

APPENDIX A CONSULTEE COMMENTS

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1. Lilleshall, Donnington and Muxton Parish Council in an email dated **7th June 2011** objects for the following reasons;

- Telford & Wrekin Council always sends its waste to a facility on the outskirts of Wolverhampton and therefore the proposed application would mainly deal with waste from other areas of Shropshire and surrounding Counties.
- Location – the proposed site is in a rural and agricultural location which is unsuitable for what effectively will be an industrial facility. There would be a catastrophic effect on the surrounding environment, wildlife and ecology and it is situated in an extremely close proximity to the Country Park. The proposed facility will also have a detrimental impact on local tourism areas such as Lilleshall Hill and Monument, Telford Equestrian Centre, Granville Country Park and The Shropshire Golf and Country Hotel.

- The planning application does not show what materials the facility will be constructed in, nor does it provide sufficient information on the effect it will have on watercourses (Granville Canal Basin), impact on health, how it will satisfactorily deal with noxious odours etc.
- Traffic – The implications of this application will lead to an unacceptable increase in the number of heavy goods vehicles on the local roads and lane access. It has been calculated that 64,000 tonnes would mean an average of 120 lorries per day. The access road, which coincidentally, runs through Granville Country Park, would not sustain this number of vehicles especially in the winter. Also, Lodge Road is an unadopted road the maintenance of which is paid for by local residents.
- Traffic residents safety issues – the Telford Equestrian Centre is extremely well used especially by children and such a development would cause an unacceptable danger to the local residents, horses and riders that frequent this area due to the unsuitability of the access road to the proposed site.
- Noise and dust pollution – as access to the site is on an incline the lorries accessing the site would have to remain in a low gear. This would increase the noise pollution to an unacceptable level for those residing within the area and those mourning the loss of relatives at the Crematorium. The number of lorries accessing the site will also lead to an unacceptable level of dust pollution.
- Light Pollution – there would also be unacceptable levels of light pollution to the surrounding area and residents due to the design of the proposed facility.
- Overdevelopment of Site and Out of Character with surrounding area – the proposed development will be larger than any agricultural building one would expect to find in a location such as this and is therefore unacceptable.
- Incorrect information – the water supply here is provided from Granville Road and not, as stated, Severn Trent Water Ltd. Therefore, some of the information provided in the application is incorrect.

Following the objection Veolia gave a presentation to the Parish Council. In an email dated **6th September 2011** the draft minutes of the meeting were given. These are:

Veolia In vessel Composting Facility

In response to this Parish Council's objection to a planning application submitted by Veolia, representatives from the company gave a presentation about the proposed composting facility. Mr McPhail introduced the members present from Veolia and then went on to explain:

- a. How the in vessel composting process works.
- b. The proposed facility.
- c. The proposed site layout plan.
- d. Opening Hours and access.

After the presentation Councillors raised the following concerns and questions.

Location – Councillors were concerned that the location remained unsuitable on Granville Country Park and suggested it would be better located on an industrial estate, e.g. Battlefield Enterprise Park, Shrewsbury due to the fact that the majority of the waste would come from Shropshire. Councillors thought that this would also be a cheaper option. Veolia explained that Telford & Wrekin Council and Shropshire Council had carried out their own investigations into location and had identified this area as a potential site. Also, historically these types of facilities have been built on green land. The site was chosen based on a scoring system created by Veolia.

Access – Concerns were raised that the land which would be used for access was partly privately owned by the residents of Watling Grange. Also, Granville Road is a narrow road and the increased use by HGVs would cause traffic safety issues. Veolia stated that they had approached local residents and checked with Land Registry and this showed that it did not cross privately owned land. Councillors suggested that they meet with the residents of Watling Grange to discuss this issue. Veolia intend to construct passing places in selected areas but did not intend to widen the whole road. It considered this to be the best access scheme possible.

Facility – Telford & Wrekin Council already has a small provision to deal with food waste from other areas and Shropshire Council processes food waste from other areas so there were concerns how the proposed new site would affect jobs at these plants. Councillors did not see why another similar facility was needed. Also, concerns were raised regarding the longevity of the scheme as this Parish Council had been told that the current landfill site would only be in location for ten years but it was still operational and had grown substantially in size. The Council did not want a repeat with this facility.

Heavy Goods Vehicles – Concerns were raised regarding the stated increased number of vehicles. Veolia stated that, based on actual results, lorries would be able to carry 18 tonnes of waste but as green waste generally weighs less than normal waste Councillors were concerned that lorries would only effectively be able to carry 13 tonnes and therefore, there would be a necessity for more HGV accessing and leaving the proposed site.

In conclusion, Councillors still objected to the proposed composting facilities and stated that a Councillor would speak about the application when it went before Telford & Wrekin Council's Plans Board.

2. Shropshire Council has commented on **22nd July, 2011** as an adjoining waste planning authority as follows. The application site is located to the immediate east of the boundary with Shropshire and the proposals would deal with organic wastes collected from Shropshire and potentially from Telford & Wrekin.

Policy

National Guidance. It is noted that the proposed site would comply with key principles of PPS10 in that it would be close to the primary road network and

would assist in diverting organic wastes away from landfill. The site would also be within relative proximity to waste arisings for Shropshire and Telford & Wrekin which would yield a significant proportion of the anticipated feedstock, although it would be relatively remote from parts of North and South Shropshire and the Oswestry area. It is acknowledged that a single facility at Woodhouse Farm may potentially be a more efficient and integrated solution. It would be helpful however if further justification could be provided by the applicant of the decision to proceed with a single larger site rather than a series of smaller more local facilities which might overall entail less transportation / a smaller carbon footprint and facilitate easier spreading of the resultant compost.

RSS. In terms of general need, the Environmental Statement refers to the West Midlands RSS (Phase 2 Revision) as supporting the need for new municipal waste management capacity in Shropshire, Telford & Wrekin. The waste forecasts in the RSS referred to in tables 4 and 5 (Ch 5) are not fully up to date and it is understood that these were based on higher assumed levels of household growth than have been identified in more recent government statistics. However, it is acknowledged that the general conclusions of the RSS remain valid for the purposes of the current application.

Waste strategies. The general compliance of the site with the landfill diversion targets set out in Waste Strategy 2007 is acknowledged. The proposals also accord with the objectives of the Shropshire Municipal Waste Management Strategy to identify ways of recovering, composting and treating greater quantities of biodegradable municipal waste and to reduce reliance on landfill. It is noted that the Telford & Wrekin Municipal Waste Management Plan 2005-2011 identifies similar priorities and acknowledge the benefits of developing co-operative work with other organisations and authorities, including in Shropshire.

Shropshire Core Strategy. Policy CS19 – waste management infrastructure recognises (in paras 7.23 / 7.26) that Shropshire needs to attract additional waste management facilities, as well as improving existing facilities, in order to make local provision for a greater proportion of the waste which it generates. This strategy also seeks to address the county's current dependence on waste management sites in surrounding areas and particularly Telford & Wrekin. The proposed site is located on the border with Shropshire and is close to the principal road network. However, the development of the proposed IVC in Telford may be contrary to Policy CS19, unless there is a very strong justification in efficiency terms for locating the facility at Woodhouse Farm.

Shropshire Waste Local Plan. An area at Woodhouse Farm incorporating part of the current application site was initially put forward for allocation for landfill and waste transfer / processing uses in the first draft of the Shropshire Waste Local Plan. The proposed site, which included land in Shropshire and Telford & Wrekin, was deleted from the Plan on the basis of the Inspector's recommendations following the Local Plan Inquiry which took place in January 2004. The Inspector did not consider that the need for additional landfill

capacity, upon which the other waste processing uses were dependent, had been satisfactorily demonstrated. Concerns were also expressed about the sensitivity of the proposed shared access with the Crematorium. It is recognised that the current proposals differ substantially from the proposals considered at the Local Plan Inquiry, and that the access issue has been resolved by proposing a westerly access to the site.

Environment. It is stated that the waste management process would be fully enclosed and subject to a high degree of containment and control. It would also be located in a relatively remote area some distance from the nearest private residential properties. The site would be located on a ridge and would involve the construction of two large buildings. However, it is considered that these would be agricultural in appearance and seen in the context of the existing agricultural buildings at Woodhouse Farm. It is stated that views from the A5 to the south have recently been foreclosed by works at the adjacent landfill site. It is also noted that the proposals involve a comprehensive landscaping scheme. The landscape and visual impact assessment concludes that the proposed site would not give rise to an unacceptable visual impact, including from viewpoints in Shropshire. It is recommended that further information is obtained in relation to artificial lighting. The proposed western access resolves concerns which were expressed at Shropshire Waste Local Plan Inquiry about the sensitivity of the alternative shared access onto Watling Street.

Existing Sites. Chapter 5 of the Environmental Statement refers to a number of IVC sites with planning permission in Shropshire. It should be noted that the status of some of the sites listed in Chapter 5 has changed:

- Childs Ercall – Recent resolution to permit subject to legal agreement, 25,000 tpa.
- Hilly Farm Pentre – temporary permission. Renewal not implemented. Now lapsed.
- Vital Earth, Market Drayton – Facility burnt down. Permission not renewed. Withdrawn.
- Twemlows, Prees – IVC Application being processed – 20,000 tpa (existing windrow composting site).
- Brookfield Farm – Permission for IV not yet implemented – 11-14,000 tpa (existing windrow composting site).

In addition to the Anaerobic Digestion (AD) Facility at Harper Adams College referred to in Chapter 5 it should be noted that a further 2 on-farm AD facilities with capacities of “23,000 tpa have recently been permitted in Shropshire (Wykey near Ruyton XI Towns and Swanscote near Bridgnorth). Permission for a third at Abbotsmoor, West Felton is imminent and further AD proposals are at the pre application stage. Therefore, IVC capacity in Shropshire has been maintained whilst AD capacity has increased significantly relative to the levels assumed in the application.

Alternatives. It is understood that food and green waste would not be collected separately but would instead be co-mingled. It is anticipated that

IVC is a suitable technology for managing this type of organic mixed waste. The applicant advises that separate collection of food waste would be likely to result in higher costs and additional waste miles, particularly in more rural parts of Shropshire. This statement is however queried as food waste can potentially be collected with other recyclates as part of the kerbside collection scheme. It is understood that this was the case until recently with food waste collections in South Shropshire.

It has been noted above that a number of AD facilities are currently operational or are being developed in Shropshire. These facilities can potentially accept subordinate amounts of non agricultural feedstocks. Recent government advice advocates AD as a favoured waste management technology given the renewable energy and climate change benefits which AD schemes can offer (Anaerobic Digestion Strategy and Action Plan, DECC/DEFRA June 2011). It is understood that AD may be less suitable for management of municipal green waste. However, food wastes are potentially well suited to the AD process given their high calorific value. It would be helpful in this context if further clarification could be provided by the applicant on the justification for the decision not to collect municipal food waste separately.

Further details.

Wheel wash / surface cleaning. It is recommended that further information is obtained in relation to wheel wash and surface cleaning provision given the potential for organic wastes and compost residues to be carried into the open circulation area.

Cut to fill balance. Some excavation may be required in the centre of the site and filling may be required at the edges in order to achieve level surfaces for construction. It is recommended that further clarification is obtained on locations for cut and fill and material balance calculations are provided. Relevant geological maps show that the site is likely to be located on a ridge of Upper Carboniferous / Permian Sandstone (Salop Formation / Enville Member). Deeper excavations may yield sandstone rubble which may need to be buried at depth within the fill areas, or exported from the site. Some of this material may potentially be suitable for use as a sub-base for hardstanding areas.

Door specifications. It is recommended that further clarification is obtained on the door specifications. Electric roller shutter doors would have additional benefits in terms of allowing rapid closure to maintain negative pressure within the building and consequent air quality control.

Compost spreading. It is not clear how much compost would be generated annually or where the compost would be spread. Is there an opportunity to use some of this material as a restoration soil on the adjacent landfill site? Given the likely volumes there may be a need for a compost spreading protocol to ensure that the agricultural benefits are maximised and waster resources are safeguarded?

The Archaeology Service at Shropshire Council advise Telford & Wrekin Council on archaeological matters on an agency basis. Commenting on **6th May, 2012** it is states that the EIA has confirmed that archaeological remains may be impacted on by the proposed development. In mitigation of this it is therefore recommended that a programme of archaeological work be made a condition of any planning permission that may be granted.

In response to a request from a request from Telford & Wrekin Council dated 20th September, 2012 for an update on the present position of which site allocations in the adopted Shropshire Waste Local Plan are vacant and which don't have planning applications granted or being proposed for waste management facilities, Shropshire Council replied as follows on the **21st September 2012:**

The current position is as follows:

B2: Stanmore Industrial Estate	Vacant, available
N3: Land adjacent to Market Drayton Livestock Market	Vacant, identified as Preferred Option for employment land including waste management and environmental industries in SAMDev.
N4: Harry West, Lower Prees Heath	Vacant, but withdrawn from future consideration at owner's request.
N12: Sandford Industrial Estate	Vacant, but withdrawn from future consideration at owner's request.
N13: Wood Lane Quarry, Ellesmere	Developed as Commercial Recycling Centre.
O1: Ifton Industrial Estate	Vacant, available but recent similar development on adjacent site. Not identified in SAMDev.
O7: TG Waste Transfer Station, Maesbury Road, Oswestry	Existing development. Not identified in SAMDev.
O8: Land off Mile Oak Industrial Estate	Development as Municipal Recycling Centre.
SA1: Battlefield, Shrewsbury	Planning consent for EfW plant due to be implemented shortly.
SA12: Land Adjacent to Blackmore Haulage, Bicton Heath	Vacant, but now conflicts with housing development proposed in Shrewsbury West SUE masterplan.
SA13: Land adjacent to Poultry Unit, Ford	Vacant, available identified as employment commitment for uses including waste management and environmental industries in SAMDev.
SA16: Buildwas Sand Pit	Existing development. Not currently identified in SAMDev.
SS13: Plot 'B' Coder Road Industrial Estate, Ludlow	Developed as Anaerobic Digester.
SS2: Land North of Sheet Road, Ludlow	Now conflicts with future development proposed in SAMDev. Withdrawn

	from consideration at owner's request.
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The recently published SAMDev Preferred Options document also identifies the following sites for employment uses including waste management and environmental industries.

1. Land off the Old Worcester Road in Bridgnorth.
2. J. N. Bentley Ltd., Lamledge Lane, Shifnal.
3. Phase 2, Ellesmere Business Park.
4. Land adjacent Shawbury Road, Wem.
5. Employment land as part of the Shrewsbury South SUE.
6. Land North of Waymills, Whitchurch.
7. Land north of Long Lane, Craven Arms.
8. Land between Coalport Road and Rough Lane, Broseley.
9. Land south of A458 opposite Wenlock Road, Bridgnorth.

Shropshire Council in an email dated **19th October, 2012** updated the table of 'Future Emerging Facilities/Capacity within Telford & Shropshire' contained in paragraph 5.15 of Section 5 on Need and Alternatives of Volume 3 of the Environmental Statement.

Updated information in bold provided by Shropshire Council.

FACILITY		CAPACITY		COMMENTS
		WML	PLANNING	
In-Vessel /Mixed Garden & Food Wastes	Childs Ercall	Not secured	Not secured. Shropshire Council resolved to grant planning permission in May 2011 subject to completion of Unilateral Undertaking which is currently being prepared.	Up to 15,000 tonnes food/garden waste in demonstrator plant.
In-Vessel/ Green Waste only	Hilley Farm, Nesscliffe	20,000 T/A	7,000 T/A. Unimplemented Permission expired in 2010.	Site not in operation and is not under construction and cannot receive food under planning.
In-Vessel /Mixed	Vital Earth (Market	11,000 T/A	11,000 T/A. Site closed	Site lease runs out

Garden & Food Wastes	Drayton)		(following fire). Permission expired 2007. Application made in 2007 to renew has been withdrawn.	February 2012.
	Temlows Hall, Ash, Whitchurch ("Twemlows")	Not secured.	Not secured. Permission for green waste granted December 2007. IVC application submitted 2010, currently undetermined (but stalled).	Up to 1,000 tones municipal waste a proportion to be managed in open windrow system.

3. The Granville Management Committee make the following comments.

Shropshire Wildlife Trust manage the Local Nature Reserve in close partnership with Granville Management Committee, which was established to monitor the management of Granville Country Park and develop and enhance the park for wildlife and the local community.

Granville Management Committee believes it is essential that all new development proposals do not negatively impact upon the existing recreational resource.

Granville Country Park (a designated Local Nature Reserve) is an informal recreational area of quiet contemplation / informal recreation for community use for the increasing number of residents across this continually growing town as well as serving a wider regional area. It is the only accessible country park for the population of the town within the urban area of Telford. This popular area is used by walkers, horse riders, cyclists, anglers etc and for Children's adventure play and is a highly regarded asset in which to promote the town to visitors.

Most users access the area via the proposed 'improved' vehicular access route for the transport of the waste to the in vessel site. The currently quiet transport route cuts through the central area of the park and crosses several of the most well used pedestrian / equestrian cycle routes which circulate around the park.

The proposal is a concern on a number of points.

1. Noise

The application documents themselves consider the noise from traffic to the site is considered a moderate increase. However, the survey has only taken into account the impact upon residential property and not those using the Country Park for quiet contemplation / recreation. A significant part of the recreational value of the country park is in its ability to provide for quiet contemplation within easy accessible reach of a large urban community. The current general sound within the countryside park is of wildlife and of the occasional car. This is the only country park serving the area. Granville Management Committee believes the impact upon this use of the park (and its value to the community) will be significantly affected by the proposal by the 42 HGV movements going through the park most days of the week. Indeed, there appears to be no mention of traffic movements relating to the transport of the finished compost itself or of expected staff / visitor traffic movements. Significant increases in transport (as proposed) through the popular central area of this country park will have a negative effect upon the quiet contemplation / tranquillity that users of the country park currently enjoy.

The impact of the proposal to wildlife that use the country park (particularly with regard to the access route right through the centre of the park) has not been considered. Will the proposal affect the wildlife using the park such as birds / bats? If so will this affect the enjoyment / usage of the Park?

The park is set to expand following the completion of the landfill site. This will increase the value of the County Park to the community. This would include an area overlooking the proposed in vessel facility. The restoration is currently underway. The use of this restored open space area may also be affected by the proposal through normal industrial noise affecting the tranquillity able to be achieved from this proposed overlooking part of the park. Granville Management Committee believes the feeling of tranquillity would be lost on this proposed restored site and significantly affected on popular areas adjacent to the proposed transport route. No consideration / migration measures have been proposed to offset the negative impact of the proposal on the park and its use.

2. Access

Most users of the Country Park gain access via Granville Country Park which is the same route proposed by the 42 HGV movements proposed as part of this application. Indeed, as mentioned previously there appears to be no mention of traffic movements relating to the transport of the finished compost itself or of expected staff / visitor traffic movements. Granville Management Board believes the current transport route is of an appropriate quality for the entrance to a country park once the road has passed the industrial adjacent units. The current route (Road) is similar to a single lane country track and has a number of road humps to reduce the speed of traffic through the busier part of the park. Many walkers / cyclists / horse riders and children use and cross this route.

Proposals to 'upgrade' the route to accommodate HGV traffic to facilitate this proposed development does not appear to cover all of Granville Road and areas of pedestrian / equestrian access not to be linked. This appears to require users of the park to utilise part of the road to access the country park. However, there is insufficient detail provided in the application on the entire route and as such it is difficult to fully evaluate the impact upon users. This link is separated currently (pedestrians are required to use the quiet road in sections) and deemed appropriate for current usage, but should visitors to the park be required to use the road to access the park with significant increases in traffic (particularly HGVs) this would both be an increased potential hazard and a barrier to use (i.e. put people off from visiting). It appears that the nature of the 'upgrade' has been to consider the requirements of the vehicular access requirements to facilitate development and not sufficiently of the other users of this route. The current access arrangements for walkers / horse riders / cyclists and vehicles to the country park are laid out informally and proposed enhancements to the road to facilitate the development potentially place users of the park at risk through shared use of the route. As such Granville Management Committee believes the proposed access arrangements are inappropriate for regular use by HGVs.

Granville Management Committee believes the application proposals appear to deem the existing road surface suitable with extensions to it without resurfacing. As stated earlier this road is purposely informal to create an aesthetic experience of entering a countryside area (the country park). Informal road humps have to be installed to reduce speed along the stretch which leads to the country park. It is uncertain from the application as to whether these are proposed to be retained. If they are not this would be likely to increase speed through the country park. If they were to be kept, it may impact upon noise as HGVs bounce over the road humps. As mentioned earlier the general sound within the park is of that users of the country park enjoy. The implications of formalising the informal access to and through the country park are that the feeling of entering the countryside is diminished. There is also an issue of the additional maintenance which may be required to repair the road from increased and heavier use.

The proposed access to the proposed development cuts right through the centre of the existing country park. The road crosses the hub of the park which provides the car parking and short/medium and long countryside walks. These routes cross the road to incorporate both the north and south of the parks main features. These routes are very popular with walkers, cyclists and horse riders. The countryside walks are likely to impact upon the feeling of tranquillity and escape to the countryside when crossing the improved road section of these walking routes. This crossing is currently fairly relaxed for users, with limited traffic use. The effect of the increased traffic use would be to create a severance of the park through causing apprehension to cross the road. This may lead to significantly reduced use of the southern section of the park which requires crossing the road from the car park. This southern section will also see an expansion of the park in the future following completion of the landfill site. Policy & Open Space strongly believes the proposed severance of the road will have a negative impact upon usage.

There are proposals for significant tree/shrub/hedgerow loss as part of this application to widen the road for HGVs without significantly agreed proposals for mitigation. In addition, the use of this road for HGVs is likely to incur additional management costs to the council and others for the increased management of vegetation at the side of the road to ensure the width of the road is maintained. Also, the proposal for the upgrade to the access route includes additional items such as bollards, changes to the land form and additional planting on council land. There is insufficient detail to evaluate the 'upgrade' access proposal (i.e. what are the bollards / how many / where exactly etc) and no confirmation as to who is to manage these new facilities. The Shropshire Wildlife Trust, Council and its partners frequently manage the country park using volunteers. This includes working alongside the roadside on hedgerow work etc. The increase in traffic (particularly from HGVs) is likely to raise the risk of using these groups for this particular work to an unacceptable risk and another method of management will need to be used.

Granville Management Committee believes the access route proposals have insufficiently evaluated the impact upon existing users of Granville Country Park which has resulted in inadequate measures for users of the park other than those in vehicles. As such, the impact upon access and tranquillity of the country park as a result of the proposal is likely to have a highly negative impact upon usage.

3. Impact of the New Building on the Park

Given that the country park is set to expand to an area overlooking the proposed in vessel facility 'following completion of the landfill site'; this restored area would no longer be able to fully view the open countryside area as envisaged (vistas / picnic area) from the country park, as the rurality of the open countryside area will be obscured / dominated by this proposed industrial building. The full impact of the visual impact of this industrial building upon this rural countryside area cannot fully be evaluated at present as the applicant has not provided elevations of the proposed building in context with the surrounding land. It is not known what impact this may have upon the ambition to expand the Local Nature Reserve designation in time.

4. Conflict of users within the Park

The Country Park is regularly used by many horse riders from across the area but predominantly from local and owners / stables and the nearby popular riding school. Many horses use the existing quiet country road to gain access to the designated horse routes through the country park, particularly those from the riding school. These designated horse riding routes through the country park are the only separated routes within the town as many other bridleway routes across the town are shared. This riding school is the only riding school in the north of Telford. Some of these routes cross the currently quiet road to utilise both sections of the park north and south of the road. Learner riders from the riding school are frequent users of the country park and include children, children with a disability and other riders with a disability.

Access to the open country park for the riding school is via the single track road proposed for use by HGVs to gain access the in vessel facility. Risks to users of the road are likely to increase as a result of the proposal and may be considered an unacceptable risk for certain users which would limit / restrict current operations. The impact of the proposed use for HGVs to existing riding school use has clearly not been considered by the applicant and is likely to restrict the use of the road (and therefore the Country Park) by horse riders as a result of the proposal. Horse riding use will also be affected by the loss of tranquillity to this rural setting as a result of the proposed changes / increases in traffic on the current quiet access route.

5. Impact on the Heritage

No consultation has been given to the heritage of the area. It is likely elements of heritage value could be lost through the proposal as potentially the lane contains remnants of railway supplying the previous use of the site (mining use).

Given the above concerns, Granville Management Committee strongly objects to this application.

4. Landscape Architects

A Landscape Architect commented on **23rd August, 2011** as follows:

Having looked through the submitted documents I wish to raise the following points:-

The application has gone into detail on the Woodhouse site where the buildings are to be located, undertaking a landscape and visual analysis and landscaping proposals. It would have been helpful if on the photographic views around the site if the height of the buildings could have been put on to scale so could determine if screened or visible. In addition a plan showing details of the surrounding area showing contours and indicate hedges which screen proposal.

Unfortunately, the same analysis has not been applied to the proposed access along Granville Road. The plans for this area do not show the full extent of Granville Country Park which HGV will travel through. It appears that a landscape and visual assessment has not been undertake for Granville Road, which in part runs through the sensitive Granville Country Park.

It is interesting to note that The Planning Supporting Statements in 6.4.1 states that “ The proposed development would cause a moderate landscape effect, concentrated with in application area and adjacent landscape but also along proposed line of access”. This document goes onto say in 6.4.2. that “Visual effects would also be caused by HGV traffic using the proposed access road to the site. These visual effects would have a negative effect on the landscape character of the area adjacent to the access road” part is of which Granville Country Park. This clearly states that negative effects are expected , but any proposed mitigation is not based on survey information.

Granville Country Park is an important recreational area in Telford used for walking, riding, enjoying the natural environment, tranquillity, wildlife and archaeological history.

A widened tarmac road, with over 5 no. HGV movements per hour would not only be visually intrusive but sever the park in two, reduce tranquillity and increase risks of health and safety to park users. In addition road improvements may effect stability of embankments, canal bridge and drainage pipes under the road.

Non of these issues have been addressed. A Landscape and Visual appraisal for Granville Road must be undertaken

In the Technical Appendix The Ecological and Landscape Report for Proposed access Improvements, talks of thickening hedges to screen HGV, but there is no rationale as to why this has been done in certain areas and not others because no landscape and visual assessments have been done. This would be needed to determine any planting and whether the negative effects could be over come.

In broader terms, the objectives may not be to totally screen the road, as important to retain views into canal and surrounding areas to maintain visual legibility and connection between the northern and southern part of the park. Also safety for recreational users.

As Granville Road cuts through the park, would need to assess impact of these on existing vehicle movements, visitors to park, walkers and riders. How would the road be made safe for these users? Currently, only a footpath proposed. No provisions made for visitors crossing road or awareness that HGV frequently using road to visitors. The safety of all users is important. There appears that no visitor / user survey has been undertake, which would help identify potential requirements.

Granville Country Park is a natural area and the introduction of a widened tarmac road would not be in character with the area and the HGV would be intrusive and a potential health and safety hazard. Hence not a suitable route for access to the Woodhouse IVCF plant.

The application has the following omitted:-

- Annotated plan along Granville Road showing adjacent land
- Landscape Visual Assessment
- Visitor/ user survey.

To progress this application further these surveys should be undertaken.

A Landscape Architect commented on **20th September, 2011** concerning the SLR letter dated 6th September.

