

Issue 5 Topic Paper

Specific Sites

Whether the specific sites allocated in policy WCS4 will deliver the required waste management capacity and whether other sites proposed are required to be allocated for the CS to be sound.



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Contents

- 1. Issue 5: Specific Sites – General Comment**
- 2. Question 1: Javelin Park**
- 3. Question 2: Wingmoor Farm West**
- 4. Question 3: Wingmoor Farm East**
- 5. Question 4: Land at Moreton Valence**
- 6. Question 5: Land at Sharpness Docks**

Issue 5: Specific Sites General Comment

Whether the specific sites allocated in policy WCS4 will deliver the required waste management capacity and whether other sites proposed are required to be allocated for the CS to be sound.

- 1.1 In relation to all of the Issue 5 questions, Strategic Objective 3 and WCS4 (CD1.1) outline the capacities required for both MSW and C&I waste. This gives a combined total of between 293,000 and 343,000 tonnes per annum. Examples of how this can be achieved in terms of estimated landtake are illustrated in paragraphs 3.25-3.26 and Table 3 on page 34 and paragraphs 4.79-4.82 on page 52 of the WCS (CD1.1).

2. Question 1: Javelin Park

Question 5.1 CD1.11 proposes (FC44) that the boundary of the site be redrawn to reduce the area substantially. Is the remaining site large enough to accommodate the uses proposed?

- 2.1 The WPA considers that the remaining site is large enough to accommodate strategic waste management uses as discussed in the supporting paragraph 4.63 to FC44 in CD1.11. The generally appropriate size of strategic sites has been considered throughout the preparation of the WCS (see Preferred Options evidence papers CD10.9, CD10.10, and Site Options CD10.17). This is discussed in Topic Paper 2, Question 6 (2.12 – 2.14) (CD 13.12).
- 2.2 The most relevant national guidance on the potential indicative land requirements for waste management facilities is set out within the ODPM Research Study '*Planning for Waste Management Facilities*', 2004 (CD12.5). A summary of this is set out in the Regional Waste Strategy (CD11.36 page 83). This demonstrates that 5ha of land would be sufficient to accommodate the likely scale of facility that would be located at the site.
- 2.3 In addition, the two preferred bidders that were remaining in the residual MSW contract process up until December 2011, have recently held exhibitions with the WDA (details can be found on <http://www.recycleforgloucestershire.com/recover/downloads/index.html>) (CD13.20 and CD13.28). Both bidders indicated that they would accommodate their proposed facility entirely within the reduced site area boundary. The now preferred bidder (Urbaser/Balfour Beatty) also recently submitted a request for a scoping opinion from GCC for Javelin Park ((CD13.19), which has been assigned reference 11/0068/STMAJW on the GCC Public Access system. Page 66 of the report clearly shows the proposal for a 190,000 tonnes per annum facility fitting within the proposed boundary change indicated in FC44. Both this scoping opinion request and the emerging proposals from the two bidders demonstrate that the amended site can accommodate a significant part of the capacity gap in provision, including potentially all the identified MSW c.150,000 tpa capacity.
- 2.4 Please also refer to the general paragraph 1.1 above under Issue 5 which signposts the appropriate evidence for capacity requirements within the WCS.

Question 5.2 The Landscape and Visual Impact assessment (CD1.1 Appendix 5 Site 3) implies that the fallback position of the extant outline permission is a significant factor. How does this permission compare in terms of footprint and size of buildings with those proposed in the CS and how realistic is this fallback position?

