

Silkstone

Environmental Ltd

www.silkstoneenvironmental.co.uk

*Geotechnical, Mineral, Waste Management
& Environmental Consultancy For Industry*

7 Hall Annex,
Thorncliffe Park,
Chapelton,
Sheffield,
S35 2PH

Tel: 0114 2573487
Fax: 0114 2573459

mail@silkstoneenvironmental.co.uk

Lincolnshire County Council
Planning Dept
Witham Park House
Waterside South
Lincoln
LN5 7JN

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Dear Sirs

Harmston Quarry - Variation of Condition 3 of Planning Permissions PL/0117/18 and PL/0118/18 for waste washing plant and centrifuge.

Introduction

Silkstone Environmental Ltd has prepared this planning application, on behalf of Mr G Hughes of Harmston Waste Management Ltd, as part of a number of Section 73 planning applications under the Town and Country Planning Act 1990 (as amended) to be submitted in relation to Harmston Quarry, Tower Lane, Harmston.

Harmston Quarry is presently used for quarrying Lincolnshire Limestone and for the recycling of construction and demolition waste. The site currently has 5 planning permissions for mineral extraction, waste recycling, waste transfer, waste washing and centrifuge plant which are currently active.

The two planning permissions to be varied are:

- PL/0117/18 – a full planning permission for washing and screening plant, settlement lagoons and a filter press, all associated with the waste recycling operations. The permission is subject to a condition which requires the development to cease by no later than 30th November 2020 and all structures, plant and machinery to be removed from the site immediately thereafter (Condition 3).
- PL/0118/18 – a full planning permission for a centrifuge (which is associated with the waste washing operations). The permission is subject to a condition which requires the development to cease by no later than 30th November 2018 and all structures, plant and machinery to be removed from the site within 28 days (Condition 3).

We are seeking a 1 year extension of time of Condition 3 of Planning Permissions PL/0117/18 and PL/0118/18 for waste washing plant and centrifuge.

The overriding reason for this is due to the COVID-19 situation, from March 2020, waste imports

reduced dramatically due to many contractors being furloughed and have continued at a much reduced rate up until the time of writing. There have been many weeks during this period that the site has been closed due to this situation.

Please refer to drawings 18196/001 and 18196/002 for the application boundary plans for the two planning permissions.

Need for the facility

The waste washing plant was installed on site to enable the operator to maximise the recycling volumes of inert waste at the facility. The washing plant complements the applicants existing operations and increases the amount of construction and demolition materials recycled with improved efficiency in terms of recycling rates and a better quality recycled product.

The existing waste recycling facility at Harmston Quarry is one of the largest in the County and contributes towards a significant percentage of Lincolnshire's inert waste recycling targets. Lincolnshire needs to have recycling facilities for construction and demolition (C & D) wastes in order to uphold the proximity principle and enable regional self sufficiency in terms of the management of wastes.

It is used by Lincolnshire County Council on a regular basis for the disposal of inert waste for recycling. If this facility were to be lost then an alternative location would be needed.

Harmston Quarry is well located in terms of its proximity to the sources of waste. The site has good access to the strategic road network and is not close to any residential properties.

Harmston Waste Management has experienced a significant growth in demand for its recycling services and products over recent years, which has increased even more since the installation of the washing plant in 2012, which provides a range of sand products as well as clean secondary aggregates which are a sustainable alternative to primary aggregates. In terms of its location, the site is well positioned to handle waste from all over Lincolnshire.

Sustainable Development

The waste recycling operations at Harmston Quarry are in accordance with all national and local policies for sustainable development and the reduction of waste to landfill. The efficiency of the washing plant on the site can recycle up to 90% of all incoming waste streams with the waste residues being used for site restoration.

The National Planning Policy Framework states that policies in Local Plans should follow the approach of the presumption in favour of sustainable development so that it is clear that development which is sustainable can be approved without delay. All plans should be based upon and reflect the presumption in favour of sustainable development, with clear policies that will guide how the presumption should be applied locally.

The Plan is based on the principle of delivering sustainable minerals and waste development in Lincolnshire. Any development that accords with the Plan is therefore sustainable and the County Council will aim to progress it without delay. Development management will be the main means by which the Plan will deliver sustainable minerals and waste development in Lincolnshire.

Policy DM1 of the Lincolnshire Minerals & Waste Local Plan Core Strategy details presumption in favour of sustainable development. It states that when considering development proposals, the County Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework. It will always work proactively with applicants jointly to find solutions which mean that proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the area.

Planning applications that accord with the policies in the Local Plan will be approved without delay, unless material considerations indicate otherwise.