Granville Road is part of the application, due to the improvements required to carry out more HGV. The impact of these improvements upon the character

of the Country Park and Local Nature Reserve are being challenged. As the applicant will introduce hard engineering, widening road, kerbs and hard surface works into another wise natural area, changing an informal road to a formal road and as such would be detrimental to the character of the area.

The identification of where planting is required to minimise impact of traffic cannot solely be determined by walking the road. A landscape and visual assessment must be undertaken to determine the impact on vehicles on the surrounding area and where planting would be best placed. This work has not been undertaken. The landscape character of regenerated pit mounds is important to Telford, and this distinctive character should not be spoiled by urbanisation.

A Landscape Architect commented in an email dated **9th November 2011** on the SLR letter, dated 6th September 2012.

- Granville Road is part of the application, due to the improvements required to carry more HGV. The improvements to Granville Road will have an impact upon the character of the Country Park and Local Nature Reserve. As they will introduce hard engineering, widening road, kerbs and hard surface works into another wise natural area, changing an informal road to a formal road and as such would be detrimental to the character of the area.
- The identification of where planting is required to minimise impact of traffic improvements cannot solely be determined by walking the road. A landscape and visual assessment must be undertaken to determine the impact on vehicles on the surrounding area and where planting would be best placed. This work has not been undertaken. The landscape character of regenerated pit mounds is important to Telford and this distinctive character should not be spoiled by urbanisation. In an email dated 9th November 2011 it was reiterated that road improvements to Granville Road will change the character of Granville Country Park and Local Nature Reserve, therefore from a landscape stand point there is an objection.

In an email dated **9th November, 2011** a Landscape Architect states that the recent information submitted relates to ecological issues. No further information has been submitted regarding character and visual assessment. Therefore her original comments stand. Road improvements to Granville Road will change the character of Granville Country Park and Local Nature Reserve, therefore from a landscape stand point I have to object to the proposal.

In an email dated **27th June 2012** a landscape architect made some additional comments on the additional comments that have been sent under Regulation 22 (EIA).

The following are additional notes in response to the additional material provided under the TOWN AND COUNTRY PLANNING (ENVIRONMENTAL

IMPACT ASSESSMENT) REGULATIONS AUGUST 2011 (REGULATION 22)
 - REQUEST FROM LPA FOR SUBMISSION OF FURTHER INFORMATION.

Reference	Comment
<p>R7 : Please provide photomontages (with and without the proposal being shown) from a representative number and variety of viewpoints for the various photographic sites chosen in the Environmental Statement. These photomontages should show the location of the proposed buildings in a wireline representation. The accompanying analysis should state what the affect of the proposals would be on the landscape and provide a comprehensive commentary on the visual assessment. Please see Appendix E</p> <p>R8: Provide visual/graphic information showing the proposed buildings in the landscape. Please see Appendix E</p>	<p>Whilst some of the visualisations show that from the middle distance the buildings are largely concealed from view , both view points B & E do demonstrate (particularly viewpoint B) that the proposal is a large structure within the landscape.</p>
<p>R9: Provide visual/graphic information showing the scale of the proposed development compared to surrounding development. Please see Appendix E</p>	<p>Whilst Appendix E provides visual information, it provides little information regarding the <i>comparison</i> to surrounding development</p> <p>We have produced our own comparison (see attached) which show how the proposal is significantly larger than existing developments (including those with an industrial or a semi industrial use) in the vicinity of the site.</p> <p>NB although smaller in scale than the Donnington Wood Business Park - this comparison with is not applicable - as it is located within the urban area of Telford and to the west of the Country Park.</p> <p>Comments regarding the Photographs contained in Appendix</p>

	<p>E:</p> <p>Whilst a number of the photographs show existing development within the same area as the proposal i.e. within the rural area to the east of the Country Park – they do not compare the scale with that of the proposal.</p> <p>Many of the images are of locations within the urban area of Telford and to the west of the Country Park and are therefore not comparable with the proposal. Images 4-8 on sheet 10/21</p>
<p>R10: Using the Design principles contained in 4.0 of the Design and Access Statement, provide information re how those principles have been achieved. In particular, aspirational design, sympathetic design, distinctive design and explain the term “... in an appropriate manner.”</p> <p>With regards the key design principles highlighted in the Design and Access Statement the proposed development would seek to meet the criteria as follows: As described in the Design and Access Statement the design of the proposed IVC would be Aspirational, Sympathetic to its setting, and to be an example of Good Design; this would be achieved via the unified form of the development and the well considered layout of the external space which would allow the development to function efficiently.</p>	<p>There is an important distinction between <i>seeking</i> to meet the criteria and meeting the criteria. The unified form of the development (which one might interpret as simple , uncomplicated built structures) could be argued as helping to assimilate the proposal into the landscape. However there is a contrary architectural thought that the large scale of a developments can be ‘concealed’ by breaking up the mass by heavy ‘articulation’ of its form, i.e. it is seen as a series of smaller blocks rather than one large mass.</p> <p>The ‘well considered’ layout of the external areas is an important design feature but relates to its function /operation – not to its impact upon the landscape.</p>

<p>As illustrated by the supplementary information that relates to the context of the site (see drawings 10/20 to 10/23 Appendix E) there are a number of existing developments within 2km of the proposed development, these vary a great deal in their nature, and range from leisure type developments through to industrial / commercial operations; the latter often being housed in medium to large scale 'sheds' that are characteristic of Telford's 'urban fringes'.</p>	<p>It is correct to say that there is an eclectic mix of uses and building types in the surrounding area, including those which use 'industrial shed' architecture. However, all of the existing developments within the rural area to the east of the Country Park (which is the area relevant to the proposal) is of a substantially smaller scale than the proposal (as shown on in the attached).</p>
<p>Within 1 km of the proposed development the existing built development is smaller scale and more haphazard in its arrangement; the equestrian centre, knackers yard, buildings associated with the landfill and existing buildings at Woodhouse Farm all being examples of this; in contrast the extent of landscape disturbance is much larger scale, with the landfill, motocross track, golf course and former colliery spoil tips all representing a change to the 'natural' landform.</p>	<p>This point confirms the issue of scale raised in the previous section</p> <p>The large scale 'landscape disturbance' described is either temporary or does not involve large built structures (unlike the proposal).</p>
<p>The proposed IVCF development would be aspirational in a sense that it represents a modern well organised facility that is representative of investment and the future improvement of this area.</p>	<p>These landscape comments cannot comment upon the merit or otherwise of the operational efficiency of the proposal. They are not directly relevant to the impact upon the landscape.</p>
<p>The proposed IVCF aims to be sympathetic to its setting via the use of a well ordered and linear form that is assimilated to the surrounding landscape via the integration of scrub and Veolia Environmental Services 13 Ref: 402.00156.00082 Regulation 22 Request 16th April 2012</p>	<p>'Well ordered' is a good but not very defined attribute. Whilst one can interpret this being about being well organised site layout – this does not in itself aid its appropriateness in the landscape.</p> <p>The linear form does slightly help the proposal to be aligned with the flow of the landscape features and in doing so – very marginally help it to be assimilated.</p>

<p>tree planting; in combination the building and proposed planting aim to be read as part of the wider landscape when seen in conjunction with existing hedgerows and woodland belts. This is illustrated via the visualisations that shown on drawings 10/12 to 10/19.</p> <p>The position and orientation of the buildings were considered as part of an iterative process which evolved to the decision to move the building away from the highest point of the application site to reduce potential visual effect.</p> <p>In addition to planting the proposed development also includes a number of ponds and ephemeral water bodies, with some acting as part of the wider 'sustainable urban drainage system' (SUDS) while others are in place purely as a marginal aquatic / wetland habitat. Overall it is envisaged that the proposed IVC development would be seen as an example of good design practice that is well suited its location when taking into account the local site context and aforementioned mitigation measures.'</p>	<p>The planting will go some way towards screening the proposal.</p> <p>The position, orientation and external works will assist in concealing and assimilating the proposal into the landscape and the SuDS features contribute to the sustainable credentials of the proposal.</p>
<p>R11: Please provide a fully dimensioned drawings including finished floor levels and the proposed site level spot heights (metres AOD).</p> <p>Fully dimensioned have already been provided when the planning application was validated. Additional drawings have been prepared and are available in Appendix E.</p>	
<p>R12: A full assessment needs to be carried out concerning the effect on leisure and recreation in the locality, such as upon the Telford Equestrian Centre, Granville Country Park, the Local</p>	<p>A key issue is the cumulative effects of the proposal upon the complete rural quality which is necessary for and supports the leisure and recreation experience.</p>

Nature reserve, Muxton ('The Shropshire') Golf Course and users of the bridleway.

The effects of leisure and recreation in the locality have been considered in each technical chapter within the Environmental Impact Assessment which has been submitted and validated by Telford & Wrekin Council in April 2011 and subject to the mitigation measures flagged up within each technical chapter no significant adverse effects have been identified.

The proposed development has the potential to impact upon leisure and recreation in the locality however subject to the mitigation proposed within each environmental effect from the development no significant adverse effects have been identified as highlighted below:

Air Quality Effect on leisure and recreation

The Air Quality Assessment (see Chapter 7 of the ES and associated Technical Appendices) has considered potential impacts during:

- the construction phase;
- fugitive dust from construction activities;
- combustion pollutants (PM10, NOx) from construction traffic. during the site operational phase;
- combustion pollutants (PM10, NOx, etc) from traffic;
- dust from operation activities; and
- potential fugitive odours from site operations.

Combustion emissions from traffic during construction and operational phases have been screened out as insignificant on the basis of the DMRB screening criteria.

A qualitative assessment of risks of

The proposal is a very large industrial scale use with large scale industrial structures to accommodate that use (and associated servicing) in what is currently a rural landscape affected by temporary urban/industrial uses.

This landscape will become increasingly rural and increasingly detached from the urban area of Telford as the land fill to the immediate west of the proposal site is reclaimed as a rural landscape.

The existence of a large scale industrial use will detract from the rural quality necessary for the leisure and recreational uses in this location.

dust from construction and during operation has been undertaken, the findings of which lead to the following conclusions:
“The potential for dust impacts at residential receptors from construction are considered to be acceptable, i.e. the duration, probability, magnitude and frequency of potential impacts is considered to be below levels likely to cause a loss of amenity. The potential for dust impacts at residential receptors during operation are considered to be acceptable, primarily due to designed-in mitigation, i.e. the probability, magnitude and frequency of potential impacts is considered to be below levels likely to cause a loss of amenity.”

Detailed odour modelling has shown that the probability of odours being detected at receptor locations is below the selected benchmark, to the extent that the dispersion of odours is not likely to lead to a loss of amenity.

It is subsequently considered that there will be no significant effects on leisure and recreation within the locality.

Noise Effect on leisure and recreation

The detailed noise impact assessment (Chapter 8 of the ES and associated Technical Appendix) has been conducted and considers both the potential for the construction and operational phases of the development with particular reference to the noise-sensitive receptors in the vicinity.

The assessment concluded that:

- construction noise levels are predicted to be well below the 70dB criterion adopted for this assessment at all receptors;
- construction related traffic

movements have not been assessed but are considered to be no greater than those associated with operational traffic movements;

- perceptible levels of vibration from the construction works is improbable at the nearest vibration-sensitive properties;
- at worst, operational noise levels would lead to a situation between marginal significance and complaints unlikely at all times; and
- at worst, site-related vehicle movements would have moderate impact on the existing measured ambient noise levels at Woodhouse Farm; and at worst, the cumulative impact of all operations and vehicle movements associated with the proposed development would have a moderate impact on the existing measured ambient noise levels at Woodhouse Farm.

Mitigation has been suggested to reduce the impact at Woodhouse Farm to a 'minor' level, in the form of a close-boarded fence along the edge of the access road. No further mitigation measures are considered necessary.

It is subsequently considered and reported within the Environmental Statement that there will be no significant effects on leisure and recreation within the locality.

Landscape and Visual Effect on leisure and recreation

A detailed Landscape and Visual Assessment (Chapter 10 of the ES) of the proposed development has been completed in accordance with accepted best practice guidance (*Guidelines for Landscape and Visual Assessments, 2nd Ed, IEMA/Landscape Instit, 2002*) .

A study of the landscape and visual components of the site and the local area was undertaken through desktop study and fieldwork. This study identified the main landscape and visual receptors and resulted in a baseline appraisal, against which landscape and visual impacts could be assessed. The main landscape and visual implications of the development and their potential impacts were identified, and mitigation was developed to minimise these impacts. Comparing the sensitivity of the receptors to the magnitude of predicted change, then allowed the significance of these resultant impacts to be assessed.

The LVIA concluded that the proposed development would cause a moderate landscape effect, concentrated within the application area and adjacent landscape, but also along the line of the proposed access.

The main change within the application site would relate to the increased density of building and large scale of buildings proposed within a rural landscape. This is partly offset by the existing buildings at Woodhouse Farm that provide a setting for the proposals.

The proposed development would result in the loss of some pasture and hedgerows as detailed in this chapter, and changes to levels within the application area to accommodate the buildings, roads and water management proposals. Within the scope of the surrounding agricultural land the loss of such landscape elements is minor.

It is subsequently considered that there will be no significant effects on leisure and recreation within the

<p>locality.</p> <p><i>Traffic and Transport effects on leisure and recreation</i></p> <p>Following extensive discussions between SLR and Neil Archer from Telford and Wrekin Highways Drawings H001 and H002 were prepared and considered acceptable to accommodate the following. This has resulted in a well developed scheme which is acceptable in principle to your Highways colleagues.</p>	
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Summary

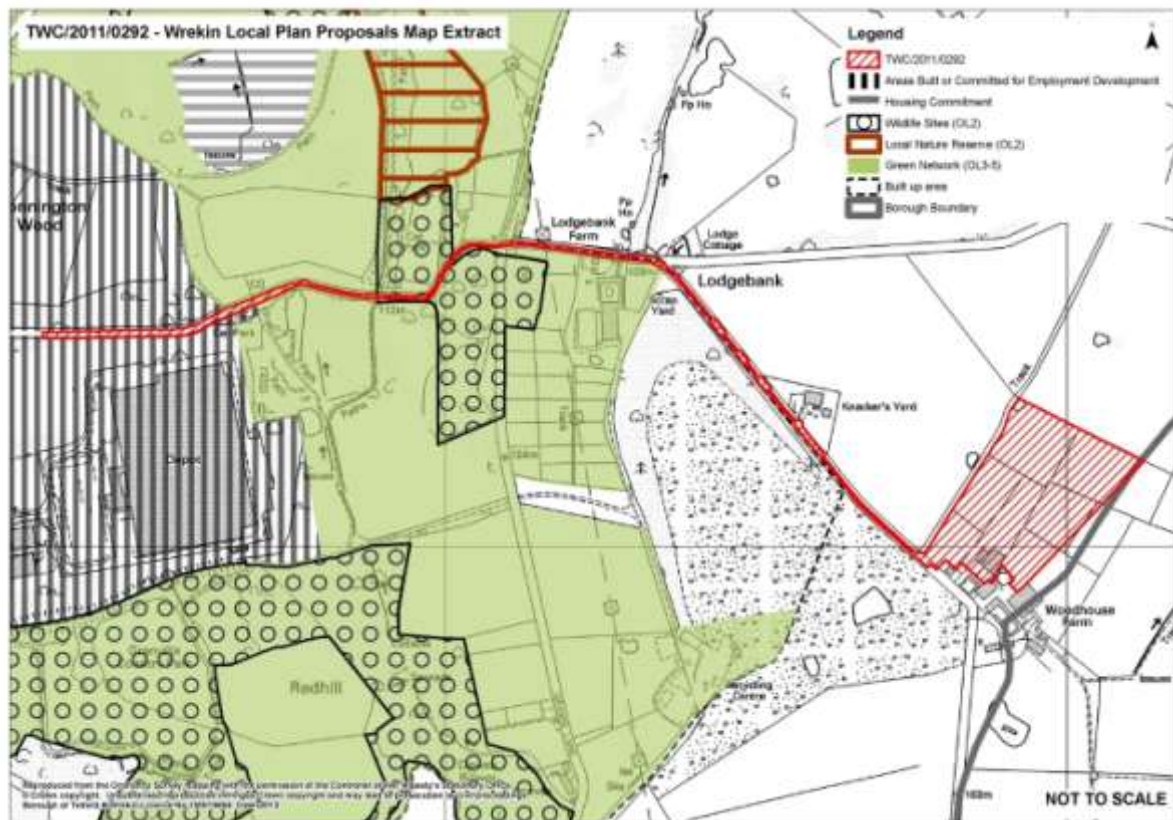
The comments contained in these notes supplement those already provided regarding Landscape and design.

The key points to emerge from the above response to individual paragraphs are :

- The proposal will have a level of visual impact
- The proposal will be seen from certain viewpoints
- The proposal will be a significant feature in the landscape when seen from the elevated ground of the reclaimed landfill site
- The proposal is located in the rural area – a feature which will be reinforced with the reclamation of the landfill site as a rural landscape
- Comparisons of scale (see attached) demonstrate that the proposal is significantly larger than other development sites in the vicinity. NB Only those located to the east of the Country Park i.e. in the rural area are relevant
- The proposal is an urban industrial type. Whilst there are developments of various types within the vicinity – some of which are of an ‘industrial style’, these are of a considerably smaller scale. NB Only those located to the east of the Country Park, i.e. in the rural area are relevant
- Design measures such as planting, building orientation and colour have been used to help assimilate, camouflage/conceal the proposal – however these will be insufficient to overcome the impact of a very large urban / industrial type structure in what is a rural landscape
- The urban (and urban scale) of the proposal will be detrimental to the rural quality of the area which are necessary to support the experience of the area for the rural related leisure/ recreational activities which take place in the area.

5. The Planning Implementation Team comment on **25th June 2012** that the planning application is for the development of an IVC facility and widened access road at the eastern fringe of Telford. The facility itself would be located on greenfield agricultural land in the rural area to the east of Telford's urban boundary. The western end of the widened access road would be within the urban boundary of Telford, falling within the Green Network and a Wildlife Site along its route.

The application boundary showing its relationship with the Wrekin Local Plan Proposals Map is shown on the map below.



In addition to the designations shown on the Wrekin Local Plan Proposals Map there are also two other designations that affect the western end of the access road: Granville Country Park; and a proposed southern extension to the Granville Local Nature Reserve that has been agreed with Natural England.

Telford & Wrekin Core Strategy

Policy CS2 – Jobs

This policy will apply as the proposed development will generate employment (6 jobs are indicated on the application form). This policy states that opportunities for new employment should be in accessible locations, that they should meet the needs of existing businesses, help to achieve diversity in the economic base and minimise the impact on existing uses and local amenity.

- In regard to what is included as an accessible location, Policy CS9 provides the criteria for this (see a summary of these policies below).
- The in-vessel composting plant may be intended to meet the needs of existing businesses by providing a mechanism for disposing and processing of their organic waste. However, the vast majority of the waste to be processed is likely to come from households rather than businesses.
- The in-vessel composting facility may not be of sufficient scale in terms of employment to signify an increase in the diversity of the economic base.
- In regard to the impact on existing uses and local amenity, the facility will be located on existing agricultural land which is part of the wider countryside. The adjacent landfill site is scheduled to close and to be restored to agricultural and countryside uses. The facility will therefore be located in open countryside. Consideration should be given to Wrekin local Plan policies UD2, UD3, UD4 and OL6 in determining the impact that the proposed development will have on existing uses and local amenity.

Policy CS7 – Rural Area

This policy states that development in the rural area will be limited to that necessary to meet the needs of the area and should be focused on the settlements of High Ercall, Tibberton and Waters Upton. Outside of these settlements development will be limited and in the open countryside it will be strictly controlled.

The proposed development is located away from the three key settlements within the open countryside. The proposal would therefore fall under the 'strictly controlled' category of this policy.

Policy CS9 – Accessibility and Social Inclusion

This policy aims to improve social and accessibility by ensuring that everyone can access opportunities such as work, recreation and open space. In order to ensure that these opportunities are accessible, new development must promote sustainable travel (i.e. public transport, cycling and pedestrian routes) be located in existing centres and include measures that minimise the negative environmental impacts of travel (e.g. congestion, air pollution and noise).

The proposed development would not be located in an existing centre. The proposed access to and from the facility is wholly focused on the widened access road and no mention of access by modes of sustainable transport has been found in any of the supporting documentation for the application. Furthermore, the widened access road is likely to increase vehicle speeds along Granville Road and thus reduce pedestrian and cycle movement between the northern and southern areas of Granville Country Park, thereby reducing the use of sustainable modes of transport and opportunities for access to recreation and open space. There are likely to be negative environmental impacts due to increased congestion, air pollution and noise. This should be confirmed with specialist advice from Environmental Health.

Policy CS11 – Open Space

This policy seeks to protect and enhance areas of open space in the borough. As previously described, the site of the proposed facility is agricultural land in the open countryside. Furthermore, the western end of the widened access road would fall within the Green Network, a Wildlife Site, a Country Park and an agreed extension to Granville Local Nature Reserve. The ecological designations (Local Nature Reserve and Wildlife Site) are covered more fully under Policy CS12.

Development is only permitted on open space where the proposal can demonstrate that it will deliver significant community and environmental benefits and where the land does not contribute to open space standards set to meet the requirements of the local population. Community and Environmental benefits are covered more fully under Wrekin Local Plan Policy OL4.

In regard to the open space standards, an Assessment of Open Space, Sport and Recreation Facilities has been carried out in accordance with PPG17. This provides evidence to show what the local needs for open space are in the borough. In relation to this proposal, the western end of the widened access road falls within an area identified by the assessment as 'Natural & Semi Natural' green space. There is deficiency of this type of open space in north east Telford of 62.62 hectares – the largest deficiency in the borough. The PPG17 Assessment recommends that all such spaces should be protected from development, that their quality should be improved, that biodiversity within them should be maximised and that access to them should be increased. As an evidential document that supports Policy CS11, the findings and recommendations of the PPG17 Assessment should be treated as a material consideration in the determination of this proposal.

Policy CS12 – Natural Environment

This policy states that the natural environment of the borough's Local Nature Reserves and Wildlife Sites will be protected from development that has the potential to adversely impact on its sustainability and that biodiversity and geodiversity will be protected from development.

Specialist advice will need to be sought from the ecology officer to determine the effect of the proposal on these sites and the biodiversity and geodiversity of the borough. It will be important to consider in particular the potential effect of the widened access road on the existing Wildlife Site and the extension to the Local Nature Reserve which has approval from Natural England.

Policy CS13 – Environmental Resources

This policy states that the development must reduce the risk of contaminated land and avoid increasing the risk of flooding. The development proposal must contain sufficient measures to ensure that these risks are minimised. These measures must be to the satisfaction of the geotechnical and drainage engineers.

Policy CS14 – Cultural, Historic and Built Environment

This policy aims to protect and enhance the borough's cultural and historic assets. As these are two Scheduled Ancient Monument's (VXACONA Roman settlement and fort) to the south of the application site, consideration will need to be made to ensure that there will be no negative effects of the development on these historic assets.

Policy CS15 – Urban Design

This policy requires development to assist in creating and sustaining safe places, strengthen local identity, project a positive local image and positively influence the appearance and use of the local environment. The development will be located in the open countryside so specialist advice from the Urban Designer will need to be sought in order to determine the conformity of the proposed development within this policy.

Wrekin Local Plan

Policies UD2, UD3 and UD4

These are specific urban design policies that relate to design criteria, urban design assessments and landscape design. As with Policy CS15 of the Core Strategy, specialist advice should be sought from the Urban Designer to determine whether or not the development proposal conforms to these policies. Particular attention should be paid to Policy UD4 (Landscape Design) due to the location of the application site at the urban fringe of Telford with wider open areas of countryside to the east.

Policy E6 – Rural Employment

This policy will apply as the proposed development will generate employment (6 jobs are indicated on the application form) and it would be located in the rural area. This policy should be considered in conjunction with Policies CS2 and CS7 of the Core Strategy. The policy requires that employment developments in the rural area must be related agriculture or forestry, be of an appropriate scale, type and design sensitive to its location and where it is new build development it must be within or adjacent to a 'suitable' rural settlement (see Policy CS7) or within a farm unit or an expansion of an existing employment use.

The proposed development is not directly related to agriculture or forestry. The application site is on greenfield agricultural land in the open countryside and the scale of the development would be much larger than the existing farm buildings to the south.

Policy T22 – Planning Obligations

This policy states that necessary transport improvements will be provided and funded by the development in order to meet transport needs that it will generate.

There would be widened and straightening of Granville Road for vehicular transport to and from the composting facility. There is little or no provision for public transport improvements, traffic calming measures, infrastructure to

meet the needs of pedestrians, cyclists and horse riders, or access for people with disabilities. These are all requirements of this policy which the proposal in its current form does not address. There may be a negative impact on pedestrian movement between the northern and southern areas of Granville Country Park as a result of the proposed widening of Granville Road – and the likely resulting increase in vehicular speeds that this will generate. Specialist advice from the highways and transport officers should be sought in order to determine the extent of this effect and whether any mitigation proposed by the applicant's is sufficient and appropriate.

Policy OL2 – Designated Sites

This policy covers sites of regional and local importance – including Wildlife Sites and Local Nature Reserves – and should be considered in conjunction with Core Strategy Policy CS12 Development which has an adverse effect on such designated sites will not be permitted. Specialist advice from the council's ecological officers should be sought in order to determine the effect the proposed development will have on these sites and whether there are adequate compensation or mitigation measures to address any negative impacts. In particular the removal of well established hedgerows along Granville Road may have a negative effect on these designations.

Policy OL3 – Green Network

This policy states that the Council will protect the Green Network and its key sites and links in order to achieve the six aims of the designation. In summary these six aims are: to maintain Telford's image as an attractive place to live and work; to retain and enhance the individual identity of parts of the town; to provide easily accessible 'green lungs' for better quality of life; to provide an appropriate supply of land to meet the recreational needs of an expanding population; to protect, enhance and maintain Telford's ecological and geological heritage and archaeological legacy, and to provide open space linkages for footpath, cycleways and ecological corridors.

Policy OL4 – Development within the Green Network

This policy relates more specifically to development proposals that fall within the Green Network. This policy will apply to this proposal as it involves the widening of Granville Road within the Green Network. The policy states that development will not be permitted unless the proposal can demonstrate that there are exceptional circumstances (i.e. predominantly open land uses), that it contributes or is complementary to the aims of the Green Network (see above) or that community and environmental benefits are an integral part of the proposal.

The widening and straightening of the Granville Road may detract from the aims of the Green Network and may negatively impact on the community and the environment rather than benefiting them. These detractions will be the result of the removal of greenery in order to make way for the widening of the road and the reduced pedestrian and ecological linkages to the north and south of the road.

Policy OL6 – Open Land

This policy seeks to protect locally important open land within or adjacent to built up areas. The application site lies at the fringe of Telford's built up area on greenfield agricultural land, the development itself may have a negative effect on the character and amenity of the area. Specialist comments should be sought from the Urban Designer and landscape specialists in order to determine the extent of this effect.

Policy OL11 – Woodland and Trees

This policy seeks to retain and enhance the contribution that trees and woodland make to the landscape character of the borough. Advice should be sought from the tree and ecological officers to determine whether the removal of trees, hedgerows and other vegetation as part of the proposed development are appropriate and whether their loss is adequately mitigated or compensated for.

