution to public water supply. A quantitative and qualitative risk assessment and groundwater protection mitigation strategy may be required subject to consultation with relevant bodies.

- The requirements of this policy have been met as;

  - The development is not unsafe, unhealthy and will not pollute the environment. The development will avoid all potential adverse effects. The development will not result in any pollution. Machinery is housed inside a building which reduces noise, vibration and air quality issues. Wastes are stored outside in concrete walled bays on a concrete surface; this prevents any possibility of ground contamination.

Policy DC 1

Design Considerations

All development shall be well designed and reinforce local distinctiveness by positively contributing to and complementing the special character and heritage of the area in line with the Council's Design Guide SPD. In particular, new development should:

1. be of a high quality and add value to the local area, incorporating creativity, detailing and materials appropriate to the character of the area;

2. be designed to respect the site and its surroundings and promote a positive sense of place and identity through its scale, height, density, layout, siting, landscaping, character and appearance;

3. create, where appropriate, attractive, active, functional, accessible and safe public and private environments which incorporate public spaces, green infrastructure including making provision for networks of multi-functional new and existing green space (both public and private), landscaping, public art, 'designing out crime' initiatives and the principles of Active Design;

4. incorporate sustainable construction techniques and design concepts for buildings and their layouts to reduce the impact of the development;

5. protect the amenity of the area, including creation of healthy active environments and residential amenity, in terms of satisfactory daylight, overbearing development, sunlight, outlook, privacy, soft landscaping as well as noise, odour and light pollution;

6. promote the maintenance, enhancement, restoration and re-creation of biodiversity and geological heritage, where appropriate;

7. provide for safe and satisfactory access and make a contribution to meeting the parking requirement arising from necessary car use;

8. require new developments to be well integrated for car, pedestrian and cycle use as well as other sustainable transport links;

9. ensure that existing drainage, wastewater and sewerage infrastructure capacity is available, and where necessary enhanced, to enable the development to proceed;

10. ensure, where appropriate, equality of access and use for all sections of the community;

11. be served by high speed broadband (>30mbps) unless it can be demonstrated through consultation with Next Generation Access Network providers that this would not be possible, practical or economically viable. In all circumstances during construction of the site sufficient and suitable ducting should be provided within the site and to the property to facilitate ease of installation at a future date.

- The proposals meet the requirements of this Policy as;

  - The proposals seek to remove large quantity of illegally deposited baled wastes, to further facilitate the remediation of the site and to enable the refurbishment of the Grade 2 listed buildings, gardens and surrounding area.
  - The proposal to treat wastes to enable these aims to be achieved are time limited and concerned solely with removal of wastes from site to enable the greater aims to then be achieved.
  - Most of the policy is irrelevant when considered in terms of what the proposals seek to achieve and enable.

Policy DC 2

The Historic Environment

1. The Council will conserve and where possible enhance heritage assets, including their setting in a manner appropriate to their significance. This will take into account the desirability of maintaining and enhancing their significance and will ensure that development proposals contribute positively to the character of the built and historic environment.
2. Protection will be given to designated heritage assets and their settings and non-designated heritage assets as set out in the NPPF.
3. All applications likely to affect heritage assets will require the submission of a heritage statement, including a qualitative visual assessment where appropriate.
4. Where development is likely to affect archaeology, both designated and undesignated, the Council requires the submission of a desk-based assessment, and where appropriate, field surveys and trench evaluation by a qualified professional.
5. Where the loss of significance is unavoidable, recording should take place and this should be added to the Historic Environment Record as a minimum, held by Staffordshire County Council.
6. Development proposals which would result in the sympathetic reuse of buildings at risk in line with NPPF policy will be welcomed by the Council.
7. The Council will promote development which sustains, respects or enhances buildings and features which contribute to the character or heritage of an area and those interests of acknowledged importance through the use of Conservation Area Appraisals, Design Guidance and Statements, Archaeological Assessments, Characterisation Studies and Masterplanning.

- The requirements of this policy have been met as;

  - A Heritage Statement has been produced as part of the application. The development will not have any impacts on the environment. Additionally, the development sustains and protects the listed buildings and features;.

