
TELFORD & WREKIN COUNCIL

PLANS BOARD – 07TH DECEMBER 2009

Schedule 1 : Planning Applications for determination by Board

---

`A' List : Major developments and/or cases in conflict with policy

---

W2008/1083 Construction and Operation of 'Energy From Waste' Centre including new buildings, new access and car parking, integral offices, weighbridge, landscaping works **Land adjacent to, Grange Lane, Redhill, Telford, Shropshire**. Recommendation Code: FR - Ward: Muxton..... **1**

Agenda Type : A

W2008/1083 Construction and Operation of 'Energy From Waste' Centre including new buildings, new access and car parking, integral offices, weighbridge, landscaping works
Land adjacent to, Grange Lane, Redhill, Telford, Shropshire.
Recommendation Code: FR
Ward: Muxton

APPLICANT:		RECEIVED ON:
SITA (UK) Ltd		19/09/08
PARISH	WARD	CASE OFFICER:
Lilleshall & Donnington	Muxton	Kate Stephens

OBJECTIONS RECEIVED: YES

MAIN ISSUES: departure from development plan, Wrekin Local Plan, predominantly greenfield site need for the waste treatment facility, prematurity, landscape and visual amenity, loss of Green Network, impact on landfill restoration, impact on recreational amenity and Granville Country Park, alternative sites, highways/traffic, environmental impacts (such as air quality, noise, health impacts),

1.0 Proposal

1.1 In September 2008 SITA (UK) Ltd submitted an application to construct an Energy from Waste plant on a 4.15 hectare site adjacent to the existing Granville Landfill Site. The proposal is described in detail in section 3, but in brief it comprises the following key features:-

- Erection of an Energy from Waste (EfW) incineration plant that would process 62,000 tonnes of waste per annum.
- The incineration process would produce approximately 17 megawatts of steam energy, capable of being converted into electrical and heat energy.
- Facility would operate 24 hours a day, 7 days a week, apart from any planned (2 per year) and unplanned shutdowns.
- Waste deliveries would take place between 7am – 8pm Mondays to Fridays and 8am – 5pm Saturdays and Sundays.
- Building to contain the combustion kiln, boiler, offices, control room, waste reception bunkers and would measure 105m length, 63m wide and 32m high, together with a 65m high chimney stack.
- Waste burned in an oscillating kiln, gases would be treated before being expelled from the chimney and approximately 15,000 tonnes of combined fly ash (residue from chimney) and bottom ash (from the kiln) would be removed from site.

- Construction would take up to 2 years with further 4 months of commissioning.

- Site adjacent to existing Granville Landfill site and Community Recycling Centre, within the built up urban boundary but on designated Green Network approximately 2.5kms from Telford town centre.

- Access would be via the existing access to the landfill and Community Recycling Centre (CRC) sites along Grange Lane off the A(5)T.

1.2 Energy from Waste (EfW) is a collective term for a number of thermal treatment techniques. The most commonly used to date in the UK is referred to as Mass Burn or direct combustion (incineration), such as the proposed plant at Granville, in which waste is burned to provide heat, which is then used to generate electricity. Some heat can be used for industrial or community heating as well as power generation and this is referred to as combined heat and power (CHP).

1.3 Unlike anaerobic digestion, EfW incineration plants can burn any organic materials, including those that are not readily degradable such as wood based wastes and plastics. The outputs of direct combustion plants produce incinerator bottom ash (IBC) and fly ash, which is a product of the abatement processes used to remove pollutants from the flue gases. The bottom ash can be used as a secondary aggregate, subject to quality criteria. The fly ash must be disposed of as a hazardous waste.

1.4 Planning officers have visited a similar EfW incineration plant operated by the applicant near Grimsby and seen it in operation.

2.0 THE APPLICATION SITE AND SURROUNDINGS

2.1 The application site occupies 4.15ha of predominantly undeveloped grassland currently in use for grazing on the eastern fringe of Telford, approximately 2.5kms from the centre of Telford (as crow flies). An area of 0.15ha of land in the north eastern and south western corners of the site is in temporary use as a car park for landfill site employees and for siting a portakabin associated with the adjacent temporary landfill site. To the east, the site is bounded by a Community Recycling Centre and existing Granville landfill site, which has planning permission for the deposit of waste to the end of 2025. The landfill restoration scheme for the landfill site includes nature conservation with public access creating recreational value.

2.2 Immediately to the west of Grange Lane lies a kennels/cattery (the nearest residential property) and further agricultural land. To the south west, approximately 100m from the south-western boundary of the application area, lies Windings Naturist campsite, which occupies a former collier site. To the south and south east lies further agricultural land and countryside. To the north there is further agricultural land and riding school facilities. Approximately 0.15ha in the north eastern corner of the site has temporary planning permission (to 12/1/2011) for car parking for employees for the

adjacent landfill and the south eastern part of the site is currently used for temporary offices and car parking associated with the landfill (permitted to 31/8/2012).

2.3 The site lies within the built up area of Telford but immediately adjacent to the boundary with the Borough's rural area and is designated Green Network on the Wrekin Local Plan Proposals Map. This is part of a larger swathe of Green Network that extends northwards to the southern edges of Muxton and westwards towards Redhill Way. The boundary of the Borough with the newly formed Shropshire Council lies approximately 600m to the east. The nearest residential housing estates of Priorslee off Castle Farm Way lie approximately 700m to the south of the site. The site is accessed via Grange Lane off the A5(T), which also serves as the existing public vehicular access for both the Granville landfill site and the Community Recycling Centre.

2.4 To the north of the site a Local Nature Reserve and Granville Country Park which is a valuable recreation area for Telford & Wrekin residents. The importance of the Granville Country Park and its wider setting was discussed in the Committee Report for the extension of the adjacent Granville Landfill Site (W2006/0232, Page 21, 12th December 2007) which states that: *"this [landfill] application cannot be considered in a vacuum without regard to the surrounding area. It is very important to remember that Granville Landfill site lies adjacent to Granville Country Park, a very important recreational area for the local community, as well as having important archaeological and ecological sites within it, e.g. Muxton Marsh SSSI and the Lodge Furnaces"*

2.5 This statement continues to be relevant with this current application. Despite the adjacent landfill site, which currently degrades the land resource in this area, it must be recognised that this is temporary in nature. The purpose of the green network designation is to look to the longer term regarding the future role that this land will have as high quality urban fringe landscape with increased recreation value following restoration of the landfill site.

2.6 The site within the Green Network to the east/north east of Telford is highly accessible to the urban area including a large residential population. It is the only area of urban fringe which is set out with contiguous green network to the north and north east of Telford urban area. The vision for this area of Green Network is to restore the landfill site in order to draw people to this area which has long distance and pleasant views to the north and north east over the Shropshire Plain.

2.7 Also to the north of the application site is a golf course which provides formal recreation and has views to the south including towards the proposed EfW site. This is one of the few golf courses in the area. Muxton Marsh SSSI is located approximately 1.5km to the north of the site and the Shropshire Hills Area of Outstanding Natural Beauty is located approximately 7km to the south west of the site.

3.0 THE PROPOSAL

3.1 This section is a non-technical description of the proposed application, its intended operation and incineration processes. Full details can be found in the applicant's supporting Environmental Statement (ES) and supporting technical appendices, which are available for public inspection with the application. The various conclusions mentioned in this section are those of the applicant and not necessarily shared by officers.

3.2 The application seeks to develop an Energy from Waste (EfW) incineration plant and ancillary developments including access from the adjacent Granville Landfill site access road, circulation roads, offices and visitors centre; car parking, weighbridge; air cooled condensers, oil storage tank, water storage and attenuation ponds and landscaping.

3.3 The Environmental Statement identifies that the EfW plant would be powered by approximately 62,000 tonnes of mainly municipal waste per annum. However in correspondence from the applicant, dated 1st May 2009 and 24th September 2009, it is established that the plant could take commercial waste. The annual output from the operation would be approximately 17 megawatts of steam energy, capable of being converted in part to electrical energy but also for heat energy and which could be used to supply combined heat and power to local businesses. The application itself does not include end users or infrastructure to provide onward transport of heat or power. About 15,000 tonnes per annum of ash residue from the incineration process would be removed from site by lorry for recycling, landfill or further treatment at a specialist facility. Access to the site would be via Grange Lane off the A5(T) which is also the existing public vehicular access to the Community Recycling Centre and the landfill site.

3.4 The EfW incineration facility is proposed in a building which would also house a waste reception hall, waste crusher and ash bunker, offices, workshops and visitor centre. The maximum dimensions of the main building as proposed are 105m long, 63m wide and 32m high - together with a chimney stack for dispersion of waste gases measuring 65m in height and approximately 2m in diameter. The total footprint of the building is approximately 4,900sq m. i.e. about 0.5 hectares. A significant proportion of the site area (approximately 1.9 ha) is associated with a screening mound and landscaping on the western part of the site. A further 0.4ha (approximately) of land in the south eastern part of the site is open, with the remainder comprising access and circulation roads, water storage and attenuation ponds, car parking, air cooled condensers, oil tank and further planting.

<u>The process</u>

3.5 The application is made for the processing of non-hazardous mainly residual municipal waste or wastes with similar characteristics.

3.6 Waste would be delivered to site by refuse collection vehicles and other vehicles. There would be no pre-treatment of the waste with the exception of

bulky items which would be crushed at reception. The vehicles would drive into the building and into the waste reception hall and discharge their waste into large concrete bunkers. The waste reception hall is 55m long and 36.5m wide and is kept closed by industrial doors, except when vehicles enter and leave. The concrete storage bunkers would have capacity to store up to 5 days' supply of waste, enough to enable the plant to operate continuously during the weekend and bank holiday periods when there would be no delivery of waste.

3.7 Waste from the bunker would be grabbed by an overhead crane and then fed into a hopper, which is a square steel cone that directs waste to slide down into a rectangular chute and eventually into the oscillating combustion cell or kiln to be burned. The chute would be kept full to ensure there is always waste available to feed the combustion cell. A ram or "pusher" controls the waste entering the kiln - about 600kg of waste per push and about 10-12 pushes per hour are needed to keep the kiln fed (see attached plans and diagrams).

3.8 The waste would then be burned under controlled combustion conditions in an oscillating (moving backward and forwards) kiln cell which would be completely enclosed. The air would be controlled to ensure efficient combustion conditions and to ensure a high carbon burn out, in order to meet the European Waste Incineration Directive that requires less than 3% total organic carbon in the bottom ash (one of the end waste products).

3.9 The kiln (effectively a long thin barrel) is designed to oscillate by rocking slowly backwards and forwards on its longitudinal axis. This motion causes the waste inside the kiln to roll around and break up, and in doing so provides fresh material at the surface for combustion and ensures a very efficient burn. The rocking motion of the kiln causes the waste to gradually move down the length of the kiln. By the time the waste has reached the end of the length of the kiln it would have burned, leaving only a mix of ash and clinker, which are collected within the building and transported off site for disposal.

3.10 Combustion gases would exit the combustion cell through an enclosed opening and enter the post combustion chamber (PCC). A proportion of fine particles and volatile compounds would combust fully in the PCC. The PCC ensures that flue gases have a two second residence time at above 850^{o}C, which is a requirement of the Waste Incineration Directive. At the base of the PCC there are hoppers that take any dust that falls out of the gas. The top of the PCC is connected to the boiler.

3.11 Flue gasses would be treated within the PCC to remove dust, acid gases, dioxins/furans (organic compounds produced in combustion process) and heavy metals. The emissions from the 65m high stack would have to comply with the emission levels permitted under the European Waste Incineration Directive and by the Environmental Permit that the applicants must obtain from the Environment Agency before the plant can operate.

3.12 There are various technologies to treat the gases and the selection would be made in conjunction with the Environment Agency when an Environmental Permit application is submitted. Processes are applied to the gases to neutralise the acid gases, activated carbon would be injected to control and absorb dioxins/furans and mercury. Other systems would be needed to control Oxides of Nitrogen and inject other reducing agents.

3.13 After the various reagents have been injected, the flue gas would pass through an enclosed filter (like a long sock filter bag) to remove any excess reagents, salts of acid gas neutralisation and activated carbon powder. Any dust particles would collect on the outside of the filters. At regular intervals a pulse of compressed air would knock the dust off the filters and this would fall down into hoppers. Between the filter and the stack there is a large fan, which would pull the gas through the system creating a small vacuum to prevent dust escape. The height of the stack was selected after running models of dispersion patterns with weather and topographical patterns.

3.14 Dust from the hoppers would then be removed by an enclosed conveyor to a residue storage silo – the resdeiue silo is a closed steel structure with a cone at its base so that waste can be loaded directly into a sealed road tanker for onward transport.

