

BOURNEMOUTH, DORSET AND POOLE WASTE PLAN

WRITTEN STATEMENT

MATTER 5

FOR ECO SUSTAINABLE SOLUTIONS LTD

8 JUNE 2018

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1.0 INTRODUCTION

- 1.1 This Statement has been prepared on behalf of Eco Sustainable Solutions in respect of land at Chapel Lane, Parley, Christchurch, BH23 6BG (the Site). The Statement refers to the Bournemouth, Dorset and Poole Waste Plan (Submission Draft).
- 1.2 The Eco Site is identified in Policy 3 of the Submission Draft Plan as an 'Allocated Site' with the *"potential for intensification and re-development, including facilities for the management of non-hazardous waste"*.
- 1.3 In identifying the County's needs, the Submission Draft states that there could be a capacity shortfall of approximately 227,000tpa for managing non-hazardous residual waste at the end of the Plan period. The Submission Draft Plan sets out that there is a need to make provision for facilities to manage residual waste and proposes to achieve this through allocation of sites for intensification or development.
- 1.4 The Eco Sustainable Solutions site is included as Inset Map 7 of the Submission Draft Plan and it states that the site has been assessed for its potential to manage circa 160,000tpa of residual waste.
- 1.5 This Statement responds specifically to the series of relevant questions posed by the Inspector under Matter 5 (Development Management).

2.0 BACKGROUND

- 2.1 Eco Sustainable Solutions Ltd (Eco) operate a comprehensive waste management and recycling facility at Chapel Lane in Parley. Eco have made previous written representations during the consultation periods for the Draft Waste Plan, dating back to September 2015.
- 2.2 The written representations promoted the site as a suitable location to deal with the County's requirements for non-hazardous residual waste. The representations focused on the prospective development of an Energy Recovery Facility as the preferred form of technology for dealing with residual waste. In this regard, Eco have worked closely with their development partner, Veolia, which together with advisers comprise the 'Project Team', to fully understand the development parameters and environmental requirements that are specific to the proposed technology on this site.
- 2.3 There are two principal considerations relevant to the proposed development of an Energy Recovery Facility here:
 - Aviation safeguarding implications for Bournemouth Airport associated with the location of the Eco site within the Inner Horizontal Surface of the Airport and potential impacts on the radar system;

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- Air quality considerations, including emissions dispersion and any associated impacts on the protected habitat designations surrounding the Eco site.
- 2.4 The development partners commissioned Avia Solutions, a specialist aviation consultant and commenced discussions with representatives of Bournemouth Airport. These discussions clarified the physical parameters for development and specifically the height that any building or emissions stack would need to adhere to. To this end, the development partners understand that any built development, including an emissions stack, cannot extend above the Inner Horizontal Surface, which means a maximum height of approximately 42.5metres above ground level on the Eco site.
- 2.5 Following confirmation of the physical development parameters, the development partners commissioned Aecom to undertake air quality modelling, to understand the emissions levels, dispersion characteristics and any associated effects on the protected habitat designations. An Air Quality Assessment was submitted to Natural England for consultation in November 2017. A consultation response was provided by Natural England on 8th March 2018, which set out a series of matters to be addressed.
- 2.6 The consultation with both the Airport owners and Natural England has provided further understanding of the associated aviation safeguarding and environmental measures that are relevant to any planning application for an Energy Recovery Facility.
- 2.7 The air quality modelling and design work is on-going and this is an iterative process which is necessary to achieve the optimum design, configuration and environmental controls for the prospective development. The feedback from the specialist consultants is that the aviation safeguarding measures and environmental requirements are capable of being complied with. In this regard, the Project Team considers that an Energy Recovery Facility is deliverable on the Eco site at Parley.
- 2.8 Notwithstanding these considerations, it is important to note that Dorset County Council's proposed policy refers to the site being suitable to deal with 160,000t of residual waste and it does not stipulate a specific type of technology. In this regard, Eco have the potential to meet the policy requirement through a series of alternative technology options, which are also under consideration and include the following:
- **Residual Waste Processing and Solid Recovered Fuel Production:** This would entail receiving residual waste, processing it to reduce its bulk and weight, removing any remaining recyclable materials and then using the remainder as a prepared fuel for combustion and energy recovery, either on site or elsewhere.
 - **Residual Waste Transfer Station:** This would be a relatively low-tech solution in that residual waste could be received, bulked (or baled) and then exported from site for energy recovery elsewhere. This option would tend to be a short-term solution whilst one of the other technologies is built on site.