Where there are no policies relevant to the application or relevant policies are out of date at the time of making the decision then the County Council will grant permission unless material considerations indicate otherwise – taking into account whether:

- Any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the National Planning Policy Framework taken as a whole; or
- Specific policies in that Framework indicate that development should be restricted.

In our opinion, the continuation of development at Harmston Quarry is sustainable and in accordance with the policies in the Local Plan and the Core Strategy in that they are diverting waste away from landfill with the recycling operations providing the material to enable the site to be restored back to a beneficial agricultural use. Without this then the site would be left un-restored and the only alternative would be either a lower level scheme which would not be suitable in this location or depositing waste materials directly in the void which is not a sustainable use of this material which can be recycled and helps reduce the need for primary aggregates.

The waste washing process increases the percentage of materials recovered from the incoming waste streams in accordance with Local and National Policy on waste recycling and sustainability and will assist in meeting future targets for inert waste recycling in the region.

Planning Policy

The proposal will be considered by Lincolnshire County Council in the context of the statutory planning framework that includes National and Local Planning Policy documentation.

National Policy

The NPPF advocates that the purpose of the planning system is to contribute to the achievement of sustainable development and indicates that there are three dimensions to sustainable development (economic, social and environmental). Para. 8 of the NPPF goes on to indicate that these dimensions give rise to the need for the system to perform the following roles:

- a) an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;
- b) a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and
- c) an environmental objective – to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.

Guidance in the NPPF also indicates that there is a presumption in favour of sustainable development and that in decision taking, applications that accord with the development plan should be approved without delay. Furthermore the NPPF provides a positive approach to strong economic development. Paragraphs 80 and 82 of the NPPF indicate that planning policies and

decisions should help to create conditions in which businesses can invest expand and adapt and should recognise and address the specific locational requirements of different sectors.

National Planning Policy for Waste

This document sets out detailed waste planning policies. It should be read in conjunction with the National Planning Policy Framework, the Waste Management Plan for England and National Policy Statements for Waste Water and Hazardous Waste, or any successor documents. All local planning authorities should have regard to its policies when discharging their responsibilities to the extent that they are appropriate to waste management.

The Waste Management Plan for England sets out the Government's ambition to work towards a more sustainable and efficient approach to resource use and management. Positive planning plays a pivotal role in delivering this country's waste ambitions through:

- delivery of sustainable development and resource efficiency, including provision of modern infrastructure, local employment opportunities and wider climate change benefits, by driving waste management up the waste hierarchy.
- ensuring that waste management is considered alongside other spatial planning concerns, such as housing and transport, recognising the positive contribution that waste management can make to the development of sustainable communities;
- providing a framework in which communities and businesses are engaged with and take more responsibility for their own waste, including by enabling waste to be disposed of or, in the case of mixed municipal waste from households, recovered, in line with the proximity principle
- helping to secure the re-use, recovery or disposal of waste without endangering human health and without harming the environment; and
- ensuring the design and layout of new residential and commercial development and other infrastructure (such as safe and reliable transport links) complements sustainable waste management, including the provision of appropriate storage and segregation facilities to facilitate high quality collections of waste.

The Waste Hierarchy

- the most effective environmental solution is often to reduce the generation of waste, including the re-use of products – prevention
- products that have become waste can be checked, cleaned or repaired so that they can be re-used – preparing for re-use
- waste materials can be reprocessed into products, materials, or substances – recycling
- waste can serve a useful purpose by replacing other materials that would otherwise have been used – other recovery
- the least desirable solution where none of the above options is appropriate – Disposal



The existing waste recycling facility complements the waste hierarchy with the recycling and re-use of materials which would otherwise end up in landfill. The waste washing process increases recycling efficiency which means more of the incoming waste is recycled and less waste residue to be disposed of in landfill.

Local Policy

Lincolnshire Minerals & Waste Local Plan Core Strategy

The County Council has produced the Lincolnshire Minerals and Waste Local Plan (MWLP) under its statutory duties as the Mineral and Waste Planning Authority for the County. Planning law requires that all applications for planning permission for waste development must be determined in accordance with this plan unless material considerations indicate otherwise.

This plan is comprised of two parts, each forming a development plan document: the Core Strategy and Development Management Policies (CSDMP) document (adopted on 1 June 2016) – which sets out the key principles to guide the future extraction of minerals and the form of waste management development in the County up to 2031, together with the development management policies against which applications for those types of development will be assessed; and the site Locations document (adopted on 15 December 2017), which includes specific proposals and policies for the provision of land for mineral and waste development.

The MWLP indicates broad locations for the extraction of minerals and the development of future waste sites and will set out criteria to be applied to proposals for new development within those locations up to 2031. It also addresses development management issues relevant to both minerals and waste.