2.5 An outline planning permission (S.05/2138/VAR) and five reserved matters permissions have now been permitted on the site (S.07/2474/REM, S.07/2473/REM, S.07/2472/REM, S.07/2471/REM, S.07/2468/REM) (CD13.31). I should be noted that various pre commencement conditions of the outline permission have been implemented. The reserved matters permissions would allow several combinations of building footprints as individual permissions across the entire site including County Council owned land, which would imply that a potential developer for either part of the site could implement whichever permission would be most appropriate to them. The fact that five separate reserve matters permissions have been applied for and granted indicates the landowner's intention for the remaining parts of the Consi/Grafton Gate land to be developed. Whether or not this occurs is a matter for the landowner to determine. The landowner obtained an extension to the time limit for implementation of the reserved matters permission (S.10/0590/VAR) and these (as above) now need to be implemented by April 2013. The most comparable permission to the proposed reduced site boundary under FC44 is S.07/2474/REM (on County Council owned land) which is for *the erection of a storage and distribution warehouse (24,891sqm), including landscaping works and internal access and parking arrangements. [Application pursuant to Outline planning permission S.05/2138]*.

2.6 Within the above mentioned permissions, Javelin Park has been split into either 2 or 3 separate areas. In each permission the northern sector (outside of County Council ownership) has an independent building or building(s) to those parts of Javelin Park within the County Council's ownership. Therefore it is a possibility that the fallback position for the northern (Consi/Grafton Gate land) could occur.

2.7 The potential scale required for a strategic waste facility (land take and building height) is considered in CD 12.5 and evidence paper CD10.10. The likely land take for a waste facility (ranging from 2000-9000m²) as outlined in Appendix 5 of CD1.1 is a considerably smaller footprint than the B8 planning permissions, however, the height of the building could be comparable with an MBT facility at 10-20m. An energy from waste facility could result in a larger building at 25-30m and a stack height of 60-80m (CD10.10) – the scoping report from Urbaser/Balfour Beatty (CD13.19) does however suggest up to a 40-50m building in places with a 70-80m stack height may come forward on this site. The current B8 planning permission is for a building height at 15.7m therefore the scale and type of waste management

facility which comes forward will dictate how they relate to the existing B8 planning permission.

2.8 However, the landscape and visual impact general development criteria in Appendix 5 of the WCS are standard sizes developed to cover a wide range of facility types based on guidance in CD12.5 and also referred to in evidence paper CD10.10. The preferred bidder in the waste procurement process has indicated energy from waste as their preferred technology and from the information so far submitted the proposals would result in buildings higher than the B8 uses permitted. When the energy from waste proposal comes forward the general and key development criteria contained in Appendix 5 of CD1.1 would need to be applied. The particular site conditions and the potential landscape matters to be considered are contained under Inset Map 3 for Javelin Park (Appendix 5 CD1.1). These matters are all derived from the Landscape and Visual Impact (LVIA) study prepared by Atkins on behalf of the WPA and incorporated into the Site Options consultation stage (CD4.1, CD10.17 and CD10.31). Further discussion of landscape issues is outlined under Site Options as discussed in Question 5.3 below.

Question 5.3 The order of the required stack height of a thermal facility is known and any built waste management facility having the capacity required is likely to be within a large building or buildings. How does the CS ensure delivery of the landmark facility required in these circumstances (CD1.1 Appendix 5 Site 3 Key Development Criteria)? [Note: how the Key Development Criteria are to be taken into account in policy terms is a matter common to each site]

2.9 The WCS (CD1.1, Inset 3, Appendix 5 Landscape Criteria) identifies that there is potential to create a landmark facility for waste management. Failure of a proposal to adhere with the Key Development Criteria will not be in compliance with the WCS. However, if the Inspector felt that the policy wording required strengthening, then the following line could be inserted into the body of the Policy WCS4:

Planning permission for waste facilities will only be granted within the outline boundaries of the site allocations as denoted in Appendix 5, where it can be demonstrated that the requirements of the Key Development Criteria have been met.

2.10 Appendix 5 of the WCS (CD1.1) identifies the key development criteria which would need to be considered for any proposals coming forward at this site. The original (LVIA) considered the potential effects of the proposals for a built Waste Facility, of two to five hectares within the Javelin Park site, on the landscape resources and impacts on the visual amenity of the area. The assessment considered the possible building height and land take for three different facility sizes (2000-6000m², up to 20m in height; 3000-7000m², up to 30m in height; 4000-9000m², up to 40m height) each with a potential for an emissions stack of 40, 60 or 80m height.

