
BDP WASTE LOCAL PLAN EXAMINATION FURTHER STATEMENT

on behalf of

WH WHITE LIMITED (1151897)

in relation to

MATTER 3

FORECASTS AND NEED FOR NEW FACILITIES

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 26

Is the planned provision of new capacity based on robust analysis of best available data and information, and an appraisal of options?

- 2.1 No. For the reasons set out in WHW's response to the Pre-submission Draft, account has not been taken of the scope for residual waste treatment within the established Dirty MRF at the Site Control Centre. As such the Plan makes significant over-provision.

- 2.2 The photo inset right 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.



3. Question 38

How would the policies provide for a good spatial distribution of localised facilities for food waste with energy recovery?

- 3.1 The policies would seemingly fail to deliver any meaningful spatial distribution. WHW advocate a network, which harnesses opportunities to deliver decentralised heat and power either through private wire / network connections or via the local distribution grid to minimise transmission losses.

- 3.2 WHW is concerned that without the inclusion of allocated sites for food waste treatment, including anaerobic digestion, the projected shortfall in capacity will not be met and the Plan will prove ineffective. Having regard to paragraph 6 of National Waste Planning Policy (annexed to the Waste Management Strategy for England), I contend that the omission site adjoining the Site Control Centre should be allocated for food waste treatment. The case for this site, together with a shadow sustainability appraisal was set out in WHW Whites response to the Pre-submission Draft.

4. Question 40

Policy 2 – Integrated waste management facilities. Should Policy 2 describe what ‘complementary activities’ are likely to be?

- 4.1 Yes, at least in the supporting text. Complementary activities can take a number of forms; but encompass polishing facilities whereby further tiers of processing might take place pursuant to optimising the value of end products derived from waste (with the ultimate aim of reaching an end of waste protocol). This is considered consistent with the waste hierarchy.

5. Question 41

Policy 3 – Sites allocated for Integrated waste management facilities. How do the proposed allocations accord with national policy on Green Belt, AONBs and with the requirements of the Habitats Regulations?

- 5.1 It is important to stress that none of the above policy designations or Regulations preclude waste management facilities. Rather more each site needs to be considered on its merits having regard to site-specific circumstances. Crucially there must be confidence that allocated sites have been robustly assessed, are deliverable and therefore render the plan effective. In all circumstances, it will be important to have regard to credible alternatives.
- 5.2 With respect to Green Belt, national policy is set out at paragraphs 88-90 of the NPPF as supplemented by paragraph 6 of the National Planning Policy for Waste (annexed to the Waste Management Strategy for England). It is evident that site specific circumstances will inform whether the individual allocations would constitute ‘inappropriate development’ or not. However, having regard to the potential technologies to be employed at Eco Sustainable Solutions it is my contention that they would constitute inappropriate development as the scale would go well beyond what might be regarded as infill and would fail the openness test.

- 5.3 For the reasons cited in WHW's response to the Pre-submission Draft, I do not believe that the inclusion of sites 7 and 10 would be consistent with, not compatible with, the Habitats Regulations owing to a lack of information and certainty.

6. Question 42

Policy 3 – Sites allocated for Integrated waste management facilities. Is it necessary to say in the second paragraph of Policy 3 that proposals are acceptable in principle.

- 6.1 No.

7. Question 43

Policy 3 – Sites allocated for Integrated waste management facilities. Should text be added to make clear that Inset 1 (Woolsbridge Industrial Estate) is allocated for a strategic bulky waste facility as well as a local waste management facility?

- 7.1 Yes.

8. Question 46

Policy 3 – Sites allocated for Integrated waste management facilities. How would waste management facilities on the allocated sites potentially affect the quality of life of people living nearby and are the Councils confident that impacts could be mitigated to acceptable levels? Please describe the potential impacts on quality of life and how the policies would provide for adequate mitigation.

- 8.1 I believe that this is appropriately explored through the Sustainability Appraisal accompanying the emerging Plan.

9. Question 47

Policy 3 – Sites allocated for Integrated waste management facilities. In respect of the allocated sites would there potentially be cumulative impacts on quality of life?

- 9.1 The co-location of activities will heighten the perception of cumulative impacts; perhaps most notably traffic movements, albeit localised. With respect to the Site Control Centre, this benefits from a discreet location and is served by a dedicated private access road connecting to Magna Road. This is identified as a main freight route and thus is eminently suitable to support the intensification of the site control centre.

- 9.2 There is also scope for cumulative impacts by virtue of noise, disturbance and air quality. However, with a move towards full enclosure (essential when treating residual waste) such impacts, in isolation and / or cumulative can be mitigated. With respect to the operations undertaken at the Site Control Centre, the site has a strong track record of collaborative working encouraged by WHW as landlord.