3.15 Ash and clinker from both the PCC and combustion cell would fall into separate water baths to quench the hot material down to ambient temperatures and to ensure no dust or steam escapes. Cooled ash and clinker would be removed from the water bath and moved to the ash bunker area. Here ferrous scrap material that has not burned would be removed. The ferrous material and bottom ash would then be stored in separate bunkers before loading into bulk vehicles for onward transport to suitably licensed off-site facilities or recycling (bottom ash is used in the construction business). The loading would take place within the building so that noise and dust would be contained.

<u>Energy Recovery and Utilistation</u>

3.16 Heat recovery from the hot combustion gases takes place in the boiler, which is connected directly to the PCC. An external heat exchanger will be fitted to recover further energy from the flue gas and will recover low grade heat in a hot water circuit that will be sued to reheat boiler feed water.

3.17 A turbine-generator set will convert the high pressure steam into electricity by passing the steam over a series of turbine blades attached to a central shaft. This shaft is then attached to a generator that produces electricity.

3.18 By the very nature of combustion, energy is produced in the form of heat and this materialises in the form of hot exhaust gases. To utilise this energy, it is common practice to produce high pressure steam in a boiler. This allows for the production of electrical power as well as a useful transmission medium for heat energy.

3.19 The boiler will produce steam at high enough temperature and pressure to allow the steam to be converted into mechanical power in a steam turbine. Heat can also be exported in the form of hot water.

3.20 Electricity generated from the plant would be fed into the national grid via a new 33kV connection proposed at the Donnington Primary substation, which will require installation of new cable and upgrade of existing underground cables. Any permissions required for the propose cable along the route from the site to the substation will be subject of separate applications.

3.21 Heat energy can also be exported in a number of ways depending on the requirements of the end user. The plant will be equipped with appropriate connections to distribute heat to an appropriate location should a demand for the heat be identified. There are a number of potential recipients in the nearby industrial premises at Donnington Wood Business Park.

Operating Hours

3.22 The facility would operate 24 hours a day, 7 days a week, apart from any planned and unplanned shutdowns. There are typically two planned shutdowns per year for maintenance each lasting approximately 7 days. Waste deliveries would take place between 7am – 8pm Mondays to Fridays and 8am – 5pm Saturdays and Sundays. However, there may be occasions when the plant would be required to receive waste outside these hours, for example in emergencies. During shutdowns, waste would be diverted from the facility to other disposal or processing sites, including the adjacent Granville landfill site.

Construction

3.23 Construction of the EfW plant would take some 2 years and this would be followed by a commissioning period of up to 4 months. Construction works would take place between 7am – 7pm Monday to Friday and from 7am – 4pm on Saturdays. Noisy activities such as piling would not take place on Saturday afternoon. In the event that it is necessary to have extended working hours, this would by agreement with the Council in advance. A Construction Environmental Management Plan would be prepared to confirm the exact construction methodologies to be used. A landscape screen bund will be constructed fairly early on so as to act as noise bund to the nearest property while construction continues.

Building Design

3.24 The building would house the EfW incineration plant with kiln and boiler, waste reception hall, waste crusher, waste bunker, ash collection bunkers, offices/meeting rooms, control room, visitor centre.

3.25 The building would have a basically rectangular footprint measuring at its largest dimensions 105m long, 63m wide and 32m high - together with a

chimney stack for dispersion of waste gases measuring 65m in height and approximately 2m in diameter. The curved roof and the stepped elevations aim to break up the bulk and mass of the building as well as its apparent scale.

3.26 The design of the building has been dictated by the operational requirements of the plant, whilst at the same time aiming to be sympathetic to its surroundings and respond positively to the physical constraints of the site. The building has been designed and orientated with the aim of minimising the visual appearance from sensitive view points of the site. The applicant proposes that a careful choice of a colour palette of materials and finishes would help the building to sit well in this location and not detract from the surroundings. The building would be clad in various coloured profiled cladding of shades of dark greens and mid to light greys. The 65m high and 2m diameter slim line steel chimney stack would be epoxy painted in light grey.

3.27 There would be 24 flood lights; each 8m high fitted with low light pollution angled light heads. These would be used when light levels dictate. The proposed lights have been designed to have minimal light spillage to reduced potential for light pollution impacts.

Air Quality

3.28 The applicant has undertaken a 12 month air quality monitoring survey around Telford. The air quality of the proposed development has been assessed with reference to relevant air quality standards. The ES concludes that no breaches of air quality objectives or guidelines are predicted.

3.30 The impact of atmospheric emissions on nearby sensitive environmental receptors, i.e. Muxton Marsh SSSI, is not considered by the applicant to be significant.

3.31 The impact on human health was evaluated as follows: A health risk assessment was carried out for dioxins and furans. This concluded that the contribution from the EfW incineration plant would be 0.2% of the Tolerable Daily Intake for a local adult. Contrasted against a hypothetical individual with maximum exposure this intake would rise to only 1.63% of the Tolerable Daily Intake. A similar assessment was carried out for heavy metals. This concluded that the intake was insignificant and that the overall lifetime carcinogenic risk was around 1 in a million.

3.32 The potential for combined emissions from the Ironbridge Power Station to the south of Telford together with the Granville landfill site and emissions from the proposed EfW incineration plant has been considered in the ES and it has concluded that no breaches of air quality objectives are predicted.

3.33 The ES therefore concludes overall that the impact of emissions from the proposed EfW plant on the general population, local community and the environment would be acceptable.

Plume visibility

3.34 Visibility of the plume will vary with weather conditions, and times of day and year. Flue gases would contain water vapour as steam. As flue gases cool in the atmosphere, stream condenses and can become visible. As the steam disposes from the chimney the condensed water also disperses, so that the plume stops being visible. Therefore on a cold day or night, steam condenses more quickly so is more likely to be visible, and on calm conditions the plume will mix with the surrounding air more slowly, and so the plume will be visible for longer. Generally longer visible plumes are seen on still winter mornings and there is more chance of seeing the plume in the morning than in the afternoon. Also over the course of a year, the plume would be less visible in the summer and most visible during the winter months of December, January and February.

3.35 From modelling of weather conditions over the last 5 years the applicants have calculated that the plume will be visible for 10% of the time. However, the plume lengths of more than 65m will only be visible for around 0.4% of the time and the plume will only be visible beyond the site boundary for around 0.6% of the time. The applicant therefore concludes that the impact of the plume visibility will be low.

Landscape and Visual Impact

3.36 The ES states that the proposed development lies within the regional Estates Farmland Character Area but it considers it more typical of the adjacent Coalfields Landscape Character Area. It is considered by the applicant that the proposals would have a slight/moderate impact on the surrounding landscape, mainly through aesthetic and perception changes to the local landscape as a result of the building, but the ES considers this impact would be largely localised. Given the scale and size of the proposed buildings the design is considered by the applicant to be successful in minimising the extent and degree of adverse landscape and visual impacts to within acceptable levels overall.

3.37 The ES also considers that the site is well screened by nearby landforms, concentrating the main visual impacts into a small visually contained area. The ES concludes overall that the application site can accommodate the proposed development more easily than other character areas in the Borough.

Traffic

3.38 The applicant advises that the waste that would go to the proposed EfW incineration plant at Granville is currently already going to the Granville landfill via the existing road network. Therefore initially, the proposed development would be simply diverting a proportion of the incoming waste to the EfW centre rather than sending it directly to landfill. The residual bottom ash could be disposed of in landfill, but SITA prefer to transport it away for recycling.

Residual fly ash (from the chimney) would have to be taken off-site for specialist treatment. Ferrous scrap residues would be separated out and taken to other facilities for reprocessing off-site.

3.39 The existing landfill and community recycling operations at Granville currently attract 19,091 HGV's a year (which equates to 38,182 movements). In addition the Community Recycling Centre attracts approximately 75,000 private cars a year.

3.40 The ES considers that the EfW incineration plant would have a limited impact on transportation in terms of traffic flows, as the adjacent landfill site already attracts the waste to be transported to the EfW. The proposed development would divert a proportion of this waste to the EfW incineration plant. Some of the residual waste not suitable for burning would be diverted back to landfill.

3.41 There would be an increase in vehicle movements should current rates of infilling at the landfill site resume once the EfW incineration plant is operational. However, this potential level of increase is considered to be within the existing capacity of the landfill operation and therefore considered by the applicant not to be significant.

3.42 The ES states that a combination of existing and proposed traffic flows reveals that the development would have a continuous but insignificant impact. SITA propose to implement a Travel Plan to encourage and facilitate more sustainable transportation by its staff.

3.43 There would be 28 parking spaces at the rear (north) of the building comprising 18 for staff, 10 for visitors including 2 disabled spaces for staff/visitors. There would also be provision for coach parking and cycles.

3.44 A clock-wise one-way system is proposed around the site using a single entry/exit point off Grange Lane - see site plan. Vehicles carrying waste entering the site would first pass over the weighbridge before entering the building and reception hall to discharge waste. They would then drive through the reception hall, out the back of the building and continue clockwise round the outside of the building and back round to where they entered the site. The internal access road would be sufficiently long to prevent vehicles queuing out of the site and onto Grange Lane towards the CRC.

<u>Alternative sites</u>

3.45 The applicant short-listed 13 alternative sites as part of an initial desk based assessment, of which 9 were chosen by the applicant (plus the application site) for further evaluation and appraisal and these are listed below:-

- Granville EfW incineration application site
- Halesfield Industrial estate, whole estate but with 4 sites highlighted.
- Hortonwood Industrial Estate (considered whole estate)
- Donnington Wood
- Nedge Hill Business Park

- Stafford Park Industrial Estate (considered whole estate)
- Audley Ave employment site in Newport
- Watling Street Grange
- Woodhouse Farm (east of landfill site)
- Former sugar beet factory at Allscott (west of Telford)

3.46 The applicant concluded that the proposed site was the most appropriate site because it had been allocated at one time in an emerging Waste DPD. Officers would add here that this Waste DPD was withdrawn following criticism from the independent Planning Inspector and is no longer relevant– this matter is referred to later in more detail in this report in para 7.100. The proposed site is away from significant built up areas and residential development, it is an existing waste management site and has good access to the primary road network and the Green Network and landscape impacts can be addressed.

Noise

3.47 Any noise generated by the development is likely to arise during construction, with associated traffic movements (which will be for a temporary duration,) and the normal operation of the proposed plant itself 24 hours a day all year round.

3.48 During construction there is likely to be vibration noise as well. There will be different noises throughout the construction process depending what phases and works are being undertaken. Foundation work may involve piling (loudest), whereas formation of the landscape bund is more likely to involve earth moving vehicles. Some noise will be sustained, other noise will be for a limited duration. There will also be increased noise form construction HGV's, in addition to the existing HGV traffic to the landfill site. The landscape bund would be constructed as soon as possible so as to reduce noise reducing the nearest residential property. However the applicant is proposing construction hours are limited to of between 7am – 7pm Monday to Friday and from 7am – 4pm on Saturdays.

3.49 Noise from the plant operation is likely to be greatest at night, as during the day there will be higher ambient noise levels including noise from the existing landfill site, at least up until it ceases to operate. There will be noise from HGV's bringing waste but this will not be dissimilar to existing HGV noise visiting the landfill site. The noise emitted from the fan via the exhaust stack has the greatest potential to contribute to community noise, but it will be steady. At night there will not be any HGV movement.

3.50 The ES states that 16 noise receptor points were identified within the locality and noise monitoring was undertaken at 9 locations selected to be representative of the noise environment at these points. The noise assessment showed that the ambient noise residual impact would be mainly negligible, though this impact rises to medium at the nearest property at the Cottage Kennels.

3.51 The proposals include mitigation measures to reduce the impact of noise and vibration. These include preparation of a Construction Environmental Management Plan, controls over times of working during construction and temporary and permanent landscape bunding adjacent to the Cottage Kennels to reduce noise and vibration impacts to acceptable levels.

Ecology

3.52 The ES found no evidence of the presence of badgers, bats, dormice, reptiles and Great Crested Newts during initial surveys. However, potential disturbance to bat roosts and the potential for Great Crested Newts in the nearby pond were identified. Further survey work confirmed the absence of Great Crested Newts within the application site.

3.53 Landscape proposals, including a new wildlife pond and retention of the majority of the boundary features provide an opportunity for habitat creation and management and minimise disturbance to bat flight lines and foraging habitats. Also, the proposed lighting scheme for the site has been designed to maximise the probability of bats continuing to use the site. The ES concludes that the only potentially significant residual impacts would be loss of other habitat but these would be restricted to the site.