2.11 Taking account of the existing business use permissions for the site, the baseline conditions of the site was considered in the context of a distribution / warehouse business park. As such, the development of a small to medium sized waste facility without an emission stack would be likely to result in a negligible impact, while a larger facility or the inclusion of an emission stack would likely have a slight to moderate impact, depending on the style and quality of the adjacent development. The Javelin Park site was considered to have a medium to high capacity to accommodate change.

2.12 There is a potential impact resulting from the permanent alteration of the site in terms of scale, height and intensity of development with a facility both taller and larger than the permitted B8 units, however as noted above, the original LVIA considerations were based on a 2ha to 5ha development area for the waste facility. Implicit in this therefore was that part of the overall 11.2ha site would be B8 development. A fallback position of the entire site area being developed as B8 use

only, was not considered.

2.13 In considering mitigation, it is noted under the Key Development Criteria (Appendix 5 CD1.1) that "*There is the potential to create a landmark facility as a gateway to Gloucester to present a high quality architectural statement.*" It is considered that nationally the precedent for such an approach in landscape terms has been set by, for example, Grundon's Colnbrook Energy from Waste Plant. Development of this sort may be identified as a quality standard for future development of this site. Accepting a mix of a waste facility and B8 development, the development will be seen in the context of the wider development and a range of building heights.

2.14 In addition, Core Policy WCS11 (AONB) (CD1.1) sets the criteria to control development and deliver appropriate design for developments within or affecting the setting of the AONB. Core Policy WCS13 (Design) (CD1.1) is the key policy consideration, alongside other relevant planning policy and guidance, in ensuring the delivery of a landmark facility. It specifically addresses the need for the use of high quality architecture and landscaping. Within this section of the WCS there is specific reference to PPS10 and to the DEFRA guidance, in partnership with CABE, on the design of waste facilities (CD12.10). In particular PPS10 paragraph 35 (CD12.31) states that '*waste management facilities in themselves should be well designed, so that they contribute positively to the character and quality of the area in which they are located.*' Paragraph 4.260 (CD1.1) provides photographs of two built examples showing the degree of design innovation required.

2.15 Section 5 of the WCS (CD1.1) page 102-103) highlights the delivery mechanism of how Core Policy WCS13 will be implemented and in Section 6 (pages 126-127) it is noted how the relevant aims, objectives and targets of the WCS will be monitored. Section 5 of the WCS also notes that design quality will ultimately be delivered having regard to the issues of design and layout through the submission of a Design and Access Statement.

5.4 What other factors might affect the deliverability of this site?

2.16 The WPA considers that it has followed the procedure to identify suitable sites outlined in paragraphs 20 and 21 of PPS10 (CD12.31). Therefore, measures have already been taken to effectively screen out sites which could be potentially undeliverable for a variety of reasons including location, transport, landownership and environmental constraints. In order to prepare the Site Options consultation paper (CD4.1) and other supporting consultation documents (CD4.2-CD4.11), detailed assessments were made on each of the 110 sites considered in CD10.17 and the Appendix which specifically deals with Javelin Park (CD10.31). This contains

details of all potential constraints to deliverability and how they were considered. CD4.4 summarises the issues and identified how they could be taken forward into the WCS (CD1.1).

- 2.17 For Javelin Park, the site schedule within the Appendix 5 of the WCS (CD1.1) details the relevant criteria which was based upon the references contained within CD10.31 and details issues which must be satisfied at the planning application stage before permission can be granted. These include highways/transport, ecology/HRA and landscape assessments.

3. Question 2: Wingmoor Farm West

5.5 If the required facility for the residual MSW contract cannot be delivered at Javelin Park, the clear implication of the CS is that this is the only other site put forward for a 150,000 tonnes per annum facility. Is this interpretation correct?