Policy DC 3

Landscape and Settlement Setting

The Council will protect and, where possible, enhance local landscape and the setting of settlements in the Staffordshire Moorlands by:

1. Resisting development which would lead to prominent intrusion into the countryside or have an adverse impact of significance to the character of the countryside or the setting of a settlement or important views into and out of the settlement as identified in the Landscape and Settlement Character evidence;

2. Supporting development which respects and enhances local landscape character, and which reinforces and enhances the setting of the settlement as identified in the Landscape and Settlement Character evidence;

3. Supporting development which maintains the biodiversity qualities of any natural or man-made features within the landscape, such as trees, woodlands, hedgerows, walls, watercourses or ponds;

4. Supporting identification and implementation of natural flood management measures that will contribute towards delivering a reduction in local and catchment-wide flood risk and impacts of climate change and other multiple benefits;

5. Supporting opportunities to positively manage the landscape and use sustainable building techniques and materials which are sympathetic to the landscape;

6. Recognising and conserving the special quality of the landscape in the Peak District National Park and ensuring that development does not adversely affect the wider setting of the National Park.

- The requirements of this policy have been met as;

  - As previously stated, the development makes a positive contribution to the local character.
  - The application has no impact on the other requirements of this policy.

Policy NE 1

Biodiversity and Geological Resources

The biodiversity and geological resources of the District and neighbouring areas will be conserved and enhanced by positive management and strict control of development (and having regard to relevant ecological evidence) by:

1. Resisting any proposed development that could have an adverse effect on the integrity of a European site (or successor designation) alone or in combination with other plans or projects unless it can be demonstrated that the legislative provisions to protect such sites can be fully met. Any development with a potential to adversely affect a European site/s through construction activities should

ensure that Ciria construction guidelines are followed including environmental good practice on control of dust and water pollution.

2. The Council will not normally permit any development proposal which would directly or indirectly (either individually or in combination with other developments) have an adverse effect on a Site of Special Scientific Interest. Where an adverse effect on the site's notified special interest features is likely, an exception should only be made where the benefits of the development, at this site, clearly outweigh both the impacts that it is likely to have on the features of the site that make it of special scientific interest and any broader impacts on the national network of Sites of Special Scientific Interest.

3. Conserving, and enhancing regional and locally designated sites. The Council will not permit any development proposal which would directly or indirectly result in significant harm to geological and biodiversity conservation interests, unless it can be demonstrated that:

a) there is no appropriate alternative site available; and

b) all statutory and regulatory requirements relating to any such proposal have been satisfied; and

c) appropriate conservation and mitigation measures are provided; or if it is demonstrated that this is not possible

d) the need for, and benefit of, the development is demonstrated to clearly outweigh the need to safeguard the intrinsic nature conservation value of the site and compensatory measures are implemented.

4. Expecting all development where possible seeks to deliver a net gain in biodiversity proportionate to the size and scale of the development. In circumstances where adverse impacts are demonstrated to be unavoidable, developers will be required to ensure that impacts are appropriately mitigated, with suitable compensation measures towards loss of habitat used only as a last resort where there is no alternative. Where any mitigation and compensation measures are required, they should be appropriately scheduled and managed according to the nature, size and scale of the development so as to minimise impacts that may disturb protected or important habitats and species.

5. Supporting opportunities to improve site management and increase public access to wildlife sites including supporting the objectives of the Staffordshire County Council Rights of Way Improvement Plan.

6. Ensuring development promotes the appropriate maintenance, enhancement, restoration and/or re-creation of biodiversity through its proposed nature, scale, location and design. The Staffordshire Moorlands Biodiversity Opportunity Map, in conjunction with the Staffordshire Biodiversity Action Plan, will be used to guide biodiversity enhancement measures to be included in development proposals as appropriate to the nature and scale of development proposed and other environmental interest, in particular supporting opportunities to increase grassland and heathland habitats including supporting targets in the UK and Staffordshire Biodiversity Action Plan.

7. Protecting and enhancing habitats and species of principal importance for

the conservation of biodiversity as identified in legislation, and recognising and implementing appropriate measures, including landscape-scale conservation management, to take account of the fact that the distribution of habitats and species will be affected by climate change.

