
BDP WASTE LOCAL PLAN EXAMINATION FURTHER STATEMENT

on behalf of

WH WHITE LIMITED (1151897)

in relation to

MATTER 1

LEGAL COMPLIANCE

1. Introduction

- 1.1 I am a chartered town planner with 20 years' experience and knowledge accumulated in consultancy, the corporate sector and the public sector. I have previously worked in the planning policy team at Borough of Poole and led the planning policy team at neighbouring Purbeck District Council. I am therefore well versed in the key issues, challenges and opportunities presented in the emerging Waste Local Plan. I founded Chapman Lily Planning in 2015 and the company is engaged in a wide variety of planning projects and proposals, a number of which involve the ever-evolving interpretation of the Habitats Regulations. I am familiar with the main points of reference and the attributes and sensitivities of the Dorset Heaths.
- 1.2 I am also a chartered waste manager with around 12 years' experience of working within the waste and resources sector. I led the Planning, Property and Permitting Team at a national waste management company (New Earth Solutions Group) which provided an invaluable insight into the operational requirements of the business and the wider regulatory framework. I have secured planning permissions for an array of different waste treatment and disposal facilities including Material Recovery Facilities (MRF), Mechanical Biological Treatment (MBT) facilities, Anaerobic Digestion (AD) plants, Advanced Thermal Treatment (ATT) plants, open windrow composting facilities and inert landfill.
- 1.3 On behalf of my client, WH White Ltd ["WHW"], I have actively engaged in the emerging Waste Local Plan. WHW own the site control centre and neighbouring Whites Pit (in former residual landfill site) at Canford in Poole.
- 1.4 The Site Control Centre occupies a discreet parcel of land, measuring c.6.7ha. It is located on the edge of the Poole-Bournemouth-Christchurch conurbation and enjoys excellent access to the strategic transport network. The site hosts:
- A fully licenced Mechanical Biological Treatment ["MBT"] facility operated by New Earth Solutions, capable of treating up to 125,000tpa of residual waste.
 - A fully licenced Materials Recovery Facility ["Dirty MRF"] operated by CRL, capable of treating up to 175,000tpa of residual waste and recyclates, as well as a small proportion of hazardous wastes.
 - A fully licenced Low Carbon Energy facility employing Advanced Thermal Treatment ["ATT"] technology operated by Syn-gas Products, converting refused derived fuel into low carbon energy.
 - A bank of landfill gas engines operated by CRE which have continuously exported renewable energy to the local distribution grid for over 20 years.

- 1.5 The Site Control Centre presents the mainstay of Bournemouth Dorset and Poole's municipal residual waste treatment capacity, as well as handling significant quantities of C&I.
- 1.6 WHW operated Whites Pit landfill prior to its transfer to Biffa and has more recently overseen its closure and restoration. Whites Pit hosts an aggregates recovery plant capable of treating up to 250,000tpa of construction, demolition and excavation ["CD&E"] waste.
- 1.7 WHW has continued to invest in site infrastructure. WHW has also helped to pioneer new waste treatment technologies and considers the Site Control Centre to be capable of intensification and expansion.

2. Question 12

Have alternatives to Inset sites 1, 7 and 10 been considered with respect to ecology?

- 2.1 WHW has consistently questioned whether the Waste Planning Authority ["WPA"] had sufficient information to conclude that the development of residual waste treatment facilities at Eco Sustainable Solutions (inset 7) and Binnegar Environmental Park (inset 10) would not, either in isolation or in combination, have an adverse impact on the integrity of the designated Dorset Heathland SPA/SAC and the protected species therein.
- 2.2 For ease of reference, WHW's representation to the Pre-submission Plan dated 25th January 2018 forms appendix [A] of this further statement. Having regard to the modifications tabled by the WPA, WHW's concerns remain unresolved.
- 2.3 WHW has also previously highlighted the availability of latent residual waste treatment capacity at the site control centre at Canford – provided by the extant consent for an enlarged Dirty MRF. In the interest of brevity, I would draw particular attention to pages 9-10 of WHW's representation to the Pre-submission Plan dated 25th January 2018. I would stress that this capacity can be liberated without further recourse to the planning system and that there is intent on the part of both the landowner (WHW) and the current operator (CRL) as demonstrated by the letter forming appendix [B] of this further statement.
- 2.4 The photo below shows the progression of the first phase of the consented extension to the Dirty MRF, which once fully built out will see a series of high bay linked buildings to fully enclose waste processing activities.



- 2.5 WHW welcome the fact that the WPA is seeking to introduce modifications (page 4 of the WPA's *'Key Issues raised with Officer Response'* published March 2018) to allow greater flexibility in the allotment of treatment capacity. However, this should not distract from the fact that this source of residual waste capacity has been overlooked and that its inclusion erodes the need to identify new sites elsewhere in the plan area.
- 2.6 WHW note that the WPA's proposed modifications infer that the release of additional capacity for residual waste treatment will be subject to the satisfaction of policy criteria. However, the extant permissions already allow for a broader range of wastes including residual, such that no further permissions would be required. I would also emphasise that there would be no adverse economic, social, environmental impacts as the proposal would be contiguous to the established base line.
- 2.7 On the basis of the above, it is evident that there are credible alternatives that have yet to be fully explored and taken into account in the Plan. WHW contend that such alternatives are not duly reflected in the Habitats Regulations Assessment accompanying the Submission Plan.

3. Question 13

Has any information from operators of potential energy from waste plants on Inset sites 7 and 10 regarding emissions and mitigation requirements been provided following the Habitats Regulation Assessment?

- 3.1 This is clearly a matter for the WPA. However, on behalf of WHW, I would respectfully request the right to participate in this session and to review and comment upon any supplementary information relating to emissions and / or mitigation.