Water Resources

3.54 The potential impacts on the water environment are the impact on water quality and the impact on the hydraulic regime of the area. There is a potential risk to surface water and ground water quality during construction, from fuel spillages from diesel machines and plant, and from solids getting into surface run-off. The application site is also located on the minor aquifer of the Keele Beds (Upper Coal Measures) in the upper reaches of the River Strine catchment.

3.55 The ES considers that due to the proposed method of working and site restoration, potential impacts to both water quality and water resources have been minimised. A number of appropriate mitigation measures have been identified and the applicant intends to utilise Sustainable Drainage (SUD's) practices. Overall mitigations measures would include good site practice and inclusion of attenuation lagoons for surface water runoff, to ensure surface water run-off rates do not exceed existing green field rates. In addition, a surface water quality monitoring programmed should be undertaken to assess any possible effects on the local surface water regime and allow remedial action to be taken if appropriate.

3.56 The ES overall concludes that with respect to the water environment, there are no significant residual impacts or cumulative effects associated with the proposed development, after consideration of the identified mitigation measures.

Geotechnics

3.57 The application site lies on the Upper Coal Measures and all soils on site are considered to be natural. There is no evidence of the presence of made ground or colliery spoil. The proposed development would disturb the natural topsoil, a silty-clay stratum and the underlying bedrock.

3.58 The ES considers that given the absence of hazardous ground conditions, the mitigation measures would be restricted to good construction practices designed to minimise and mitigate the impacts on the proposed construction on soil quality thus protecting its physical properties and contaminant free status.

3.59 The applicant concludes that with respect to geology, ground conditions and land quality, there are no significant residual impacts or cumulative effects associated with the proposed development, after consideration of the identified mitigation measures.

Agriculture

3.60 The ES reports that only a small area of agricultural land would be permanently removed from potential agricultural use and impact on nearby agricultural receptors is deemed to be insignificant. Loss of soils would be minimised through implementation of a soil management strategy and use of the soils within the temporary and permanent landscape schemes.

Archaeology

3.61 The ES reports that there are no recorded heritage features within the site. There is little recorded prehistoric activity in the locality, although in the Roman period Watling Street was constructed to the south, with an associated camp and small town settlement. During the medieval period the site lay within a wooded deer park, and a grange attached to the Abbey of Lilleshall was situated to the south. The local area was widely exploited for coal in the later post medieval and modern periods.

3.62 It is reported that there are no known direct physical impacts from the proposed development upon cultural heritage features. It also states that there would be a slight non-physical visual effect as a result of the development upon the nearby three scheduled ancient monuments, a moderate non-physical visual effect on one listed building (Watling Street Grange) and a slight/neutral non-physical visual effect upon the Grange Colliery. Geophysical survey and archaeological evaluation trenches 200m to the south east found no significant archaeological remains. Proposed mitigation for the site comprises an archaeological watching brief which could be included in a condition in the event that planning permission is granted.

4.0 PLANNING HISTORY

4.1 The site itself, save for 0.15 ha, has no planning history for the majority of the site as it has always been in agricultural use. The site is undeveloped grassland and used for grazing other than for 0.15 ha in the north eastern and

south western corners of the site which are in temporary use as a car park for landfill site employees and for siting a portakabin associated with the adjacent temporary landfill site. The car park is permitted only until 12th January 2011 and the portakabin is permitted only until 31st August 2012.

4.2 Even though there is no planning history of the site there are a series of relevant planning applications that relate to the adjoining Granville Landfill Site :-

- CC80/40 - This is the original planning permission granted by Shropshire County Council in 1989 at Granville Landfill site for the disposal of municipal and industrial and commercial wastes.

- MW94/0424/WR) - Extension and restoration to agriculture, woodland and public amenity of Granville landfill site. This involved a Section 106 agreement. Granted 4th December 1996. This is the current landfill planning permission.

- W2006/0232 – extension of landfill site by deepening and raising the contour profile and variation of restoration conditions, following receipt of a legal undertaking from SITA, and allowing waste to be deposited until 2025. Granted 19th March 2008. **This is the current landfill planning permission**

4.3 There are a number of other extant planning permissions for the Granville Landfill site that are for non landfill facilities. These are:-
MW94/0400/WR - Installation of landfill gas extraction and gas flaring unit and electricity generating plant. Granted 6th February 1996.

- MW98/0067/WR - Variation of condition 1 of planning permission MW94/0400/WR to extend specified timescale for commencement of development by one year to 6th February 1999. Granted 31st March 1998.

- MW98/0152/WR - Construction of a recycling centre to enable the bulking up of paper, cans, textile sand glass. Granted 31st March 1998.
- W98/1120 - Extension to household waste recycling centre. Granted 18th April 2000.

- W99/0314 - Modification of conditions 17, 18, 19, 21(B), 24(A), 214(B)(I), 36, 40(B) and 56 of planning permission W94/0424. Granted 18th November 1999.

- W2007/0592 – Provision of a wood shredding facility. Not yet determined – awaiting noise report.

4.4 These planning permissions would all cease upon cessation of the landfill site in 2025 apart from MW/98/0152/WR. Following this the landfill site will undergo a phased restoration which will revert the land to recreational urban

fringe land use including access, recreation routes, woodland and other habitat typologies.

4.5 Extant permissions that would remain independent of the landfill planning permission are listed below. However it should be noted that only those applications relating to the recycling paper bay are permanent: - -

- W2005/0935 - Erection of an extension to existing paper bay. Granted
- W2005/1408 - Formation of a temporary car park. Granted 12th January 2006. (Temporary permission for 5 years)
- W2005/1409 -Erection of an extension to existing paper storage bay. Granted 12th January 2006.
- W2007/0932 - Temporary siting of offices for a period of five years, car parking and a screening bund. Granted 31st August 2007.

4.6 Following the cessation of the landfill site operations and the ending of the temporary car park and portakabin planning permissions only the Community Recycling Site will remain. Whilst this has permanent planning permission there is uncertainty regarding the future of this facility. The Council is intending to construct a bulking station close to or adjacent to the Rail Freight Terminal. This is in the Council's Investment Plan and is under consultation with Council Members. In addition a review of Community Recycling Centre sites across Telford is currently underway and the Council may look at co-locating these sites with the bulking of waste in the future. The future of the standalone Granville CRC is therefore uncertain.

4.7 There is one lapsed unimplemented planning permissionMW96/0171/WR for the installation of a leachate plant and associated pumping station. Granted 15th July 1996.

5.0 PLANNING POLICY CONTEXT:

5.1 National Policy and Planning Guidance

Planning Policy Statements/Guidance Notes

- PPS1: Delivering Sustainable Development (2005)
- PPS7: Sustainable Development in Rural Areas (2004)
- PPS9: Biodiversity and Geological Conservation (2005)
- PPS10: Planning for Sustainable Waste Management (2005)
- PPG13: Transport (2001)
- PPS22: Renewable Energy (2004)
- PPS23: Planning and Pollution Control (2004)
- PPG24: Planning and Noise (1994)

Waste Strategy for England 2007 (WSfE)

Draft Overarching National Policy Statement for Energy (EN1) (Nov 2009)

Draft national Policy Statement for Renewable Energy Infrastructure (EN-3) (Nov 2009)

5.2 Regional Policy and Guidance

Regional Spatial Strategy for the West Midlands incorporating Phase 1 Revision (January 2008) (Former RPG 11 incorporating Phase 1 Revision) (WMRSS1)

- QE1 Conserving and Enhancing the Environment
- QE4 Greenery, Urban Greenspace and Public Spaces
- QE5 Protection and Enhancement of the Historic Environment
- QE6 The Conservation, Enhancement and Restoration of the Region's Landscape
- EN1 Energy Generation
- WD1 Targets for Waste Management in the Region
- WD2 The Need for Waste Management Facilities – by Sub-Region
- WD3 Criteria for the Location of Waste Management Facilities

West Midlands Regional Spatial Strategy Phase 2 Revision Draft Submission (WMRSS2)

- W1 Waste Strategy
- W2 Targets for Waste Management
- W3 The Need for Waste Management Facilities
- W5 The Location of New Waste Management Facilities
- W7 Waste Management Facilities and Open Land
- QE1 Conserving and Enhancing the Environment (as WMRSS1)
- QE4 Greenery, Urban Greenspace and Public Spaces (as WMRSS1)
- QE5 Protection and Enhancement of the Historic Environment (as WMRSS1)
- QE6 The Conservation, Enhancement and Restoration of the Region's Landscape

West Midlands Landfill Capacity Study 2009 Update

Draft West Midlands Regional Waste Planning Strategy (Nov 2001)

5.3 Local Planning and Policy Guidance

The Shropshire and Telford & Wrekin Joint Structure Plan 1996-2001 (JSP)

- P16 Air Quality
- P31 Sustainable Transport Strategy
- P35 Road Freight
- P64 Waste Minimisation
- P65 Provision of Waste Facilities

- P66 Protection of Waste Management Facilities
- P67 Environmental Considerations
- P68 Transport of Minerals and Waste
- P69 Reclamation and After-Use

Wrekin Local Plan 1995-2006 (WLP)

- NR1 Location of Renewable Energy Developments
- UD2 Design Criteria
- OL2 Designated Areas
- OL3 Green Network
- OL4 Development in the Green Network
- OL6 Open Land

Local Development Framework Core Strategy (adopted Dec 2007) (CS)

- CS11 Open Space
- CS12 Natural Environment
- CS13 Environmental Resources
- CS14 Cultural, Historic and Built Environment
- CS15 Urban Design

Telford & Wrekin Municipal Waste Management Strategy 2005-2021 From Waste to Resource

6.0 CONSULTATION RESPONSES:

6.1 Non Council Consultation Responses (summarised below but all responses are available in full on planning file)

West Midlands Regional Assembly – concludes the proposal is in general conformity with the existing and emerging West Midlands Regional Spatial Strategy, however there are some locational and environmental matters which the Waste Planning Authority will need to consider before permitting the site. Their comments are summarised below:-

- The Development Plan includes the approved Regional Spatial Strategy and the 2004 version of the RSS is the approved document, although now having received the Panel Report greater attention will have to be taken with regard to the new policies in the RSS Revision Phase 2.

- The approved RSS identifies the need to divert 150,000 tpa of municipal waste from landfill in Shropshire and Telford and Wrekin. This is stated to be potentially either 3 x 50,000tpa Material Recycling Facilities or a 150,000tpa Energy from Waste facility. A planning application has been submitted for a 92,000 tpa Energy from Waste facility in Shrewsbury and taken together with this application for 62,000 tpa of treatment capacity,

the 150,000tpa capacity requirements of Shropshire and Telford & Wrekin could be met if both applications are approved.

- The RSS Phase 2 Revision identifies a separate requirement for Telford & Wrekin from that for Shropshire for the minimum diversion from landfill for both municipal and for commercial and industrial waste – for Telford this is 26,000 tpa in 2005/6; 64,000 tpa in 2010/11; 88,000 tpa in 2015/16; 108,000 tpa in 2020/21; and 121,000 tpa in 2025/6. The corresponding figures for Commercial and Industrial waste are 198,000 tpa in 2005/6; 226,000 tpa in 2010/11; 281,000 tpa in 2015/16; 356,000 tpa in 2020/21; and 366,000 tpa in 2025/6.

- The proposed treatment capacity of 62,000 tpa is within the new capacity required to be provided in the Borough both in the approved RSS and the proposed revisions Policies W1; W2 and W3.

- The site is within the defined "built-up area" for Telford but is within a "green network" and very close to a "nature reserve".

- Policy W5 lists the criteria which new waste management sites should meet "in the first instance". Although the proposed site for this facility is adjacent to a quarry and waste management facilities it is not on a site "with current use rights for waste management purposes" or an "active mineral working site or landfill".

- Policy W7 states that new waste management facilities should only be permitted on "open land" where the site is "close to the communities producing the waste" and "where there are no preferable alternative sites" and "where it would not harm the openness of land", or "where it can be demonstrated to be necessary to support an existing essential activity and to facilitate other key development".

- Whilst the Granville site is close to the community it is intended to serve there may be alternative suitable sites. At the region level the Assembly is not in a position to comment on whether it is essential to "support an existing essential activity and to facilitate other key development" that is a local matter.

- There are no landscape designations which affect this site. Muxton Marshes is 1.5km for the site and there is no evidence before the RPB that suggests that this area will be harmed by this proposal.

- The proposal lies outside the Green Belt, but it is adjacent to an existing operational waste management facility and therefore the Council will have to consider the cumulative impact arising from this development in this locality together with its environmental acceptability.