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- **Gasification:** This would be an advanced energy recovery process, gasifying and burning waste under reduced oxygen conditions. This option is potentially of higher efficiency than simple combustion but has not proven as robust to date.
 - **Pyrolysis:** This would be an advanced energy recovery process, burning waste under zero oxygen conditions. This option is potentially of higher efficiency than simple combustion but has not proven as robust to date.
- 2.9 An Energy Recovery Facility using moving grate technology provides the preferred technology for Eco and their development partners at this stage. However, it is also important to note that the technologies summarised in Paragraph 2.8 provide alternatives that may be considered further. Each has a different emissions profile and development form that may assist in meeting environmental and other constraints as necessary.
- 2.10 It should be noted that the Site already has consent for a larger biomass plant and other waste operations that involve similar issues of air quality and chimney height. This demonstrates the ability on the site to accommodate appropriate technical solutions with the appropriate assessment and mitigation.
- 2.11 The current and consented processes and these new technologies further emphasise that the Eco site is deliverable with reference to Dorset County Council's proposed Policy 3 and proposed allocation of the Eco site.
- 2.12 Importantly in this case, there is an existing, willing waste and energy operator, with a proven track record and international waste management partner that together can provide the optimum development solution.

3.0 CLARIFICATION REGARDING SITE BOUNDARY AND CAPACITY

- 3.1 Eco's representations on the Pre-Submission Draft Plan (dated 29th January 2018), included objections to two aspects of the Plan: firstly, that the red line boundary of the Eco site should be extended to include an additional 1.04 hectares of land; secondly, that the Eco site has the potential to manage up to 220,000tpa of residual waste, compared to 160,000tpa in the Pre-Submission Draft.
- 3.2 These points of objection have been withdrawn. Eco have further considered how the existing processes on the site can be reconfigured or replaced to accommodate a prospective technology solution, whilst ensuring that existing processes and waste streams are not undermined. They are now content with the extent of the existing permitted red line boundary. The proposed throughput will also be determined by the detailed analysis and initial air quality modelling for the prospective Energy Recovery Facility is based on a capacity of 160,000tpa.

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4.0 INSET 7 – ECO SUSTAINABLE SOLUTIONS

- 4.1 Inspector's questions numbered 92 to 98 refer specifically to Inset Map 7 and the Eco Sustainable Solutions Site. Our responses are set out below.
- 4.2 **Question 92** states: *"Should the Development Considerations state that the applicant must provide sufficient information to enable the Waste Planning Authority to carry out an Appropriate Assessment and set out the information that would be required?"*
- 4.3 **Our Response:** The Development Considerations on Inset Map 7 refer to *"Appropriate assessment in accordance with the Conservation of Habitats and Species Regulations 2017"*. We agree that the Development Considerations should be amended to refer to the Applicant needing to provide sufficient information for the WPA to carry out an Appropriate Assessment.
- 4.4 We anticipate that the EIA and technical assessments would provide the information necessary for an Appropriate Assessment.
- 4.5 **Question 93** states: *"Is there sufficient certainty that effects on the European and Ramsar sites could be adequately mitigated?"*
- 4.6 **Our Response:** An initial Air Quality Assessment was prepared by Aecom and submitted to Natural England for consultation. The consultation response and feedback from Natural England has helped to inform the additional matters that need to be further assessed and factored into the emissions modelling process.
- 4.7 This process has proved to clarify the environmental requirements that will need to be adhered to as part of any planning application and the Project Team considers that these requirements can be complied with.
- 4.8 **Question 94** states: *"Were alternative sites considered in terms of potential biodiversity effects?"*
- 4.9 **Our Response:** The Waste Plan evidences several stages whereby a number of alternative approaches to achieving the vision and objectives of the strategy have been considered and appraised. These alternatives include high level spatial options together with site specific options for addressing the waste management needs are also considered and have developed throughout the preparation of the Waste Plan.
- 4.10 The Options and Alternatives are summarised in Table 20 of the Council's Waste Plan Sustainability Appraisal Report (November 2017). There are no realistic, sustainable or deliverable alternatives that can meet Plan requirements.
- 4.11 A large portion of the County is subject to statutory ecological designations, whilst much of the remainder of the County is subject to designation as Areas of Natural Beauty. This restricts the scope for development of facilities to deal with residual waste.