Policy OL12 – Open Land and Landscape – Contributions from New Development

This policy seeks to ensure appropriate commitment from developers for landscape and open space improvements, where there is a need arising from the development.

As there are a number of potential negative effects of the development on the open space and landscape of the area – as identified above – there should either be improvements made to the open space and landscape within the scheme or contributions should be sought for off-site improvements and management of the local open space and landscape. Of particular concern are the effects on Granville Country Park and Local Nature Reserve, the Wildlife Site and Green Network and also the wider impact of the composting facility on the amenity and character of the surrounding open countryside.

Summary of the Main Policy issues

In summary, the main issues in relation to this proposed development, as identified by the review of the local planning policies identified above are:

- The accessibility of the proposal. It is not in an accessible location and there is little or no evidence of how the new development could be accessed by sustainable modes of transport.
- The widened access road may have a negative effect on pedestrian and ecological movement between the northern and southern areas of Granville Country Park, extended Local Nature Reserve and Green network either side of Granville Road.
- The effect of the widened access road and the facility building on the amenity and functionality of Granville Country Park, Wildlife Site, extended Local Nature Reserve, Green Network. In particular the removal of hedgerows.
- The visual and physical impact of the development on the surrounding open land and the wider countryside.
- Conformity with policies CS2, CS7, CS9, CS11, CS12, UD4, E6, T22, OL2, OL3, OI4, OI6, OL11 and OI12 need particular consideration in relation to this development proposal.

In an email dated **27th July 2012** the Planning Implementation team state why the Country Parks are strategic designations:

Country Parks are predominantly located in areas where urban and rural environments converge. They serve the recreational needs of resident in urban areas by providing access to the natural environment and the countryside in locations close to where people live. Because of their location, Country Parks act as transitional areas that provide an interface between built settlements and the wider countryside. As such they are of greater importance local surroundings and can therefore be considered to be of a strategic nature. Natural England require Country Parks that they accredit to be of at least 10 hectares in size. In this respect they are too large an area to be considered to be only of local importance.

6. The Parks and Open Spaces Manager in an email dated **2nd February 2012** states that the Council provide a grant to the Shropshire Wildlife Trust every year to manage Granville Country park. This is £3,000. There is also a pot of money which is split between three SSSI sites across the Borough, The Ercall Newport Canal and Granville. The total pot is £18,000, the split varies between the three sites depending on what jobs need to be completed. On top of that there is a Section 106 pot relating to the Western Stockpile.

7. The Parks and Open Spaces Team Leader reports that the Council have got £50,000 SITA grant money to fund footpath improvements. He has also found £3,500 worth of work been put through M3 to do minor repairs during 2011/12.

The Priority Action Co-ordinator (Co-operative Council Delivery Team) in an email dated 16th August 2012 confirmed the following concerning expenditure at Granville Park.

SRB6 fund 2003-2003 = £5,100
SRB6 fund 2004-2005 = £6,625
SRB6 fund 2005-2006 = £3,200

Donnington Partnership grant received from Living Spaces Fund in 2006 = £25,000. There was also a successful application in 2010 to the Heritage Lottery Fund (amount ?) put forward by Shropshire Wildlife Trust on behalf of the Granville Management Board, but perhaps the SWT have already included this?

Plus the smaller scale projects as SWT mentioned by the Friends of Granville park group.

8. The Parks and Open Spaces Officer in a email letter dated **12th April 2012** has given a response that is almost the same as the Granville Management Board response above.

The Parks and Open Spaces Officer sent the HDC an email dated 29th June, 2012. It was asked whether the HDC would be adopting the proposed

road/footpath verge etc? If you are can you confirm whether you would be carrying out the maintenance on the additional items proposed through the country park (knee rail/trees/hedgerow/bollards etc) or would you be expecting this to be identified in the management plan? This proposal should not add further responsibility to the Council (Public & Open Space) to maintain something which we do not currently do. The management plan should cover the access route as well even though it is outside the boundary of the application.

Could you confirm the type of crossing points you would propose?

One comment you made was that you would be unable to support the application if the developer has not secured the necessary permissions. As they do not have permission from Public & Open Space to do these works can you confirm you are unable to support the proposal.

9. The Trees and Woodlands Officer

The Trees and Woodland Officer in an email dated **5th March 2012** stated:

- My first point would be to enquire as to the weight and size of the vehicles intended to use this roadway. He is not unaware of any geotextile cellweb system that is designed for constant use by heavy, industrial plant, or logistic support.
- There is no mention of 'over ground tree surgery operations'. If these are high sided vehicles using this access way then tree surgery operations will be extensive and over the recommended canopy per tree loss. There is also the issue of target wound size left on these trees, leaving the trees open to infection and disease until such a time as the wood can compartmentise to create to create a wall of defence.
- It appears that in areas indicated for widening this could be undertaken opposite those trees identified for retention as opposed to the suggestion of undertaking these works within the RPA of these trees.
- Ongoing tree surgery operations will inevitably be required to maintain a safe and clear access to this facility. Section 106 monies must be secured to undertake these operations where the access road is adjacent to Local Authority trees and vegetation.
- Tree 158 is indicated for retention and it is requested detail here with specifics to drainage installation and bunding proposals.
- Given the impact on the amenity of the area and the foreseen disruption of the trees within existing hedgerows, until such a time as these issues can be thoroughly investigated and resolutions found, an objection to the application is made on the above grounds.

The Trees and Woodlands Officer in an email dated **10th July 2012** states:

- Appendices 'G' and 'I' appear to contradict one another. Whilst appendix G provides information to substantiate an average number of 56 vehicle movements per day, appendix I suggests that the average vehicle movements per day is 19.95, rising to 21. in 2034.

- Appendix I suggests a 50% increase in output by 2034 which appears to equate to an increase in movements by 1.26 movements per day. Is my assumption correct in this application?

In an email commenting on the additional information (Regulation 22) on the **13th July, 2012** that are further to the comments initially made:

- Table 6.3 states that the prediction of 50 two way movements per day equates to 4 movements per hour and not the suggested 2 movements. There are a number of points along the suggested access road which are to be widened and expanded to accommodate two passing vehicles. A number of these areas are directly beneath the canopies of well established and mature native trees, synonymous with our landscape and are features within such as stand alone specimens. Further details regarding this is considered necessary at this stage of the development.
- The extent of rot plate removal suggested in some instances equates to what may be approaching 50% and is clearly unacceptable. Given that the high sided vehicles will also require a significant amount of crown removal to meet the statutory regulations. The proximity of the new road layout to the existing trees will clearly require the removal of up to 50% of the crown, an operation I would not consider any tree to be able to respond to. Given that this issue and observations affects the trees along this proposed access to a great extent and that the loss of these trees is not accepted, both this and the first point raised above require resolution prior to any approvals being given to this application.

The revised BS 5837 of 2012 clearly points out the initial stages of any application to develop within proximity to trees and although it is appreciated that that this document was not endorsed at the submittance stage of this application he would recommend that as this is now considered to be the best practice approach it should be adopted where necessary and applied to all applications, delayed or otherwise. You will see that there is a soil survey request within it regarding the construction within the root protection area of a tree, a further request to be applied to this application although this can be applied post approval stage.

Given the above observations and considering the impact and loss of trees this development appears to suggest it is recommended that the application is refused until such a time as these issues have been considered and addressed.

10. Telford Equestrian Centre and Equine Experiences Ltd commented in **August 2011** that they are an established business sites on the proposed access road (Granville Road) to the above planned facility. Their business provides horse riding and care tuition, and horse livery services. The establishment has been operating for the last twenty years. Many of the clients are novice horse riders and first time horse owners for the last twenty years. Many of the clients are novice riders and first time horse owners and a good majority of these are children. Riding horses in the Granville Country

Park forms a large part of the reason for the ongoing business of our existing clients and the off road hacking is an attraction for prospective new clients to the centre.

As well as their regular lessons, they work with Telford & Wrekin Council providing horse riding weekly for adult disabled people attending their day centre. Both of these groups ride out in the park as often as the weather allows and being out on the horses in nature is something they very much look forward to each week. As they are sure we can imagine people are often very vulnerable and their balance is fragile, they have volunteers who walk beside them to assist with keeping them safe and the horses are of course chosen for their good temperaments; at present they have no busy roads to negotiate so this is doable.

They have grave concerns about the amount of traffic that, if the above plan were to go ahead, is likely to be passing their facility. In order to access the bridleways in the Granville Country Park it is necessary to ride on Granville Road. To date this has been fine as the only vehicles travelling on this road generally belong to their clients or those attending the Shropshire Golf Club; this has meant the traffic here is light and manageable with the horses; the above suggested proposal means that all of this will change.

Their fear in the first instance is for those who have their horses kept at livery here at the Centre. Currently many children and adults alike can ride in reasonable safety to the bridleways. Due to many of the riders that attend this establishment being nervous or novice, this forms a large part of their marketing strategy. This is not going to be the case should the applicant's plan go ahead. Horses and traffic really don't mix well and there is a real risk to people's safety here.

They consider this is going to be to the detriment of the business at Telford Equestrian Centre, as the situation is going to undermine the value of the services they offer. In the current economic climate this is not a hit they will be able to withstand.

Furthermore, if the Equestrian Centre were to fold because of this, it will impact on the following community work they are developing at this establishment.

To expand as a business, they have invested much time and money in training to work in equine facilitated learning. As a result, alongside their regular riding school clients, the Centre is now able to meet the needs of people seeking personal development work, which is particularly effective with the horses.

They have a programme for children in residential care along with the attendants who work with them with a view to improve the children's ability to develop healthy relationships, and to achieve a better understanding of the world they live in.

They work with the ponies with groups of under privileged children offering riding and pony care experiences for them as part of a holiday package provided by the 'Happy Holidays' charity.

They are currently in the process of setting up their own charity which will be assessing disabled people through therapeutic art inspired by working with the horses.

They already offer personal development course for people in all walks of life to develop emotional fitness skills while working with the horses.

This work is of a very sensitive nature and the ambience of the facility is paramount to the clients being able to relax in the environment and feel safe. Again they have their doubts about how this is going to work when they have trucks moving up and down the road which is directly in front of the property.

They believe that the proposals will prove to be unsafe for the horse riders and others who currently enjoy walking with their children and dogs in the park. Also it will have a potentially devastating effect on Telford Equestrian Centre and will be a threat to the survival of the valuable work they are doing here to serve the community.

They bring this to our attention with the expectation that the Council will take them, the work they do there, and the action they will need to take should the proposals go ahead, into consideration before making a final decision. They also ask that the Council considers what it is prepared to do to assist them in the safety and security of their business and the future well being of their clients, staff and horses here, should planning permission be granted.

11. Mr and Mrs Howard of Watling Street Grange in a letter dated 13th February 2012 objects to the proposed access route for the following reasons:

1. Volume 1: Planning Support Summary, 2.2 Surrounding Area

To the south of the proposal land for the In Vessel Composting Facility lies Grange Lane. This lane carries heavy goods vehicles and private traffic through out the day seven days a week. To date, the applicant's have not explored an alternative route down this lane and across their 'bottom field' – an area adjacent to the south side of the landfill site.

2. Volume 1, Planning Support Summary, 3.2 Tonnages and Movements

The proposed application wants to subject residents and businesses who currently reside and work off an extremely quiet and peaceful road (Granville Road) to the noise and movements of 42 HGV vehicles per day. The distance is approximately 2kms. On Granville Road are The Golf Club and the Granville Country Park and the Telford Equestrian Centre. The noise of these vehicles approaching and roaring past will spook horses and ponies and in a very short space of time, adults and children will look for alternative equestrian centres to pursue this leisure activity.

Having lived here for the past 14 years, a significant number of HGV drivers ignore speed limits and speed ramps. The frequent crashing noises we hear are from HGV drivers speeding up Grange Lane towards the A5 having tipped their rubbish and are light in weight. They do not slow for any speed ramp.

3. Volume 1, Planning Support Summary 3.4 Access Upgrade

It is noted that the only other access route explored was directly past The Telford Crematorium. Any improvements and upgrade to Granville Road will increase noise and traffic over time.

4. Volume 1, Planning Support Summary 3.5 Hours of Operation

The hours of opening for this proposed plant are Monday to Friday and Saturday morning. This would have a significant impact on Telford Equestrian Centre. The Golf Club and the general public enjoying the facilities of the Granville Country Park, particularly in the school holidays.

If the applicants had explored this suggested alternative route and undertaken some research, they find this could be a solution for the following reasons.

- a) The route across the bottom field would be less than 250 metres to Woodhouse Farm's boundary.
- b) Should the In Vessel Composting Facility be built, some of the HGV traffic currently discharging at the landfill site, presumably will divert to the new composting facility. As a result the increase in HGV traffic along Grange Lane would become less than the 42 movements proposed to be inflicted upon a brand new access route such as Granville Road.
- c) As the access to this route across the bottom field is before the entrance to the Telford Naturists Camp at The Windings, all vehicles will be forced to slow to turn right therefore reducing the noise to The Windings and along the lane itself to the Landfill Site.
- d) If, for argument sake, there still remained 21 HGV vehicles (i.e. 42 HGV movements per day) this would not substantially increase current vehicle movements (namely less than five per hour approx) due to the volume of traffic on the lane.
- e) This alternative route would sit comfortably with the Policy Guidance of PPS10 due to its proximity off the primary highway network, namely the A5.

In conclusion, Veolia states in The Planning Support Summary:

"In line with national planning policy guidance, the West Midlands Regional Spatial Strategy promotes sustainable transport choices and reducing the need to travel..."

By upgrading and accessing this In Vessel Composting Plant for approximately 2 km along Granville Road, Veolia is effectively blighting the life

and activities of the general public and significantly increases the hazards to 'life and limb' for those residents and families undertaking activities both on, around and crossing the Granville Road area.

A suggested route down Grange Lane and across less than 250 metres of their bottom field would eliminate any potential disaster from happening.

12. Nathan Leese of 1 New Lodge Cottage, Lodge Bank, Donnington Wood wrote on 22nd October 2012 to David Wright MP, who passed it onto Mark Pritchard MP (the application site is within the Wrekin Parliamentary Constituency), who forward the letter to the Council. Although the letter is titled "Proposal to alter access to the Granville Community Recycling Centre through Lodgebank", it is interpreted as an objection to the current planning application since this involves widening of Granville Road, which serves Lodge Bank.

"I was devastated to hear about the above proposal and would like to object strongly to it. Granville Country Park is an area of green space where people go to enjoy the countryside and for the local council to consider spoiling this by sending dust carts and recycling lorries through it is unforgiveable."

"My cottage is located just off Lodge Bank, therefore I know that the area is very popular with cyclists, horse riders, hikers and dog walkers. Many of the green spaces in Telford are rapidly disappearing (great newts for the building industry and developers, but to the detriments of local people's quality of life and the aesthetics of the area),so the ones that remain need to be protected for people to enjoy."

"Telford Equestrian Centre (TEC) is located a few hundred yards down the land from my property. It is a thriving business providing livery, guided riding sessions (hacks) through the Country Park and private riding sessions. Many of the people who use TEC do so because of its location in Granville Country Park and the excellent bridleways and routes that are available, as well as the opportunity to enjoy riding in a quiet and picturesque setting. I am concerned that if the above proposals become reality then many of TECs customers will simply move else where causing the business to struggle. Lorries roaring past and additional heavy traffic can upset horses and may lead to more rising accidents and will certainly detract from the ambiance of the riding centre at present."

"I do not wish this letter to sound like a case of NIMBYism and I hope that by considering the view points of many different people as mentioned above I have avoided that. One final point I would like to make is that there is already a perfectly adequate access to the recycling centre via the A5. I understand that some additional work may be needed to allow the access to be used by lorries, but to modify an existing entrance would be considerably cheaper than creating a totally new one and in this age of austerity this surely counts."

"Please take the time to consider the points I have raised in this letter. I am aware that a petition is being created and many people have signed it so far,

so the views expressed are shared by many others. I would appreciate a reply at your earliest convenience.”

13. Nine **other local residents** have collectively objected for the following reasons:

- Land forming new Lodge Farm has the benefit of rights of drainage into the ditches along Granville Road and rights of access.
- There are water pipes and water metres on Granville Road serving Lilleshall Barns and New Lodge Farm.
- Noise. SLRs Design & Access (D&A) statement, 6.1.1 states that “the route adjacent to the Crematorium would have had an unacceptable impact by virtue of the sensitivity of the location and the resulting noise.” They believe that the increased noise generated by construction, the plant and its traffic would also be unacceptable in this location regardless of the actual supply route. The Council should analyse this noise information. Local residents currently live in a quiet location and do not wish this to change. If permission is granted, how will the Council monitor the noise levels?
- Traffic. This planning application includes road modifications to Granville Road, Granville Road leads onto Lodge Road (an unadopted Road) for which some local residents are liable for its upkeep. The Granville Road modifications will lead to increased misuse of Lodge Road. Fly tipping is already a concern in Lodge Road and its environs and greater use of the road will almost certainly cause an increase in this problem. The improved road may lead to more traffic from Donnington and Muxton via Lodge Road, increasing noise levels.
- Site and Aspect. The site of the proposed plant is on elevated ground. This means that it would be visible from many aspects, such as the Lilleshall Hill and Monument, the Shropshire Golf Course and the Crematorium. Visitors to Granville Country Park would no longer be able to experience peace and quiet due to the large number of HGVs thundering through Granville Road. There would also be an increased possibility of local people and wildlife being involved in road traffic accidents.
- Many of the photographs accompanying this application were taken when the trees and hedgerows were in full leaf. This vegetation would not screen the processing plant during other times of the year. This application claims that as the proposed plant is adjacent to the current landfill site that there will be no detriment to the area. As the landfill site is shortly to cease operations and to be restored to form a green buffer to the edge of Telford, this proposed plant will be a blot on the landscape.
- The application proposes to bring waste from all Shropshire to this rural area. There are more appropriate sites, such as industrial estates, where the noise and other issues would be of less concern. The proposed plant is industrial in its scope and therefore unsuited for its suggested role.
- Light and Air Pollution. In the application, under Chapter 15 – Summary, Section 15.12 (Visual Impact), it is noted that the maturation

building “would be visible side on with translucent roof panels visible when illuminated at night time”. Light pollution is an increasing problem and not deemed acceptable in this rural area.

- The application claims that only a small amount of air pollution will occur in the form of odours. When quoted as a percentile this might seem acceptable (98% odourless) but any air pollution is detrimental in this setting.
- There are also conflicting statements in the documentation concerning the reception building’s doors. For the building to function correctly the doors need to be shut at all times except for the entry and exit of vehicles but Chapter 3.3.32 states “The doors of the reception building are likely to remain open most of the time during working hours.”
- The effectiveness of the biofilters specified for this plant has also been called into question. Telford & Wrekin’s own Environmental Health Dept state: “The major failing of biofilters is that because they are dependant on living organisms, they cannot cope well with the large fluctuations in feedstock volume (the odours and methane) that can be expected with the proposed methodology.” The close proximity of the proposed plant to the Crematorium could result in the smell of decomposition being discernible and be a cause of distress to mourners.
- The possibility of air pollution in the form of dust by the operation of the plant or by vehicular movements is discussed in the application. An asthma sufferer could be affected.
- Further Concerns. Some waste supplies reach residents via Granville Road, with a water meter being next to Woodhouse. Residents don’t want any interruption, damage or pollution to their water supply during the construction or operation of the proposed plant or by vehicles serving it. This is of particular concern because the Flood Risk Assessment states that “Severn Trent Water has confirmed they do not own or operate any services within 100m of the application site.” This statement is incorrect.
- SLRs D&A,item 6.2, states that “Vehicles access to the site will be from the public road, the B430.” As this road can be found just north of Oxford, this is clearly a mistake in the document. If a simple error like this can be overlooked, there may be other errors in the SLR application.
- This is an installation of an industrial processing plant in a rural area.
- Proximity to local residences and therefore has a profound effect on residents local amenities.
- Since the site will be for Council use, an independent body should investigate the proposal.
- The Telford Equestrian Centre is used by local residents and would no longer see this as an environment for learning to ride with HGVs driving past the centre.
- Devaluation of property.
- Design and Materials. The drawings that have been submitted as part of the application are at best diagrammatic. You cannot see on the drawings any reference to the building’s construction materials. Whilst

there is one section through the site there is no appreciation of how the buildings will sit on the site. Drawing 04 which shows the elevation of the Maturation Hall doesn't have a single reference to the construction materials whilst it sits on a rectangular block with no reference to ground level or any other buildings around it. Drawing 10/3 showing the Landscape Context not only states that the drawing isn't to scale (for reasons that are not clear) but doesn't even show the building on the site, just an outline in the red of the site itself. It is therefore impossible to understand from the drawings what the buildings are really going to look like.

- What the drawings appear to show are very large industrial style buildings whose design and size in no way relates to the agricultural setting at the site. The building would be more appropriate on an industrial park than in the countryside and it should not be forgotten that the application seeks to place this very large industrial facility amongst fields and historic farmland. Should the Council even start to consider this application the appearance of the building should be investigated in more detail and request further evidence of how the buildings will sit in its agricultural setting using materials and detail that reflect their context. Surely this building should be of the very highest design quality and use the most appropriate materials to be considered in such a location? At this stage however the applicant has not demonstrated clearly enough the impact of the buildings in their context or whether their design is suitable for such an exposed location.
- The applicant's states in the Design and Access statement the following:

"The design strives to synthesize the functional requirements of the process technology and the need to enclose, drape and screen this with the need to consider the visual impact on the local communities by providing an attractive, sustainable, environmentally friendly exemplar waste management facility that fits well into its rural setting, enhancing the image of its location and having features that contribute to its sense of place."

No evidence can be found in the submission that is able to demonstrate this powerful statement. The statement goes on to refer to the appropriateness of the materials but does not state what these actually are. The photographs of the cladding panels contained within the report look like some sort of corrugated metal more appropriate to an industrial setting.

- Scale and Massing. Compounded by its siting, the size of the facility is overbearing and the size and massing of the buildings inappropriate to the size and scale of agricultural buildings that would normally be seen in this type of setting.

The Design and Access statement states the following:

“The overall size of the maturation building is m long, varying from m in height to the apex of the roof set to xxxm AOD. Two small stacks set at 4m above base level, m AOD.”

Even with the blanks filled in this poorly written statement doesn't demonstrate an appreciation of the building's relationship to the site or how it addresses its very large bulk compared to the surrounding farm buildings and landscape.

- Access and Landscaping. The access is totally unacceptable. Even taking into account the proposed alterations the 'road' to the site is narrow. It is also on an upward incline from the Country Park to the Woodhouse Farm site. This will inevitably require low gear driving for the HGVs when they are at their fullest. This will maximise the noise from these trucks.
- The additional heavy traffic, in front of the Telford Equestrian Centre, is bound to create dust in dry periods and noise at all times. This is totally out of keeping for a country pursuit. It will create an environment that, potentially, will be a health hazard and also dangerous for a facility which is used, in the main, by young children.
- A drawing entitled 'Landscape Mitigation Proposals' was expected to show how the application will mitigate any impact the proposal will have on the surrounding countryside. The drawing only appears to demonstrate how a series of passing places will be created along the access road. Is there a drawing which seeks to mitigate the impact of the facility itself and is the Council satisfied that the applicant has taken all the necessary measures to do so? The extensive proposal for bollards (assumed to be concrete) to be placed along the edge of each footpath. The use of concrete bollards is completely inappropriate for a rural setting and assurance is sought that these are replaced with something more appropriate.
- The applicant has provided drawings of the trees that are to be protected and those which are of low quality are to be removed. There are no proposals to replace any of the trees to be removed. Shouldn't the Council encourage this.
- Environmental Considerations. No documents that consider sustainability.

14. Carter Jonas made a revised representation dated 25th April, 2012. They have been instructed to lodge an objection on behalf of **Burhill Golf and Leisure Limited ('Burhill')**, owners of the Shropshire Golf Centre (referred to in this letter as the golf course). They understand that Paul Barnes of Burhill met Council Officers on 19th March, 2012.

As you are aware, the golf course is located just a little way to the north of the application site and takes its access from Granville Road. Indeed, Granville Road forms the southern boundary of the course for a distance of around 150m and players are therefore in close proximity to the road for a period of time whilst on the course.

Our objections cover four principal issues:

- Location – the proposal is in the wrong place.
- Traffic and access – access is inappropriate and substandard.
- Noise and Air Quality – the proposal will cause significant noise and odour, harming the rural character.
- Visual impact – the proposal will harm the open countryside.

1. Location

National guidance on waste management is set out in PPS10 (March 2011) and stresses the need to locate waste facilities close to the source of the waste. While we acknowledge that the chosen site at Woodhouse Farm is reasonably close to the primary network and close to an urban area, this is not the area that will in practice be served by this facility and furthermore, we do not see the justification for creating one large site to deal with Shropshire County's waste, rather than a series of smaller, local facilities which would entail less transport and related carbon emissions, and would allow easier distribution of the resultant compost material.

The proposed composting facility would serve the needs of Shropshire (under the terms of Veolia's contract to provide waste services to the County). We understand that at the moment Telford & Wrekin has no commitment to utilise this spare capacity, and any decision on whether to do so would be taken by their Waste Procurement section.

Given that this facility is in large part proposed to treat Shropshire's waste, the policies of the Shropshire Core Strategy (March 2011) are therefore relevant. Policy CS19 of the Core Strategy states that the County will allocate sites for waste treatment through a separate DPD, according to identified broad locations (Core Strategy Fig. 9 Broad Locations for Waste Management Sites 2009-2026).

One of the key intentions behind the policy as stated in the supporting text is to address the current dependence of the County on waste management sites in surrounding areas and particularly Telford & Wrekin.

The current proposal will simply exacerbate that dependence and does not accord with the objectives of policy CS19 to allocate a series of smaller sites, accessible to the main urban areas (principally Shrewsbury and Oswestry). Figure 9 identifies broad locations for such sites, however, the application site does not lie within one of those broad locations and we consider that the proposal is therefore contrary to the Shropshire Core Strategy.

The proposed creation of a major waste management processing plant in the countryside, and the significant detrimental impacts on the tranquillity of the surrounding environment, in particular on the amenities of the golf course and equestrian centre and the nature conservation interest of the Granville Country Park are also contrary to the saved policies of the Wrekin Local Plan and of the Joint Shropshire and Telford & Wrekin Joint Structure Plan.

We therefore object to the proposed location of this facility which does not meet the objectives of the County's waste strategy, or the guidance in PPS10 and would be contrary to local planning policy.

2. Traffic and Access

Notwithstanding our objection to the principle of locating this facility at Woodhouse Farm, we are very concerned about the proposed access route from the primary road network (Granville Road) which is completely inappropriate for the type and quantity of traffic that this facility will be served by.

As the applicant's Transport Assessment states, the site is located approximately 2km along Granville Road from its junction with Redhill Way and Donnington Wood Way (B5060). Granville Road is for the most part a private road that while metalled in part is predominantly an unsurfaced track. It provides access to a number of residents and users including the golf course, the Telford Equestrian Centre and the Granville Nature Reserve and Country Park.

The latter straddles Granville Road and would be particularly affected by the HGV traffic that would serve the facility, which would have a significant detrimental impact on both the nature conservation value of the Park and to the amenity of its visitors.