Environment Agency (EA) makes the following comments:-
<u>Air Quality</u>

- The EA have analysed the review of the air quality based on measured data, computer modelling of the contribution of emissions to ground level concentrations; and comparison with air quality standards and guidelines, prediction of the concentration of pollutants.

- Section 6.2 of the ES confirms that 'the only significant source of atmospheric emissions from the plant would be the main chimney stack containing a single flue'. These emissions would be regulated by the EA.

- Ideally there should be parallel tracking of the planning and Environmental Permitting Regulations (EPR) applications in order to enable the agency to give a robust appraisal of the technical aspects of the proposals at the time a planning decision is required.

- A draft application has not been submitted so the agency is unable to give a full response, however, the agency has had meetings with the applicant about the EPR application and understands that they could expect a formal submission (in December 2008). NB. To date no EPR application has yet been submitted.

- The ES outlines 'best available techniques' and based on air quality modelling considers that a stack height of 65m is required as a reasonable balance between improved dispersion and visual impact. The assessment concludes that 'the plant is predicted to make an insignificant contribution to short term and long term air quality.' The agency would be reviewing this, in more detail, when they receive the permit application, which would be assessed against the requirements of European legislation, developments in technology and an appraisal of pollutants released from the site on local air quality.

- The agency would also comment that the proposed facility would be very similar to an existing installation operated by Newlincs Developments Ltd, near Grimsby, Lincolnshire, which the agency regulates and would advise that it operates on a technically sound basis using established and proven technology. It has performed well over 4 years of operation and complies with its EPR permit conditions including meeting the required emission limit values (ELVs) set in accordance with the Waste Incineration Directive. These ELVs protect the environment and public health to a high standard resulting in a minimal risk to both.

- The information in the ES, relating to the EPR considerations, does not give the agency cause for concern.

<u>Pollution Prevention</u>

- The contents of paragraph 12.75 of the ES 'water quality management measures' should be strictly adhered to during construction, operation and decommissioning of the site.

- It is essential that the waste and ash bunkers are constructed in such a way to ensure that no discharge/leakage of leachate to groundwater occurs.

- Appropriate ongoing assessment of the integrity of the bunkers must be undertaken as well as adequate maintenance. These details would be required and controlled by the permit application.

- It is essential that all areas to be used for handling of waste are located on an impermeable hard standing, unless otherwise agreed in writing by the Local Planning Authority.

- Ensure that the long term dewatering operation does not impact on the wider area (i.e. localised groundwater flooding issues).

- Care should be taken during site construction to ensure that all fuels, lubrication oils and any other potentially contaminating materials should be stored so as to prevent accidental/unauthorised discharge to ground.

- Suggest conditions requiring areas for the storage and handling of waste be constructed of impermeable hard standing; all surface water drainage from parking areas and hard standing be passed through an oil interceptor; storage of oils, fuels or chemicals shall be sited on impervious bases and surrounded by the impervious bund walls

Surface Water

- The site is located within Flood Zone 1 (low probability) based on the EAs indicative Flood Zone Map.

- As part of the surface water attenuation pond for surface water would be located below the water table, it essential that the pond is designed and constructed to ensure that it is sealed (lined) so that discharge of contaminated water to groundwater does not occur and the pond can cater for 1% plus climate change (20% 'peak rainfall intensity') with roads and areas of hard standing draining by gravity, via silt and hydrocarbon interceptor prior to discharge to this feature.

- It is essential that there is an appropriate management / maintenance regime in place as the pond relies on pumping for it to be emptied, but would prefer site to be drained naturally rather than rely on a pumped regime.

Contaminated Land

- The agency concurs with the conclusions of the report that the previous uses of the site have not had significant impact on the site.

- Suggest conditions requiring further work if contamination is found during development; no piling or penetrative foundation design unless agreed.

- Comments relate solely to controlled waters and so issues relating to human health should be directed to the relevant Environmental Health Department.

Foul Drainage

- No information appears to have been submitted to address the proposed septic tank, however, in this instance and considering the proposed scale and nature of the toilet facilities the Council is advised to seek the completion of the 'foul drainage assessment form', and seek advice of Environmental Health Officer and Building Regulations.

- A point of information is that consent of the agency is normally required for any discharge of sewage or trade effluent into controlled waters, and may be required for any discharge of surface water to such controlled waters or for any discharge of sewage and trade effluent from buildings or fixed plant into or onto ground, or into waters which are not controlled waters and such consent may be withheld.

- The prior agreement of the agency is required for any dewatering activities to controlled waters (which includes rivers, streams, and underground waters).

Biodiversity

- The proposed wildlife pond should be sized so that there is an enhancement, post development and must provide adequate 'like for like' compensation of habitat - there appears to be adequate room for a larger pond feature.

- The agency would recommend that all plantings and sowing within the site should seek to be of locally native species, of UK generic stock and suited to the location, to help to maximise the wildlife benefits of any habitat created.

- A management plan should be drawn up to manage/maintain the landscaped areas and habitat features of the site so as to maximise the wildlife and biodiversity benefits both in the short and long term.

Shropshire County Council

- Requested an extension of time for submitting comments, although no further comments have been received to date.

The Director of Public Health Telford & Wrekin Primary Care Trust

- Recommends that a Health Impact Assessment is completed.

Severn Trent Water Ltd

- No objections to the proposal subject to a condition requiring details of sustainable foul and surface water drainage.

Natural England initial comments are summarised below:-

- Whilst not wishing to object to the proposals on agricultural grounds almost all the application area is on land of 'best and most versatile' Sub grade 3a.

- Where soils are affected, the applicant proposes to develop a Soil Management strategy – the applicant's proposals to handle soils in accordance with the forthcoming Code of Practice for the Sustainable Use and Management of Soils on Construction Sites is endorsed, but until this is available recommend use of the Good Practice Guide for Handling Soils.

- Not clear what would be the nature of the disturbance to the 3.38ha of the site not proposed to be used for the EfW plant and as a result what the soil management plan for this area should be - need clarification that this is included in the proposed Soil Management Strategy and an aftercare plan may be necessary.

- No objection to the proposed development in respect of legally protected species as they are not aware that they are likely to be adversely affected by the proposal.

- If planning permission is granted, this does not absolve the applicant or agent from complying with the relevant law, including obtaining and complying with the terms and conditions of any licences required as described in Part 1V B of the Circular 06/2005.

Shropshire Wildlife Trust

- The various reports appear to give a reasonably thorough assessment of the potential impacts and subsequent mitigation/compensation, but have the following concerns.

- The predicted impact on Muxton Marsh SSSI has been assessed and found to be negligible (based on theoretical limits sourced from third party organisations such as the UK Air Pollution Information System APIS). An assumption is then made that as the impact at Muxton Marsh is insignificant other more distant sites would not be affected, however, the presence of Wildlife Sites, the nearest of which is immediately adjacent to the site and approximately 250m from the flue stack is not identified (other than as 'visually important vegetation').

- As Wildlife Site (Donnington Freehold and NE Telford) may be subject to much higher levels of emissions than Muxton March, an assessment of impact should be provided. This area is also designated as a Local Nature Reserve (LNR) and this designation is currently in the process of

being extended; this would bring the LNR area within 500m of the proposed development.

- A large proportion of the energy produced seems to be as heat ("4.3 MW electrical energy and 12.8 MW low grade heat Energy"). Who will this serve - presumably not the plant itself and as stated there are few other dwellings or commercial units in the area. How far is it feasible to run heating pipes?

- The ecological impact due to land take is low, but the mitigation/compensation measures could be improved, such as enhancing hedgerows in the locality and creating a 'wildlife' pond, possibly beyond the site boundary or alternatively create a larger wildlife pond.

- Should planning permission be granted, additional monitoring and survey work in the local area (especially Granville LNR and neighbouring Wildlife Sites) could be suitable candidates for S106 contributions (as advised in a Scrutiny Report on Granville Park in May 2005).

6.2 **Council Consultation Responses (**summarised below but all comments are available in full on planning file)

Scientific Officer (Pollution Control) on reviewing the original and supplementary ground investigation reports comments that:-

- Very marginal concentrations and flows of ground gases have been identified.

- Whilst the report proposes additional rounds of monitoring, the proposals for gas migration measures as per section 5.3.3 would be sufficient to protect the development.

- No elevated levels of ground contamination have been identified and as such the site is suitable for this commercial development.

- As regards the supplementary ground gas risk assessment, the report has characterised the site as "Very Low Hazard Potential" and that no gas precautionary measures are necessary, with the exception of a gas resistant waste bunker, and would reiterate agreement with the gas mitigation measures as per section 5.3.3 of the original as a 'belt and braces' approach.

Drainage Engineer

- Acknowledge the applicant's work in addressing potential problems on the site, in particular the use of a water recovery system for roof run off.

- However concerned that the surface water drainage path would be altered, as the discharge is proposed to drain into a watercourse that would not naturally accept run off from the site.

- Although the principle of attenuating run off from the site is acceptable, the run off is currently proposed to discharge to the wrong catchment, and hence increase flows to the Muxtonbridge Farm Brook.

- SITA would need to review their on-site drainage layout to allow flows to be discharged to the correct watershed, namely west of Grange Lane.

- In order to check capacity to the attenuation basis the Micro drainage output sheets are required.

- Concerning soil gas mitigation the site investigation has not highlighted any significant gassing issues on the site, but the report recommends installation of gas protection measures due to the proximity of the site to the landfill and the possible variation in the gassing regime with time.

- The Drainage Engineer could condition the installation of gas protection measures (condition 100) if any permission is granted, provided they are constructed in line with the findings of the site investigation.

- Following assessment of additional information submitted by the applicant, comment:-

- As surface water is proposed to be discharged via an existing attenuation pool to a watercourse that would not naturally be the receiving watercourse, there must be no increase to the existing Greenfield discharge from the attenuation basis.

- The attenuation basis would need to be upsized to be capable of accepting and storing all the additional flows from the new site up to a 1 in 100 year storm event.

Environmental Project Team

- Whilst assessment of the impact of the development on protected and priority species and habitats has been made, Great Crested Newt survey data is only available for the pond on site - and there appears to be no assessment of the other ponds in the vicinity of the site for their potential to support Great Crested Newts, namely Pond at Cottage kennels just outside the site boundary (across the road); Ponds at approximately 200m east of the site; Pond 250m south-west of the site and Pond 250m west of the site within the Wildlife Site. Was a Habitat Suitability Index calculated for these ponds at the scoping stage and they were found not suitable?

- The adjacent Donnington and north-east Telford Wildlife Site was not identified in the report as an ecological receptor and there is no consideration of the impact of the development on the Wildlife Site.

- Should planning permission be granted the recommendations made in the ES should be made conditions to protect and enhance biodiversity on site, namely:

    i. Maintenance and enhancement of hedgerows to include infilling of gaps around the boundary and extension of the scrubs along the hedgerow.
    ii. Bat mitigation – sympathetic lighting and screen planting to minimise impact and disturbance, and retention of boundary features.
    iii. Prior to destruction of the pond, a netting and hand searching operation supervised by an ecologist to be undertaken with individuals found moved to suitable terrestrial habitat stages.
    iv. A watching brief by an ecologist through-out mitigation, pond removal and development stages.
    v. Submit plans for the proposed pond and wildlife area to include measures to ensure that the pond is appropriately managed for biodiversity in the long term.

Highways Management Initial response:-

- The scope of the Transport Assessment was not agreed with the Highway Authority before submitting the application so clarification on the Transport Assessment is required.

- The base turning count was carried out in 2005, but should be reassessed in 2008 to reflect the current traffic conditions through this junction. The background traffic has changed with Annual Average Daily Flows (AADF's) - average flow on a road measured over 24 hours on the A5 approaching 8,000 vehicles (two-way) in 2007 and so it is necessary to consider if there were any changes arising from the W2006/0232 landfill permission.

- The assessment assumes a proportion of the imported waste would be diverted to the EfW incineration plant. Whilst this may be the case, it must also be remembered that the landfill has permission to import a maximum of 200,000 tonnes of material per annum. This situation would not change as a result of any determination of this submission. The worst case scenario could be the EfW plant operating alongside the landfill accepting its full quota of imported waste.

- The various trip elements associated with the landfill, community recycling centre, other recycling and the energy from waste proposals have been calculated, including import and export of materials for both sites. However, for clarity it would be of assistance to see these calculations for each component in tabulated form.

- The combination of the above two sets of flows would be required for the Priority Intersection Capacity And Delay (PICADY) computer modelling program for assessing the capacity of priority junctions and the model may need to be re-run. The appendices do not include the AM peak assessment.