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- 4.12 The Eco Site is an existing permanent waste facility and is of sufficient size to accommodate new technology to deal with a wider range of residual waste. It is sustainably located close to the main conurbations and sources of arisings. Furthermore, the presence of existing waste streams and processes on-site will allow for resource efficiency to be maximised.
- 4.13 **Question 95** states: *"What is the requirement of developers in respect of long-term restoration of surrounding heathland?"*
- 4.14 **Our Response:** Eco have established a productive working relationship with Dorset County Council and Natural England in the restoration and long-term management of the surrounding heathland. This has involved phases of heathland creation as part of former mineral working and previous phases of development. Current arrangements for management of neighbouring heathland is enshrined in a S106 Agreement (dated 1/8/2016), which relates to the site's last major planning permission (Ref: 8/14/0515).
- 4.15 The S106 Agreement requires that Eco pay an annual contribution to Dorset County Council's management of the 5.54 hectares of lowland heathland and woodland to the immediate south of the Eco site which helps connect adjacent areas of heath.
- 4.16 The same Section 106 Agreement required Eco to undertake heathland restoration for an area of 4.6 hectares on the opposite side of Chapel Lane. This work was carried out by Eco in accordance with a Landscape and Ecological Management Plan, which was submitted to and approved by Dorset County Council.
- 4.17 **Question 96** states: *"Is any of the heathland within the allocated area?"*
- 4.18 **Our Response:** None of the heathland is within the allocated area and Eco are not proposing to extend into the heathland habitat.
- 4.19 **Question 97** states: *"If developers would be required to carry out or contribute to restoration of heathland, how would any contribution be justified in terms of the national policy tests for conditions and planning obligations?"*
- 4.20 **Our Response:** We would consider that any contribution to the restoration of the heathland would need to consider the effects of any proposed development, as well as any cumulative alongside previously-consented developments. If there were no significant impact to mitigate or offset, no additional restoration could be justified. The contribution would need to comply with Regulation 122 of the Community Infrastructure Levy Regulations 2010 (as amended), which sets out the following criteria for contributions:
- (a) necessary to make the development acceptable;
 - (b) directly related to the development;
 - (c) fairly and reasonably related in scale and kind.

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- 4.21 **Question 98** states: *"Should the Development Considerations include a requirement to create a buffer zone in the south-east section of the site and carefully designed surface water drainage system as recommended in the Habitats Regulations Assessment?"*
- 4.22 **Our Response:** There is a buffer zone already present in the form of the restored landfill area between the existing permitted waste management site and Hurn Common SSSI, which lies between the site and Aviation Park West, including areas of heathland creation and other planting.
- 4.23 The restoration area between the Eco site and Hurn Common SSSI has been expanded and maintained at Eco's expense, as part of works undertaken in accordance with the Section 106 Agreement.
- 4.24 The current site already has a comprehensive surface water management system designed as part of recent development. This keeps surface water separate from process water and prevents contamination. The site also has a dedicated discharge main to Palmersford Sewage Treatment Works. This has been informed by process management, FRA and SUDS principles. The principles of this system would be maintained in any redevelopment.