3.1 All sites have potential for MSW waste treatment and it is possible that if the contract cannot be delivered at Javelin Park then it could be delivered across two or more sites as part of a multi-site solution or by a one site solution. The only site for which the WCS makes a distinction over possible limitation in the scale of operation is Wingmoor Farm West (Site B) (See CD 1.1 paragraphs 4.93 – 4.98). Guidance in CD12.5 suggests that larger scale waste management facilities of up to 250,000 tpa may occupy land between 2- 5ha. It would appear that except perhaps for Wingmoor Farm West (Site B) that the other sites can in principle accommodate a plant of at least 150,000 tpa subject to satisfying the criteria of the WCS in Appendix 5 (CD1.1). If Javelin Park cannot be delivered then clearly the other sites and methods of waste management would need to be considered. The WCS is sufficiently flexible and makes suitable provision for this to be achieved.

5.6 The Park (Area A) (CD1.1 Appendix 5, site 2) appears to be occupied by existing businesses. What is the delivery mechanism and timescale for this part of the allocated site?

3.2 The land is within control of the waste operator who promoted the site and who has recently gained permission (April 2011) for an In-Vessel Composting facility at The Park. Condition 1 of the permission requires implementation by April 2014.

3.3 There was also an application submitted by Cory (T.05/3176/0623/FUL) for the Construction of a Resource Recovery Park which was validated on 16th April 2005 and withdrawn on 22nd September 2010. The application was for a total throughput of 160,000 tpa on the site. This would have managed 25,000tpa of waste via an Anaerobic Digestion facility and 135,000tpa through a MBT facility. Although the application was withdrawn by the applicant, it does demonstrate in principle that the site has potential to deliver strategic waste management development. However, the delivery mechanism and timescale for future waste management facilities would be a matter for the waste operator as and when a planning application comes forward. The timescales for this part of the Inset 2 allocation will be dependent on how the business plan of the waste operator progresses at this site. If the IVC is implemented by 2014 and current operations continue any strategic development at this site might be in medium or longer term of the WCS plan period.

5.7 Green Belt policy in general terms is the subject of Issue 3. Although there may be some built development on Part B, the rationale for development here appears to be that the site is fundamentally an operational landfill and thus a change of use of the land with the ultimate aim of restoration to a use compatible with the Green Belt location. What is the timescale for this, how does it relate to the Plan period or the residual MSW contract period and what, given the likely development to come forward is meant by demountable buildings in the Green Belt Key Development Criteria?

- 3.4 The landfill permission under which the operator is working does not have a prescribed end date therefore the potential timeframe relates to rates of fill against the available void space. CD10.4 Section 11 page 84 outlines the latest position on this. However, through other issues raised on the landfill policy, Cory, the operator, indicated the likely lifetime of this site, which could conceivably last beyond the end of the WCS plan period at 2027. The contract for disposal of MSW to landfill has recently been extended to Cory to 2018, reflecting implementation of the residual waste contract plant, which is intended to commence operation in 2015. In this scenario a large percentage of MSW which is currently landfilled would be diverted to treatment. The intention is that the residual waste project would run for 25 years, therefore potentially to 2040 (see Outline Business Case for PFI, paragraph 1.4.1.3 – CD13.26).
- 3.5 The actual landfill site is operating under permission 97/5443/0826/FUL, granted 22nd April 1998. This does not have a fixed end date. Subsequent to the granting of this permission, there have been several permissions granted for various temporary activities on site such as storage facilities, inert recycling facilities and waste transfer. These have all been for a short fixed-term period such as 2 or 5 years, or have all been tied into the life of the landfill. However, activities at the Park (WCS Inset Map 2 site A) such as the permitted IVC plant will operate independently of landfill operations and do not have any fixed end date. As referred to in Topic Paper 2 (CD13.12), Question 4 (landfill) any proposal coming forward has scope to intercept waste already coming to Wingmoor Farm West for landfilling. Therefore any recovery of that waste would have scope to husband the capacity of the landfill over a longer time frame. Therefore any recovery proposals coming forward could potentially have a condition to link to the life of the landfill. That may be well after the end date of the WCS
- 3.6 The term Demountable Buildings arose from the Planning Inspector's report of the Waste Local Plan (WLP) (August 2002) (CD13.32). The Inspector recommended Site Specific Criteria for Development (paragraph 4.20.22, chapter 4 page 31 of the Inspector's Report). GCC's assumption is that the term is used in the context of buildings which are non-permanent and can be easily removed at the end of the time period, allowing the site to be restored in a way that will accord with Green Belt