- Further information was requested of the applicant and duly submitted to address the highway engineers' concerns. On assessment of this additional information highway engineers are satisfied that it addresses the initial deficiencies in the original submission. Even with the worst case scenario of the landfill traffic continuing along side incinerator traffic, Highway engineers are satisfied that the surrounding road network (including A5) would operate within designed capacity.

- Therefore there no objections in principle to the development subject to a condition requiring the access, internal roads, parking, turning and servicing areas to be surfaced in a bound material. Also require the sum of £15,000 to be secured through a Section 106 Agreement to be used for traffic management/safety measures on the A5(T) in the vicinity of the Grange Lane junction and to complement the original street lighting enhancement secured for W2006/0232 (Granville deepening permission).

Engineering Services

- Mining - The site is in an area affected by past underground mining, although it is at such a depth that is should not influence the proposed development, but suggest informative advice could be provided.

- Contamination/Landfill Gas - The report highlights that further landfill gas monitoring results were expected in September 2008. These results need to be disclosed and the gas protection measures need to be designed and installed in line with the findings of this investigation.

- Earthworks - The earthworks specifications need to be disclosed and agreed prior to development commencing and upon completion of the earthworks a completion report needs to be carried out, which confirms the specifications have been carried out.

- Retaining Walls - The design of all retaining walls must take into account the actual on-site ground conditions and structural calculations and designs should be submitted for approval prior to development commencing.

Woodland Officer

- On landscape mitigation and planting measures, whilst the specifications are provided the size of the planting stock is not mentioned - 1+1 bare root transplants are acceptable of 40-60cm size.

- Regular inspections should be carried out over the first three years and any losses (due to mortality or animal grazing) should be replaced during the first

subsequently available planting season, so as to ensure satisfactory tree/shrub cover.

- No details of design and construction methods are provided for the replacement pond to be built in the north-west corner of the site.

- Pond should ideally be completed and protected from further disturbance in advance of site clearance activities and in-fill of the existing pond and ideally pond design and construction details should be submitted and approved by the Council prior to determination.

- Otherwise, the application provides an assessment of the tree, hedge and other ecological factors of the site and the various evaluations and recommendations are accepted.

- On receipt of additional information to address various queries the Woodland Officer had no further concerns.

6.3 **Other Consultation Responses** (summarised below but all letters available in full on planning file)

Country Landowners Association (CLA)

- CLA members have expressed a number of concerns about the above planning application for an energy from waste facility on the Granville, Telford

- The CLA represents landowners, farmers and rural businesses throughout Shropshire.

- Our members manage the land within the vicinity of the proposed site as well as rural businesses.

- They produce high value arable crops and dairy produce (for the liquid milk and processing markets), the majority of which are crops destined for human consumption and include bread making and malting wheat, barley, oil seed rape, potatoes and horticultural crops. Crops grown locally will also be used for animal feed. Some of the nearby land is managed under organic systems.

- Applicant has not taken account of the importance of food production in the Telford area. An increase in the levels of trace elements on the land can cause significant problems for crop production. Our members are concerned about the dioxins and would like to see more real time monitoring as these could collect in nearby farmland.

- Waste is not being separated for recycling or composting to generate energy, and burning this undifferentiated waste could deliver as little as 20% of the energy in the waste, by way of electrical and heat output.

- The best environmental option is to split the waste (separate collections) into what can go into Anaerobic Digestion and what should be gasified or pyrolised.

- Urge the Council to insist that a robust assessment of the impacts on local agricultural production and business is completed before the development is considered for possible approval.

Friends of Earth (West Midlands) object for reasons summarised below:
Waste Hierarchy and National Waste Strategy

- Non-compliance with the Waste Hierarchy as incineration should not be used in preference to waste reduction, reuse, recycling and composting (including anaerobic digestion).

- Non-compliance with the National Waste Strategy, which encourages Local Authorities to use anaerobic digestion for biodegradable waste, as there are significant environmental benefits over other options [including incineration]…" such as the digestate produced by anaerobic digestion can be used as a fertiliser or soil improver.

- The incinerator would affect recycling and composting rates.

- The Council's waste management strategy sets out targets to recycle and compost a minimum of 30% of household waste by 2009; 40% by 2010 and 45% by 2015.

Regional issues

- Does not comply with Regional Planning Guidance or the Regional Spatial Strategy.
-
- Proposal does not "have regard to the proximity principle" (policy WD3 A1) or "be in the form of a small scale facility which may be more easily integrated into the local setting" (WD3 B) or "Where possible site specific proposals for new waste management facilities should be included in development plans" (WD3 B).

- Proposal does not fit with criteria of proximity principle, protection of amenity, harm to open land or the green belt.

- West Midlands Regional Spatial Strategy stresses the need to treat so called 'waste' as a resource and move treatment up the waste hierarchy.

- Incinerators are plentiful within the West Midlands with plants at Stoke-on-Trent, Wolverhampton, Dudley, Coventry and Birmingham with new incinerators planned in South Staffordshire, Shrewsbury and Coventry – as recycling and composting increase these existing plants are being shared by greater numbers of councils.

- The current incinerators have spare capacity and are now starting to take waste from other authorities.

- Existing incineration contracts are impeding greater recycling in places like Stoke-on-Trent which is not able to benefit by recycling more or reducing the amount of waste produced.

- The existing incinerators are all running below rated capacity due to increased recycling and there has also been much coverage of shortfalls at the Wolverhampton plant.

- The region is lacking in recycling plants such as food grade plastic recycling plants. Various other councils are bringing forward plans for extra waste treatment capacity within the region.

- Given the large rise in recycling, the proposed plant would lead to an oversupply of incinerator capacity within the centre of the region.

- PPS10 recognises that development plan policy should ensure "the management of waste in ways that protect the environment and human health, including producing less waste and using it as a resource wherever possible." "minimise the need to consume new resources over the lifetime of the development by making more efficient use or re-use of existing resources, rather than making new demands on the environment; it should seek to promote and encourage, rather than restrict, the use of renewable resources (for example, by the development of renewable energy)."

- PPS10 can be used to support a case against mass-burn incineration, as the pattern of waste facilities proposed by a regional planning body should look forward in time but should "not constrain movement up the waste hierarchy." And that waste planning authorities should identify the types of waste management facility that would be appropriately located on allocated sites, but "taking care to avoid stifling innovation in line with the waste hierarchy."

- The planning for large waste facilities that require long term contracts of 25-30 years, such as an incinerator, could prevent the development of more environmentally sound waste options in the future.

- The Government would review waste targets for 2015 and 2020 in the light of progress to 2010 and future forecast, to see if they can be even more ambitious.

- An EfW incineration scheme in Telford & Waste would mean increased costs for the taxpayer together with failure to meet the Government's waste targets for recycling/composting.

<u>Shropshire and Telford & Wrekin Joint Structure Plan</u>

- Contrary to policy P63.

- The planning application does not provide 'the best balance of social, environmental and economic costs and benefits', as it would incinerate materials that could be readily recycled given more commitment from the local authority to working to best practice.

- The Borough can effectively double the recycling/composting of municipal waste resulting in a far lower quantity of residual waste that can be readily land filled.

- Commitment to an incinerator demanding high continuing 'residual' waste deliveries stifles initiatives to reduce waste, reuse, recycle and the possible promotion and use of anaerobic digestion within Telford & Wrekin, thereby contravening the waste hierarchy principles.

Lack of Need

- No convincing evidence of need is provided by the applicant.

- Data from the Council suggests the movement in total Municipal Solid Waste (MSW) in recent years provides no convincing evidence of need.

- The suggestion is the incinerator would have to rely upon either MSW imported from outside the Borough (would violate the proximity principle) and/or upon Commercial & Industrial Waste, but no solid evidence of need.

- Municipal solid waste growth has fallen nationally and in Telford.

Green network

- The site is on 'Green Network' land which is not suitable for the development proposed and which is protected by policies in the Wrekin Local Plan, and hence proposal would be contrary to policies OL3 and OL4.

Commercial Waste – not Household as per application

- Concerned at reports that the incinerator is now to be fuelled by commercial waste.

- The original planning application was proposed as a solution to dealing with residual Telford & Wrekin household waste and the various documents supporting the application were accordingly based on local household waste. The Council's Cabinet ended the residual household waste procurement process at its 8th December 2008 meeting. Are there enough household 'residual' waste resources available to fuel the plant as proposed?

- Businesses are increasingly interested in reducing, reusing, recycling and composting of waste.

- Concerned that there are no environmental impact or health assessment reports on the transport and other environmental implications of such a change in feedstock.

- Such a change invalidates the current planning application together with its non-technical summary and all supporting documentation which is based on local residual household waste.

Incineration vs. landfill

- The OECD has found that incineration is not a better alternative to landfill in that total social costs are higher for incineration (comparisons done in UK and Netherlands) and whilst the environmental harm caused by a modern landfill and a modern incineration plant are of similar magnitude, the costs of building and operating an incinerator are much higher than the similar costs for a landfill, hence, the total costs to society as a whole of a modern incinerator are significantly higher than for land filling.

Incineration – a commitment to wasting resources for decades?

- Waste reduction is not best served by committing an excessive tonnage of commercial waste to incineration, which demands a constant supply over several decades, especially when this is counter to the government's commitment to reduce waste.

- Burning waste resources (commercial or household) after a single use does not address the basic unsustainability of our current natural resources consumption.

- Waste reduction, reuse, recycling, composting and anaerobic digestion do address this issue directly.

- Telford & Wrekin appreciates this reality having appointed a Commercial Waste Officer to pursue the diversion of waste from landfill and a pilot project is being pursued in Stafford Park Industrial Estate to encourage companies to recycle cardboard, and reduce the amount of waste they send to landfill.

- An incinerator would undermine the Council's investment in this work.

National and local climate change targets

- A local incinerator does not help the Council deliver on its and the national government's climate change targets allowing and hence does not accord with the Council's commitment in its Climate Change Strategy:

- Incineration with energy recovery is one of the least effective means available in seeking to reduce energy use and carbon dioxide emissions.

- Recycling of materials saves the energy and emissions that would otherwise be required to extract raw materials.

- Incineration with energy recovery or composting of biodegradable materials avoids the negative effects of landfilling (methane emissions) and saves limited amounts of energy or materials.

- There is still further research to be undertaken, but studies have shown that new technologies can deliver far lower greenhouse gas emissions than using conventional incineration or landfill.

- The best performing study scenarios, in terms of their greenhouse gas impact, were those based on either mechanical biological treatment (MBT) followed by anaerobic digestion (AD) or on gasification preceded by autoclave, coupled with hydrogen fuel cell technologies.

- Study scenarios using incineration were amongst the poorest performing and were considerably worse than the best performers - this is largely due to low levels of recycling along with significant emissions from wholesale combustion of plastics, which negates the benefits of emission savings from energy generation."

Finally

- Urge the Council to require the current planning application be withdrawn, reconsidered and, if the applicant so decides, a new application be submitted based on the proposed incineration of commercial waste and the impacts arising from such waste, its particular composition and incineration properties.

- This should include a new, detailed independent Environmental Impact Assessment, covering the different traffic impacts for example and an independent Health Impact Assessment.

Telford Friends of the Earth (Telford)

- The Council says it will give priority to increasing recycling, reuse and waste reduction and has a recycling target of 40% for 2020/21.

- An EfW plant would set a ceiling to waste reduction, re-sue and recycling/composting and hinder achievements of government targets.

- Waste fell in the Borough to 88,675 tonnes between 2000/01 – 2007/08 which does not tally with the projections for 3% growth per annum from 2006/07 to 20010/11.

- Using real data with increased recycling/composting, residual waste would reduce to 38,000 tonnes in 2020/21 (the Council assumes waste would reduce to be 65,000 tonnes).

- Waste reduction is not ache ivied by sending excessive tonnage of residential household waste to incineration, which needs constant supply over several decades.

- The proposals do not accord with Council's commitment to Climate Change Strategy of reducing greenhouse gas emissions.

- Incineration is one of the leased effective means of reducing carbon dioxide emissions or reducing energy.

- Concerned about use of commercial waste – no evidence to back up SITA's claim that there are "thousands of businesses" and the change invalidates the application and a new application should be made.

- Commercial waste will be locally reduced with initiatives and an incinerator could undermine this reduction.

- Waste may then be brought in from outside the borough to maintain the incinerator.

Mark Pritchard MP objects to the proposals. He believes the siting of an EfW plant at this location is wrong for the following reasons:

- Proximity to residential areas (Muxton, Priorslee and Sherrifhales).
- Proximity to schools (Muxton, Priorslee and Sherrifhales).
- The dange`r to local watercourses (airborne particles).
- Increased vehicular activity on the adjoining road network.
- The gradient of the site – and visual impact of any subsequent chimney/tower.
- The failure of government to encourage enough recycling.
- This is contradictory to the given aim of reducing carbon emissions.