8. Recognizing the value of the natural environment for sport and leisure activities and the need to manage such activities to ensure there is no conflict.

9. Ensuring the provision and protection of green infrastructure networks in line with Policy C3.

- The requirements of this policy have been met as;

  - The development will not directly or indirectly have an adverse effect on any SSSI.
  - The application has no impact on the other requirements of this policy.

Policy T1

Development and Sustainable Transport

The Council will promote and support development which reduces reliance on the private car for travel journeys, reduces the need to travel generally and helps deliver the priorities of the Staffordshire Local Transport Plan. This will be achieved by:

1. Ensuring that all new development is located where the highway network can satisfactorily accommodate traffic generated by the development or can be improved as part of the development.

2. Ensuring that major development is located in areas that are accessible by sustainable travel modes or can be made accessible as part of the proposal.

3. Considering appropriate parking provision on a case by case basis with recourse to the parking guidance set out in Appendix 8.

4. Where appropriate all new development shall facilitate walking and cycling within neighbourhoods and town centres, and link with or extend identified walking or cycling routes.

Development which generates significant demand for travel or is likely to have significant transport implications (as identified within a Transport Assessment) will, where appropriate:

- Contribute to improved public transport provision

- Provide proactive facilities and measures to support sustainable transport modes including on-site features to encourage sustainable travel methods e.g. cycle path links, cycle storage facilities, bus stops etc.

- Provide and actively promote travel plans.

- The requirements of this policy have been met as;

  - The highway network can accommodate traffic generated by the development. As waste already exists on the site there will be no vehicle movements delivering wastes to the site. Vehicles movements will be predominantly from wastes leaving the site, with minimal additional movements by car for staff and visitors.

5.3 National Planning Policy Framework – updated 24 July 2018 (NPPF):

Section 12:

The development will function well and add to the overall quality of the area by ensuring that fly tipped waste is treated and removed from sites appropriately and efficiently with no impacts on the surrounding environment.

In addition, the development will allow for the fly tipped wastes to be treated higher up the waste hierarchy. Most of the operations, including all treatment operations, will be housed inside a building which will make the site more visually attractive and in keeping with the surrounding landscape.

Section 13:

The development is not proposing to change the characteristics of Green Belt. The land where the site is located is to be remediated and predominantly used for farming operations. The development is temporary and is to aid in the recycling and removal of fly tipped wastes at the site.

Section 15:

The development will not impact on the surrounding environment or sites of biodiversity.

The operations which the development aims to carry out will not result in noise, soil, water or air pollution; measures are in place to ensure that any potential issues are effectively controlled and mitigated.

The wastes treated and stored at site are generally low risk and will not result in any contamination. Measures such as concreting of the ground and storing wastes within concrete bays will ensure that all pollution pathways to ground and water are mitigated.

Section 16:

A Heritage Statement has been produced as part of the application. It concluded that the development and process of removing wastes from the site is a positive proposal and will have a positive impact on the heritage assets by:

- Improving the setting of the barn and farmhouse and;
- Enabling the positive reuse of the site, which secures the long-term future of the assets.

5.4 Planning Practice Guidance (PPG):

Air Quality

The design and layout of the site and the operations carried out there ensure that no issues relating to air quality arise. Activities which impact air quality are housed inside a building which ensures that they have no impact on the air quality.

Additionally, wastes which will be stored outside and on concrete pads can be easily swept to ensure that dust doesn't become an issue; there will also be minimal vehicle movements to and from the site relating to the proposed development. The opportunity for dusts to arise at the site is considered to be low (Please refer to section 4.2 and 4.3 for further details of Dust). In addition, the site will be operated in accordance with an Environmental Management System approved by the Environment Agency, which is deigned to mitigate all potential impacts on human health and the environment.

Conserving and enhancing the historic environment

A Heritage Statement has been produced as part of the application. The conclusion of the statement was that the development is *'significant in that the sites makes a positive contribution to local character and distinctiveness'.*

In addition, the development will improve the area surrounding existing Grade II listed buildings and enable the site to secure a long-term future of the assets.