policy in PPG2 (CD12.27). The Inspector outlines this in paragraph 4.20.9 (13.32). This was included in the WLP (2004) itself (CD11.8). When the Key Development Criteria for the sites were being written, it was decided that circumstances had not altered in relation to Green Belt and therefore the criterion was appropriate to be used within the WCS, particularly as it had arisen from the recommendation of a Planning Inspector and was included within the adopted WLP.

5.8 Can the Landscape/Visual Impact Key Development Criterion be delivered at this site for the scale of uses proposed particularly if the proposed development includes an emission stack?

- 3.7 The comments in relation to Landscape/Visual Impact arise from the landscape assessments undertaken by Atkins on behalf of GCC for the Site Options consultation paper (CD4.1) and identifies the potential for strategic facilities in the landscape section of CD10.47 (page 11) to be delivered at the site, provided that good design techniques were employed. As outlined above in response to Question 5.2 the key development criteria will be critical as to whether a given proposal can be permitted at this site, particularly if including an emission stack.
- 3.8 The original Landscape and Visual Impact Assessment examined the potential effects of the proposals for a built Waste Facility, of two to five hectares within the Park and Wingmoor Farm West sites, on the landscape resources and impacts on the visual amenity of the area. The assessment considered the possible building height and land take for three different facility sizes (2000-6000m², up to 20m height / 3000-7000m², up to 30m height / 4000-9000m², up to 40m height) each with a potential for an emissions stack of 40, 60 or 80m height. Two site options (CD4.1 pages 32-33 and 48-49) at Wingmoor Farm West were assessed as having low capacity to accept change. Landscape reasons were part of the process as to these sites being scoped out after that stage (see also response reports CD4.3 and CD4.4). The remaining two site options, Wingmoor Farm West Sites A & B in CD1.1 (Inset Map Appendix 5) were assessed as having a high capacity to accept change. These landscape issues are highlighted and included in CD4.1 pages 32-33 and 48-49 and which led to the allocations contained in the WCS CD1.1.
- 3.9 The Landscape/Visual Environmental Considerations for the sites in Appendix 5 notes that properties to the south of the existing landfill, in particular those on Lowdilow Land and a lesser extent properties to the north fringe of Swindon Village, have experienced substantial adverse impacts in relation to the current landfill activities and increasing height of the landform. Any development to Sites A&B should be carefully planned so as to not vertically encroach above the existing landfill height in views from this arc.

3.10 The Landscape/Visual Impact Assessment (LVIA) (incorporated into CD10.47, page 11) was incorporated into the WCS Appendix 5 (CD1.1). The conclusion of the LVIA then notes: *"By sensitively planning the site and facility to limit the height of vertical structures and minimise areas of hardstanding, the site would experience negligible impacts due to the development of a small facility omitting an emission stack would have a slight adverse impact on the area due to primarily to wintertime views. A large facility with any height emission stack would have a slight to moderate adverse impact on the local landscape character and visual amenity of the area"*. In summary the LVIA did not rule out the inclusion of this site for a strategic development on landscape grounds.

3.11 It is considered that the planning process together with the same controls and guidance noted in the responses to Question 5.3 above (Javelin Park), would allow the Landscape/Visual Impact Key Development Criterion be delivered at this site for the scale of uses proposed. The relevant policy background for design is outlined in Policy WCS13.

5.9 What other factors might affect the deliverability of the site?

3.12 As outlined with the other sites, the WPA considers that it has followed the procedure to identify suitable sites outlined in paragraphs 20 and 21 of PPS10. In order to prepare the Site Options consultation paper (CD4.1) and other supporting consultation documents (CD4.2-CD4.11), measures have already been taken to effectively screen out sites which could be potentially undeliverable for a variety of reasons including location, transport, landownership and environmental constraints. Specific issues relating to Wingmoor Farm West and how the WPA has considered them are outlined within CD10.47.