David Wright MP objects to the proposals for following reasons:-

- Wrote to all households in St George's and Priorslee areas and received 498 responses, 70% of which opposed the application.

- Residents share my concerns about siting so close to residential area with the potential for airborne population, increases in local vehicle moments.

- A full environmental impact assessment has not been subject to comprehensive debate, and applicant failed to engage effectively with the local community.

- Whilst not opposed to principle of energy from waste incineration, the Borough needs to develop this as part of an overarching waste strategy.

- This application "jumps the gun" and does not facilitate such a strategic discussion.

- Applicant should withdraw proposal and work with partners to develop a local debate.

Lilleshall and Donnington Parish Council – whilst have no objection and accept the proposal, the Parish Councillors did comment:-

- There was no real benefit to the Parish

- Mechanical and Biological treatments should be further investigated.

- Due to the complicated technology and lack of expertise could not pass comment.

- Incineration would reduce the amount to landfill.

- The Parish has had its fair share of waste disposal, so why not locate it elsewhere.

- Despite assurance it would use municipal waste, this may run out and commercial waste may have to be burned.

St Georges and Priorslee Parish Council

- Recommend refusal on the grounds that the proposal would create increased traffic through the Parish and increased threat of pollution.

Little Wenlock Parish Council

- Acknowledge that the proposed site is not within their parish, but feel very strongly that proposed development as it would have an impact on the Borough area.

- Contravenes policies P63, P64 and P67 of the Shropshire and Telford & Wrekin Joint Structure Plan 1996-2011.

- It is not a practical environmental option to burn waste which could be recycled.

- Recycling creates more jobs [a social advantage] and saves more energy [an economic advantage] than producing energy from waste.

- Although there are better pollution controls on modern incinerators some dioxins and minute particles would be added to the atmosphere.

- Especially worrying are the smallest particles, less than PM4 as once inhaled these remain in the lungs. Unfortunately, the content of these very small particles in the air appears not to be monitored.

- The proposed incinerator would be capable of handling 62,000 tonnes of residual waste per year, but T&W Council created only 53,820 tonnes of residual waste in 2007/8.

- This waste deficit means that either waste would be imported into Telford & Wrekin [using more fuel and producing more greenhouse gases and other pollutants contravening] or commercial waste that could have been recycled would be used.

- With a waste deficit T&W Council could be fined/penalised by SITA, a bill which local community tax payers would have to pay.

- Currently kitchen waste constitutes 17% of our landfill waste as T&W Council have no procedure for collecting, composting or bio-digesting it. If Telford & Wrekin do not divert kitchen bio-degradable waste away from landfill by 2010 government fines would be levied – another cost for local community tax payers. Alternatively, the supply of waste to the incinerator could fall by 17% accentuating the difference between demand and local supply of waste.

- This imbalance of higher demand/lower supply situation for the incinerator would discourage and reduce the incentive to recycle in the Borough, which already has a low recycling rate of 36% compared with 60% in Cornwall.

- There would be unacceptable adverse impact on people, local communities and water resources.

- Incinerator ash is more toxic than the original waste, it has to be landfilled and chemicals within it are more mobile and more likely to seep into landfill leachate which could pollute streams or ground water.

  NB: Structure Plan policy P63 has not been 'saved' and therefore is no longer relevant.

Tibberton and Cherrington Parish Council

- Deeply concerned about the proposal's possible health consequences.

- Appreciate the generally high air and environmental quality in the Borough and are keen not to allow this to be jeopardised.

- Urge the Council to undertake an independent Health Impact Assessment prior to any decision being made on the application.

- Aware that in the near future new legislation is likely to prohibit the construction of energy from waste plants of the design being proposed at Granville, but that this would not operate retrospectively.

- Hope T&W Council takes this into account and are not pressurised into saddling its inhabitants with an inferior system that does not fully protect their health.

Child Ercall Parish Council

- Concerns from residents

- Particular fears of air-born pollution

- What wastes would be incinerated on the site and what information is available as regards to possible pollution of the surrounding areas.

The former **Bridgnorth District Council** (BDC) objected strongly on following grounds:-

- Would adversely impact on human and animal health and agricultural crops therefore recommend refusal.

- Request that the application is not determined until an independent Health Impact Assessment has been carried out.

Newport & District Community Society object.

- The submitted details are less than categoric as to the ability to maintain the content of emissions within the levels required by law.

- Object until such time as a full Health Impact Assessment has been undertaken and results published.

Telford PAIN (local pressure group) submitted several letters of comment and information to object, for reasons summarised below:-

- Want to ensure waste is recovered and disposed of without endangering human health and without using methods which could harm the environment.

- Proposed extracted energy from the facility is very small scale & highly inefficient use of resources. Where such plants operate but are unable to generate electricity, they continue to operate at 85%-95% of their revenue income, which is derived primarily from gate fees, not from sale of electricity to the national or local grid – therefore this is an incinerator.

- Proposal is the lowest commitment option to resolving the waste management.

- Incineration is no better than landfill from environmental, social or economic standpoints.

- Environmental & health impacts are the subjects of great controversy by scientists & academics & have not been fully researched, as such the associated Whole Life, Operational & Management Risks for such facilities cannot be clarified either way. i.e. risks remain.

- Lack of Need – as incinerators at Shrewsbury and Four Ashes cast doubt on the need for, and viability of this proposal and numerous existing incinerators in the area (including ones at Wolverhampton, Dudley and Stoke) would have a negative influence on progress towards recycling rates for the area.

- Non compliance with Waste Hierarchy

- Non compatibility with National Regional & Local plans.

- Non compatibility with National Waste Strategy 2007

- Would have greater climate change Impact than alternative strategies.

- Unacceptable and poor location as in close proximity to schools and housing, and Telford has a younger profile than the national average so families, pregnant women and numerous schools would be affected.

- A plant of this size 65m high chimneys, high buildings and silos- would be visible from numerous points (not least by the residents to the east of the site outside the district).

- Seeing the plant would be constant reminder for those who are in fear of the potential harm that the residual pollution may have on their families.

- The plant would create noise, dust and wind blow 24 hours a day 7 days a week for the next 30 years.

- The plant would generate a large volume of heavy traffic, imposing greater strain and danger on the local roads, especially at junctions.

- Lorries would deposit litter and debris on the roads and surrounding areas.

- Concerns about potential impact on the adjourning conservation area of Granville Nature reserve. If local habitats are affected by the disruption or residual pollution the damage could be irreversible.

- Incompatibility with “Transforming Telford” policy, the development of Telford Town Centre & stated policy to promote inward investment into the Telford Area.

- Would have a negative impact on our Unique Town and inward investment.

- Application is premature.

- Incineration is the least desirable option for waste management as it destroys valuable natural resources & is a positive 25 year disincentive to Reduce, Re-use, Recycle & compost.

- SITA stated in 2008 document “Granville Update issue 1” that “capacity of the plant has been calculated to cope with the anticipated rise in waste and population as Telford grows over the next 25 years” and that “the centre is intended for household and municipal waste, together with a small amount of commercial waste.”

- SITA are misleading saying that the majority of the waste treated at the proposed facility would be domestic waste.

- There is a presumption that Telford and Wrekin would commit to this facility if planning were to be granted, but no such contract exists.

- SITA have publically announced that if they did not get a contract for residual waste they would burn commercial waste.

- The Granville Update, in response to the question "Doesn't EfW discourage recycling?" stated "Not when the EfW facility is correctly scaled to the needs of the local community." But the Council's "From Waste to Resource" public leaflet states that in 2008/2009 the recycling rate was at 39% ...with a 45% target by 2015. These estimated figures and SITA's plans for a correctly scaled facility are based on the adult population and the shift in trend towards more recycling. In T&W the rate has improved dramatically from19.75% in 2004/2005.

- What does not appear to have been included in the estimations is the impact the next generation would have on these targets - 10 year olds today would be adults in 2017 and these young people are being grossly underestimated.

- The current adult population have been conditioned in a throw away culture, but the next generation have been conditioned to reduce, re-use and recycle, participating in Eco- Schools activities from the age of five.

- The waste management strategy proposes to reduce the amount of waste that we send to landfill through alternative disposal methods.

- Allowing an incinerator would have a major impact on the environment as it would increase the impact that the waste produced by the borough has on the environment.

- SITA's track record for managing & running such facilities is not good (regular breaches of emissions, breakdowns, fires).

- Incineration is not an efficient diversion from landfill process due to residual bottom ash & fly ash. Fly ash is hazardous waste requiring specialised licensed disposal & transportation costs (accident Risk in & out of district).

- Visual damage to local environment as would dominate being a substantial facility with building 30m high, stack 60m high on high ground near to a high density housing area & adjacent rural areas.

- There is widespread public concern about the pollutants emitted from incinerators and the risks from airborne particles in terms of diseases and conditions such as leukaemia, and there is a reasonable evidential base according to some members of the scientific community and health organisations around the world.

- Full account should be taken of these legitimate fears.

- Health Impact Assessment requested, but one not published to our knowledge.

- Has independent research been conducted into the effects of the residual pollution from the proposed incinerator combined with the residual pollution from Ironbridge power station, mixed with the remaining mercury emissions from the crematorium?

- Has anyone assessed the rota effect of the wind over Red Hill, a force so strong that micro lights would not fly over the area?

- How would this effect the dispersal of emissions over the population of Red Hill, Priorslee, Muxton, St Georges, Donnington, Lilleshall and Sherrifhales? These questions remain unanswered.

- There are concerns that incinerator monitoring measures the wrong thing, in the wrong places & at the wrong times.

- The absolute minimum is done to conform to outdated EU regulations.

- Waste HPA report says in chapter 7, 7.5.32 "It is important to note that increased mortality & morbidity due to elevated levels of PM10 exposure is small & limited to a fraction of the population which is already in poor health. As such the term Deaths Brought Forward, DBF does not constitute new/additional deaths but a reduction in life expectancy for those whose health is already seriously compromised." This statement alone fully illustrates that health issues would always take second place to avoidance of the Landfill tax, and achievement of fiscal targets.

- The Paris Appeal report, which has been signed by many international scientific key figures and by the Standing Committee of European Doctors (SCED), "…In order to preserve children's health and the health of future generations, it is vital that the European Union and all Member States consider the preservation of health and the environment as the central issue of all public policies… "The recovery of wastes through selective sorting and recycling in place of incineration and co-incineration."

- There are strong links between environmental pollution and increasing health risks. Current research has been conducted on adults and rather than specific scientific research on the direct effects of pollution on children's health and development. Since embryos, foetuses, neonates and children are even more sensitive to environmental factors than adults, it is the responsibility of those with authority to protect our environment and protect our children's future health. We need to implement effective preventative measures and wait for scientific certainty as to the safety of technology.

- Although the proposed plant would comply with current legislation, local people have legitimate fears of incinerators, as there have been accidents, failings and regular incidents of permitted emission levels being exceeded and fear the risk of a catastrophic accident occurring on their doorstep (remember the Donning ton fire).

- The most vulnerable members of our community are most likely to be affected by residual pollution and the Waste HPA indicated those in poor health are most at risk.

- Who has the right to make such lifespan decisions for any other UK citizen sick or otherwise, certainly not local councils or large waste management companies?

- Councils are being influenced by the Health Protection Agency and SITA will have undoubtedly argued that the HPA's current position is that the emissions

from incinerators are currently thought to be safe based on their research available to date.

- HPA updated their position in September 2009 - however according to the HPA no research has been published since the ENVIROS report in 2004 and no recent research has been conducted by the HPA. Therefore the report from the HPA raises many questions and states that their position may change in light of new evidence.

- HPA also state that "*possible health effects are **likely** to be small".* But "likely" does not have a scientifically proven status as it indicates that the health effects have not yet been researched fully. Some aspects of emissions have been researched as stated in section 7 of the HPA report.

- The HPA report comments that *The World Health Organization (WHO) in its 2005 report on Air Pollution and Children's Health and Development, concluded that there was an association between air pollution and infant mortality that appeared to be mainly due to particulate air pollution.*

- Dioxins breathed in from residual pollution may be quite small but the bigger problem is that the dioxins are stored in fatty tissue and so contaminate the food chain. Our total intake of dioxins will be affected by our diet and intake of animal foodstuffs like milk, eggs, cheese, yoghurt, meat and fish. Dioxins would be stored in our fatty tissues too, including the brain, and could potentially have serious consequences on development.