The character of Granville Road is of a relatively quiet country lane which is used by a wide variety of users including horses from the Equestrian Centre. This nature of traffic is compatible with the Golf Course, but the introduction of at least 42 HGV/Refuse Truck movements a day (or between 4 and 5 lorry movements per hour) Monday to Saturday lunchtime) plus staff and visitor movements will completely change this character to the detriment of existing businesses and the amenity of the surrounding area.

Granville Road is completely unsuited to this type and level of traffic, and the improvements proposed to it will simply increase the damaging impact that it will have on the residents, businesses and amenities currently served off it. In particular, the introduction of traffic lights will create an alien, urban character and will serve to increase the noise and pollution created by lorries as they brake to stop and then accelerate through the controlled sections.

Route Choice

As is stated at paragraph 6.12 of the Traffic and Transport chapter of the Environmental Statement, the site is located only 1km to the north of the A5 along Woodhouse Lane. This is a direct and self evidently much shorter route between the site and the strategic road network which avoids any conflict with the other users of Granville Road and would accord with guidance in PPS10. There is a good junction with the A5 including a right turn lane for traffic coming from the east and space for traffic turning west onto the A5.

The only other use served by Woodhouse Lane is the Crematorium. While a shared access between these two users is undoubtedly a sensitive matter, there is ample scope for further screening to the Crematorium along its frontage to Woodhouse Lane which could mitigate any noise impacts from the traffic associated with the composting facility.

Granville Road is wholly unsuitable as an access to the proposed facility. In the event that the Council accepts that this is the right location for this facility, it must be accessed from Woodhouse Lane.

3. Noise and Air Quality

Noise

We have significant concerns about the impact of the facility on the amenities of the golf course through the noise and air quality impacts associated with its construction and operation. The introduction of 42 HGV movements along Granville Road will create significant levels of noise for users of the golf course who are currently used to very low levels of ambient noise, characteristic of this rural area and essential for the enjoyment of golf as a peaceful pastime. This will be magnified by the introduction of a traffic light at the junction of Granville Road and Lodge Road on the south eastern corner of the golf course, where traffic noise will increase as vehicles brake to a halt and then rev their engines to move off again.

Air Quality

The proposed facility would be located on high ground to the south of the golf course and therefore any odours and other emissions from the facility can be expected to blow across the course, dependent on wind direction.

We have seen the response of the Environment Agency (EA) who have raised a number of concerns with the proposals including the way that odour arising from the treatment process (including bioaerosols) will be treated and contained. From the EA's comments it is evident that they have serious concerns about the design of the bio-bed system of controlling off-site odour annoyance. Indeed, they state that failure to properly manage such a system could result in significant off-site odour and could have implications for the health of those in the surrounding area.

The EA's letter refers specifically to other external composting facilities to the south west of the current proposal. These have generated a large number of complaints from residents, thus reinforcing the need to robustly address the issue of odour.

The EA also raise concerns about the stack height (4m) and the lack of justification for this or demonstration that it will effectively disperse emissions and minimise odour annoyance. We would also add that there are likely to be impacts from the odours emanating from the HGVs and Refuse Vehicles that serve the site. Refuse vehicles are generally open at the rear and they are likely to create bad odours as they pass along Granville Road.

Clearly there are significant objections with regard to the proposals based on noise and air quality impacts and we are not satisfied that these have been addressed satisfactorily. We therefore object to the application on these grounds. These matters further support the conclusion that this is not the right location for this type of facility.

4. Visual Impact

As mentioned earlier, the site is located on elevated ground and would be highly visible in views from many aspects, including from many parts of the golf course. This area is rural in character and the introduction of industrial scale buildings with a stack will intrude on the rural character.

The introduction of 42 HGV movements per day will take away people's quiet enjoyment of this part of the countryside, whether visitors to the golf course, horse riders at the Equestrian Centre, or visitors to the Nature Reserve and Country Park.

There are significant objections to the visual impact of the proposal. This also supports the conclusion that the facility should not be located here.

Conclusion

We wish to register our strong objection to this application for all the reasons set out above. The proposal is in the wrong location to serve Shropshire's waste treatment needs and is contrary to national and local planning policy. In terms of the proposals for Woodhouse Farm, the access is completely inappropriate and will damage the amenity and businesses of those who are located along the length of Granville Road. The noise and air quality impacts will be significant and have not been adequately addressed by the applicants. The construction of such a facility at Woodhouse Farm will be highly visible from the surrounding area including the golf course and will spoil the rural amenity of this area.

For all these reasons this application should be refused.

15. The Co-ordinator of Telford Friends of the Earth (FoE) comments on 15th October, 2012 that:

FoE objects to the planning application TWC/2011/0292, from Veolia Environmental Services Shropshire Limited for the construction and operation of a 64,000 tonnes per annum In Vessel Composting (IVC) facility with

windrow composting (fully enclosed) to compost and recycle Shropshire's organic non-hazardous waste and Telford & Wrekin's organic waste, located at land adjacent to Woodhouse Farm, Granville Road, Donnington Wood, Telford.

TOE wishes to also support the objections raised by several interested parties including Granville Management Committee, Shropshire Wildlife Trust and various sections of Telford & Wrekin Council.

In addition, FoE wish to emphasise the need for the Council to be consistent in its planning decisions. The Council previously rejected an application by SITA for an 'Energy from Waste' Centre adjacent Grange Lane, in the vicinity of this current application for an IVC facility.

The Minutes of the Plans Board with regard to that decision of 7th December 2009 state:

"This was an application by SITA (UK) Ltd for the construction of an Energy from Waste (EfW) plant on a site adjacent to the existing Granville Landfill Site...

The site lay within the built up area of Telford, as defined on the Local Plan proposals map, immediately adjacent to the boundary within the Borough's rural area and was part of a larger swathe of Green network that extended northwards to the southern edges of Muxton and westwards towards Redhill Way.

The proposal site was not allocated for any form of development within the Local Plan proposals map and was specifically protected against built development as part of the Green Network in the east of the Telford urban/rural fringe area with amenity, recreation and landscape value. There was, therefore, a presumption in favour of preserving the Green Network and the proposed EfW did not meet any of the criteria established within the Local Plan in WLP Policy OL4 and CS Policy CS11.

By virtue of its commanding location in an elevated location on the interface between the town and rural landscape, the proposed development did not comply with the provisions of JSP Policy P67 and WLP Policy NR1, both of which required that proposals for waste management should not have unacceptable impacts on interests of acknowledged importance, including landscape character.

... as the restoration of the Granville landfill back to countryside with amenity and recreation value following expiry of the temporary planning permission in 2025, and which had a degrading effect on the perceived character and quality of the local landscape would be delayed. The EfW facility would be a permanent, uncharacteristic and intrusive form of development, with an ongoing impact on the area following restoration in accordance with the Council's long term countryside/recreation aims for this area of Telford and with a public recreation asset with strong links to Granville Country Park.

There was acknowledged significant pressure on land within the urban fringe and the proposed EfW facility would increase this, forming an 'island' of development separate from the built up areas of Telford. This could increase pressure from other forms of development for the release of further Green Network land and would undermine the spatial strategy for the future direction of development in Telford, as provided within the Development Plan.

Based on an initial assessment of alternative sites available, it was evident that there were a number of sites that were preferable to the proposal, as described in the report. Planning policy favoured the development of waste management facilities within employment/industrial areas or on brownfield land, as stated in PPS10 and policy W5 of the WMRSS2. It was therefore, considered that there were alternative preferable sites and that the applicant had not fully considered alternative locations and had failed to demonstrate that alternative sites existed.

... In summing up the debate the Head of Planning & Transport said that approval of the application would have a serious effect in terms of policy upon the Council's ability to rise up the Waste Hierarchy and would be detrimental to developing the principles of reducing, re-use and recycling. Although the proposal was better than landfill, it was still at the low end of the Hierarchy and would not promote the better management of reducing and recycling waste.

In conclusion, he drew the Board's attention to the recommendations in the officer's report and proposed that Reason 1 for refusal be amended to make reference to 'the loss of best and most versatile agricultural land' and that in Reason 3 the word 'transfer' be deleted and replaced by the word 'recycling'.

On being put to the vote it was unanimously:

RESOLVED: that following expiry of the departure time on 11th December 2009 delegated authority be granted to the Head of Planning & Transport, following consultation with the Chairman of the Plans Board, to REFUSE PLANNING PERMISSION for the following reasons:-

1. Green Network

The proposed development would be a visually prominent and permanent encroachment into the designated Green Network which was not consistent with the stated aims and objectives of land within the Green Network. By reason of its location, permanency, scale and mass the proposals would erode the identify of this part of town, would conflict with the aims of providing an appropriate supply of open land and would have a negative impact upon the character, appearance and amenity of the Green Network and the local area and Granville Country Park, especially following completion of the landfill reclamation proposals. As such, the proposal would be contrary to WMRSS2 Policy W7, Joint Structure Plan Policy P67, Wrekin Local Plan Policies OL3 and OL4 and LDF Core Strategy Policy CS11;

2. Landscape

The proposed development by reason of its location, design, scale, mass, height and permanency would be visually harmful to the open character of this part of Telford's urban fringe area and be detrimental to the setting of this area by delaying the restoration of the landfill site back to open land as such would be contrary to WMRSS Policies QE6 and W7, Joint Structure Plan Policy 67 and Wrekin Local Plan Policy NR1;

3. Waste Hierarchy

The proposed EfW facility, without removal of the biodegradable fraction for biological treatment or the absence of a materials recycling facility at the "front end", had the potential to prejudice movement up the waste hierarchy and prejudice the evolution of a preferred waste management strategy for the Borough that could undermine the government's objective of minimising waste (and the recycling of waste) and hence would be contrary to the advice in the national Waste Strategy, PPS10, WMRSS2 Policy W1, Joint Structure Plan Policy P65;

4. Prematurity

The proposed development was considered premature to the consideration of the emerging LDF waste policies and there was no urgent or regional need for the proposed EfW facility that would warrant pre-empting the LDF Review.

5. Alternative Sites

The applicant had inadequately considered and failed to demonstrate that there were no preferable alternative sites and hence the proposed development would be contrary to PPS10 and WRRSS2 Policies W5 and W7."

The Plans Board at the time therefore placed very high priority on:

- "Green Network in the east of the Telford urban/rural fringe area.
- On interests of acknowledged importance, including landscape character.
- The restoration of the Granville landfill back to countryside with amenity and recreation value.
- A degrading effect on the perceived character and quality of the local landscape.
- A permanent, uncharacteristic and intrusive form of development, with an ongoing impact on the area following restoration {of the Granville landfill site}.
- Acknowledged significant pressure on land within the urban fringe and the proposed EfW facility would increase this, forming an 'island' of development separate from the built up areas of Telford. This could increase pressure from other forms of development for the release of

further Green network land and would undermine the spatial strategy for the future direction of development in Telford, as providing within the Development Plan.

- Based on an initial assessment of alternative sites available, it was evident that there were a number of sites that were preferable to the proposal, as described in the report. Planning policy favoured the development of waste management facilities within employment/industrial areas as stated in PPS10 and policy W5 of the WMRSS2. It was, therefore, considered that there were alternative preferable sites, and that the applicant had not fully considered alternative locations and had failed to demonstrate that alternative sites existed.'

There is also an important point to be made with regard to the waste hierarchy. FoE quote the Minutes as follows:

“In summing up the debate the Head of Planning & Transport said that approval of the application would have a serious effect in terms of policy upon the Council’s ability to rise up the Waste Hierarchy and would be detrimental to developing the principles of reducing, re-use and recycling. Although the proposal was better than landfill, it was still at the low end of the Hierarchy and would not promote the better management of reducing and recycling waste.”

Although the proposed IVC facility offers windrow composting (fully enclosed) to compost and recycle organic non-hazardous waste it actually does not promote the reduction of waste. The scheme is based on the collection of mixed garden and food waste. If this is compared to the real life experiences of the separate food waste collection (and anaerobic digestion) in South Shropshire (utilising the Coder Road AD facility) a significant reduction in the food waste collected per household was achieved simultaneously with high levels of participation. This reduction in waste (top of the waste hierarchy) was achieved because householders realised the quantity of food they were wasting and actively reduced their production of food waste to save on household expenditure and avoid unnecessary waste. The proposed IVC facility household collection service would use larger wheelie bins where the garden and food waste is mixed and the quantity of food waste is much less obvious. Consequently the facility would actually not encourage waste reduction and hence ‘not promote the better management of reducing and recycling waste.’

FoE also suggest that allowing this development may result in ‘the loss of best and most versatile agricultural land’ as acknowledged in the case of the EfW application as a reason for refusal.

The current proposal would also ‘have a negative impact upon the character, appearance and amenity of the Green Network and the local area and Granville Country Park. As such, the proposal would be contrary to WMRSS2 Policy W7, Joint Structure Plan Policy P67, Wrekin Local Plan Policies OL3 and OL4, and LDF Core Strategy Policy CS11’.

FoE also believe, as in the case of the EfW proposal, the Veolia scheme: ‘... by reason of its location, design, scale, mass, height and permanency would be visually harmful to the open character of this part of Telford’s urban fringe area and be detrimental to the setting of this area by delaying the restoration of the landfill site back to open land and as such would be contrary to WMRSS Policies QE6 and W7, Joint Structure Plan Policy 67 and Wrekin Local Plan Policy NR1.’

FoE also believe, as in the case of the EfW proposal, regarding the Veolia scheme: ‘The proposed development is considered premature to the consideration of the emerging LDF waste policies and would pre-empt the LDF Review.’ {Officers would be able to clarify the state of Development Strategy waste policies.}

In addition, as in the case of the EfW proposal FoE believe: ‘The applicant had inadequately considered and failed to demonstrate that there were no preferable alternative sites and hence the proposed development would be contrary to PPS10 and WMRSS2 Policies W5 and W7.’

The existing access road is recognised as incapable of taking the necessary level of additional traffic (some 44 HGV movements per 8 hour working day) without significant ‘improvements’. This would have a serious impact on the intended Country Park/Local Nature Reserve area affecting not only the ecology but the whole character of the site and this area of Telford.

As SWT state: ‘The access road will not only result in the loss of adjacent hedgerows and scrub but will contribute to an increased fragmentation of the site and a considerable change in the perception of the area for visitors to the LNR.’

The Environment Agency has also expressed serious concerns regarding the cumulative impact of bioaerosols, odour, flies, dust and noise at this location. Their concerns may have been met in the meantime with a sufficiency improved suite of measures by the applicant.

FoE understand Granville Management Committee (GMC) was established to monitor the management of Granville Park and develop and enhance the Park for wildlife and the local community. Granville Country Park (a designated Local Nature Reserve) is seen by GMC and the wider community as an informal recreational area of quiet contemplation/informal recreation for community use which is increasingly important with the growing number of residents in this regional growth point of Telford and also serving the wider regional area.

As GMC state: ‘It is the only accessible country park for the population of the town within the urban area of Telford. This popular area is used by walkers, horse riders, cyclists, anglers etc and for Children’s adventure play and is highly regarded asset in which to promote the town to visitors.’

GMC highlight the access road (currently a low key informal route) is at present a quiet transport route cutting through the central area of the park, crossing several of the most well used pedestrian/equestrian/cycle routes which circulate around the park.

GMC state: 'The general sound within the park is of wildlife so even small occasional noise levels can have a large impact upon the tranquillity that users of the country park enjoy. The implications of formalising the informal access to and through the country park are that the feeling of entering the countryside is diminished.

FoE agree with this assertion and are concerned at the current route, similar to a single lane country track and having a number of road humps, being subjected to significant upgrading and many large goods vehicle movements. This would seriously harm the tranquillity of the park.

The Trees and Woodlands Officer, Parks and Open Spaces, at Telford & Wrekin Council, has expressed serious concerns over the upgrading of the access road resulting in extensive tree surgery operations in excess of the recommended canopy per tree loss.

As the officer states: 'Given the impact of the amenity of the area and the foreseen disruption to the trees within existing hedgerows, until such a time as these issues can be thoroughly investigated and resolutions found I object to this planning application on the above grounds.'

GMC also state: 'The park is set to expand following the completion of the landfill site. This will increase the value of the Country Park to the community. This would include an area overlooking the proposed vessel facility. This restoration is currently underway. The use of this restored area may be affected by the proposal through normal industrial noise affecting the tranquillity able to be achieved from this proposed overlooking part of the park. Granville Management Committee believes the feeling of tranquillity would be lost on this proposed restored site and significantly affected on popular areas adjacent to the proposed transport route. No consideration/mitigation measures have been proposed to offset the negative impact of the proposal on the park and its use.'

FoE support the objection by GMC on the grounds quoted of harm to the tranquillity of the park and areas adjacent to the proposed transport route.

Finally, FoE believe the technology proposed to be inappropriate when there is already general availability of open windrow composting (i.e. not fully enclosed in an industrial building) and anaerobic digestion facilities that can deal separately with garden and food waste. Examples, amongst others, include Jack Moody Ltd., Harper Adams University College, Lower Reule Farm and the new Marches Biogas Anaerobic Digester plant.

In conclusion, FoE propose that there is considerable evidence of substantial planning grounds to refuse IVC planning application, not least to be seen as a

planning authority consistent in its treatment of planning applications in the Telford urban/rural fringe area.

James Cook, a planning manager at **Veolia**, in an email dated **24th October, 2012**, has replied to the FoE representation as follows, quoted verbatim:

- This objection has been received some c18 months following the original submission – this is disappointing given that I recall from previously released minutes that FoE had already considered the application some time ago;
- The objection largely reiterates a series of comments/reasons for refusal in relation to an EFW proposal (i.e. completely different proposed development with different issues) on a separate site. Whilst comments in the previous committee report may be useful background to the VES proposed development however it can be no more than this. For example the level of HGV movements proposed was far greater than those associated with the IVC development;
- I struggle to comprehend the comments in relation to the waste hierarchy – the IVC will treat suitable wastes collected from the local area (i.e. Shropshire and Telford) which has historically been disposed to land and create a quality assured composted product for sale/use on land using innovative but proven technology. Whilst efforts are made to encourage residents (and businesses) to minimise their waste production through other methods, in accordance with the waste hierarchy, the reality is there is still a need to accommodate the waste currently being produced and projected into the future. This tonnage is in line with sound evidence which has been subjected to examination. Similarly, the comments fail to recognise the implications of separate food and green collections, including collection/treatment infrastructure and impact collection rounds;
- Prematurity is simply not a defensible reason to object to this application - as described in the planning application there is an urgent need to deliver waste treatment facilities across the West Midlands now and deliver more sustainable waste management through landfill diversion;
- The specific issues raised and reiterated by FoE have been addressed by VES through various responses, additional site surveys, reports and the Regulation 22 response – for example the EA concerns (amenity issues) have now been addressed and will be subjected to further interrogation through the permitting process, along with comments regarding the highways design, landscape and ecology concerns. I trust that TWC will adequately address each of the specific points in turn to ensure there are no misunderstanding/areas of uncertainty.
- An Alternative Sites Assessment has been conducted, submitted as part of the application and updated through email correspondence and the Regulation 22 response. Any alternative, currently operational sites must be considered alongside i) deliverability criterion, and ii) planning/technical requirements such as the ability to manage the types of waste (i.e. green and food with obvious collection efficiencies

- and ABPR considerations) and the tonnage proposed. The submitted planning application robustly answers the deliverability question;
- Whilst the site setting (and particularly the access route) has been raised as an area of concern the application provides detailed assessments of the various issues, including air quality/odour, noise and transport considerations. In addition VES has confirmed that it is willing to work with the Granville Country Park Management Committee and the Shropshire Wildlife Trust (SWT) and enter into a legal agreement to deliver a suite of enhancements with a view to benefiting the management of habitats across the area and improving the visitor experience. This assurance has led to the SWT withdrawing any objections with a view to securing the required enhancements. As discussed previously, VES is keen to deliver this enhancement work to ensure it is seen to be a 'good neighbour' rather than in negative light as suggested in the objection.
 - I trust the Officer's report will correctly reference the average number of HGVs referenced from both the Transport Assessment and subsequent Regulation 22 response which provides a spreadsheet breaking down the figures and assumptions used (i.e. an average of 21 HGV movements over the working week based on the maximum capacity).

16. Natural England (NE)

In a letter dated **9th June 2011** NE commented that the lack of specific comments from them should not be interpreted as a statement that there are no impacts on the natural environment. Other bodies and individuals may wish to comment. NE would however expect the Council to consider the issues outlined in the enclosed advice note, particularly with respect to the possible enhancements for biodiversity which, in general, the NE and welcome in the proposals.

NEs concerns relate to the proposed access road and lack of renewable evidence, (for example a phase 1 survey and protected species surveys) on the impacts of this part of the proposals on the nature conservation interest.

Should the proposals be amended in a way which significantly affects its impact on the natural environment then, in accordance with Section 4 of the Natural Environment and Rural Communities Act 2006, Natural England should be consulted again.

NE in an email dated **12th September 2011** confirms its original advice and requests that the appropriate survey work and assessment is undertaken.

NE in an email dated **5th November 2012** have confirmed that the application site that contains agricultural land (not the farm buildings) is on agricultural land classification 3.

17. Shropshire Wildlife Trust (SWT)

SWT objected to the application as given in their email dated **12th May 2011**.

The SWT has a number of concerns and so objects to this development.

The SWT concerns relate to the access road rather than the actual size of the composting facility. It is clearly recognised that the existing road cannot take the required level of additional traffic (44 HGV movements per 8 hour working day) without significant 'improvements'. This will have a significant impact on the Country Park / Local nature reserve area affecting not only the ecology but the whole character of the site and this area of Telford.

These impacts have only partially been addressed and the proposed mitigation and compensation is inadequate. The access route runs virtually through the centre of the suite of sites that Telford & Wrekin Council are proposing to encapsulate under an extended LNR designation.

The access road will not only result in the loss of adjacent hedgerows and scrub but will contribute to an increased fragmentation of the site and a considerable change in the perception of the area for visitors to the LNR.

The access from the south / A5 appears to have had no detailed investigation and has been discounted on the basis of objections relating to unacceptable impact upon the Crematorium.

Given the current proposals the SWT objects to the proposals and suggests that either an alternative site access route is required or considerably more effort and resources are placed on mitigation and compensation of the impacts associated with the access road. Such measures could include:

- GCN exclusion fencing (construction phase)
- Invertebrate habitat (Dingy Skipper)
- Wildlife tunnels (built into/under road during construction)
- Signage and interpretation for LNR (including clarification of what is not accessible to traffic)
- Improvements to LNR car park area.
- Provision of educational facilities linked to recycling and nature conservation.
- Contribution towards on-going management of the park.

The alternative route or measure including the above would help the development to meet the requirements of PPS9, see below.

PPS9 states that:

- "Local Nature Reserves and Local Sites, have a fundamental role to play in meeting overall national biodiversity targets; contributing to the quality of life and the well being of the community; and in supporting research and education."

- “Local planning authorities will need to be satisfied that the development cannot reasonably be located on any alternative sites that would result in less or no harm. Given the facilities proposed are suggested to cater for the whole of Shropshire there are surely a wide range of alternatives to consider. Granted proximity to the principle road network is desirable but many alternative sites will better meet this requirement.”
- “Planning decisions should aim to maintain, and enhance, restore or add to biodiversity and geological and conservation interests”.

SWT comment on **20th August, 2012** that the 2010 HLF bid was included within the £150,000, but probably not the SRB6 fund and Living Spaces Funds.

SWT comments dated 2nd February, 2012 state:

The SWT continues to maintain its objection to the proposed scheme. SWT has had discussions with Veolia regarding their various concerns and while some technical issues have been afforded additional work and a number of measures suggested, their main concern remains unresolved.

The main concern of SWT relates to the impact on the present and future character of the area. While it may be technically possible to meet the legal and planning requirements relating to the construction of an ‘improved’ access road the very presence of the road will have an impact that needs addressing.

Unresolved issues:

Vehicle movements

It has been suggested that Granville Road is currently already has a substantial level of traffic, including HGV movements. Informal monitoring of traffic by volunteer wardens suggests lower levels of traffic especially HGVs. While SWT accept that this monitoring may lack the scientific rigour of formal traffic counts no explanation has yet been forthcoming relating to the apparent difference in traffic flow.

Character

The description of the area as regenerated coal workings, severed in two by the existing road and surrounded by landfill and industry is vastly different from the perception that local residents, visitors, horse riders and naturalists have of the site. It also gives no recognition to the Local Nature Reserve designation of the area that the access route will pass through.

The existing road may be less than ideal as a welcome to a Country Park and Local Nature Reserve. It may also be used by visitors to the golf club and stables but the suggested increase in traffic and ‘improvements’ will have a significant impact on the character of the area and how the park is perceived by visitors.

Although discussions with Veolia have promised an exploration of enhancement works (e.g. educational facilities, interpretation boards etc) no firm options have yet been presented.

Suitable 'improvements' to a road running through a Country Park and Local Nature Reserve would not normally include widening, traffic signals, increasing traffic movements etc. Certainly none of these measures are beneficial to the conservation of nature, the opportunity for research, or the enjoyment of nature; which should be priority concerns in managing the LNR.

Impacts have been dismissed as insignificant but SWT still has concerns relating to fragmentation of the site that have not been addressed. Measures to allow safe passage of pedestrians and species across the road would be desirable.

A need for greater recognition of both the biodiversity value and LNR status is underlined by:

- The key principles in PPS9 require that planning decisions not only avoid, mitigate or compensate for harm but seek ways to enhance and restore biodiversity.
- Telford & Wrekin Core Strategy which gives specific mention to the value of previously developed sites, LNRs and the need for enhancement as well as protection.

As regards funding for Granville Country Park, the SWT comment on 3rd February, 2012 as follows. The SWT have unearthed some paperwork on Wild Spaces grant funding from natural England (2002-2005) which generated just over £50,000 towards activity on the site. Plus SWT are certain that there have been two landfill tax funded initiatives both also around the £50,000 mark. There have been numerous smaller sale contributions but these would be hard to quantify.

Fiona Moore (TWC Neighbourhood Coordinator) has been involved in successful funding bids relating to the site and the Greenwood Trust has a project focused there.

In summary, since the SWT involvement with the site c1995 it is estimated they have raised approximately £150,000 third party funding towards work on the site. There are also recent/current projects in place that relate to the site.

SWT comments dated **8th December 2011** are as follows:

The SWT initial concern relating to protecting species has been allayed by the additional survey work and proposed avoidance measures. However, their main concern has been the potential impact caused by the access route on the character of the area and the SWT is currently in dialogue with Veolia with regard to possible compensatory enhancements.

Veolia have indicated a desire to deliver enhancement works to compensate for the impact on the character of the Local Nature Reserve/Country Park. A meeting and further subsequent discussions, have been held with representatives from Veolia and the SWT to discuss issues associated with the application. During the meeting Veolia confirmed that it would seek to provide suitable enhancement works, including habitat enhancements and improvements to improve the visitor experience. Although significant work has been provided on the habitat enhancement of the works, visitor enhancement works have yet to be discussed in detail but should consider for example improved signage and interpretation, installation of gates/fencing, potential removal and subsequent reinstatement of old railway lines. Veolia have confirmed that they will work in partnership with the SWT and together with the voluntary management board for Granville Park to identify appropriate works and enhancement opportunities in the future.