Land affected by contamination

The development is unlikely to be affected by contamination and unlikely to result in contamination in the future. The site is not located within an industrial estate where

contamination is likely to occur; instead it is located on a farm where the likelihood of contamination occurring or already occurred is low.

The operations carried out as part of the development will not result in any future contamination as all pollution pathways have been effectively controlled and mitigated.

Removal of the baled wastes will enable an assessment of contamination on the ground on which they currently sit to be made and remediation of that ground can then take place.

Natural Environment

The development will have no impact on any sites of biodiversity. No habitats and species will be affected by the operations carried out as part of the development.

Noise

The proposed operations to be carried out will not result in high levels of noise. Measures are in place to ensure that noise if effectively controlled e.g. housing machinery inside a building and only operate during daytime working hours. These methods will significantly reduce any potential noise levels at the site.

Transport

The development will not result in significant traffic generation. The development is temporary and will only involve vehicle movements as a result of wastes leaving the site. The surrounding roads are able to sustain the number of vehicle movements and vehicle types as they are compatible with similar movements and types in the surrounding area.

Waste

The removal of wastes is a temporary procedure. The site has been designed to ensure that waste sorting and storage is carried out in an efficient and safe manner with no adverse impacts on human health and the surrounding area.

The site will have an Environmental Management System/Site Management Plan in place as part of an approved Environment Permit from The Environment Agency which ensures that wastes are sorted, stored and removed from site appropriately with routine monitoring and inspections being carried out daily.

The development also allows for wastes to be treated further up the hierarchy and reduces the distance that waste needs to travel in order for it to be treated.

5.5 National Planning Policy for Waste (NPPW):

Paragraph 6:

The site is located within the Green Belt. However, the development is not deemed inappropriate and is simply designed to sort, store and recycle fly tipped wastes already existing on the site. The development will not involve bringing in wastes from outside sources.

Paragraph 7:

The development will have no impact on the local environment. The site has been designed to ensure that all pollution pathways are prevented. In addition, the Heritage Statements suggests that the development is *'significant in that the sites makes a positive contribution to local character and distinctiveness'.*

Appendix B:

The development will be designed to ensure that it has no adverse effects on the surrounding environment. The concrete pads for the storage of wastes ensures that all pollution pathways are prevented; the wastes will be stored in concrete walled bays which will ensure litter doesn't escape easily. In the event that litter does occur; routine litter picks are in place to mitigate the potential issue. Additionally, by housing all operations inside a building there will be a significant reduction in any issues relating to vibration, noise, dust and odours.

As previously mentioned, a Heritage Statement has been produced which states that the development is *'significant in that the sites makes a positive contribution to local character and distinctiveness'.*

There will be no wastes brought into site and therefore vehicle movements will be minimal and predominantly be from wastes leaving the site. The surrounding area mainly consists of other similar/farming operations. The vehicle types used to transport the waste from the site are compatible to vehicles already used on the surrounding roads. It is therefore deemed that the road network is suitable for operations carried out on the site.

Conclusion

6.1 There are a number of benefits of this proposal which have been outlined throughout this report. These are as follows:

6.1.1 The development will enable the removal of illegally flytipped wastes from site.

6.1.2 It will enable remediation of ay contamination of soils which may have occurred during the period the baled waste were on site

6.1.3 It will enable the wider refurbishment/redevelopment ot this historic site and Grade 2 listed buildings

6.2 In particular the proposals to treat wastes on site will;

6.2.1 Put in place measures, including an approved Environmental Management System to ensure the site operates efficiently and any potential risks of contamination, noise, pests, litter, dust and odours are all fully mitigated.

6.2.2 improve the amount of waste material which is treated and recycled higher up the waste hierarchy.

6.2.3 The scale of development and the proposals comply with the aims and objectives of the Staffordshire and Stoke Joint Waste Local Plan (2010-2026), Staffordshire Moorland Local Plan and the National Planning Policy Framework.

6.3 This development will improve the local economy in the area by providing more jobs. The company aim to offer even more opportunities for employment in the future, and with this new development they will be closer to meeting these aspirations.

6.4 The proposed development is deemed to be of an acceptable scale and appearance which has many benefits as detailed in this Statement.