- Evidence that incinerator emissions will not increase the likelihood of health effects has not been submitted. Assumptions based on outdated research are still being used and the larger problem is that despite reassurances from the industry, Environment Agency and the HPA on the effects of incinerator emissions, this proposed development would not stand alone as a single polluter. It would add to existing pollution which due to the lack of an independent Health Impact Assessment, has not been calculated. It is the possible cumulative effect of pollution on people's health that needs to be addressed.

- The precautionary principle should be invoked when there is good reason to believe that irreparable damage to humans and the environment may be caused and that there is scientific uncertainty about the consequences, as evidenced by the HPA in their own document, September 2009. The burden of proof should be on SITA UK to prove beyond reasonable doubt that what they are proposing is safe for our children. They have not given these reassurances. We are not expecting absolute proof, because this does not exist, but further evidence on the safety to children particularly, should be sought.

- Conflict between planning application (MSW) & SITA Executive Management (Commercial Waste as prime fuel).

- Failure to achieve best value for T&W Council electorate due to highest gate fees & bottom/fly ash disposal costs.

- The wider site within which the proposal is located is currently occupied by a landfill operation, which would be restored and it was and still is the reasonable expectation of residents.

Kaleidoscope Child Care

- Our objection is based on the potential harm that could be inflicted on the most vulnerable members of our community and we feel that their rights are currently being ignored.

- If planning permission were to be granted we feel this would be a violation of their human rights.

- Very little research has been conducted on the health impact of incinerator emissions on children and the World Health Organization and the Health Protection Agency are now doing something about that.

- We refer to Health Protection Agency document A Children's Environment and Health Strategy for the UK. March 2009.

- Telford & Wrekin Council and Shropshire Council may well have already started formulating their action plans for the regional priority goals, with particular focus on goals 3 and 4.

- There is a suggestion of when siting new schools, childcare facilities and play areas that there should be an assessment of the surrounding air quality. Alternatively the potential reduction in air quality from an incinerator should be considered at planning stage due to its close proximity to schools, homes, play areas and childcare facilities.

- The HPA states that they are at the forefront of an action plan aimed at reducing the impact of environmental facts on children's health, but has stated that there is much to be done and further research needed.

- Ask Telford & Wrekin Council to invoke the Precautionary Principle as stated in PPS23.

- There is good reason to believe that harmful effects may occur to humans and that the level of scientific uncertainty about the consequences or likelihood of the risk is such that best available scientific advice cannot assess the risk with sufficient confidence to inform decision making.

- Furthermore this current anti precautionary principle that exists whereby the burden of proof is on the community and the council should be stopped. The precautionary principle should be used to refuse this planning application and the burden of proof put firmly on SITA.

- Sita UK must provide sufficient evidence as to the safety of the proposed development on our children's health before permission is granted. The decision by the plans board will affect our children for their lifetime. We must not gamble with our children's health.

Telford Crematorium:-

- Found out about application from consultants on site.
- There was delay getting copies of plans from the Council.
- The model at SITA's offices was not available to see until another time.
- Consider being kept in the dark.
- Accept landfill can't continue and incineration most efficient technology.
- Makes sense to put incinerator next to landfill site.
- No objection to the waste process provided it doesn't interfere with the crematorium business.
- Don't want buildings to be visible from the Gardens of Remembrance, or for prevailing winds to deposit particulates onto the ground, or fumes to cause more distress than already endured.
- What would be the full impact?

Neighbour consultations

- 244 letters and e-mails of objection (including from the Cottage Kennels/Cattery on Grange Lane as the nearest property to the site) have been received from residents, which are summarised below as follows (all letters available in full on the planning file):-

Health hazard

- Health hazards are caused by incinerators, particularly by PM2.5 and PM1 particulates, would spread by up to 15 miles away, e.g. increased heart and lung diseases, and higher infant mortality rates.
- Health hazards are exacerbated by the incinerator's close proximity to residential property, i.e. Priorslee.
- Already polluted by the Ironbridge Power Station and the Telford Crematorium without the proposed incinerator.
- Pollution problems of incinerators and operators have been taken to court.
- Incineration of unknown substances in unknown combinations and quantities.

- Meteorological conditions would distribute particulates into the surrounding area, especially Shropshire.

- The plant is based on an old technology model, designed to meet the old EEC 2000 Regulations and would not meet the new 2010 micro particle standards.

- Waste incinerator already removed from Stafford Park on health grounds.

- We should be reducing carbon emissions.

- The incinerator is illegal due to the European Law passed in 2006 where countries within the EEC have to use the most up to date technique to protect public health. By allowing the incinerator to burn waste at levels of temperature that are not high enough to eradicate all toxins, and to also ignore the plasma system of waste incineration the Council are not abiding by European Law.

- By not incinerating at a high enough level would cause health issues in the local area which includes a school, university campus and densely populated area. Reports carried out by Dr Van Steenis have proved that there are health issues with this type of incinerator.

- The proposal is very close to the town centre, which would mean dust, foul smells and smoke could be directed into the centre with prevailing winds and dissuade customers from spending their time and money in an area that the Council is so desperately trying to promote.

- Odour

- Parents may not send their children to Sheriffhales Primary School out of concerns over their health - even a small reduction in the number of children could affect the future of the school.

- Contamination of ground water that is drunk.

- Don't want to look at smoke plumes coming out of the chimney.

- The Council should adopt the precautionary principle to prevent environmental contamination.

- No Health Impact Assessment been undertaken

<u>No need/contrary to waste policies and targets</u>

- No need for an incinerator as there are ones at Wolverhampton and Walsall and one likely to be built at Shrewsbury, so waste could be loaded up and transferred to the rail terminus at Donnington or easily taken there by road.

- The finances of an incinerator are such that it would require an enormous amount of waste to make it economic and this would reduce the amount available for recycling.

- Use alternative methods of waste management higher up the waste hierarchy instead of an incinerator.

- The Government would shortly review the national targets set in the Waste Strategy for England (2007), which may be more ambitious in reducing the amount of waste that goes to landfill due to lower levels of waste growth.

- National Waste Strategy (2007) encourages Local Authorities to use anaerobic digestion for biodegradable wastes.

- The EfW plant would have a detrimental impact on recycling and composting rates and would result in high residual waste. Waste incineration would result in non-compliance with the National Waste Strategy (2007).

- Proposals incompatible with Joint Structure Plan Policy P63 (A Sustainable approach to Waste Management) as proposals do not provide the best balance of social, environmental and economic costs and benefits - around 70% of household waste is readily recyclable yet the Council only managed 36.5% in 2007/8, whereas Staffordshire Moorlands recycles over 60% and 80% in Dorset.

- Not compatible with Joint Structure Plan Policy P58 (A Sustainable Approach to Minerals Development) as incineration destroys minerals rather than conserve them, does not promote the efficient use of materials since non-renewable resources are finite.

- Why not utilise quarry sites to dispose of these waste instead.

- Proposal does not accord with the Council's commitment to Climate Change and would contribute to global warming.

- Importing waste from Shropshire into the Granville landfill site means there is less tipping space for Telford & Wrekin waste.

- MSW generation and the landfilling of its residual waste with the Borough are declining as required by the Waste Management Strategy. Danger the plant would have to rely on imported municipal waste contrary to the proximity principle. Also, West Midlands have a high density of incinerators compared to other regions.

- Commercial waste as well as municipal waste may be the burner fuel.

- Danger of importation of wastes from other areas to sustain the incinerator.

- Resource efficiency. Destroying resources that could be recycled does not make sense - landfills in America are already being mined to recover resources.
- Long term contracts councils enter into with waste companies with energy from waste plants effectively caps recycling rates.

- The proposals are contrary to Saved Policy NR1 (Location of Renewable Energy Developments) which states that the Council would support proposals for generation of power from renewable sources provided that they do not have negative impacts on the local environment.

Traffic/noise

- Probable increase in noise from the additional traffic and the incinerator itself.

- Waste would be transported along roads that would go through residential areas who may abuse traffic regulations.

- Residents along Grange Lane will experience greater increase in traffic than SITA predict, and land already dangerous for pedestrians/cyclists as no footpath

- Vibration along Grange Lane from HGVs.

- Danger to pedestrians along Grange Lane from increased traffic.

- Object to the extended operating hours for vehicle operating movements.

- Need to reduce the speed of motorists using the affected sections of the A5 with traffic calming measures, speed cameras etc.

- Highways network cannot cope with the increased traffic.

- Much construction work will be within 100m of the Cattery so will be very noisy.

Green network/visual intrusion

- The proposal lies within the Green Network and does not satisfy the requirements of Policies OL3 and OL4.

- The Granville site is surrounded by a country park with abundance wildlife.

- Size of plant and 65m stack would cause visual intrusion on the landscape, thereby affecting local amenities.

- The proposed building and surrounding area would be highly illuminated, which is inappropriate for a rural area.

Alternative sites

- Should look for alternative sites.

- Even if there was a need for the plant, then a brownfield of industrial site is more appropriate. Only reasons given to this site is its proximity to existing adjacent landfill site, and possibly Council ownership of the land.

- The site is in an area of past mining where there has been ground movement, mine shafts and tunnels beneath the site.

- What happens to the overhead electricity cables and pylons, the line of which appears to pass through the middle of the site for the proposed new building?

Other matters

- Reduction in house prices.

- Loss of TV signals due to land raising.

- Will affect health of animals at the nearby Kennels/Cattery.

- The incinerator cannot be approved if democracy counts for anything given the large number of objections.

- No one who lives in the surrounding area wants it.

- Proposal is very close to the Kennels, Grange Lane.

- The surrounding areas have a very high population, and crucially young children go to school here - there are several large settlements in very close proximity, i.e. Priorslee, Oakengates, St Georges and Donnington.

- The site is close to Redhill Primary School and other Telford schools.

- Lack of public consultation.

- The application has been secretive and little publicity, particularly as Newport is downwind of any pollution fallout.

- The proposals would make people redundant at the present site because they would not need as many employees.

- Recycling has the potential to create more jobs than the proposed incinerator.

- Lack of co-ordination with neighbouring local authorities in contravention of The Secretary of State's Proposed Changes to RSS (July 2008) Policy 37 which requires waste planning authorities 'to make provision for waste management capacity equal to the amount of waste generated.'

- Adverse effect on listed buildings, nature conservation, biodiversity and fisheries.

- Many areas of the local environment are already under preservation orders, without this addition.
- To propose this site close to a crematorium is insensitive.
- It is of concern that some work has already began to access the site.
- Why was the Granville landfill site sold to SITA, who has benefited financially?
- When did SITA purchase the land and from whom?
- SITA has a poor record of incinerator breakdowns.
- More efficient ways of generating electricity.
- Environmental costs outweigh the few jobs that are being created.
- There is flooding in the vicinity of the site from SITA's operational works and freak weather conditions, and with raised topography in front of the kennels, there will be increased flooding/water run-off.
- Erosion of quality of life for residents living along Grange Lane who are closest to the site.
- Screening mound in front of the Kennels will be excessively tall and visually intrusive.
- Stress and worry especially to those living closest to the site.
- No "disaster or evacuation plan" – the nearby Kennels/Cattery has over 80 animals.

A petition has been received signed by 58 people opposing the proposed energy from waste plant on the following grounds:

- Hazards to human health.
- Impact on the environment.
- Money should be going to increasing recycling and directing waste away from landfill.
- Destroying valuable resources that should be kept within the eco-system.
- Gift of £50,000 was apparently offered to the Parish Council to boost the funds for a new village hall.

1 letter of support for the incinerator received from a resident of Muxton:-

- As former member of the then Shropshire County Council in 1980's opposed the closure of the Stafford Park incinerator on financial grounds.

- Back then the County Council argued it was cheaper to landfill and there was plenty of void space for tipping.

- Had the Stafford Park plant been used efficiently using the heat to generate heating and hot water to industrial units in Stafford Park, we would not have to rely on landfill like we have.

- We have run out of landfill and had to reconstruct the landscape at Granville by building huge mounds.

- It costs to collect recyclable matter, so much of which is not recycled, but shipped abroad as plastic to be landfilled, would have been saved.

- Energy created by burning is more efficient than collections for recycling.

- The economic climate at the moment would result in reduced demand for recycled matter.

- The fears of health and safety of the current proposal by local residents are understandable but are unfounded.

- Incinerators have been around for years and there have been no major health fears. The elevated and isolated position at Granville should cause rapid dissipation of emissions into the atmosphere.

- Tipping in landfill sites is becoming less of an option and the demand for recycled material is falling.

- Incineration is the best option and a plant at Granville would make for more efficient disposal of rubbish in Telford.

- The Council should grant planning permission.