With Veolia's confirmation of their commitment to these enhancements and future involvement with the Reserve, the SWT withdraws its objection to the development. This would however be on the condition that a S106 or similar agreement is in place prior to the commencement of development. The SWT look forward to finalising the scope and costs of the enhancement works to form the basis such an agreement that satisfies Veolia, the Council and the SWT.

This is in response to Veolia's letter to the SWT dated 21st September 2011 which states;

There are two specific issues of concern to SWT: firstly, the vehicle movements along Granville Road and secondly, the potential impact of those movements and proposed road improvement works upon the setting of the Country Park and associated ecology. As discussed at the meeting SLR are also spending some time looking at enhancement works which could be offered as part of the overall package of works associated with the proposed development.

Vehicle Movements along Granville Road

There is already significant usage of Granville Road as supported by SLR Consulting Ltd's Transport Assessment which was prepared for the planning application and associated Environmental Impact Assessment. The recorded 24 hour 2 way traffic flows along Granville Road between the Asda Roundabout and the access to the car park, considered to be the principal length of road that impacts upon the Country Park, is as follows:

- Weekday average (all vehicles) – 706 vehicles of which 29 (4.1%) were HGV and
- 7 day average (all vehicles) – 746 vehicles of which 24 (3.2%) were HGV.

For clarity, between 0800 – 1700 on a weekday, which is the period with the majority of traffic movements generated by the proposed facility (as set out in the Environmental Statement), the average 2-way flow is 433 vehicles.

Recorded movements show that nearly all existing commercial vehicles are contained within this period.

At its full capacity the development is predicted to generate 42 HGV movements per day (21 arrivals and departures) and 10 staff movements (5 arrivals and departures). On average, therefore, the flows in total will increase as follows:

- Weekday average (24 hour) flows – 758 (total increase of 7.4%). HGV flows – 71 movements therefore 9.4% of total flow.
- Weekday flows (0800 – 1700) – 485 (total increase if 12%). HGV flows – 71 movements therefore 14.6% of the total flow for the period.

These figures are based upon actual readings and do not consider any increase in movements associated with the Gold Club's proposed hotel overnight accommodation leisure development which are understood to still be delivered. As part of the most recently proposed planning permission (issued 18th June 2010, Ref W2009/0009) at the Golf Club it was anticipated that there would be a 34.4% increase in the number of visitors to the Centre once the whole development was completed. As a result this will further reduce the overall percentage of vehicles associated with the proposed development.

It is worth noting that as part of this permission the Highways Engineer was keen that a financial contribution should be made to upgrade and improve the road and make it more attractive for motorists. This particular development met with no objections from the Council's Ecologist, subject to a condition relating to the implementing of the mitigation measures recommended in the protected species survey. The principle of improving Granville Road therefore has already been established through this extant permission. The proposed Veolia scheme will improve the road to the required standard, allowing the Council to adopt it as desired.

Ecology Considerations

Following our meeting, clarification has been sought from our ecology consultants as to the justification for the details included within the submission in respect of the access road improvements. The access improvements require vegetation removal from only small areas which in many cases involves the pruning of vegetation which has encroached on the carriageway. As a result it was considered that the ecological impacts associated with such work were not significant. As such, extensive mitigation in the form of barrier fencing, creation or management of invertebrate habitats (such as for Dingy Skipper) and road tunnels would not be commensurate with the level of impacts predicted and are therefore not deemed to be required.

Nonetheless, within the planning application suitable measures have been proposed by Veolia's ecologists

SWT commented on **13th September, 2012** as follows:

While the SWT appreciates the update on ecological survey work these technical details on specific species have not been our main concern. It is the wider impact of the access route and traffic on the character of the Local Nature Reserve and Local Wildlife Sites that the SWT see as a major issue. SWT has indicated that it would be willing to withdraw its original objection to the application on the condition that a formal agreement is in place prior to the commencement of development to address, or compensate for, these impacts. SWT very much welcome Veolia's commitment to enhancements and future involvement with the Reserve and would like to see this formalised into a plan that is acceptable to SWT, the Granville Management Board and Telford & Wrekin Council all who have an interest on the site.

SWT clarified their position and their comments made on 13th September 2012 on **5th November, 2012** as follows:

SWT have met with Veolia a number of times and can see that the development could be acceptable given a number of matters are clarified. While the requirements relating to protected species are of minor concern to SWT, the approach route through a LNR has given us considerable concern.

Veolia have indicated that they would be able to look at clarifying some issues (e.g. the apparent discrepancy between their traffic counts and those conducted by volunteer wardens) and will commit to a number of compensation and mitigation measures. SWT has indicated that with more detail and clarity on these issues they would be willing to consider removing their objection. As the SWT do not feel that sufficient detail and clarity has been provided their objection stands. Bottom line SWT has no problem with development (a seemingly good 'sustainable' approach to waste management) but struggle with chopping an LNR with an access road.

18. Atkins

The Council has appointed Atkins, independent consultants to undertake an ecological evaluation of the proposals.

In Atkins covering email dated **6th February, 2012** state:

The Council has instructed Atkins to undertake a review of the ecological parts of the application (submitted in January 2011), including the Environmental Impact Assessment and supplementary ecologically related documents submitted in October 2011 and to advise the Council whether the ecological reports (including the two supplementary October 2011 reports) have followed Natural England's standing advice with respect to protected species. Atkins have taken account of the comments of the planning ecologist, in emails dated 19th May 2011 and 16 September 2011.

Although the Council did not instruct Atkins to take account of how the ES dealt with designated sites, Atkins would advise that the reports on the access route do not appear to give full consideration to the impacts of the improved

access road with its increased width, increased traffic flows, noise, lighting etc on the proposed extension of the Granville Country Park Local Nature Reserve that has been agreed by the Council's Cabinet but not yet formally declared. Granville Road passes through the extended Local Nature Reserve. Ecological impacts would also include increased fragmentation of the proposed Local Nature Reserve and the designated Wildlife Site. The planning ecologist raises this issue in her September email.

Atkins commented in a letter dated 6th February, 2012 that further information was required, which resulted in further ecological surveys being submitted in July, 2012. Further advice was received from Atkins on 14th September, 2012 which required clarification on some points. When this was received Atkins confirmed in a letter dated 8th October, 2012 that Natural England's standing advice had been followed in relation to the ecological reports.

The Telford & Wrekin Council Cabinet approved the proposal for an extension to the existing Granville LNR at its meeting on 12th February 2007 and again following wider consultation on 9th June 2009. The proposal for this extension to the existing LNR was welcomed by Natural England in a letter dated 8th March 2011 responding to the formal consultation required by Section 21(6) of the NPAC Act. It is understood that the proposed extension to the LNR has been approved by Cabinet, welcomed by Natural England and is currently awaiting the final legal seal.

Potential impacts on the proposed extension to the LNR would include: a) severance of the proposed extension to the LNR by Granville Road; b) the loss of habitat from the improvements to the access route; and c) impacts from the increased traffic improvements associated with the proposed application site.

Severance of the proposed LNR extension by Granville Road: The Granville Road has been included in the proposed LNR extension and the severance of the proposed LNR is relevant to consideration of the ecological impacts associated with the application, but the situation is essentially unchanged from that which obtains at the present time in that the proposed LNR extension contains a section of Granville Road. It is understood that there will not be any additional street lighting along Granville Road, although there will be new traffic lights. Based on the information provided in the applicant's ES and supplementary ecological reports, the presence of this road as the access route to the application site does not alter in any significant way the impacts of the current severance of the proposed LNR extension by the existing Granville Road, other than in relation to the increased traffic improvements set out below.

The loss of habitat from the improvement to the access route: The proposed access to the application site will be subject to some minor improvements but no widening is proposed other than in localised places. Impacts from these road improvements on adjacent habitats and species would appear to be minor and mitigation measures are proposed by the applicant.

Impacts from the increased traffic movements associated with the proposed application site: Increased traffic movements along the Granville Road from HGVs are estimated as being 21 trips (42 movements) per day Monday to Saturday morning as set out in Section 3.2 of the Planning Supporting Statement (March 2011) and in sections 6.74 & 6.80 of the Traffic & Transport of the Environmental Statement (January 2011). This equates to one movement every 15 minutes on average. However, a worst case figure of 56 movements per day and an average of 12 movements per hour is given in the Noise chapter of the ES (para 8.81); this equates on average to a worst case of one every 5 minutes during the working day. It is understood that the Granville Road is currently used for access to properties and to the Golf Course and this use is likely to be predominantly by cars.

Effects from these lorry movements may have adverse impacts on mobile species such as deterring the movement of some birds and insects across the Granville Road, but these impacts are unlikely to be significant.

Impacts from lorry movements on the proposed LNR extension need to take account of the use by the public of the LNR for the enjoyment of nature and open-air recreation. There is a car park located just to the north of Granville Road in the vicinity of the Canal Wharf and there is access for the public to the Canal Wharf along existing paths. The waterbody associated with the Canal Wharf is immediately adjacent to the Granville Road. The Noise chapter of the ES sets out predicted noise levels from the operational use of the proposed access route at four noise receptors including Lodge bank which is close to the Granville Road but to the east of the Canal Wharf. The daytime noise levels at Lodge Bank are predicted to increase from 43.0 to 45.8 L_{AeqT} , free-field, dB (Tables 8.12 & 8.13) and this increase of 2.8 dB is assessed as being a Minor impact (Tables 8.12 & 8.13) [where the scale for Minor impacts is a change of 0.1 – 2.9 dB and for Moderate impacts is a change of 3.0 – 4.9 (Table 8.1)]. There is no noise data for the Canal Wharf where it is adjacent to Granville Road.

Conclusion: Access to the application site would be from Donnington Wood along Granville Road which passes through the proposed extension to the Granville Local Nature Reserve (LNR). Once declared, Granville will be a statutory nature reserve managed for conservation and recreational purposes (including the enjoyment of nature and open-air recreation). There will be HGV movements to the proposed IVC facility along Granville Road from Monday to Saturday morning of between 42 and 56 movements per day (equating to one movement on average every 11 to 15 minutes) and potentially a worst case of up to 12 movements per hour (equating to one movement on average every 5 minutes). Potential impacts on the proposed extension to the LNR would include: a) severance of the proposed LNR extension by the Granville Road; b) the loss of habitat from the improvements to the access route; and c) impacts from the increased traffic movements associated with the proposed application site.

The proposed use of Granville Road as the access route to the application site does not alter in any significant way the impacts of the current severance

of the proposed extension to the Granville LNR by the existing Granville Road, other than in relation to the increased traffic movements from HGVs. Impacts from the proposed road improvements on adjacent habitats and species would appear to be minor and mitigation measures are proposed by the applicant.

The presence of HGVs, their frequency of movement and the associated noise will have adverse on the functions of the proposed extension to the Granville LNR and its use by the public for the enjoyment of nature and open-air recreation, in particular those locations close to the Granville Road such as the Canal Wharf. The Canal Wharf is a key feature of importance for wildlife, and is likely to be a key feature for the general public to enjoy nature, and it lies immediately adjacent to the Granville Road. The impacts associated with the HGV movements would be very difficult if not impossible to adequately mitigate. These negative effects on the ability of the LNR to deliver its functions in respect of its recreational purposes at locations adjacent to Granville Road are a material consideration and are a most important factor in any assessment of the impacts of the proposed development.

Atkins recommended in their letters of 6th February, 2012 that further work was required on ecology to demonstrate that Natural England's standing advice has been followed. This resulted in SLR submitting supplementary ecological reports in July 2012, which resulted in Atkins in letters dated 14th September, 2012 and 26th September, 2012 requiring clarification on some points. This was received and Atkins confirmed in a latter dated 30th October 2012 that Natural England's standing advice has been followed in the ecological reports.

19. Planning Ecologists (PE)

In an email dated **16th May 2011** the planning ecologist states:

Impact on Protected Species

Great Crested Newts

A 'low' breeding population of Great Crested Newts has been recorded within pond TN11, which is situated in close proximity (c40m) to the application site. There is also a population of smooth newts within pond TN3 situated on the northwest corner of the site. Development has the potential to disturb, kill or injure newts during the construction and operational phases. Therefore a European Protected Species Licence is required.

The recent Wooley and Morge cases have clarified the legal duty of a Local Planning Authority when determining a planning application for development which may impact on a European Protected Species. Under regulation 9(5) of the Conservation of Habitats and Species Regulations 2010 competent authorities must 'have regard' to the Habitat Directive in the exercise of its functions.

Local Planning Authorities must consider whether the tests of the Habitats Directive can be met. The proposed development must meet a purpose of

preserving public health or public safety or other imperative reasons of overriding public interest, including those of a social or economic nature and beneficial consequences of primary importance for the environment. In addition the authority must be satisfied that:

- (a) there is no satisfactory alternative and
- (b) the action authorised will not be detrimental to the maintenance of the population of the species concerned at a favourable conservation status, in their natural range.

Even though Natural England, as the licensing authority, has to apply these tests in relation to a licence application, the case law clarifies that these tests must also be considered by the Local Planning Authority when granting planning permission. This is due to the Local Planning Authority's Regulation 9(5) duty.

Therefore it is recommended that the applicant demonstrates how their development is "in the overriding public interest" and there is no satisfactory alternative". This should not be a burdensome request as this information will in any event need to be provided later to Natural England when applying for a European Protected Species licence, but is essential to meet the tests of the directive, which should be done prior to the determination of the application.

A mitigation strategy and habitat/landscaping scheme has been included within the planning application to show the development will not be detrimental to the maintenance of the population of the species concerned at a favourable conservation status in their natural range. It includes exclusion fencing, capture and relocation of individuals and provision of suitable replacement habitat within the development as compensation.

The following aspects of the planning application in relation to the development site needs conditioning to ensure implementation:

- Ecological Mitigation Strategy summarised in Table 11.8 of the Environmental Statement.
- Landscape scheme, including the habitat restoration and creation measures outline in Technical Appendix 10, which includes a 5 year aftercare plan for the management of habitats.
- A longer term management plan for the maintenance of natural features, e.g. planted areas, trees and hedgerows once they are established on site.

In relation to the proposed access route she has the following comments:

Policy OL2 Designated Sites in the Wrekin Local Plan (1995-2006). Policy OL2 states:

Development which is likely to adversely affect, either directly or indirectly, the following sites of regional or local importance will not be permitted unless the

applicant can demonstrate that the benefits of the proposal significantly outweigh the importance of the area:-

- a) Areas of Special Landscape Character.
- b) Local Nature Reserves.
- c) Wildlife Sites.
- d) Ancient Woodland sites as listed in the Shropshire Inventory of Ancient woodland.

Policy CS12 Natural Environment in the Core Strategy states:

The natural environment of The Shropshire Hills Area of Outstanding Natural Beauty and that of the Borough's Sites of Special Scientific Interest, Area of Special Landscape Character, Local Nature Reserves, Wildlife Sites and Ancient Woodland sites will be protected from development that has potential to adversely impact on its sustainability.

The access route is proposed to pass through Granville Country Park and Local Nature Reserve. This would require upgrading and widening of the road as it passes through the Local Nature Reserve and would result in the removal of vegetation and roadside habitats including trees and hedgerows.

HGV traffic has been addressed to cause an adverse effect on the designated sites. Visual and noise effects would be caused by HGV traffic using the proposed access road to the site. These effects would have a negative effect on the landscape character of the areas adjacent to the access road. The landscape assessment concludes that the proposed access route would cause a moderate landscape effect.

If an alternative cannot be found and the adverse impact on the Local Nature Reserve is deemed acceptable, then mitigation measures outlined in the Ecological and Landscape Study should be improved to provide biodiversity and LNR enhancements and conditioned. It should include the control of Japanese Knotweed and a developer contribution to the ongoing management of the Local Nature Reserve/Country Park. Improvements within the LNR would be required to compensate and mitigate impacts from increased traffic and the road improvements.

The application contains insufficient survey information to demonstrate whether or not the access road would have an adverse effect on Great Crested Newts. For this reason it is recommended that either the planning application is either refused or defer a decision pending a revised proposal that addresses the deficiencies.

The ecological walkover provides insufficient detail, particularly within the section that passes through the Local Nature Reserve. It acknowledges that there is a reasonable likelihood of Great Crested Newts, a legally protected species, being present and adversely affected by the development, but no further survey has been carried out. A Great Crested Newt Survey is needed

for the canal basin and any other ponds within the search area. At present the report uses a 2005 GCN record provided by Shropshire Wildlife Trust. This information is insufficient to assess impact as population size is unknown and the record is out of date. Historical species information from a data search should only be used to inform the scope of survey required. A Phase 1 Habitat survey should also be provided to adequately assess roadside habitats as part of the impact assessment. For example, hedgerows and trees have been identified during the walkover but no consideration has been given to use of these features by bats or as a wildlife corridor.

For further information on the type and level of surveys required, please see the Natural England Standing Advice for Protected Species.

In an email dated **16th September, 2011** the planning ecologist in response to the letter dated 8th July 2011 from consultants SLR states:

In response to the letter that the applicant's provide further information to my comments in relation to Point 5 – impact of the access road on GCN.

The PE recommend that the applicant's provide further information to justify why a GCN survey has not been carried out for ponds in the vicinity of the access road.

The OS map shows a pond close to the road in Area 3 (SJ 72289 12502) which has not been assessed in the report. A Habitat Suitability Index survey should be carried out on this pond as the plans propose hedgerow and scrub clearance in close proximity.

The Natural England Standing Advice states that a survey should be carried out when there are historical records in the area and ponds in the vicinity. The flowchart attached shows that further survey effort is required.

To carry out a risk assessment using Natural England's Great Crested Newt method statement template; up to date survey information is required to understand impacts and hence appropriateness of mitigation. The impact assessment included by SLR is not informed by a recent survey.

Vegetation in vicinity of canal to be removed:

Area 1: footpath realignment.

Area 2: hedgerow and scrub clearance for passing bays.

What is the total area of temporary/permanent habitat loss/disturbance?
Does the rapid risk assessment in the GCN method statement template show this is negligible?

The report states that the high quality newt habitat is located around the pond reducing the likelihood for newts to use the less favourable road corridor as habitat. However, this statement is not backed up by a Phase 1 Habitat map. To clarify the situation a map showing the location and quality of terrestrial

habitat in relation to the road improvements and proximity to the canal basin would be useful. This plan could then be used to calculate the area of temporary/permanent habitat loss, disturbance or damage, which is required for the risk assessment. This would aid in justifying the reports conclusions.

If a risk assessment indicates that the development activities are of such a scale and location that it is highly unlikely any offence would be committed should the development progress, therefore no licence would be required. This would be sufficient and non-licensed avoidance measures conditioned if necessary.

Ecology comments were made on **22nd May 2012**, which supported the application subject to conditions.

Erection of nest boxes

The following boxes shall be incorporated into or erected onto the buildings prior to occupation:

- 1 Schwegler bat box or bat brick [models 1FF, 1FD, 1FR, 1FQ, 1FFH or N27].
- 1 Schwegler bird box or bird brick [models N24, N25, N26 or 'Bird House'].

The locations and positioning of the boxes should be determined by and ecologist, who should also supervise their installation. If this is not possible then the manufacturer's guidelines should be followed.

At the end of each breeding season, the bird boxes should be cleaned out and nearly all nesting material removed. An annual check of all boxes should be made, and any damaged boxes replaced.

Boxes can be purchased from, among other websites, www.alaneology.com, www.arkwildlife.co.uk, www.birdfoot.co.uk, www.jacobijayne.co.uk, www.nestbox.co.uk, www.shopping.rspb.org.uk and www.wildlifeshop.co.uk.

Reason: To compensate for lost nesting and roosting opportunities, and to enhance the site for biodiversity, in accordance with the section 11 of the NPPF.

Bats and Birds

There is potential bat and bird foraging habitat close to this site (e.g. woodland, hedgerows, tree lines, rough grassland, mature trees, gardens and open water). As this development involves works to the existing roof space, it is possible that roosting bats and nesting birds could be affected.

Contractors should be made aware of the potential presence of bats and birds and should be vigilant when carrying out works, particularly when removing roof tiles.

If any bats are encountered during works the development must be halted and a licensed ecologist and Natural England (0845 601 4523) contacted for advice. The Local Planning Authority should also be informed.

If any nesting birds are present then works must cease immediately and cannot resume until the fledglings have left the nest.

Bats are protected under the Conservation of Habitats and Species Regulations 2010 and Schedule 5 of the Wildlife and Countryside Act 1981 (as amended). It is a criminal offence to kill, injure, capture or disturb a bat, or damage, destroy or obstruct access to a bat roost. There is a maximum fine of £5,000 per incident or bat and/or up to six months imprisonment for such offences.

All wild birds, their nests and young are protected during the nesting period under The Wildlife and Countryside Act 1981 (as amended). There is a maximum fine of £5,000 per bird, nest or egg and/or up to six months imprisonment for such offences.

Enhancement Planting

Planting some native tree or shrub species of local provenance, berry-producing shrubs or nectar-rich flowers would enhance the site for wildlife. A list of particularly valuable plants is available on request.

20. Highways Development Control (HDC)

The HDC commented on **26th May 2011**:

As you are aware only the first section of Granville Road is adopted (approximately 400m from Granville Roundabout) and is 7.3m in width. Beyond this point the road narrows sharply and it is this section as far as the site which is private and potentially in multiple ownerships. Please note the annotation of the adopted extents on drw. No. 70 is incorrect.

The development proposes widening over the length of the road as far as the entrance to the golf course with a less intensive scheme of works beyond that point to include localised widening, passing places and traffic signal control shuttle working at choke points. HDC will discuss the mitigation works later.

Transport Assessment

Based on the volume of material to be treated at this site and the staffing levels proposed the TA predicts some 50 two way movements through a normal working weekday (Table 6.3). This equates to 4 two way HGV movements per hour (or an average of one trip to or from the site every 15 minutes).

HDC have no objections in principle to the assumptions used to derive these daily figures from the per annum tonnage of material as this is the usual methodology utilised for this type of application. In reality there will be +/- fluctuations around these figures.

The aforementioned level of trips is negligible in terms of its impact on the adopted highway network and the Granville Roundabout during the peak periods. What is harder to quantify is whether this is acceptable for the private sections of the road particularly given the status of the Country Park. HDC presume other consultees will advise on this.

For the level of staff proposed it is perhaps questionable as to what level of benefit a Travel Plan will give but HDC will not dissuade them from submitting a site specific report.

Granville Road – from adopted section to Golf Club entrance) drw. Nos. 70-72)

The works to the first section up to the golf course entrance involves general widening to a minimum of about 6-6.1m on one or both sides of the road. There is additional widening on certain sections and around some of the tighter bends to about 7m. There is one section that is below the aforementioned widths and this is 50m length near the car park entrance where the width is scaled as 5.5m though with wider passing sections at either end.

No details are included at this stage to define the construction of the new carriageway or to detail whether the existing road is of suitable construction to take the size and weight of vehicle. Details of drainage, kerbing (to protect verges) signing and lining etc will be required including the treatment of the filled in cattle grids.

This section also includes some traffic calming features (speed humps). It is not clear if these are to be removed, retained or redesigned. Some clarification of this will be required.

There are a number of access points off this road that are in regular use and any alterations to the carriageway will need to accommodate these in the design. HDC would need the proposals to indicate visibility splays at the car park entrance, golf club entrance and any private accesses in regular use.

Granville Road – from Golf Club entrance to Site (drw. Nos. 72-76).

Beyond the entrance to the Golf Club the standard of construction and proposed width changes. There are sections where physical constraints are such that the available access route cannot be widened and in general there is reliance on the use of passing places.

On two sections signal controlled shuttle working is proposed. In theory this will work but it would need to be shown that the detection equipment would pick potential vehicular movements from all possible routes. The first set of singles covers multiple routes and access points by the scrap yard (drw. No. 73). HDC is not convinced this can be controlled with a single set of lights.

The second set is simpler in that it only controls the access up to the site (drw. No.65). What concerns HDC is the various annotated cabins and trailers outside the former Knackers yard. HDC appreciate these are nothing to do

with this proposal but these are a new addition to the track from his previous visits and will clearly have an impact on the safe operation of the road, visibility to the single head and ability of vehicles to pass in this area.

The submitted plans annotate this road as gravel. The HDC is not convinced that this will be appropriate surface treatment in terms of maintenance and weathering due to the volume and weight of vehicles likely over the life of the development. As before the HDC will require full details for construction with details of drainage including any works to the adjoining ditch course, kerbing, signing and lining etc.

HDC in an email dated **12th July 2011** stated:

HDC spoke to SLRs consultant in June about his consultation response. HDC had a number of issues which required clarification on. These were discussed in general terms with the Consultant and, whilst some could be dealt with Grampian conditions, HDC did reiterate which points still required clarification. This letter suggests this information is not going to be forthcoming which would not be helpful. For the avoidance of doubt HDC would ask for clarification of the following in writing or on plan as appropriate.

- i) HDC would like an indicative highway cross section showing potential construction (based on a full reconstruction scenario) for the metalled section of the following in writing or on plan as appropriate.
- ii) Details of any traffic calming. The route currently has speed humps and it is not clear if these will be removed or be replaced. From a highways perspective HDC have no particular preferences but there are other implications which may interest us. For example, there is a noise element associated with speed humps and large vehicles particularly when they are un-laden. HDC do not wish to defer this.
- iii) HDC will require details of all visibility splays at access points to the widened road to show these can be provided. This has implications for land take and the safe operation of the access. Easier to condition a plan rather than specify standards for each individual access.
- iv) The applicant will need to prove they can provide the signal scheme at the scrap yard and that the design will work. This has implications for land take and the safe operation of the access.
- v) The applicant will need to clarify that the access road will not be obstructed by containers as shown at the knackers yard. This has implications for the safe operation of the access road and implies land ownership issues.

HDC in an email dated **11th August 2011** stated (numbering relates to the questions given in the 12th July 2011 email):

1. The proposed construction details seem reasonable and the new construction is suitable for HGVs. What HDC do not know is whether the existing road is constructed to the same standard or if it is of a thinner construction. The applicant's will need to do cores to prove it will be up to the job. Also details of drainage will be required (this could be conditioned).

2. It is noted that traffic calming is to be retained and enhanced. This clarification is useful and the HDC has no further comments.
3. The quoted visibility splays relate to vehicular speeds between 25 and 40mph. This seems reasonable with the traffic calming present. The scheme has widened into a private access adjacent to the entrance to the golf course but no splays are shown on this location.
4. The junction by the scrap yard has three arms and two access points. A two light shuttle working scheme will not work as the third arm is uncontrolled. There are residential properties served off this road so it is trafficked and needs to be considered.
5. Noted. Is this a planning matter?

In an email dated the **13th September 2011** HDC stated that we always knew there was going to be a conflict between the development and the various consultees.

In providing measures to satisfy the access requirements there is invariably going to be a detrimental impact alongside the vehicular corridor and particularly its relationship with Granville Park. The Landscape Architect makes a number of valid points and it is these that are a matter to be debated with the applicant.

HDC has already raised the issue of the existing road construction and the requirement to ensure this is up to the job. This would apply to existing drainage/bridge structures etc and HDC considers it could be conditioned as part of the testing that will be required.

The points where pedestrian/cycle/horse routes cross the road (for example The Hutchinson Way) will need to be considered in terms of any features (gates/signage etc). Again this point has already been raised I would suggest that this could be conditioned in consultation with the Rights of Way Officer.

HDC comments dated **17th November 2011** have been completed after numerous negotiations have taken place.

A lot of additional information has been submitted and whilst not all the detail is to hand it is considered that the omissions could be conditioned.