The Core Strategy sets out the key principles to guide the future winning and working of minerals and the form of waste management development in the County. The Development Management Policies set out the criteria against which planning applications for minerals and waste development will be considered.

Paragraph 4.5 sets out the Strategic Objectives of the Plan, confirming that by prioritising movement of waste up the waste hierarchy the Plan seeks, to “*maximise opportunities for the re-use and recycling of waste*”. The retention of the washing plant and centrifuge would support this strategic objective.

Section 5 of the Plan addresses aggregates, with Paragraphs 5.11 to 5.16 focusing on recycled and secondary aggregates. Paragraph 5.13 of the Plan recognises the benefits of using recycled Aggregates.

Policy M1 ‘*Recycled and Secondary Aggregates*’ states:

“Planning Permission will be granted for recycling/reprocessing of materials for use as secondary or recycled aggregates in appropriate locations as specified in Policy W4, provided that proposals accord with all relevant Development Management Policies set out in the Plan.”

Policy W4 is addressed below.

Whilst Policy W3 seeks to steer waste development towards the main urban areas, Paragraph 6.53 confirms that waste facilities such as those for the recycling of construction and demolition waste may be considered acceptable where they are located at existing mineral operations, stating that:

“To be considered appropriate, the site must be capable of accommodating such a facility and it

should not impinge on any existing operations. Any planning permission for C&D recycling in an active quarry shall be temporary, and linked to the lifespan of the quarry.”

Whilst recognising that developments may be developed outside the areas identified in Policy W3 Paragraph 6.53 also indicates that, where *new or extended recycling operations* are co-located with mineral extraction, they should not:

“..... cause or significantly increase the environmental impact of the site, in terms of noise, dust, vibration, traffic disturbance or visual impact (cumulative impacts).

It also states that:

“ limestone and chalk quarries are likely to be more suitable than sand and gravel sites because they are deeper, providing opportunities to locate recycling operations in the base of the quarry thereby minimising visual intrusion and noise and dust emissions.”

Policy W4 sets out the criteria for locating new waste facilities for the production of recycled aggregates by the recycling of C, D & E waste in and around main urban areas as set out in Policy W3.

Further to this, the Policy states that:

“Proposals for the recycling of construction and demolition waste and/or the production of recycled aggregates in and around the main urban areas set out in Policy W3 will also be permitted at existing Active Mining Sites.

In the case of large extensions to existing waste facilities, where the proposals do not accord with the main urban areas set out in Policy W3, proposals will be permitted where they can demonstrate they have met the above criteria.”

In terms of location, whilst the site is not one which is identified/allocated for waste development in the Site Locations document (which was adopted in December 2017 and supports the CS), the site has been deemed to fall within the definition of 'in or around' a main urban area as referenced in Policies W3 and W4 – in this case being approx. 4.5km outside of Grantham and in close proximity to the A1 and also having direct access onto the B6430 which provides a good transport route into Grantham.

Table 6 of the MWLP outlines the projected C, D & E waste arisings and anticipated management methods for the period 2014 to 2031. These indicate that, when compared to the current position, an additional 60,000 per annum tonnes of C & D and E wastes will need to be managed by 2031.

Table 9 details the forecast capacity gaps in waste processing facilities, with Table 10 providing a summary of the number of new waste facilities that would be needed by type to fill the identified capacity gaps. Table 10 shows that there are no new facilities deemed to be required before 2020 period.

The key development policies of relevance in this case are as follows (summarised):

Policy DM1 '*Presumption in favour of sustainable development*' states that the Council will take a positive approach that reflects the presumption in favour of sustainable development, thus echoing the underlying theme contained in the NPPF. The continuation of recycling within an existing quarry is considered to be an inherently sustainable development which will result in continued efficiencies brought about by the co-location of complimentary activities. Policy DM1 states that such applications should '*be approved without delay*'.

Summary of the Proposal

The operations at Harmston Quarry recover materials from construction and demolition wastes and enable them to be re-used in other infrastructure and construction projects. The recovery and re-use of such materials therefore reduces the overall quantities of waste that may otherwise go to landfill but also helps reduce the demand for the extraction of primary or new virgin materials. The recycling operations therefore represent a sustainable waste management practice and help move the management of wastes up the waste hierarchy.

The continued waste recycling operations are therefore in accordance with the principles and objectives of the NPPF, The National Planning Policy for Waste and Policy DM1 in the Lincolnshire MWLP for sustainable development.

The waste washing process increases the percentage of materials recovered from the incoming waste streams in accordance with Local and National Policy on waste recycling and sustainability and will assist in meeting future targets for inert waste recycling in the region.

Yours sincerely

P. Sharland

Philip Sharland
Senior Planning Consultant