3.13 Site A has potential for consolidation of buildings/permanent waste management facilities. This is currently the case for some of the planning permissions on this site. Site B has potential for development to at least for 15 years or more beyond the timescale of the WCS. There is at least scope for demountable buildings which clearly could be linked to the life of the landfill. Any such facility would potentially result in a longer lifespan for the landfill activities. Indeed any facilities which are associated to life of landfill has the advantage of co-location opportunities (PPS10 paragraph 20 (CD12.31)).The only question is whether such development should be of a more permanent nature. However, this would depend on the merits of any specific proposal and matters such as the availability of alternative sites.

4. Question 3: Wingmoor Farm East

5.10 Green Belt policy in general terms is the subject of Issue 3. CD1.1 Appendix 5, site 1 says that the allocated part of the site is unworked. What effect does the recent approval of the landfill application (CD13.2) have on this CS allocation?

- 4.1 The site is currently unworked, but is within the permitted boundary of the recently permitted application. The site was also subject to a previous (unimplemented) permission where the principle of a building was established on the site. This was permission number T/98/8446/0015/FUL for lightweight aggregate plant and the life of the plant was tied to the life of the clay extraction (which was tied to the landfill permission).
- 4.2 Under the current permission the land would not be excavated or landfilled, but would form part of the overall site restoration scheme boundary (although no actual 'cells' would be developed here. If a waste management facility came forward on the site allocation a revised restoration scheme for the current permission would need to be approved by the WPA. However, this would only require minimal adjustment of the scheme for the reasons outlined above. Quite clearly if any proposal which came forward was related to the current waste management operation at Wingmoor Farm East, as for the currently permitted 50,000 tpa MRF facility (which forms part of the T/98/8446/0015/FUL permission as detailed within the committee report (CD13.3)), this could have potential to extend the life of the landfill beyond the recently permitted end date (currently 2029). In that scenario the operator would have to come forward to vary the end date to a more appropriate timeframe.

5.11 If it has no impact, the allocated site would appear to be undeveloped land, albeit within an approved landfill permission area, within the Green Belt. Is this allocation consistent with national Green Belt policy?

- 4.3 As outlined above in Question 5.10 there is a precedent where the principle of development has been established for this area albeit tied to the life of the landfill. This precedent is not just applicable to the application area, but to other areas associated with the landfill permission, such as the building hosting the MRF and the silos used for the stabilisation of the Air Pollution Control residue (See Topic Paper 2 (CD13.12), Question 3 for discussions on hazardous waste).
- 4.4 The consistency with national policy has been discussed under Issue 3, Question 3.2 (CD13.13). In summary, the site has good locational advantages, being within Zone C and close to the main source of waste arisings, there are no deliverable alternatives

apart from the 3 other sites proposed to be allocated within the WCS (CD1.1). There is a possibility to co-locate with other facilities and that the environmental and economic benefits of the site outweigh the fact that it is located within the Green Belt.

5.12 Can the Landscape/Visual Impact Key Development Criterion be delivered at this site for the scale of uses proposed particularly if the proposed development includes an emission stack?

- 4.5 It would be possible for a small or medium-scale facility to be delivered at the site (as detailed within the landscape assessment in page 11 of CD10.119) and generally within CD4.1-CD4.19 and CD10.119, provided that good design techniques were employed. As outlined above in response to Question 5.3 the key development criteria will be critical as to whether a given proposal can be permitted at this site, particularly if including an emission stack.
- 4.6 At the time the Landscape and Visual Impact appraisal was undertaken to inform the WCS, three sites were under consideration at Wingmoor Farm East – Site A, the MRF Site, Site B, the Waste Management Site and Site C, the Remediated Landfill. Of these only Site C (as a reduced area) was taken forward to WCS (CD1.1). Whilst it was noted that for all three sites a 40-80m stack would be a significant incongruous element in the landscape this was qualified by consideration of the impact on the various receptors and potential for mitigation.
- 4.7 The LVIA appraisal considered that a small or medium sized facility with any height emission stack would have a slight – moderate adverse impact on neighbouring residences area and the Cotswold AONB if located to the either the MRF, Site A and Site C, remediated landfill, parcels of land. A large facility with any height emission stack would have a moderate adverse impact if located to the MRF site, slight adverse impact on the local landscape character and visual amenity of the area if located to remediated landfill. The report concluded that Site C, the remediated landfill site, had a medium landscape suitability for development of a waste facility. CD1.1 Appendix 5 identifies the matters which would be the basis for the consideration of any detailed proposals would need to be considered at planning application stage.