For the record these comments are based on the General arrangement drawings ref H0011rev.D0 and H002rev.D1.

Please be advised the HDC has no objections to the proposals subject to the following:

- 1) Before the proposed development is commenced details shall be submitted for the approval of the Local Planning Authority, indicating:

- a) The testing regime for the existing carriageway and associated highway structures (culverts, drains etc) and any recommendations arising from this report shall be enacted as part of the wider highway works (to be detailed as (b) before the development is brought into operation to ensure the whole access route is suitable for HGV traffic.
 - b) The full road/footway construction including longitudinal sections, materials, drainage, street lighting, service corridors, highways enclosure/boundary treatment, visibility splays, retaining structures and a satisfactory means of draining roads to an acceptable drainage outfall. Those works so approved shall be constructed before the development is occupied.
 - c) The detailed signal design for shuttle working to include all approaches to the junction and details of the associated maintenance regime. The approved works shall be provided before the development is brought into operation and shall be maintained in full working order for the life of the development.
 - d) The design of features to accommodate safe crossing points for the Hutchison Way (named footpath) and on road section of SUSTRANS route NCN 55.
- 2) Before the proposed development is brought into use all association on site parking and servicing areas shall be formed, permanently marked out and available for use.
- 3) Before any buildings are occupied details of the Travel Plan for the development shall be submitted to and approved in writing by the Local Planning Authority in consultation with the Workplace Travel Co-ordinator.

Please note the highways works fall on land that is either not registered or is in third party ownership. It is assumed the developer will secure the necessary permissions to deliver the works. If they cannot do this for the entirety of the route then the HDC would be unable to support the proposal.

Notwithstanding this and in the absence of any other authority the HDC would recommend that the detailed design is checked and approved by the Council who should also superintend any constructive works.

The HDC has not specified means of access for construction traffic to the site but he would suggest the highway works would need to be completed if Granville Road/Woodhouse Lane is used as it is not suitable for any additional HGV traffic in its present condition. You may wish to give this some thought.

In terms of the other points there is already a road passing through the park which is trafficked. The widening and additional traffic, particularly HGVs, will have an impact which may be material/unacceptable when viewed from the position of the Landscape Architect.

The HDC email comments of **22nd June 2012** are:

As has been said before there was always going to be conflict between the developer and various consultees. As you know from my point of view there is an engineering solution to the problem and the HDC have responded accordingly. Those comments were with the proviso that, as the road is unadopted and parts of the route are unregistered or in third party control, the applicant would need to secure the necessary permissions to carry out the proposed improvements.

This letter appears to be a direct copy of Derek Owen's comments (referring to the Granville Management Committee comments).

When viewed from the perspective the HDC is not surprised by their comments and, whilst they have perhaps overstated some of the points, the HDC do not think they have said anything unreasonable given their priorities, aims and responsibilities.

The one point where they have some uncertainty is on the numbers of trips. This is covered in the Traffic and Transport report and Appendix 6. Staff, import and export of materials has been considered in the transport assessment. The figure of 42 HGVs assumes separate lorries for the raw material and finished product as a worst case scenario. In practice a lorry delivering raw material would be utilised for the exportation of compost so the daily HGVs could be lower (see TA para 6.33).

The HDC emailed to the Parks & Open Space Officer on **28th June 2012** and stated:

The HDC made its formal recommendation last year (5th December 2011). The HDC had a bit of difficulty with this one as my interest officially ends with the adopted highway near NOM diary. The section that then leads through the country park is unregistered over much of its length (with no-one claiming ownership or responsibility for it) and in third party control over other sections.

The applicant's promoted a solution which, based on the scale of the development, would be appropriate and the HDC have accepted this though given the land ownership issues it remains to be seen whether they can actually deliver it.

The HDC fully appreciates that there is conflict of interest between the proposal and the Country Park and between the various consultees depending on their perspective and specific professional interests. The reliance on an engineered highways solution has potential environmental impacts which may themselves be unacceptable.

The HDC replied to the Parks & Open Space Officer's email dated **29th June 2012** on 2nd July 2012 and stated:

The HDC has made comments on the basis that the road retains its existing status. It was not the intention of the HDC to adopt the road as it is not a

straightforward process where landownership is unknown or where the land owner may not be the Applicant (or even a willing participant).

The access route is included within the Application red edged boundary and it is appropriate to place conditions or S106 obligations upon it as necessary. It should also therefore be covered by the managerial plan. The propose works will be a full reconstruction of the road and it would not be unreasonable for them to maintain it for the life of the development. If, in accommodating the highways works, there are ancillary works on land for which you are responsible then it would also be appropriate to secure a commuted maintenance sum if future maintenance were likely to be an issue.

The issue of crossings has been dealt with as a Grampian style condition. They will have to submit a design prior to commencement. It would then be open to comment. It would be my intention to discuss this with the Rights of Way Officer.

As explained, the majority of the access route is unregistered. Where it is registered it does not appear to be in the control of the Applicant. This does not prevent them from applying for permission or even having Consent granted. However, the application has to proceed as submitted. If they cannot provide part of the highway works because the landowner refuses permission to work on their land then HDC does not see how the application can proceed in its current form.

HDC comments dated **10th July 2012** state (in relation to the comments of the Tree and Woodlands Officer of 10th July, 2012):

The HDC recommends working from the figure of 56 two way movements as a worst case figure. Of course this is an average working back from the annual tonnage figure and as such there will be fluctuations. HDC repeated his comments of 26th May 2011.

“Based on the volume of material to be treated at this site and the staffing levels proposed the TA predicts some 50 two way movements through a normal working weekday (Table 6.3). This equates to 4 two way HGV movements per hour (or an average of one trip to or from the site every 15 minutes).”

“I have no objections in principle to the assumptions used to derive these daily figures from the per annum tonnage of material as this is the usual methodology utilised for this type of application. In reality there will be +/- fluctuations around these figures.”

“The aforementioned level of trips is negligible in terms of its impact on the adopted highway network and the Granville Roundabout during the peak periods. What is harder to quantify is whether this is acceptable for the private sections of the road particularly given the status of the Country Park. I presume other consultees will advise on this.”

The HDC in an email dated **17th July, 2012** commenting on the Trees and Woodland Officer comments on 13th July, 2012 states that there are some discrepancies.

The HDC has worked off the Transport Assessment which was Chapter 6 of the EA (*meaning Environmental Assessment not the Environment Agency, my italics*). The TA quotes 42 two way HGV movements per day (page 13, para. 6.74) and 10 staff trips (page 14, para 6.76). 52 total two way movements.

This accords with Appendix 1 of the April 2012 correspondence which quotes a maximum HGV flow in 2034 (with both Shropshire and Telford & Wrekin waste) of 21 one way movements on site. Convert this to two way and add staff cars and you get the 52 two way movements per day.

Appendix G is a copy of the 2008 site selection document. At that point in time it was suggested that the site would generate some 56 two way movements. It did not include staff cars in the figure (therefore potentially a total of 66 two way movements). I do not know who wrote the report but its purpose was not as a transport assessment. I can only assume they have refined their figures for the TA submitted with the 2011 Application.

21. Environment Agency (EA)

The **EA** sent the Council a letter dated **15th June 2011**. The EA has concerns at this time based on the information submitted in the ES. These are outlined below. The EA recommend that the Council seek further information from the applicant in relation to the identification of potential significant adverse environmental effects and the measures envisaged to avoid, reduce or remedy such effects.

Background water resource information

The site is located on the Enville Sandstone Member of the highly faulted Coal Measures. This is classified as a secondary aquifer of intermediate vulnerability to contaminated.

The EA do not have any records relating to a water supply borehole within 250m of the site. However, the information held by the Environmental Health section of the Council should also be checked for information on water supplies/abstractions within the area.

Other previous uses of the land, including former mining activity, have the potential to pollute water resources when the land surface is moved or drilled into, introducing new pathways between source (pollutant) and sensitive receptors (people and the water environment). The developers should therefore adopt all appropriate pollution control measures, both underground and on the surface, to ensure that the integrity of the aquatic environment, both groundwater and surface water, is assured.

The EA recommend that further information is sought from the developer to provide assurance that the base of the underground process tank(s) does not

extend below groundwater level at any time including the wet season. In order to protect the groundwater regime, pollutants may not be stored below the water table on primary or secondary aquifers. Any potential redesign required to ensure that the process tanks do not have adverse impact on the groundwater could have land use implications.

If, during development, contamination not previously identified is found to be present at the site then no further development (unless otherwise agreed in writing with the Local Planning Authority) should be carried out until the developer has submitted, and obtained written approval from the Local Planning Authority for a remediation strategy detailing how this unsuspected contaminated shall be dealt with. The remediation strategy shall be implemented as approved.

This is a precaution required for the assessment of the severity of any previously unsuspected contamination and for it to be remediated appropriately in order to protect the environment. This concern could be covered by a condition on any permission which the Council may be minded to grant.

Landfill gas

The proposed development lies less than 250m from the landfill at Granville. This includes a former landfill site that accepted various waste materials. The proposed development would not appear to increase the risk of landfill gas intrusion into property. The applicant should however be advised of the presence of the landfill site as they wish to carry out their own risk assessment. Additionally, the Council's own Building Control Section may wish to address the issue of subsurface gas when finalising the construction details of any new or modified structures on the site.

Foul drainage

The EA recommend that further details for the containment, storage, re-circulation or disposal of the leachate should be submitted, so that both the operator and the regulators are aware of the risks to ground and surface waters from the leachate. The developer should demonstrate that there is no unacceptable risk to the land and water environment.

It is understood from the supporting documents that non-mains drainage for on site ablutions is being proposed although little detail has been given.

Full details of the foul drainage should be submitted for approval prior to any planning permission being granted to ensure that it is acceptable under planning requirements including Circular 3/99 on non-mains drainage.

An approved non-mains drainage assessment should include the following specific mitigation measures:

1. Soakaways to be constructed to BS6297:2007.
2. Non connection to watercourse or land drainage system and no part of the soakaway system to be within 10m of any watercourse.

3. No siting of any septic tank/package sewage treatment plant within 50m or upslope of any well, spring or borehole used for private water supply.

These measures are required to protect any current and future government users due to the highly fractured nature of the rock and variable permeability.

If foul drainage from the toilets etc on the sites is to be via septic tank to soakaway, such a discharge to land or watercourse may require a permit under the Environmental Permitting Regulations (England and Wales) 2010.

Drainage/flood risk information

The site lies within Flood Zone 1 (low risk of fluvial flooding) and our Flood Risk Standing Advice should be referred to for guidance on assessing the application.

The EA note that the Flood Risk Assessment (FRA) statement in Chapter 9 of the report is brief, but there is also more detail in the Appendices.

The EA have seen a micro drainage submission to show that the 1% plus climate change flood event has been considered as required by PPS25 Development and Flood Risk. However, there is limited clear detail as to how the attenuation is to be achieved. The FRA does suggest that attenuation will be provided to constrain pass forward flows to greenfield run-off rates.

The EA recommend that further information should be submitted to satisfy the Council's Drainage Engineers on the management of surface water run off and appropriate sustainable attenuation measures to ensure the provision of a satisfactory means of surface water disposal.

Air quality, odour, bioaerosols, dust, noise, flies

Air handling and bio bed

Currently it is not completely clear if every part of the process is totally enclosed with adequate mitigation to prevent escape of bioaerosols. The EA's policy with regard to determining permit applications for composting proposals is to require a site specific bio aerosol assessment where a sensitive receptor is within 250m of the composting proposal.

The EA would expect the applicant to provide a technical report to explain how air handling within the process building(s) will be managed to prevent odorous air overwhelming the bio filter bed system.

The positioning of air handling points, balance of air flow, concentration of odour units, and number of air exchanges per hour, must ensure the bio bed can effectively treat odours and still operate within its design parameters.

Justification for bio bed

The applicant should submit a technical report to explain why this design of bio bed is appropriate as the sole abatement technique to mitigate against offsite odour annoyance.

Taking into account the site proximity to sensitive receptors, the applicant has not provided enough evidence to justify this design of bio bed, or its ability to treat odorants and particulates which could be foreseeable produced by this process.

The EA recommend that the applicant utilises the services of a Chemical Engineer, or other suitably qualified person to technically assess the proposals to ensure the process does not result in detriment to amenity or harm to health. In the report, the applicant should include the monitoring that will be used to determine how effectively the bio bed treats odorous emissions.

Bio beds are dynamic biological systems that need to be well managed. The EA would expect the applicant to conduct monitoring of the bio bed and also incoming air flow to maintain peak environmental conditions.

Bio bed composting

The proposals do not detail how the bio bed will be commissioned. The applicant should submit further details on how site commissioning will be managed and monitored, whilst ensuring the bio bed is effectively treating emissions, and minimising offsite odour annoyance.

The bio bed is a dynamic biological system and it takes times for the appropriate number, and type of bacteria, to colonise the woodchip media. Before any waste operations commence, the applicant should agree with us a progressive plan to manage waste acceptance whilst monitoring the environmental conditions and effectiveness of the bio bed.

Failure to manage the commissioning phase of the operation could result in failure of the bio bed and significant offsite odour.

Stack dispersion and minimisation of odour annoyance

The applicant should submit a technical report which explains how this 4m stack is an appropriate measure to minimise odour annoyance for sensitive receptors.

The application does not include the parameters used in the AERMOD dispersion model to calculate the odour impact at sensitive receptors. Due to this omission the EA cannot determine if this stack height, along with other operational parameters, will enable effective dispersion and minimise offsite odour annoyance.

In the technical report, the applicant should also demonstrate how changing fan speeds from daytime to night time settings will impact stack dispersion and odour concentration at sensitive receptors.

Aerobic conditions for composting

The proposals indicate all parts of the waste activity will be maintained in an aerobic environment. The applicant should submit a technical report to explain how using this design of in-vessel technique ensures aerobic

conditions throughout the tunnel phases(s). This should include detailed design of the vessels and explain how air will permeate through the waste pile to ensure an aerobic environment.

Maintenance of an aerobic environment is essential to minimise odour generation. If waste becomes anaerobic there is a greater potential to generate malodours which can lead to the bio bed having to manage higher concentrations of odour than the design specifications allow. This could result in significant offsite odour annoyance for nearby residents. Exposure to strong odours is documented as having potential implications for health too.

General management Plan and Odour Management Plan

These should be submitted by the applicant and agreed by the regulators before Operations commence. This ensures the applicant understands what is expected of him, and also provides the regulatory tool to ensure the EA can enforce the appropriate measures.

Stack noise

The applicant has not identified stack noise as part of the risk assessment. Due to the proximity of sensitive receptors, stack noise may become evident at night, especially as the background noise levels detailed in the report, appear low. The applicant should re-visit the risk assessment, and where necessary ensure the appropriate abatement is installed to minimise noise annoyance before operation commence.

Leachate tanks

There must be no connection of leachate tanks to surface water drainage systems that serve Controlled Waters or ground soakaway. All storage tanks should be above high groundwater level (typically winter/spring) and have level detection and monitoring to prevent overflowing and leakage,

SCADA system

In order to prevent pollution of land, air and water, the applicant must submit details of the emergency measures in place should the SCADA computer system fail, or there is an extended period of time without power. These measures should be agreed with the EA before operations commence.

Oil/diesel storage

The applicant has not detailed how oils or fuels will be managed on site. Where appropriate this must comply with Control of Pollution (Oil Storage) (England and Wales) Regulations. Oil and fuels can cause significant pollution of ground and water and all storage must comply with the relevant legislation.

Interceptors

The applicant has not submitted details of oil interceptors on site.

The type and location of oil interceptors must be appropriate to mitigate against the level of risk assessed. It is foreseeable that fuels and oils will be stored on site, and HGV lorries will also hold a considerable volume of fuel. If

a leak or spillage enters the surface water drainage system, an interceptor could significantly reduce the severity of pollution.

The applicant should submit an overarching drainage strategy for pollution control which should be agreed by the EA before development commences.

Monitoring and control of fly pollution

The applicant has not submitted details of how fly pollution will be monitored and managed. This procedure should be agreed with the EA before operations commence.

Fly larvae will be present in waste deliveries to site. In order to meet Animal By Product Order (ABPO) the temperatures will exceed 40 degrees Celsius and break the fly cycle. However, if waste acceptance results in the carryover of waste from one day to the next, there is the potential for fly larvae to develop into adult flies. If poorly managed this could result in offsite fly pollution.

Sheeting of lorries to prevent odour

The EA recommend delivery lorries are sheeted to and from site as an appropriate measure to minimise diffuse odour from vehicle movements. Incoming delivery should only be un-sheeted inside the process building and re-sheeted in the process building before leaving site. Vehicles taking compost from site should be sheeted before leaving site. This measure will minimise diffuse odour from vehicle movements to and from the site.

Reception hall

The applicant has not explained how deliveries to the process building will not cause diffuse odour emissions. These emissions may result on offsite odour annoyance.

It is the opinion of the EA that a slight negative air pressure will not prevent diffuse emissions from the delivery access doors, especially in turbulent wind conditions. The applicant should submit these details in the air handling technical report detailed above.

The proposals indicate the reception hall doors will be left open throughout the day. This proposal is not acceptable as this will reduce negative air pressure within the building and also enable fly populations to escape to the environment.

Preventing fugitive releases/smoke testing of building

The applicant has not detailed any procedure to check the integrity of the process building to prevent diffuse odour emissions. The EA recommend that smoke testing is undertaken at regular intervals to identify any points in the building structure that could contribute to offsite odour and remedial work undertaken.

Vehicle washing

The washing of delivery vehicles must be sufficient to prevent waste residues leaving site on tyres or vehicle bodies. The applicant should submit a report for agreement which details how vehicle cleanliness will be monitored and managed.

This report should also include the proposed measures to manage dirty water from vehicle washing so that it does not pose a risk of pollution and minimises the contribution to malodours.

Vehicles leaving site could track or deposit waste on access roads, this may breach ABPO and cause littering of the highway.

Plastic contamination

The waste used to produce compost will be sourced from kerb side collections. The applicant has not given sufficient information on how the issue of plastic and other contaminants will be monitored and managed, the EA would expect the proposals to include plastic extraction equipment as part of the process on site.

The presence of plastics and other contaminants in the final compost could pose significant problems if the applicant intends to spread this waste to land. As such, the final compost is unlikely to meet PAS100 specifications. Excessive plastic contamination may cause a littering effect and detriment to soil quality if spread to land. Revised proposals should be submitted to mitigate against this risk.

Permitting information

As well as requiring planning permission, the composting activity will also require an Environmental Permit (EP) under the Environmental Permitting Regulations (England and Wales) 2010.

Due to the proximity of local workplaces and housing, e.g. the neighbouring premises at Woodhouse Farm, a Bespoke, rather than a Standard Rules, permit would be required. The site operator will need to contact the EAs National Permitting Centre.

The EA recommend that the permitting process and the planning process are conducted in parallel (twin tracking) to assist transparent and consistent decision making by ensuring that the same information is available for all decision makers at the same time. Any possible amendments and decisions relating to the proposal which are required by the EA in the permitting process could have implications for the implementation of any planning permission which may have been granted on different assumptions. Currently the EA are not aware if any application for an EP having been submitted to the EAs Permitting Team.

The permit application must identify any proposed release of emissions to land, air or water and give details of the source, type and quantity of each. The application must also be accompanied by a statement of the technical standards to which the operator plans to carry out the proposed activities.

These technical standards must either be those standards outlined in the EAs Technical Guidance Note series or otherwise justified by reference to appropriate Environmental Risk Assessment and associated control measures for those risks identified.

The use of our H1 Environmental Risk Assessment tool and associated guidance is recommended for Risk Assessments used in support of EP applications. Risks to the environment and human health from composting activities are those from odours, contaminated run off to surface water or groundwater.

It should be noted that external windrow composting and household and industrial waste landfilling do already take place in close proximity to the proposal site, i.e. within 1.5km. In the last two years the EA has received approximately 50 complaints of waste type odour from the residents of the housing areas to the south west of these existing activities and the proposal site. This would suggest that the residents of this area are particularly sensitive to the types of odour which the application activity has the potential to emit and therefore should be considered within any assessment of odour impact beyond the boundary of the site.

Any EP granted with respect to the proposed composting operation is likely to include conditions relating to the control of odours such as:

- i) Emissions from the activities shall be free from odour at levels likely to cause pollution outside the site, as perceived by an authorised officer of the EA, unless the operator has used appropriate measures, including, but not limited to, those specified in any approved odour management plan, to prevent or where that is not practicable, to minimise, the odour.
- ii) The operator shall:
 - a) Maintain and implement an odour management plan;
 - b) If notified by the EA that the activities are giving rise to pollution outside the site due to odour, submit to the EA for approval within the specified period, a revised odour management plan;
 - c) Implement any approved revised odour management plan from the date of approval, unless otherwise agreed in writing by the EA.

It should be noted that composting activity will always produce some form of odour. The EA are therefore unlikely to take enforcement action over occasional slight odours which may be detected at any neighbouring property. If the Council are not happy to grant planning permission unless the operator ensures that no odours at all leave the site it should be noted that the Council can not rely on the enforcement of the associated EP to secure that standard.

A more detailed indication of the manner in which the EA will enforce against odour from sites operating under the EP is given in the latest draft of the Technical Guidance Note H4 – Odour Management.

Environment Agency position on the planning application

The EA would expect a satisfactory level of detail to be provided within the EIA to address the above issues and to establish a reasonable degree of certainty.

On the basis of the points raised in this letter, the EA consider that the EIA is not sufficiently robust, or accurate, to inform the current planning application. The EA recommend that further information is submitted by the applicant to address the above points of concern.

The additional information is required to enable confirmation that significant effects would not result, and to ensure that sufficient measures to avoid (or remedy) any such effects are available. The applicant should demonstrate that any risks to land, air or groundwater posed by this development can be satisfactorily managed, cross referenced to the EP requirements, to clarify the above. Further technical detail of the proposed processes is required to ensure that the development as submitted is feasible, as technical amendments could have land use implications.

When the EA have received and considered an adequate level of detail, the EA should be in a position to submit further recommendations to the Council on the planning application/EIA.

Please note that the EP conditions will relate only to the EP application site (installation boundary), but the EA recommend that in determining the planning application the EA consider the cumulative impact of the current and proposed bio aerosol producing activities in the locality (including odour) and ensure, that where appropriate, a site specific Bio Aerosol Risk Assessment is undertaken by the developer and submitted to you for appraisal. The EA should ensure that the Council are satisfied that the proposal is a suitable use of land at the location in accordance with PPS10 (Government policy on Waste). The identification of sensitive receptors within 250m of the proposal (including one virtually on the boundary), is seen as a critical factor for consideration in this context.

Natural England should also be consulted for their input to the potential impact on nearby wildlife sites and the flora and fauna.

The **EA** sent a letter to SLR dated **11th August 2011**. It states that further to the SLR letter ref 402-00156-00082 dated 25th July 2011 from Morgan Fitzpatrick, the EA have the following response in relation to air quality impacts of the proposed composting development adjacent to Woodhouse Farm.

Planning and permitting

The relevant pollution control regime will need to be applied. This is a separate issue from empowering the Planning Authority to make a fair and reasoned decision relating to the proposed development in accordance with their responsibilities. Environmental impact is material for Telford & Wrekin Council (the Council) in their determination of the planning application. The EA are a statutory consultee on EIA applications and the Council uses their

expertise and input in weighting up the land use implications as required under the Town and Country Planning legislation. It is important that technical queries are resolved both prior to determination of the permit and the planning application.

The technical points raised in SLRs letter do not relate to the design of the proposed development to relevant guidance, standards, or other operational site criteria. In order to have confidence that these have been considered and that the proposed development will be in compliance with these, the EA require more information.

Air handling and the bio bed

With regard to predicted bio aerosol emissions the EA note that an assessment was undertaken, but the EA require clarification on how this relates to the specific proposals of the planning application. It is reasonable to expect the concentration of bio aerosols and emission rates to be effected by partial or total enclosure (with appropriate abatement) and this requires clarification.

Stack dispersion and odour

Dispersion modelling has been undertaken but the EA have not seen the data set underpinning the modelling process. The EA would like to have an opportunity to check the validity of SLRs conclusions.

With regards to the following: “The principals and technology for containing and treating building air are well established and their inclusion in the design has been incorporated into the planning application as appropriate ... The principals and technology for treating odours using bio filters are well established and their inclusion in the design has been incorporated into the planning application, i.e. the design parameters have been assessed using atmospheric dispersion modelling and no adverse impact on air quality is predicted.” The EA require the Council to detail these principles and the actual calculations used to demonstrate to both the EA and the Council that this development will be able to operate effectively and is appropriate for this locality.

With regards to the following: “A detailed technical review of the design would be addressed under Environmental Permitting and the facility would not be issued a permit until the EA are satisfied that it would be operated without leading to pollution.” The Permitting process cannot and does not technically review every single application to the same degree. The fundamental principles and calculations which underpin this development are unlikely to be reviewed as part of the permitting process. These will need to be clarified to ensure that there will be no adverse environmental impacts which could influence determination of the planning application.

The applicant remains responsible for ensuring the proposals are appropriate for the intended activity throughout the permitting process. The EA would advise the applicant, and the Council, not to rely solely on the permitting process to technically review this development at depth or necessarily act as

a measure to prevent all pollution, as the permitting process has its own legislative framework within which it has to operate.

The odour management plan and general management documents will be required at the Permitting stage. However, SLR should not assume that these documents will be “effective or enforceable”. It is the applicant’s responsibility to ensure that these documents have taken account of the relevant guidance. Subsequent shortfalls in the quality or content are often addressed during a site audit after a permit has been issued, i.e. when already operational.

Progression

Some technical queries must be addressed before the EA can remove their objection. However, it is possible that some other queries could be addressed before waste deliveries commence (subject to the necessary planning permission having been granted).

The EAs appraisal has been restricted as they have been unable to access the Council’s web site to view the technical appendix 7 and technical appendix 3 Bio-Aerosols which are referred to as being in Volume 4 of the submitted Environmental Statement (although the EA have been able to view other components of the planning application there). This has contributed to the EAs request for dispersion modelling data. The EA reiterate their advice that twin tracking of a planning application and a permit application is beneficial for efficient and consistent decision making, which can assist speedier resolution of issues and contribute to earlier operation of the proposal.

The EA note that SLR refer to a separate letter which would be sent to the EA subsequently to address the water quality/drainage issues. The EA await this and will respond on those points following receipt of these from SLR.

In one letter to the Council dated **8th September 2011** the EA comment:

The EA have received further information from SLR in relation to their geology, hydrology and hydrogeology concerns, in a letter dated to the EA of 17th August 2011.

The additional information regarding the drainage of the site has now satisfactorily addressed the EAs concerns regarding drainage and run-off from the site, subject to a condition requiring the developer to provide a detailed surface water design incorporating attenuation as set out in the Flood Risk Assessment and additional submitted information, prior to work commencing on site. The attenuation must be proposed run-off rates of 4.41/s/h, with storage to accommodate the 100 year plus climate change event.

SLR have confirmed that the proposed tanks would be constructed at ground level and would not be underground tanks. On this basis the EA are satisfied that water quality can be maintained.

Please note however that on different issues such as bioaerosols, the EA have still have concerns which have not been resolved (see separate letters of 11th August 2011 ref SV/2011/1050318-2L01 and 8th September 2011 re SV/2011/105656).

