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# **BDP WASTE LOCAL PLAN EXAMINATION FURTHER STATEMENT**

on behalf of

**WH WHITE LIMITED (1151897)**

in relation to

**MATTER 2**

**SPATIAL STRATEGY AND ALLOCATIONS**

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## 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 21

*How would development of the allocated sites safeguard and enhance local amenity, landscape and natural resources, environmental, cultural and economic assets, tourism and the health and well-being of the people?*

- 2.1 With respect to the allocation of the Site Control Centre, I would make the following observations:
  - The strategic location of the Site Control Centre in close proximity of the main sources of waste arisings (homes and businesses within the conurbation) allows for an efficient kerbside collection regime within Bournemouth, Poole and Dorset and helps to reduce waste miles. Thus, it is consistent with the proximity principle and assists local residents and businesses in fulfilling their social responsibilities. The issue of waste generated through tourism (particularly visits to the beach) has received significant press attention over the last fortnight. Again, local treatment capacity, combined with education initiatives, can help mitigate the impacts. Waste treatment is part of the essential infrastructure of the local area; responsibly operated sites in discreet locations, such as the Site Control Centre serve to safeguard amenity, landscape, natural resources and environmental assets.
  - The co-location of complementary processes enables waste to ascend the waste hierarchy using the most appropriate technology. This provides a one-stop which can assist local collection authorities employing split bodied Refuse Collection Vehicles – again this helps to reduce waste miles.
  - The Site Control Centre benefits from established infrastructure in the form of the dedicated private access road, internal circulation roads, weighbridges, enclosed buildings, decentralised on-site low carbon energy generation and private wire

arrangements. There is an ongoing programme of investment. Thus, the liberation of additional latent capacity has a reduced impact relative to a new standalone facility.

- The outputs produced through the treatment of waste at the Site Control Centre are already put to beneficial use; For instance, compost like output from the MBT process has been utilised in the restoration of the adjacent Whites Pit landfill, displacing the need for artificial nitrogen-based fertilizers and the impact that this would otherwise have upon environmental assets.
- The Site Control Centre plays host to an R&D programme, which is seeking to optimise modular ATT technologies. This has generated significant interest both nationally and internationally and attracted new investment. The Dorset LEP views the environmental technology sector as a strength and opportunity for growth, sitting comfortably with the high natural capital of the area. The existing and proposed operations therefore serve to bolster the areas economic assets.
- The opportunity exists to further advance the economic, environmental and social benefits through the export of heat (via a distribution grid) to a recently consented 16,000sqm business park some 400m to the east. A gas main runs alongside the site presenting the spectre of directly injecting gas (meeting a specification under an end of waste protocol) derived from the treatment of waste. Such initiatives are helping to support the wider transition to a low carbon economy. The existing and proposed operations therefore serve to support and enhance the areas economic assets.
- The Site Control Centre enjoys a discreet location, and a high degree of enclosure. Waste treatment is part of the essential infrastructure of the local area; responsibility operated sites in discreet locations, such as the Site Control Centre serve to safeguard amenity, landscape, natural resources and environmental assets.
- The Site Control Centre benefits from a proven operational track record. There is ample separation distance between it and the nearest residential receptors.

### 3. Question 22

*How would development of the allocated sites seek to optimise the location of facilities and travel modes and distances? How would use of sustainable transport modes be promoted?*

3.1 With respect to the allocation of the Site Control Centre, I would make the following observations:

- The strategic location of the Site Control Centre in close proximity of the main sources of waste arisings (homes and businesses within the conurbation) allows for an efficient kerbside collection regime within Bournemouth, Poole and Dorset and helps

to reduce waste miles. Thus, it is consistent with the proximity principle and assists local residents and businesses in fulfilling their social responsibilities. The issue of waste generated through tourism (particularly visits to the beach) has received significant press attention over the last fortnight. Again, local treatment capacity, combined with education initiatives, can help mitigate the impacts.

- The co-location of complementary processes enables waste to ascend the waste hierarchy using the most appropriate technology. This provides a one-stop which can assist local collection authorities employing split bodied Refuse Collection Vehicles – again this helps to reduce waste miles.

#### **4. Question 23**

*Would any of the allocations result in significant adverse impacts that could not be acceptability mitigated? In such cases how have the benefits of allocation been demonstrated to outweigh the detriment?*

- 4.1 WHW has raised concerns about potential significant adverse impacts associated with sites 7 and 10. In the interest of brevity, I shall not repeat the concern set out in my response to the Pre-submission Draft but will look to rely upon it at the EiP.

#### **5. Question 24**

*The spatial strategy in respect of strategic recycling facilities states that “The strategy is based on the assumption that one of two permitted material recovery facilities (MRF) becomes operational in the early part of the Plan period”. Would development of one of the two permitted facilities be sufficient or would further MRF be required?*

- 5.1 I believe that only one would be required; but notwithstanding this would point to the fact that the established Dirty MRF (as consented to be extended) already processes a wider range of material and that the focus is shifting to the treatment of residual waste as indicated by WHW and the current operator (CRL). I would reaffirm that this can be taken forward without any further recourse to the planning system.
- 5.2 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.