5.13 What other factors might affect the deliverability of the site?

- 4.8 The WPA considers that it has followed the procedure to identify suitable sites as outlined in paragraphs 20 and 21 of PPS10. Therefore, measures have already been taken to effectively screen out sites which could be potentially undeliverable for a variety of reasons including location, transport, landownership and environmental constraints. As the site is 2.8 ha, this would have the capacity for a facility sufficient

to handle the amount of non-hazardous waste which currently goes to landfill at the site. (c. 100,000 tpa – CD10.4, page 85). The relationship between size of facility in landtake and throughput is also discussed within CD12.5 and CD10.10.

- 4.9 For Wingmoor Farm East the site schedule within the plan at Appendix 5 (CD1.1) details the relevant criteria which contain issues that must be satisfied at planning application stage before permission can be granted. These include highways transport, ecology and landscape assessments, as well as Green Belt policy. The more detailed assessments can be found within CD10.119. Specific Green Belt issues not covered in question 5.11 and the Issue 3 topic paper (CD13.13), are covered by the response to question 5.7 above. Although Wingmoor Farm West is a separate allocation, the Green Belt issues relating to the site, in particular Site B, and the use of demountable buildings are applicable to Wingmoor Farm East.

5. Question 4: Land at Moreton Valence

Question 5.14 Are the CS proposals deliverable within the identified Area?

- 6.1 As the site is 5.6 hectares in size the WPA considers that this is within the footprint identified for a strategic waste facility in paragraph 3.23 of CD1.1. The evidence outlined on other site specific questions CD12.5 and CD10.10 outlines that a strategic scale waste operation may be possible on this size of site. Paragraph 4.98 of CD1.1 indicates the availability and type of use anticipated for the site.

- 6.2 Notwithstanding the above, the operator submitted a proposed extension to the area for which a separate consultation was undertaken between 5th July and 2nd August 2010 following the main sites consultation exercise which ran between 5th October and 30th November 2009. The area (c.12ha) consulted upon is detailed in CD4.14 and CD4.15. A summary of the representations made and the WPA's response in relation to both the area consulted upon in Site Options and the Proposed Extension area are found within paragraphs 3.14 to 3.16 of CD4.4. More detailed responses can be found within CD4.3¹. Following the additional consultation exercise the WPA were not convinced that such a large extension to the site was required and that by better configuration of the existing site there was additional capacity available. Notwithstanding this, the WPA suggested to the operator that, if they were able to, they could submit a refined site boundary for consideration prior to Publication of the WCS. This was never submitted to the WPA who then proceeded with the original "Site Options Consultation Stage" boundary. It is important to note that this original site boundary was the one submitted by the operator as part of the original call for sites process, this is detailed in page 29 of CD10.128. The current site itself has a licensed capacity of 300,000tpa across all waste streams.

Question 5.15 What would be the impact on the existing waste management operations?

- 6.3 It is likely that the site would require some degree of reconfiguration to accommodate a new, larger strategic facility. However, the operator has recently been granted a new permission (11/0017/STMAJW) on the site which effectively reflects improvements in gasification technology and re-organises part of the site, therefore existing waste management operations are going to be changed which reflects the site's evolution over time and the operator's willingness to continually use innovative technology and to improve efficiency on the site. As referred to

¹ In particular pages 20-21, 34-35, 111-112, 544, 643, 871-872, 948, 950 contain comments in relation to the proposed extension.

under Question 5.14 above, it should be remembered that the original site boundary was proposed by the operator as outlined within page 29 of CD10.128.