In the other **EA** letter dated to the Council dated **8th September 2011** the EA state:

The EA have received technical information from SLR.

SLR have also provided the following response to our queries:

- 1) Questions regarding 'air handling and the bio-bed' in relation to bioaerosols would be answered by the Bioaerosol Risk assessment Vol. 4, Tech Appendix 3 (attached).
- 2) Questions regarding 'Stack Dispersion and odour' would be answered by the Odour Impact Assessment Volume 4 – Appendix 7/1 (attached).
- 3) Queries regarding 'fundamental principals and calculations' would be partly answered by the Odour Impact Assessment Volume 4 – Appendix 7/1 which details the calculations used to determine the emissions form the biofilter. With regard to 'fundamental principles' SLR refer the EA to 2 sources:
 - a) Defra Good Practice and regulatory Guidance on Composting and Odour Control fro Local Authorities (March 2009).
 - b) An industry guide for the prevention and control of odours at biowaste processing facilities, Composting Association with technical input from the Environmental Agency (2007).

EA Response

Please note the EAs response should be read in conjunction with their previous reply dated 11th August 2011 ref SV/2011/105318/02-I01 which also relates to our air quality concerns.

1. The assessment has insufficient information on the monitoring and on the management intervention strategy, to ensure dust and other particulate do not adversely impact air handling and bio bed performance. The EA would expect the proposals to include monitoring for back pressure as a measure to identify a trend towards blinding, and compaction of bio bed media, that could result in poor treatment of process emissions.
2. The proposals indicate continuous monitoring of the bio bed, but the EA do not understand how parameters which should include moisture content, and treatment of the bio bed, will be monitored and the management intervention procedure operated if the acceptable operational range is exceeded.
3. The applicant has not described an air flow design for the bio bed to give assurance that the air flow will be evenly distributed throughout the media and aid effective odour treatment. This is particularly

important for woodchip media that over time can break down, blind air channels, and impeded bio bed performance.

4. An adequate explanation is required on how the building air exchange rate is related to the following:
 - The provision of a predetermined and controlled negative pressure.
 - Wind loading effect on building and potential for diffuse emissions.
 - Removal of odorous air during door opening in waste reception / further maturation area to facilitate waste movement.
5. An adequate explanation is required on how air handling is managed to prevent shock loading of the bio filter from cyclic heat, and preventing odour emissions, particularly when composting vessels are emptied. The applicant has detailed an increase in fan speed, but the EA do not understand how this mitigating measure affects odour treatment and emissions.
6. The proposals indicate that a heat exchanger or scrubber will be utilised to treat process emissions. The EA require clarification on what the applicant intends to use, and the technical justification, as this has significant implications for the nature of process emissions going forward to the bio bed and subsequent environmental conditions for effective odour removal.

The EA agree with the calculated treatment capacity of the bio bed and residence time. The bio bed has been assumed to emit 1000 ouE/m³ which is middle ground for a well designed and well managed system, but this is not related to odour concentrations from the proposed building air flow design.

The applicant has acknowledged that the waste will change broadly between summer and winter months. There has been no further discussion on the impact that these significantly different ratios (of waste types) will have on process emissions, or the ability of the bio bed to manage the change in different chemical species, in a relatively short time frame whilst preventing excessive odour.

7. Odour levels experienced by receptors could be significantly higher if the inlet flow to the bio filter is more concentrated than expected. The EA require the applicant to demonstrate how the bio filter can achieve odour concentrations at, or below 3 ouE/m³, at sensitive receptors across the range of foreseeable operating conditions and waste throughputs.

In assessing the planning application, the Council should be advised that should bio filter emissions significantly exceed 1000 ouE/m³, then the likelihood of odour annoyance would increase.

8. The proposals indicate that the fan speed will be turned down at night as a measure to reduce noise and energy consumption. However, the applicant has not considered the effect of reduced fan speed on stack

velocity and offset odour. Reduced stack velocity will impact plume dispersion and could result in odour annoyance for sensitive receptors.

The applicant must re-visit the dispersion model and predict the likely outcome of changing fan speeds on offsite odour. This will provide assurance that this measure is appropriate.

The applicant must also consider the risk of offsite odour annoyance from:

- Bio bed saturation from sudden shock loading when fan speed is increased for working hours.
- Reduced fan speeds causing dirty air to accumulate in the process building with diffuse loss via the wind loading effect on the building.

9. The proposed development relies on stack dispersion as a secondary measure to prevent odour annoyance for nearby receptors. The EA have concerns with this approach taking into account the close proximity of some receptors.

The applicant must ensure these proposals consider weather conditions which are known to impede stack dispersion. The EA would not accept temperature inversions, low or zero wind days, as a satisfactory cause of odour annoyance. These weather phenomena are foreseeable, and the EA strongly recommend that the applicant and the Council take this into account at this early stage.

The EA require the applicant to re-visit the dispersion model and demonstrate that these proposals have taken into account low wind days, which could foreseeable result in odour annoyance for nearby residents due to reduced stack dispersion.

10. The EA note the odour impact assessment focus on stack emissions, which does not include diffuse loss from open windrows. The EA not expect a matured compost to exhibit significant odour, but the applicant must consider this risk, and have a management intervention procedure that effectively deals with this issue, without compromising other aspects of the process.
11. The EA acknowledge that the applicant has produced a comprehensively bio-aerosol assessment, but the EA direct the Council to the Health Protection Agency to determine the likely health impact (if any) from predicted concentrations.

The EA advise the Council that the predicted concentrations are reliant upon a well designed and well managed bio filter, complimented by an effective system of air handling, and prevention of diffuse emissions from the process building. It is foreseeable that a failure in either of these measures could increase bio aerosol concentrations.

12. The EA disagree with table 3.3 reference a) – the EA feel it is irrelevant how the land was procured for this development, the resident is a sensitive receptor, and should be given equal weighting in the assessment.
13. The EA the comment from SLR “It is not considered appropriate or necessary to duplicate the full background to the principals of odour control using bio filters in the planning application when information is already provided in guidance from the Environment Agency and Defra.” The EA do not intend the applicant to duplicate guidance, the EA want the applicant to provide them and the community with the evidence base to demonstrate that these proposals have taken into account the relevant guidance and standards, and are appropriate for this location.
14. The EA do not recommend the Council should rely solely on their Permitting process as a measure to ensure complete Environmental Protection, as the permitting process can only operate within its legislative framework. The can provide Council with advice to assist it in determining if these proposals are appropriate for this locality. However, the EA need to be satisfied with the technical aspects of the proposals before it can recommend that they consider that he proposal is acceptable at this location. The EA would not see this advice on the planning issues as a duplication of our Permitting system.

Until these issues, as described above and in the EAs previous letter have been satisfactory addressed, the EA would not recommend that the Council grant planning permission for the proposals.

In a letter to the applicant’s consultants SLR Consulting Ltd (SLR), dated **6th October 2011** the EA stated:

Background position

The EA would like to confirm their viewpoint that they have a statutory responsibility to respond to local planning authorities (LPA’s) on EIA (Environmental Impact Assessment) planning applications. The EA aim to provide technical advice to the LPA to assist them in determining the planning application. The EA have worked with the Council providing relevant environmental information to assist the Council in weighing up the land use issues at this stage which are material to determining the application.

The EA also have a role in regulating the composting process within the site via the Environmental Permitting Regulations 2010. Although this process is complementary to that under the planning regulations, determination of each process often utilises the same data.

The EA accept SLR’s observation that some of the information required from the developer will be the same for the permit as for the planning application. In fact the EA have previously advised the developer and the Council that a twin track approach to this proposed development would be advantageous both from the developer and the regulatory bodies so that both the permit and

the planning application can benefit from the same information to assist a consistent and coordinated approach. However, to date, I am not aware that a permit application has been validated by our National Permitting Service, and the EA understand that the applicant intends to apply for the permit only if and when they have secured the planning permission.

The EA are still of the view that insufficient detail has been submitted land use in this location, the EA must be satisfied with the technical basis underpinning these proposals. Where the EA have technical queries relating to the proposals, it would be wrong for the EA not to query these at the planning stage, especially if the proposals could cause future amenity problems for nearby residents, as this is material to the planning application. As the EA have already received a number of complaints relating to odour in the area, the EA are aware of an advanced level of awareness and concern relating to odour/air emissions in the locality.

Please note that the Council also require sufficient information within the EIA for them to be able to arrive at an informed view of the cumulative impact of bioaerosols, odour, flies, dust and noise at this location.

The debate over the information required is unfortunate in that it is slowing up the processing of the application. The EA would wish to see a resolution to this situation and still recommend twin tracking the planning application with the permit. However, if that is not the preferred approach of the applicant, the lack of a permit should not stop the planning application being determined subject to a reasonable degree of certainty on air quality and amenity issues for the EIA as described above and in our previous correspondence.

Current position

At this time, the EA are not yet in a position to retract their concerns expressed to the Council. With respect to progressing the situation, the EA have the following technical detail for SLR to take forward in the context of, and in conjunction with, the EAs previous correspondence – see refs.

- SV/2011/105656/01-L01 dated 8th September 2011 to T&WC cc to SLR.
- SV/2011/10531/02-L01 dated 11th August 2011 to Mr J Palmer SLR.
- SV/2011/105318/01-L01 dated 15th June 2011 to TWC cc SLR.

Technical detail

The odour figures quoted are typical for a well designed and well managed bio filter. The abatement system is only one part of the design proposals, and there are other aspects, like air handling, that can significantly affect odour emitted from the bio filter. For this reason the odour treatment system should not be viewed in isolation from the rest of the design proposals.

Even though a bio filter is widely used in the bio waste sector, it does not mean that it will automatically be appropriate for this location, or that it will be able to deliver the level of performance required at this location as the general indicative figure suggests.

In order to address your latest bullet points the EA have the following comments:

- To ensure the effective operation of the bio filter, the EA require the applicant to explain which parameters will be monitored. These parameters must include media selection, temperature, moisture content, back pressure monitoring and ammonia. The applicant must explain the typical operational range for these parameters and the foreseeable outcome on odour emissions should they be exceeded. The applicant must outline typical management techniques that would be taken to restore acceptable operational parameters and effective treatment of emissions. The applicant will provide assurance that the bio filter can be well managed to maintain local amenity and prevent the biofilter becoming a significant source of bioaerosols.
- As stated in previous correspondence, the EA are uncertain if the proposals include a scrubber or other abatement technology in addition to the bio filter. The proposals do not identify a rate of efficiency for this design of bio filter to treat odorous air, and the proposals do not detail any consideration of odour of pre-abatement air flows across different waste streams.
- A detailed monitoring and management intervention strategy will be required at the Permitting stage, and would require a review to take into account 'fine tuning' after the successful commissioning of the site. At this planning stage the EA recognise assurance that the proposals will allow the effective monitoring of the process, and that sufficient mechanisms exist to allow the operator to manage the activity and maintain local amenity. Having this information will assist the Council in weighing up the material considerations prior to their determination.
- The EA acknowledge that the applicant has already concluded some dispersion modelling to validate these proposals. It is important that the developer provides an assessment of specifically zero (or as near as possible with dispersion modelling) and low wind days and increase the likelihood of annoyance for offsite receptors. The EA do not accept such weather conditions as an acceptable excuse to cause odour annoyance for nearby receptors. If necessary the applicant should consider additional measures or other abatement solutions, to reduce offsite odour to a level unlikely to cause annoyance.
- Every composting proposal has a unique set of circumstances and must be assessed on its own merits. Sufficient detail is required from the developer to enable the Council to assess the implications, weighing up the material factors of each unique site and circumstances.

The EA in a letter dated **6th December 2011** comment that they have outstanding issues/concerns relating to air emissions. If these outstanding concerns are not addressed then the EA consider that they have a robust

positions in line with the EHO views and they are prepared to go to appeal. The EA have looked at the Sutton Courtney site, Oxfordshire, in their Thames area referred to by SLR in their letter dated 20th October 2011 where the EA did not require such detail for the planning application. The EA consider that this site is very different to the current application so they do not consider it is a valid comparison (i.e. mechanical biological treatment, in a large building, within 264ha landfill/recycling site, nearest residential receptor is 900m away and preliminary pre application discussions had commenced).

The EA sent an email to Veolia dated **22nd May, 2012**. It states:

During our last conversation we referred to the situation regards the composting site at Whittington. This was with the intent of persuading Veolia of the reasonableness of the EAs approach and it's help in providing sufficient certainty for the EA to be able to offer substantive comment to the Council. The EA recall that Veolia thought less had been by the Whittington proposer than for Woodhouse Farm.

Still to assist and hopefully resolve matters, the EA have included the detail they have received from Whittington. It is listed below and attached in the form a couple of documents because not all is uploaded on the website yet. The recent information being looked at re Ford has not been formally submitted.

Whittington documents;

- BRA (July 2011)
- SLR consulting BRA (December 2011) version 2.
- Information from Vital Earth facility in Ashbourne, Derbyshire including BRA and odour management plan.
- Site specific Odour Management Plan (Jan 2012).
- Odour Impact Assessment (The Airshed) March 2012.
- Letter dated 27th March 2012 entitled 'Ventilation of maturation sheds Whittington' from Justine Lake, Durham Filtration Limited.

A site visit took place on 12th April 2012 including John Wakefield of Vital Earth Limited. Following this meeting additional information was submitted. The further information record is as follows:

- Meeting response from Crestwood Environmental dated 13th April 2012.
- Email of 16th April 2012 21:35 from John Wakefield including email of 16th April 2012 from Peter Cowing – Dust and Fume Control, Durham Filtration Ltd confirming that 'Ventilation rates for reception and maturation sheds taken into account wind loadings and structural imperfections that would air escape, the calculation have been based on Valentin and North method of calculating a design wind speed and ventilation coefficient.'
- Email of 18th April 2012 from John Wakefield with amended meeting response.

- Email of 18th April 2012 with attached letter of 2nd April 2012 entitled 'Design Criteria for wind loading Extraction rates from maturation and reception sheds, Whittington', Durham Filtration Ltd.
 - Email dated 25th April 2012 15:08 (planning update) from Crestwood Environmental.
 - Formal re-consultation of 4th May 2012 from LPA.
- 1) The Whittington and Ford proposals clearly define their pollution control measures. Woodhouse Farm may include a scrubber and on humidifier, in addition to a bio filter, and Veolia should specify their fundamental pollution control measures so the EA can develop confidence in their proposals. It is foreseeable this process will produce particulates (dust and bioaerosols), ammonia and other odorous compounds which could significantly impact the performance of the bio filter and result in offsite pollution.

Veolia Response: The Woodhouse Farm IVC application includes a range of pollution control measures. In the case of odour management/control specifically (as detailed within the 'Detailed Odour Assessment' (Sept 2010) this will be offered in particular through the following:

- All waste treatment, storage and loading activities will take place inside purpose built buildings.
- All extracted air is passed through a wet scrubbing system and adequately sized biofilter prior to discharge to air. The biofilter will be sized to meet Industry Best Practice – i.e. 45 sec retention time. All air from the process will be discharged from the building via a scrubber to remove ammonia odour-causing bacteria and mould, and a biofilter (via an air humidifier). The air humidifier moistens the discharge air and removes ammonia spikes that may otherwise poison the microbial population.
- The biofilters will be fully enclosed, and exhaust air from the biofilter will be emitted to atmosphere via two stacks to aid dispersion.
- Air flow to the biofilter has assumed 2.5 air changes per hour in the reception hall and 2 air changes per hour in the maturation hall.
- Regular, proactive servicing and maintenance to ensure the facility continues to operate as expected and assessed within the ES.

Odour could be generated from the IVC as green/kitchen waste is tipped prior to treatment or disturbed whilst in situ. The potential for emission from the building would be from the external roller shutter doors which will be minimised by the architectural design and the use of automatic doors (and if necessary air curtain to further minimise emissions). The emission from the Tipping Hall access doors when there is a lack of positive pressure within the building is considered to be insignificant based upon the limited HGV movements outlined in the application, surface area of the source, minimal velocity and roller shutter doors.

Emission data used as input to the dispersion model is shown in the Table below. As described above, the emission rates for the biofilters are based

upon the maximum output to the biofilter assuming 2.5 air changes per hour in the reception hall and 2 air changes per hour in the maturation hall. An odour emission of 1,000 ou_E/m³ has been applied based upon measured biofilter emissions.

Table
Biofilter Emissions Data

Parameter	Value
Stack Diameter (m)	1.4
Exit Velocity (m/s)	17.06
Emission Rate per Stack (ou _E /s)	26,264
Total Volumetric Flow (m ³ /s)	52.53
Total Volumetric Flow (m ³ /h)	189,100
Release Temperature (°C)	20.0

The Woodhouse farm will operate as an IVC accepting only kitchen and green waste (i.e. not the broader range of waste as for example at an MBT). The IVC will therefore accept the same waste as that proposed at the Whittington facility – but will employ a different tunnel-based technology which Veolia are sure the EAs technical experts will be familiar with.

The biofilter emission rates are in-line with those used in other assessments for similar facilities, such as:

- Deep Moor In-Vessel Composting Facility Odour and Bioaerosol Assessment for Viridor Waste Management (study undertaken by RPS);
- Odour and Bioaerosol Assessment Integrated Waste Management Facility, Old Kent Road, Bermondsey, London for Veolia ES Southwark Ltd (study undertaken by RPS).
- Viridor: Proposed Development of a Waste Treatment Plant, Lostock Gralam. Air Quality Assessment (study undertaken by Wardell Armstrong).

A commonly stated target criterion is 500U_E/m³ which derives from the German TA Luft Standard for odour control at MBT. Although this relates to a different type of waste handling operation, it demonstrates the achievability of the 1,000ou_E/m³ modelling value. As detailed previously, Veolia would be happy to accept the concentration as a performance guarantee (secured, for example, through a suitably worded condition).

- 2) Whittington and Ford have incorporated louver vents in the proposals to compliment an effective air flow design. A controlled flow of clean make up air should be maintained particularly when external doors are closed.

Veolia's answer: Extraction systems in the buildings maintain negative pressure inside all areas of the building; this encourages air to flow into the buildings and processing areas in the IVC facility. The buildings are totally

enclosed, with access into or out of them only possible through automatically closing doors. This ensures egress of odour and bioaerosols through building apertures is minimised (as detailed previously).

For avoidance of doubt, extraction systems (to be the subject of further detailed designs) and an inward air flow via louvers into the waste reception and maturation building will prevent uncontrolled egress of odour. These are shown on the drawings submitted with the planning application. Further technical precautions can be employed such as the use of air curtains however Veolia consider that this should be addressed through the Odour Assessment elements of the Environmental Permitting process and such a measure would not have any significant planning implications.

As detailed previously, the process air from the buildings will be passed through a scrubber and biofilter. The air is passed through a combination of an acidic scrubber and an enclosed biofilter. The washing process, undertaken within the scrubber, removes dust and ammonia and ensures the biofilter continues to operate effectively.

- 3) Vital Earth used representative emission data from their Ashbourne facility to validate the parameters used in the dispersion model. The Ford application used the services of ADAS to model emissions from the bio filter, and other sources such as windrows, and based their dispersion model on the cumulative impact on the site. Both Whittington and Ford applications have now incorporated a stack to reduce the likelihood of odour pollution based on this modelling exercise. This is particularly important since both applications originally omitted this measure.

Veolia's response: This being the case why can't we also use the Ashbourne data given that much of the waste accepted is Shropshire waste in any event (food and green). The waste accepted at Ashbourne is very similar to that proposed at Woodhouse Farm IVC.

Veolia has used the services of SLR Consulting to model emissions from the biofilter which have been included in a dispersion model (reported within the 'Detailed Odour Assessment' (Sept 2010) technical appendix chapter of the ES). This assumes the following:

- Modelling level of odour at the inlet to the biofilter – 1,000 OUE/m³ based upon accepted literature values.
- Emission rate assumed from each biofilter stack – 26,264 OUE/sec.
- Modelled Exit Velocity from the Stack – 17.06 m/sec.
- Release temperature - 20° C.

One of the mitigation measures falling out of our Assessment was that a 4m high stack (with 1.4m ext diam) would be required to adequately disperse odours. The modelling predicted a maximum concentration of 1.9OUE/m³ at the Woodhouse Farm receptor and a maximum of 1.4OUE/m³ at the former Knackers Yard. An odour impact contour plan is detailed at Plan Ref A7/1

which reports the findings of the AERMOD odour dispersion modelling. The findings of this Odour Assessment, and the EIA holistically, consider the impacts to be acceptable which has included consideration of cumulative effects.

It is also interesting to note that the principle of establishing a waste treatment facility on this site was historically supported by the Council who were proposing to allocate the site in the aborted Waste Site Allocations DPD. Whilst an abortive plan (due to various procedural issues) this provides some indication that this site has previously been considered a broadly acceptable site for such uses – as you are no doubt aware, the Authority is a tightly constrained area from a waste planning perspective due to its limited size, geography and policy context.

- 4) Whittington and Ford have provided an overview of their air flow design based on the Valetin FHH and North method to establish an air extraction rate which is likely to counteract the wind loading on the building envelope. There are other methods available. This is a key measure to minimise the likelihood of diffuse pollution from the building envelope. The applicant must design the abatement system to accommodate the required air flows and provide the appropriate treatment. This has implications for the design and choice of abatement system (such as the number of scrubbers, size of the bio filter).

It is the EAs opinion that the suitability of the location is influenced by the detailed design and as an EIA development it might be considered more critical that Woodhouse farm includes the above as appropriate impact assessment and mitigation.

Notwithstanding the above the works outlined will also aid the applicant to provide a robust a robust permit application, which should also minimise the permit review process. This will minimise the likelihood of the applicant having to revise their planning permission should permitting been foreseeable addressed at the decision stage. The EA appreciate that Veolia have decided not to twin track the submissions.

Veolia's response: From previous correspondence and discussions it is clear that the Environment Agency appear concerned that, should the scheme require adaptation during the Permitting process (i.e. in order to obtain a Permit) then this may result in a further planning application being required. As the EA are aware the Local Planning Authority and consultees are required to consider the application before them rather than speculating upon potential changes which may or may not be required in the future. Concerns relating to what may or may not happen in the future in relation to selection of technologies and the potential for further planning requirements should not be relevant to this application where they relate to specific process considerations.

Throughout the planning application (which has included a thorough EIA) and subsequent process Veolia have described in detail how the Local Planning Authority will have satisfactory assurance that pollution and harm to human health are unlikely to occur from this proposed land use since all of the EAs questions must be answered before the facility will be granted a permit to operate and, if the EA are not satisfied that the design of the odour control and/or air handling is not adequate, then the EA will not issue a Permit and the facility will not be able to operate. Veolia consider that this provides the Local Planning Authority with the ultimate assurance, and this is consistent with National planning Policy, such as PPS10 and the recently released NPPF:

“122. In doing so, local planning authorities should focus on whether the development itself is an acceptable use of the land, and the impact of the use, rather than the control of processes or emissions themselves where these are subject to approval under pollution control regimes. Local planning authorities should assume that these regimes will operate effectively. Equally, where a planning decision has been made on a particular development, the planning issues should not be revisited through the permitting regimes operated by pollution control authorities.”

Should the EA consider there is a need for further suitably worded pre-commencement conditions to be inserted onto any planning permission, such as an Odour Management Plan (also required through the Environmental permitting process) then this will be for the EA to advise the Local Planning Authority who will in turn consider such a request. Veolia would be content to consider such a condition.

On the basis of what the EA have received for Whittington, the EA have raised no concerns on the principle of the proposed development at this location.

<http://planningpa.shropshire.gov.uk/online-applications/simpleSearchResults.do?action=firstPage>

In comments dated **10th July, 2012** to Veolia, the EA thank the company for their e mail of 20th June 2012 which provided some additional clarification facility proposed adjacent to Woodhouse Farm, Granville.

The EA understand that the proposals will include a scrubber system, separate humidifier, and bio filter. Confirmation has now been provided that the building envelope will include ventilation louver vents to enable an adequate flow of clean make up air, even when doors are closed.

The EA note that the company have not demonstrated how the building air flow design (extraction rates) will counteract the wind loading effect on the building envelope. The company's supporting information has instead relied on air exchanges per hour. With this level of information the EA are not able to determine if this will be sufficient for this design of facility in this specific location. However, the EA now have sufficient detail to advise Telford &

Wrekin Council (TWC) on the general appropriateness of the proposed land use at the site.

The company have stated in the e mail that “The emission from the Tipping Hall access doors when there is a lack of positive pressure within the building to be insignificant based upon the limited HGV movements outlined in the application, surface area of the source, minimal velocity and roller shutter doors.” The EA assume that the company intended to state negative instead of positive pressure.

For the company’s reference, the EA do have experience of odour pollution, from similar facilities, caused by door opening for vehicle movements where there is also ineffective extraction rates within the building envelope.

The EA note the company’s comments which relate to their assessment of design particulars for the odour control and sit handling system. Our Permitting process ensures that there is relevant assessment of the proposed activities and assumes that the applicant has undertaken the appropriate calculations to ensure that the design presented for the Permit application is fit for purpose. The applicant retains responsibility for their proposals throughout the Permitting process as a means of total environmental protection. The permitting process provides a measure of environmental protection, but its legislative framework may not satisfy all concerned parties on all aspects of their perceived amenity, particularly the sensitive receptors in close proximity to the proposed development.

Please note that the EA would not consider it appropriate to seek to control odour emissions with an emission limit value (ELV). There is a margin of error associated with dispersion modelling and the modelled values should be taken as being indicative. The odour dispersion model will of course also be validated as part of the Permitting process when a Permit application is submitted to the EA for determination.

It should be noted that Telford & Wrekin’s Public Protection team should also be consulted on the noise and odour assessments, both in relation to statutory nuisance and to ensure that the pollution control regimes via the planning process and the permitting process are complimentary.

Summary

The clarification of detail provided by the company, particularly in relation to the assessment of pollution control measures for emissions to air (including odour) has been helpful in providing a greater understanding of the proposals and their potential impact.

The information submitted to the EA to date has enhanced the evidence base for the Environmental Impact Assessment for the planning application for the proposed development, such that the EA would now be able to offer planning conditions to address any remaining mitigating requirements.

As discussed previously, the EA recommend 'twin tracking' of the Environmental Permit (EP), with the aim of encouraging more comprehensive submissions and thereby more informed, and speedier planning decisions, i.e. more detailed information should be available to enable sufficient consideration of key land use issues and so assist in the Council's determination of the planning application. The above comments are of course made in the absence of an EP being submitted, at this time, but the provision on whether any determination is an acceptable use of the land.

The above comments are also made without prejudice to any future EP determination.

It is important that Telford & Wrekin Council have the same information available to them as has been submitted to the EA, prior to their determination of the planning application. On this basis, the EA have copied the Council in to this response to the company, but the EA would anticipate that the company would submit the clarification details to the Council and to the EA on the agreed details, the EA would submit their revised response on the planning application to the Council, which would include appropriate conditions.

On **31st July 2012** the EA stated:

With regards to 'arisings', the EA don't have any solid 'actual' data; it's all inferred from disposal data, since that waste must have come from somewhere. The Waste Data Interrogator is a National database/tool the Agency has delivered from waste returns (quarterly/annually consolidated) from operators. It:

- Gives data on a snap shot of current waste 'arisings' using the most current, actual returns information from operators and not a model.
- Has been in use for 5 years and is a very big set of 'actual data', not estimates or models (data trends and direction of travel).
- Contains tonnages of different types of waste and the origin and destination of the waste.
- Is balanced and accounted for.
- Has an element of Quality Assessing at the Agency.
- Is sent to Local Authorities on CD and they can extract information on waste dealt with in/into their authority for waste planning; it is used by all Waste Planning Authorities (WPAs).