5.0 POLICY 20 – AIRFIELD SAFEGUARDING AREAS AND INSET 7

- 5.1 Question 106 refers to Policy 20 and the relationship between the Airfield Safeguarding Areas and Inset Map 7. The question and our response are set out below.
- 5.2 **Question 106** states: *"Has any detailed investigation been undertaken with respect to the likely stack height required on the Inset 7 site and has any view been expressed by the Civil Aviation Authority?"*
- 5.3 **Our Response:** The consultation undertaken with representatives of Bournemouth Airport has informed the design process and the stack height for an Energy Recovery Facility would need to be kept below the Inner Horizontal Surface of the Airport "which is at a level of 45 m above datum. Having regard to existing levels on the Eco site, this would mean that the stack height would be limited to a maximum height of approximately 42.5metres above ground level.
- 5.4 The on-going emissions modelling is based on a stack height that lies below the Inner Horizontal Surface and as such, the emissions point is 42.5metres.
- 5.5 The discussions regarding the aviation safeguarding have been hindered by the sale of Bournemouth Airport to Regional and Cities Airports (RCA) in November 2017. There followed a six-month safeguarding handover period, during which all discussions were put on hold. Discussions are now re-commencing with RCA as the safeguarding authority for the Airport.

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6.0 POLICY 21 – SOUTH EAST DORSET GREEN BELT

- 6.1 Questions 111 and 112 refer specifically to the Eco site's location within the South-East Dorset Green Belt. Our responses are set out below.
- 6.2 **Question 111** states: *"Have alternative sites which are outside the Green Belt been considered and if so, which ones?"*
- 6.3 **Our Response:** The preparation of the Waste Plan involved consideration by Dorset County Council of alternative sites located outside of the Green Belt. The Options and Alternatives considered by the Council are summarised in Table 20 of the Waste Plan Sustainability Appraisal Report (November 2017).
- 6.4 Other sites outside the Green Belt present challenges, notably in terms of accessibility, ecological constraints, landscape and visual effects. There are no suitable or available sites in the urban areas. The Green Belt covers all the area of Dorset around the main centres of population and AONB covers much of the remainder. Thus, if both were avoided, it severely limits options to much less sustainable locations. The greenfield status of some sites renders them unsuitable and poses questions regarding their deliverability.
- 6.5 The proposed site is a brownfield option and a major developed site already in waste use. The red line boundary of the site will remain as permitted.
- 6.6 The redevelopment of existing developed sites is considered acceptable in Green Belt policy. Considering the need for sustainable waste management facilities, lack of alternatives and existing developed state of the site, the proposed allocation constitutes very special circumstances, which justifies a proposed facility on previously-developed land within the Green Belt.
- 6.7 **Question 112** states: *"Would the increase in built form and the stack which would be necessary to minimise the impact of emissions on the European site be likely to cause further harm to the openness of the Green Belt?"*
- 6.8 **Our Response:** The prospective Energy Recovery Facility would be located within the boundary of an existing, permanent waste site with an overall area of 16.06 hectares. The site is already developed and is approved for comprehensive redevelopment comprising a variety of waste management and recycling processes.
- 6.9 The built form and emissions stack of a new facility may have a localised effect from a landscape and visual perspective. However, the present buildings and surrounding context is relevant in considering any harm to the openness of the Green Belt. There are large-scale solar energy installations located to the north, east and west of the site, whilst the area to the south is characterised by the cluster of buildings associated with the Airport and Aviation

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Business Park. In this context, the intensification of the Eco site is unlikely to materially detract from the openness of the Green Belt in this area.

- 6.10 The previous three major planning applications on the site were referred to the National Planning Caseworks Unit (NPCU) and on each occasion the NPCU confirmed that the development of the site would be acceptable in terms of Green Belt policy.

7.0 CONCLUSION

- 7.1 This Written Statement responds specifically to a series of questions raised by the Inspector under Matter 5.
- 7.2 The Statement supports Dorset County Council's allocation of the Eco Sustainable Solutions site identified in Policy 3 and on Inset Map 7 of the Submission Draft Plan, which states that the site has the potential for intensification and re-development, including facilities for the management of non-hazardous waste.
- 7.3 We would respectfully submit that the site is deliverable for this allocation including possible Energy Recovery Facility, or alternative technologies which would deal with non-hazardous residual waste.