Question 5.16 What other factors might affect the deliverability of the site?

- 6.4 The WPA considers that it followed the procedure to identify suitable sites outlined in paragraphs 20 and 21 of PPS10 (CD12.31). Therefore, measures have already been taken to effectively screen out sites which could be potentially undeliverable for a variety of reasons including location, transport, landownership and environmental constraints. In order to prepare the Site Options consultation paper (CD4.1) and other supporting consultation documents (CD4.2-CD4.11), detailed assessments were made on each of the 110 sites considered and the Appendix to CD10.17 which specifically deals with Moreton Valence is CD10.105. This contains details of all potential constraints to deliverability and how they were considered.
- 6.5 For Moreton Valence the site schedule within the plan (CD1.1) details the relevant criteria which contain issues that must be satisfied at planning application stage before permission can be granted. These include highways/transport, ecology/HRA and landscape assessments.

6. Question 4: Land at Sharpness Docks

Question 5.17 Would the CS be unsound without inclusion of the site put forward by New Earth Solutions?

- 6.1 The WPA does not consider the CS to be unsound without inclusion of the site. The WPA followed a clear procedure to reach the four preferred site allocations, starting with over 300 sites, moving to 110 sites (of which the New Earth Solutions site formed part of a larger area CD10.106). Each of the 110 sites were assessed for all aspects of deliverability including constraints and land ownership based on the fact that the WPA was only looking for strategic site allocations capable of delivering a larger recovery facility for residual waste. This is outlined within Technical Evidence Paper WCS-N (CD10.17) and page 30 of CD10.128 is also applicable. It should also be noted that there was only 0.8ha of additional land suggested which on its own was considered to be insufficient in size for a strategic site. If it were to be added to the existing site then the entire site would require redevelopment.
- 6.2 It was clear all along that smaller sites such as this would be able to be dealt with on a criteria-based approach. The site already accommodates an established waste use (for In-vessel composting of organic wastes), which is not a process that is currently used for residual waste². Should the operator wish to increase the capacity to a site greater than 50,000 tpa, the site is located within 'Zone C' and therefore not prejudiced by policies within the WCS. The WPA had long discussions with the landowner British Waterways who have confirmed on more than one occasion that they do not wish any of their land at Sharpness to be allocated for a strategic waste management site. There is an obvious discrepancy between wishes of the landlord and wishes of the tenant, but ultimately British Waterways are the landowner and they are still adamant that they do not want their land allocated for strategic waste management facilities. It would therefore appear to the WPA that the site is not deliverable.
- 6.3 Furthermore, the WPA would actually consider the CS to be unsound if the site were to be formally allocated under policy WCS 4 for the following reasons:
 - It does not consider the site to be deliverable.
 - It does not appear to have any spare capacity of a size large enough for a new facility to be developed, this would not then be inconsistent with the process followed when identifying suitable sites and used when discounting other smaller sites within the county.

² There are several references within the WCS (CD1.1) to the fact that residual waste is waste which cannot be recycled or composted. In-vessel composting clearly would not be applicable for this type of waste.

- It has not been consulted upon at Site Options or Publication stage, nor has it had a Sustainability Appraisal (see below).
- It is not required, the four preferred sites will provide enough capacity for strategic facilities and applications to develop smaller sites are adequately provided for by policies within the plan to enable them to be dealt with on a criteria-based approach.

Question 5.18 Has this site been subject to Sustainability Appraisal and consultation carried out either by the promoter or the Council?

6.4 The site was not one of the 13 site options subject to consultation in 2009. However, the site was part of the area assessed within CD10.106 and CD10.128 which were made available as part of the evidence base to support the Site Options consultation. Therefore this site was not subject to any of the Sustainability Appraisals carried out by the WPA's independent consultant on the 13 sites presented at the Site Options consultation stage. As the site had already been screened-out of the process at this stage (see question 5.17 above and CD10.17), sustainability appraisal was not required.