With any dataset there are limitations, e.g. it's operator data, exemptions are not included, there will be gaps and the Agency don't always receive returns from operators. However, the overall trend is reasonably consistent despite the limitations. The Agency supply the data, not the interpretation. Any drilling down of data is for the County/Unitary Councils. The Agency haven't done any work to forecast how much these arisings might grow or decline in the future. The Agency's view is this is the only 'actual' value of arisings that is available, derived from waste operator returns, in that all this waste came from somewhere, deducting any 'double handling' component at transfer stations.

DEFRA are responsible for waste production data. In 2010, for example, they commissioned Jacobs to do a C&I survey of some type (see attached). The survey was:

- Based on a sampling exercise on a limited range of businesses;
- A statistically scaled/manipulated model and not actual data.
- A National Scale survey.
- A single day snapshot; no formal sampling was done;
- 'Opt in' therefore limited sample.
- Missed a large number of businesses, e.g. ancillary/office activities of agriculture, mining, construction sectors etc.
- Not a comprehensive snapshot and not everyone is captured by the survey therefore it's an estimate.

The caveats in the survey are that there are big limitations with taking data down to County scale; it depends on diversity of businesses in any particular authority. The different business sector classes used in the survey can themselves be very diverse. It was a quick survey done for EU reporting purposes, no quality assessing was done and the data was destroyed. It is not designed to be taken down to a single WPA level; 'A guide on the use of the data should be developed to ensure needs assessments carried out as part of waste and minerals planning properly reflect the limitations of applying highly disaggregated estimates at a WPA level'. So you shouldn't simply just map the figures across to a WPA.

With regard to compostable material, figures may depend on what the current domestic waste arrangements Local Authorities have to collect waste such as green waste, and if any changes are planned. WRAP are also a good source of information on this.

You are right in your 'waste planning equation', if only it was that simple. Waste does not respect boundaries, so to get a sensible arisings/capacity estimate you need to know how much waste is being imported or exported from the WPA area. The West Midlands regional Spatial Strategy (WMRSS) will have apportionments that were 'found sound', so you could refer to these, and update them as appropriate.

As requested, please find attached the most current waste data. Please note the Agency's 'official' waste data is from 2010; the Agency are currently quality assessing the data sets for 2011 ready for release.

For all West Midlands region sites the Agency have reported all the sites that have accepted organic wastes (types and form shown) together with their respective inputs for this waste type. For the 3 WPAs Shropshire, Telford & Wrekin and Staffordshire, the Agency have reported all the sites within each of these WPAs and additionally shown both the annual capacity and the input tonnages per site. Please note that some composting activities will also be exempt.

Finally, as IVC does not make waste disappear completely, and there will be treated residue requiring spreading, this will need a reliable outlet as part of this development. Has this been identified.

The latest comments of the EA dated **25th October 2012** stated.

Introduction

Further to your consultation with us based on the initial planning application with Environmental Impact Assessment (EIA) and consequent additional environmental information provided by the applicant, we have the following response for your information.

I refer you also to our previous letters to you (or the applicant/developer and copied to you):

10th July 2012 ref SV/2012/106329 (Veolia)
5th January 2012 ref SV/2011/105656/03-L02 (Veolia)
6th October 2011 ref SV/105656/02-L01 (SLR)
8th September 2011 ref SV/2011/105656/01-LO1 (T&WC)
8th September 2011 ref SV/2011/105318/03-L01 (T&WC)
11th August 2011 ref SV/2011/105318/02-L01 (SLR)
15th June 2011 SV/2011/105318/01-L01 (T&WC)

We have had meetings and exchanges of views between ourselves and the applicant/consultants to try to reach an adequate level of understanding of the proposed processes and use of land for us to be satisfied that we could provide you with advice on the environmental impacts of the proposal.

In a letter dated 10th July 2012 we detailed our outstanding concerns in relation to this proposed development and its potential environmental impact. Although replying to our letters, the applicant has not responded with further evidence to fully address our concerns. The applicant's basis for this position is that such level of detail is not appropriate at the planning stage but will be regulated under the Environmental Permit which they intend to apply for after planning permission is received.

Planning Position

Having reviewed the submitted information, we are of the view that the applicant has submitted sufficient information for us not to object to the principle of the proposal. However we highlight for your decision making process that some uncertainty currently remains on the detail of the proposal particularly in relation to odour emissions. This is expanded on under the specific headings below, in the context of our previous correspondence with you.

Flood Risk

The site lies in Flood Zone 1 (low risk of fluvial flooding) and we refer you to our Flood Risk Standing Advice. Your internal drainage engineers will also be

able to assist you with advice relating to surface water drainage and the adequacy of measures for achieving sustainable attenuation for the 1% plus climate change event. We would expect them to recommend a condition to manage foul and surface water measures to reduce flood risk, based on the submitted Flood Risk Assessment (FRA) SLR Ref 402 0156 0082 dated August 2010.

Ground Water Protection

The proposed development is sited over a secondary aquifer of intermediate vulnerability to contamination. There is an active landfill in close proximity. It is not within a Source Protection Zone. Previous uses of the land, including former mining activity have the potential to pollute water resources. The developer should therefore prevent mobilisation of contaminants and pollution to groundwater during construction and operation of the facility. We have produced a range of guidance notes giving advice on statutory responsibilities and good environmental practice which include Pollution Prevention Guidance Notes (PPGs) targeted at specific activities. Pollution prevention guidance can be viewed at:

<http://www.environment-agency.gov.uk/business/444251/444731/ppg/>

All storage of oil and fuel must be in accordance with the Control of Pollution (Oil Storage) (England and Wales) Regulations to prevent pollution of ground and water.

As previously stated to you in our letter dated 15th June 2011 ref SV/2011/105318, we recommend the use of our Foul Drainage Assessment Form to assist consideration of the proposed non-mains drainage facilities (form previously circulated to you).

We recommend the inclusion of the following conditions on any permission you may be minded to grant to mitigate risk of pollution to the water environment:

Condition

Prior to being discharged into any watercourse, surface water sewer or soakaway system, all surface water drainage from hardstandings associated with the waste activity shall be passed through an oil interceptor designed and constructed to have a capacity and details compatible with the site being drained. Any clean surface water or roof water shall not pass through the interceptor.

Reason: To prevent pollution of the water environment/controlled waters.

Condition

If during development, contamination not previously identified, is found to be present at the site at the site then no further development (unless otherwise agreed in writing with the Local Planning Authority) shall be carried out until the developer has submitted, and obtained written approval from the Local Planning Authority, a Method Statement for remediation. The Method Statement must detail how this unsuspected contamination shall be dealt with.

A Verification (Validation) Report demonstrating completion of the works set out in the Method Statement shall be submitted to and approved in writing by the Local Planning Authority. The report shall include results of any sampling and monitoring. It shall also include any plan (a "long-term monitoring and arrangements for contingency action and for the reporting of this to the Local Planning Authority).

Reason: To ensure that any unexpected contamination is dealt with and the development complies with approved details in the interests of protection of ground and surface waters ('controlled waters' as defined under the Water Resources Act 1991).

Condition

No infiltration of surface water drainage (including leachate) into the ground shall be permitted other than with the express written consent of the local planning authority, which may be given for those parts of the site where it can be demonstrated that there is no resultant unacceptable risk to controlled waters. The development shall be carried out in accordance with the approved details.

Reason: To minimise contamination to controlled waters.

Condition

The base of all storage and process tanks shall be above ground level and incorporate level detection.

Reason: To minimise contamination to controlled waters from leakage and overflow.

Note: the applicant has provided assurance following the initial submission that tanks would not be underground and would be constructed at ground level. However, to assist any necessary enforcement this condition is also recommended.

Landfill Gas

The proposed development lies less than 250 metres from the landfill at Granville. The proposed development does to appear to increase the risk of landfill gas intrusion into the proposal, however the applicant should be aware of the risk and consider the need for carrying out a risk assessment for their own satisfaction. Your Building Regulation section may also wish to assess the issue of subsurface gas when finalising construction details of all new and modified structures on the site.

Amenity

Landscaping should provide a structural basis for mitigation of issues such as noise and dust as indicated in the Environmental Statement (ES), in conjunction with the use and monitoring of Noise and Odour Management Plans within the permit process.

Air Quality

A detailed odour assessment has also been produced see SLR Ref 402.0156.0082 and produced in Appendix 7/1. As with any model, a degree of caution is advised with regard to the findings. Further clarification relating to odour assessment has subsequently been provided by the applicant which states the intention to pursue the applicant's chosen air flow design and abatement system incorporating a scrubber system, separate humidifier, bio filter and louver vents. The applicant is of the view that this is likely to be adequate and that at this planning stage full demonstration of the effectiveness of ventilation and extraction at this location to satisfy local expectation in all weather conditions is not required. As this relates to the fundamental design principles of the facility, we are not in a position to offer any conditions of planning relating to this aspect.

A Bioaerosol Risk Assessment has been produced as part of the ES (SLR Ref 403-0156-00082 and included in Volume 4 Technical Appendix 3). Although "sensitive receptors" are close and within 250m, our guidance accepts that where both IVC and windrow composting are both totally enclosed and in conjunction with negative aeration, uncontrolled releases of high levels of bioaerosols are less likely to result and are therefore seen as lower risk activities. The ES shows the provision of 2 number stacks of 4m height as a means of providing adequate dispersion. Some assurance on controlling risk to the environment via potential emissions to air, land and water will be provided by the permit process. Further detail on this is provided in the Permit Information section below.

Mitigation measures to reduce potential adverse impact from dust during both the construction and operation phases have been provided in the ES (see chapter 7 Air Quality) and do not cause us significant concern.

A Noise Assessment has been carried out in accordance with best practice and guidance (see ES Volume 3, Chapter 8 Noise). Mitigation measures are proposed to reduce the potential impact at the nearby receptor of Woodhouse Farm. We have no issues with this respect of the planning application.

We recommend that you also consult your Environmental Health officers to assist in providing advice on public protection and statutory nuisance to help in your determination of the planning application.

Permit Information

As you are aware, as well as any planning permission that you may be minded to grant, a permit determined by us under the Environmental Permit Regulations 2010 is also required prior to commencement of this proposal.

We have advocated the twin tracking of the planning application with the permit application so that all details are available to both regulating bodies at the same time to aid consistency of decision making and open, efficient decision making. The applicant however has chosen to seek determinations sequentially with the planning application as a first stage in the regulatory process.

We recommend that the applicant contact us at the earliest opportunity regarding the permit to reduce potential delays necessitated by the determination of the permitting process (tel 03708 506 506).

A Bespoke Permit would be required for this facility which aims to produce a high percentage of PAS 100 compliant compost. We note that a small percentage of non compliant material is likely to be required to be removed from the site.

We cannot pre-empt a decision on a permit application, but from the planning information provided to date, at this stage a major show stopper to a permit seems unlikely. Thus from the permitting position, although the movement and processing of food waste has an inherent level of odour, it is possible that with appropriate management the development would be unlikely to cause significant adverse environmental impact.

We remind you that the applicant retains responsibility for their proposals throughout the permitting process, and it would be inappropriate to rely on this regulatory regime as a means of total environmental protection. The legislative framework may not satisfy all concerned parties on all aspects of their perceived amenity, particularly sensitive receptors in close proximity to the proposed development.

Please note that our comments included in this letter are made in the absence of a permit application being submitted to date, and are without prejudice to any future permit determination.

We anticipate that the following would be covered in the permit.

Air Quality

A site specific bio aerosol risk assessment would be required due to the proximity of sensitive receptors. The adjoining residential property at Woodhouse Farm is considered a sensitive receptor even though it may currently be occupied by the owner and/or operator. The Table within section 4.2 of Veolia's Qualitative Bioaerosol Risk Assessment SLR Ref 403-0156-00082 dated March 2010 submitted with the planning application identifies three sensitive receptors within 250m of the site boundary, i.e. Woodhouse Farm Bungalow (3m), Woodhouse Farm Barn (3m), Woodhouse Farm (64m).

A Dust Management Plan is likely to be required to help minimise emissions of dust during operations. Monitoring would be undertaken by the operator and periodically audited by the Environment Agency.

An Odour Management Plan would be required to be submitted and approved prior to commencement of operations. Any problems associated with odours would be identified, with the developer introducing appropriate remedial and corrective action without undue delay.

Should this development result in odour pollution, the Permit (if granted) would require the operator to take all appropriate measures to minimise odour

pollution. Such retrospective action could foreseeably have significant financial and legal implications for the operator. The local community could also be impacted by increased odour whilst further measures are being undertaken.

We wish to highlight to you that a composting operation is unlikely to be free of odour and some sensitive individuals may find the odour is unacceptable to them even though the indicative odour modelling suggests otherwise. We are unlikely to take enforcement action over occasional slight odours which may be detected by people at neighbouring properties.

Noise

A Noise Management Plan would be required to be submitted and approved prior to commencement of operations.

Controlled Water Protection

A system of containing and controlling the quality of potentially polluted runoff and leachate in accordance with Best Available Techniques (BAT) would be required.

22. The Environmental Health Officer (EHO) comments are split between an Officer who has given advice to Planning (EHO-P) and an officer who has given advice to Veolia (EHO-V).

The EHO-V (Ian Moorhouse) comments dated **11th November 2011** are that if the application is not twin tracked, i.e. there is no concurrent EA Permit application then the Environmental Health Department has a duty to comment on the Pollution Prevention issues. These include noise, dust, odour etc.

The EHO-P have the same concerns as the EA on dispersion modelling for zero and low wind speed days and would require specific data on this in order to accurately assess the application.

Without this the EHO would unfortunately be in a position where he would have to object to the application in its current form.

The EHO-P (Tony Higgins) commented on **13th August 2012** concerning the EA letter to Veolia dated 10th July 2012, as follows. The comments of the EA in their letter are endorsed.

It is clear that the EA have ongoing concerns over odour, and have not been comforted by the additional material submitted by the company. The EHO has no doubt that the EA conclusions in respect of possible odour. If the building cannot remain integral then escape of odour is possible, moreover, the capacity of treatment plant associated with that activity needs to ensure that it is capable of maintaining a negative pressure in the very large building. This means that the chemical scrubber (presumably a two stage acid/alkali arrangement) will need to be sized appropriately and be demonstrated to be effective in removing target species, the humidifier and bio filter will need to likewise ensure that any influent gases are appropriately treated and have both the correct flow rates and residence times to ensure complete oxidation

of waste gases. Given that the primary treatment (the chemical scrubber) is the likely weak link in the treatment system, it is recommended that a final stage activated carbon filter may be appropriate to offer a degree of polishing to the final effluent system. The EHO have not seen the specific data outlined by the EA in respect of this matter so cannot comment further. If you have copies please forward them and I'll review. In order to review consistency the EHO would need to liaise with the EA to arrive at appropriate conditions.

In respect of noise, it is noted that the area is one predominantly rural in nature referred to as tranquil. The loudest activities are those associated with the farm itself, and whilst they are occasionally loud, they are consistent with agricultural activities and an accepted part of normal life in the area. Composting on a commercial scale is not an agricultural activity, it is industrial. The increase in HGV and general road vehicles will have a noticeable effect on residential amenity, as well as changing the character of the area. It is unlikely that the company will be able to meet any standard noise limits set that relate their onsite activities to background noise levels. Irrespective of whether they meet numerical standards it is highly likely that they will become the dominant noise source in the area, and will be noticeable. Again the EHO can review the submitted noise data if you send it through to me.

The EHO-V (Ian Moorhouse) made the following comments on **20th August 2012**. The proposed development will be regulated by the Environment Agency. It is common practice to run the Planning Application and the Environmental Permitting Application concurrently.

This informs the decision making process, however there is no compunction on the proposed developer to do this. This application is a stand along application.

The only comment that the EHO can make is that it is known that similar developments of this nature have been the cause of complaint in other parts of the country in respect of noise and smell.

In respect of the submitted application the EHO considers that it will be necessary to ensure that for the purposes of assessing impact of the proposal the nearest sensitive receptor is the adjoining property. The EHO cannot concur with the view that because it is currently in the same ownership that it should be discounted. Ownership and or occupation of premises can change and for this reason the property should be considered the nearest sensitive reception.

23. The Drainage Engineer has commented (4th May 2011) on the Flood Risk Assessment (FRA) and states that there are several conditions that should be addressed:

Condition: The FRA states that the site will be restricted to the 2 year existing runoff rate (23/9l/s) for all flows up to and including the 1 in 100 year storm

event. Climate change is currently set at 10%. This should be increased to 30%.

Condition: Micro drainage calculations should be submitted to take the increase in climate change into account. This submission should include the full electronic model.

Condition: Full drainage layout plan should be submitted with numbered runs which relate to the calculations. This should also include details on the foul system.

Condition: Further information should also be submitted on the point of discharge and the line and condition of the downstream surface water system.

24. The Geotechnical Engineer supports the application subject to conditions being imposed on any permission granted. Informatives 117 and 120 would be required.

25. Fisher German Chartered Surveyors comment in a letter dated 20th April 2011 that they can confirm that their client's apparatus, the **Government Pipelines and Storage System (GPSS)** may be affected by the proposals as indicated on the attached plan(s). The plan(s) supplied are intended for general guidance only and should not be relied upon for excavation or construction purposes. No guarantee is given regarding the accuracy of the information provided and in order to verify the accurate location of the pipeline on conjunction with the proposals you should contact OPA Central Services to arrange a site visit.

26. Les Stephan Planning Ltd in a letter dated 29th July 2012 have not objected but have made a series of comments in response to the submitted information.

It is noted that the facility is intended to process 52,000 tonnes of waste from the rest of Shropshire as well as 12,000 *tonnes* from Telford & Wrekin.

However, due to the distance from the site to the source of waste in the rest of Shropshire the question needs to be asked:- is this the correct location for single facility designed to cater for a larger area? Clearly one of the issues which need to be addressed when considering a facility such as this is environmental sustainability in terms of transport costs (financial and environmental) set against the environmental benefit of managing compostable waste.

It makes little sense to expend large amounts of carbon based energy transporting material from the rest of Shropshire to a single facility which may not produce the equivalent environmental return and reduction in carbon footprint.

PPS10 provides guidance on this issue and requires waste planning authorities to identify sites and areas for new or enhanced waste management facilities for the needs OF THEIR AREAS.

Policy CS19 of the Shropshire Core Strategy is clear on this matter:-

“sites will be allocated as part of the Site Allocations and Management of Development DPD in accessible locations close to the main urban areas within the broad locations identified in Fig.9. Outside of these broad locations Shropshire Council will support applications for smaller scale waste facilities capable of meeting local needs in locations which are consistent with the principles and site identification criteria set out in national and regional policy.”

In this case the proposal to provide IVC facilities for Shropshire as well as Telford & Wrekin appears to contradict this requirement.

This is pertinent at the present time as Shropshire Council is currently reviewing existing composting facilities within Shropshire, potential areas for the provision of new facilities and the likely tonnages of compostable materials which will arise in the future.

If new IVC facilities are subsequently provided in Shropshire close to the sources of the material the viability of the Telford facility may be called into question given the expected tonnages from wider Shropshire compared to the arisings from Telford.

The application implies that there is no other suitable site in Shropshire. This is based on surveys carried out in 2007. But by the applicant's own admission these surveys were not fully comprehensive and both the March 2007 report and the May 2007 report conclude that further investigation was necessary. The December 2008 report appears to simply use information from the previous reports. Further to these incomplete surveys of alternative sites there has been a significant change to planning policy and also in technologies relevant to waste disposal and recovery so there may be more suitable and sustainable sites available today.

They have been instructed to prepare and submit an application for an Energy Recovery Unit/VIC of 30,000 tonnes for a client which has an existing 25,000 tonnes green waste facility at Shrewsbury. The site was not identified in the above reports (in itself an omission). Furthermore the site is already identified within the former Shropshire Waste Local Plan and now within Policy CS19 of the Shropshire Core Strategy and forms part of a brownfield site. The two units are on the same premises and will work in conjunction. The new unit is designed to handle food, catering and green waste in any combination and will also incorporate energy recovery in the form of electricity and heat.

The site would be significantly closer to the main source of waste, e.g. 10km from Shrewsbury, 20km from Oswestry as opposed to Woodhouse Farm being 20km from Shrewsbury and 50km from Oswestry. The more remote

areas of Shropshire, e.g. Bishops Castle would also be less accessible to the Woodhouse Farm site than the proposed site near Shrewsbury.

It is also notable that the proposal at Woodhouse Farm does not include any reference to electricity generation or heat recovery.

This is important as the use of waste as a source of energy is a material consideration within Annex C of PPS10 and is clearly identified as such within the "Waste Hierarchy".

The proposed facility in Shropshire is designed to produce 1mw of electricity and 1mw equivalent in heat energy.

There is already a written agreement with a nearby landowner to utilise the heat energy in a hotel and leisure complex. A connection to the national grid is available.

This complies with the requirements of Policy CS19 of the Shropshire Core Strategy:-

"National Policy is clear that we should actively promote opportunities to recover the energy value of biomass particularly by capturing both the heat and energy value of biomass materials."

Recent Central Government advice from Defra reinforces PPS10 and Shropshire Core Strategy Policy CS19 and emphasise the renewable energy and climate change benefits which anaerobic digestion schemes can offer both of which appear to be lacking in the Woodhouse Farm proposal.

27. The Development Plans Team Leader in an email dated 9th August 2012 states that there is not yet an agreed timetable for the publication of the replacement Telford & Wrekin Core Strategy, so the following dates should be taken as a guide.

Preliminary engagement: January – February 2012 (completed).

Strategy and Option: October – November 2012

Draft Plan Consultation: April – May 2013

Submission of Plan for Examination: August 2013

Public Hearing: Late 2013

Inspector's report received: April 2014

Adoption: May 2014

28. The Strategic Waste Team Leader commented on 9th September 2011 that the Council currently collects green waste from the kerbside and at our four CRC sites. This is processed at a third party facility within the Borough. As we carry out a separate collection of the material, open windrow composting is suitable and it is unlikely that, without changes to legislation forcing us to use in-vessel composting, such a plant could be competitive for us. If a competitive fee were to be charged it would probably be to cover

spare capacity and it would therefore indicate that there had not been demand for as in vessel plant.

The Council have just ended our food waste collection trial and have no plans to conduct another such trial or to roll out a borough wide food waste collection service. The food waste we did collect was processed outside the borough in Staffordshire. Since we started our trial a new Anaerobic Digestion Plant has opened at Harper Adams in the Borough. At the time of tendering as well as the AD plant we used there was also the Greenfinch one in Ludlow. In recent days I have been contacted by another new plant that has opened up near Bridgnorth. There is therefore already significant demand for the food waste that the Council may collect at some point in the future. Industry indications are that, as AD plants earn income from the sale of electricity, as the number of plants available increases they will drop their gate fees and may eventually pay us for the material in order to make their income from the electricity. In vessel plants have to use energy to carry out their process it is unlikely that such plants will be able to compete with Ad unless again it was because a plant was buying material.

The only scenario whereby in vessel composting would become a viable consideration for us would be if we so collected food with green (i.e. in the same container and/of vehicle) as we have no plans to collect food co-collected with green or otherwise we have no need of access to an in vessel composting plant.

SLR replied to these comments dated 15th September 2011 is that they understand that there is indeed a shift in regulatory requirements. The EA are now expecting a much greater level of control at open windrow sites which will eventually see more of the large scale facilities driven towards IVC type operations, as evidenced through the tightening of the exemption limits and importation of set minimum distance criteria from houses, workplaces, SSSI etc for standard rules permissions. Furthermore, all changes to permits are causing existing operators to raise standard via bio aerosol risk assessments etc, i.e. this is raising the regulatory standards.

Despite Telford sending their organic waste to other operators (AD and Open Windrow) there is still a defined need for further capacity to be delivered, as outlined in the Need section of their planning application which for the purpose of this application remains valid.

The cost of collecting separately needs to be balanced by perception of a higher gate fee for IVC. Since the cost has not been asked, to say it will be more expensive as an alternative option surely would need to be fully costed to reach that conclusion. It is understood that VES have done this which is why the development proposals are for the IVC option. SLR believe and maintain therefore that AD is still more expensive than IVC, with Double ROCS incentive.

The Strategic Waste Team Leader on **31st October, 2012** states that the future provision of CRC services in the Borough will be reviewed during the

first year of the new waste management contract currently being procured. The management of the Ketley and Halesfield CRCs is part of the procurement. With the current contract expiring in 2019 their management will pass into the new contract at that time. The provision and management of the Granville site is not part of the current procurement and the future provision of a site at, or serving the same area will be decided as part of the first year review.

29. The Strategic Waste Project Officer in an email dated 15th June, 2012 has given the present waste management contractual information for the Council.

Green Waste

Contractor	Jack Moody
Start of contract	Variation to refuse contract dated April 2005
Duration	Expires March 2019
Extension options	None
Tonnes contracted	All household green waste. Tonnage not specified.
Location where waste is treated	Jack Moody, Lodgewood Farm, Redhill Way, Telford, TF2 9PD.
Tonnes collected 2011/12	14,445.67 (kerbside 12,726.25 plus CRCs 1,719.42)

Refuse

Contractor	SITA
Start of contract	Dated April 2005
Duration	Expires March 2019
Extension options	None
Tonnes contracted	None
Location where waste is treated	SITA Landfill, Redhill, Telford
Tonnes collected 2011/12	Municipal Waste 50,761.02

Dry recycling kerbside (paper, glass, cardboard, plastics, mixed cans and textiles)

Contractor	Telford & Wrekin Services
Start of contract	January 2006
Duration	Expires 31 st March 2014
Extension options	None
Tonnes contracted	All kerbside recycling. Tonnage not specified.
Location where waste is treated	Pink Skips and Recycling, Recycling House, Rock Road, Ketley, Telford,

	TF1 5HW.
Tonnes collected 2011/12	25,384.74

Community Recycling Centres

Ketley and Halesfield Site

Contractor	Telford & Wrekin Services
Start of contract	April 2001
Duration	Expires March 2019
Extension options	None
Tonnes contracted	All household waste arriving on site excluding WEEE. Tonnage not specified.

Granville Site

Contractor	SITA
Start of contract	February 1994
Duration	Expired June 2009
Extension options	Until terminated by either party
Tonnes contacted	All household waste arriving on site excluding WEEE. Tonnage not specified.

Combined CRCs tonnage 9,790.71 (this also includes residual).

30. **The Conservation Officer** in an email dated 21st November 2011 has looked at the area affected on the plan and can determine that there are no listed buildings, local interest Buildings or Scheduled Ancient Monuments in the immediate location. It is pointed out that there are a couple of Scheduled Ancient Monuments to the south west of the site, as well as Watling Street Grange, and a number of TPOs on the crematorium site but these are unlikely to be directly affected as far as can be seen.

The only other matter is the GIS layer of "other monuments" running along the access road towards Dawley (*typing error, should be Donnington, my italics*) and covering some of the Country Park, this is commonly related to archaeological deposits and it is understood that the County Archaeologist has been consulted for an opinion on the matter.