7.0 PLANNING CONSIDERATIONS

7.1 This section should be read in conjunction with the independent consultant reports commissioned by the Council and which form part of this officer report. The consultants' conclusions are appended as follows:-

- Appendix 1 - Planning Case by Nathaniel Lichfield Partners (Nov 2009).
- Appendix 2 - Waste Management Options Appraisal by ATM Safety & Environment (Nov 2009).
- Appendix 3 - Assessment of Landscape Issues by EDP (Nov 2009).

a) Waste generated and currently managed by Telford & Wrekin

7.2 The West Midlands Landfill Capacity Study 2009 (by Scott Wilson) estimated that for 2008/09 in the region of 1.2 million tonnes of controlled wastes (excluding agricultural and quarry & mines waste) is generated in the Borough each year. Table 1 below shows the quantities of each of the different types taken from that study for the Telford & Wrekin area

Waste Type	**Estimated for 2008/09 (tonnes)**
Municipal Solid Waste (MSW)	93,553
Construction and Demolition (C & D)	828,848
Commercial and Industrial (C & I)	295,187
Hazardous	9,665
Total	**1,227,253**

Table 1: Predicted quantities of waste by type in the Borough for 2008/09
Source - The West Midlands Landfill Capacity Study 2009 (by Scott Wilson)

7.3 Of this total, municipal solid waste (MSW) arisings represents only approximately 8%. The remaining 92% of controlled waste is generated through development (construction and demolition - C&D) and through production of goods and services (commercial and industrial - C&I). A small proportion (<1%) of the waste arisings in the Borough comprise hazardous waste.

7.4 Recent figures for the actual total MSW arisings for the Borough for 2008/9 was 88,613 tonnes, which is less than the 93,553 tonnes estimated in the West Midlands Landfill Capacity Study in table 1 above and also less than the actual tonnages for 2003/04 (89,250 tonnes). Of this MSW waste, approximately 39% was recycled or composted, following segregation at source, either at the kerbside, at "Bring sites" or at Community Recycling Centres (CRCs), leaving approximately 54,000 tonnes of residual MSW to go to landfill. Note that this amount is less than the required 62,000 tonnes that the proposed EfW plant would need to operate at capacity and so additional residual waste from other sources would be required. Notwithstanding this in correspondence dated 1st May 2009 and 24th September 2009 the applicant outlined that the EfW facility could be operated solely on commercial waste.

Municipal waste

7.5 As a Unitary Authority, Telford & Wrekin Council is responsible for both the collection and disposal of municipal waste. Municipal waste includes waste from household collection rounds, schools, street litter, waste delivered to Council recycling points, municipal parks, garden waste, community recycling centres and some commercial waste from shops and small trading estates where waste collection agreements are in place with the Council and Council office waste. Other wastes such as construction/demolition wastes and commercial/industrial wastes are handled by the waste management industry under normal market conditions.

7.6 Over the period 2003/04 to 2008/09 there were changes in the way in which the Council managed household waste. The Council has introduced and now operates an alternate weekly household kerbside collection service and

currently recycles paper and card, tins and cans, textiles and glass and garden waste. Garden waste and recycling (which includes paper, card, tins, cans, textiles and glass) are collected one week, and residual waste (that which is not recycled or composted) is collected the following week. Green waste is collected for composting and the Council has committed to introducing kerbside collection of plastics for recycling in spring 2010.

7.7 The amount of residual household waste that is being collected at the kerbside and sent to landfill has reduced over recent years and particularly since the introduction of the Council's alternate weekly collection service in 2004/05. In 2004/05 approximately 70,000 tonnes of household was going to landfill per year. In 2008/09 this had reduced to approximately 54,000 tonnes per annum – see fig 1 below.

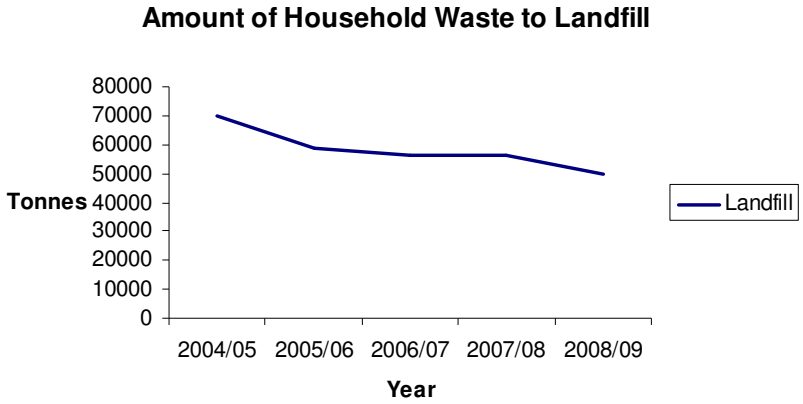


Fig 1: ***Amount of household waste from T&W sent to landfill over last 5 years***

7.8 This reduction is partly due to more material now being recycled and less material being collected as residual waste as a result of the efforts of residents and changes in the Council's services being provided. The current trend for the Borough shows that the amount of residual household waste going to landfill is continuing to go down, which is consistent with the trend throughout England and Wales. Although it is likely that the reduction in 2008/9 in part reflects the impact of the recent economic downturn, it does reflect a continued trend that has begun to emerge nationally over the last few years. Over the last five years, and prior to the economic downturn, total household waste in England has declined at an average rate of 0.4% per annum[1].

7.9 The Council recognises that much more that can still be done to further reduce waste arisings and estimates that a further 22% of the residual household waste currently sent to landfill could be recycled. The Council is looking at alternatives to landfill, maximising recycling at the Community Recycling Centres and initiatives to increase capture rates from the kerbside recycling service. Kerbside collection of kitchen waste and plastics is being considered and is likely to be trialled soon as the Council strives to achieve 47% recycling rates by 2010. This recycling target is in line with and even

exceeds the national Waste Strategy for England (2007) recycling targets of at least 40% by 2010 and 45% by 2015.

7.10 The Council's Municipal Waste Management Strategy 2005-2021 identifies 13,000 tonnes of kitchen waste that could be diverted away from landfill, based on the predicted figures for the year 2012. However, in the event that the Council were to adopt a strategy including separate collection and biological treatment of kitchen waste, and assuming that waste generation in 2011/12 is as previously predicted, which seems unlikely given the current falling trend, this would mean that the quantity of residual MSW would further decrease to the order of 52,000 tonnes/per annum, which is less than the 62,000 tonnes of waste per annum that the EfW plant requires.

7.11 The Council's recycling targets are considered to be achievable, particularly as there is general public support in the Borough for increased recycling. The Council recently initiated a consultation by questionnaire seeking the views of interested parties and support for differing levels of recycling. With a return rate of almost 30%, the majority of those who replied were in favour of achieving a recycling rate of 60% and beyond for the longer term and there was also support for weekly food waste collections, nappy recycling collections, reduced residual waste capacity, incentives for recycling and fines for none recycling. In addition, 58% of people answering the questionnaire felt that priority should be given to diverting biodegradable wastes away from landfill.

7.12 At present in Telford & Wrekin the majority of residual municipal waste (i.e. that which is not recycled or composted) is sent to landfill at Granville, where the current landfill operations have planning permission to continue until April 2025. Granville is permitted to take 200,000 tonnes of waste a year.

7.13 However, under the European Union Landfill Directive there is a requirement for the UK to reduce the amount of Biodegradable Municipal Waste (BMW) that is sent to landfill as follows:-

- By 2010 - reduce the amount of BMW going to landfill to 75% of that produced in 1995.
- By 2013 - reduce the amount of BMW going to landfill to 50% of that produced in 1995.
- By 2020 - reduce the amount of BMW going to landfill to 35% of that produced in 1995.

7.14 Biodegradable waste is waste that is capable of undergoing anaerobic or aerobic decomposition, such as food, garden waste, and paper and paperboard.

7.15 To encourage waste producers to reduce the quantity of waste disposed of to landfill, in 1996 the Government introduced the landfill tax. The landfill tax applies to all wastes irrespective of its source (i.e. both municipal and commercial/industrial) and is applied at two rates, currently £40/tonne for "active wastes" (those with a polluting potential) and £2.50/tonne for "inactive wastes"(those that are essentially inert). The rate for active wastes is set to

continue to increase each year by £8/tonnes until 2013, at which point it would be £72/tonne.

7.16 Landfill Allowances were adopted by legislation in April 2005. The scheme was set up for England to meet the obligations set under the EU Landfill Directive and applies to Local Authority's municipal waste. Telford & Wrekin were allocated allowances for the amount of biodegradable municipal wastes sent to landfill each year up to 2020. Each year the allowances decrease. For every tonne of municipal waste landfilled over the allowance the council can be fined £150 (this is distinct from landfill tax, which continues to apply).

7.17 The Landfill Allowance Trading Scheme (LATS) was also introduced by government legislation in 2005 for Local Authority municipal waste and allows councils to 'trade' with other councils, buying from those with surplus landfill allowances and selling to those with a deficit. It is likely that the Telford and Wrekin would become LATS deficient in 2010/11 after which time they must acquire credits from other Local Authorities or divert municipal waste from landfill in accordance with their allowance.

7.18 The Council must increase diversion from landfill if LATS penalties are to be avoided. As part of this the Council initiated a procurement exercise for a waste management facility, but did not dictate the treatment technology it was seeking. Reductions in the amount of waste produced and increases in recycling have significantly reduced the potential impact of LATS. As a result of the lower than expected value of tradable LATS, the Authority's models in relation to procuring a long term waste disposal contract from 2011/12 have been reconsidered in the short term. The value of tradable LATS is probably a reflection of the reduction of municipal waste being sent to landfill exceeding the targets set by Government, leading to surplus credits. More recently announced increases in landfill tax, rising to £72/tonne in 2013/4 are now a more significant driver than LATS values.

7.19 In 2009 the Council stopped its procurement process and a short term (5 years) interim approach has now been adopted that would use additional diversion via recycling schemes and continued use of landfill. The Council will shortly be entering into a 3 year contract with the applicant to continue to dispose of residual municipal waste at Granville landfill site and this could be extended a further 2 years as part of the interim short-term measure. This approach would minimise the need to buy LATS and allow the council to utilise existing treatment capacity in the region and that which would become available elsewhere over coming years. Section c) will look at waste disposal capacity in the region.

7.20 However, there still remains a national and regional policy requirement to continue to divert municipal waste away from landfill. The overall objective of a new procurement exercise would be to give the Council options to do this as well as deciding on alternative technologies to use. A range of alternative technologies were considered in the 2005 Municipal Waste Management Strategy and are briefly discussed in the applicant's Environmental Statement. Amongst the technologies considered were, Mechanical

Biological Treatment; In Vessel Composting; Anaerobic Digestion; Autoclaving/Mechanical Heat Treatment; Mass burn energy from waste; and Pyrolysis and Gasification. These remain the most viable options and an overview of each of these technologies is given in Appendix 4 of this report.

7.21 An important lesson learned by the Council from the procurement process is that **flexibility** is key to long term residual waste options. Committing the Council to one long-term treatment contract or technology is not the best option as the council needs to remain flexible in accessing treatment facilities.

Commercial and Industrial Waste

7.22 This waste is not collected or disposed of by the Council, but by commercial companies. Currently, it is understood that commercial and industrial waste is taken to Granville and Candles, where it undergoes minimal separation or recycling before disposal. It has been confirmed by SITA that the Granville EfW plant has the potential to accept and incinerate commercial and industrial waste, but this is a matter for the operator.

7.23 Commercial and industrial waste (C&I) has not been subject to the same degree of reduction, reuse and recycling incentives and policies as municipal waste, both nationally and locally. However, Government has recognised that the business sector needs to access sustainable waste management and the national Waste Strategy for England 2007 states:- *'The Government is encouraging local authorities to use their role as local community leaders in partnership with businesses, other local, sub-regional and regional public sector organisations and third sector organisations to achieve a more integrated approach to resources and waste in their area'.*

7.24 It is likely, then, that the management of commercial and industrial wastes would receive greater attention than previously to divert materials away from those options low in the waste hierarchy, such as landfill, and as a result the amount that could be recycled has the potential to significantly increase as government initiatives are set to bring the commercial and industrial waste sector more in line with municipal waste treatment. If a materials recycling facility, for example, was to be constructed and intercept the stream of commercial and industrial waste, the quantity of waste requiring landfill would reduce.

7.25 The Government, through Defra, has recently set out aims and objectives for commercial and industrial waste in England as part of a broad-based campaign on business resource efficiency and is using the similar concepts of waste reduction, reuse and recycling that are used for municipal waste, in order to reduce the amount of waste that is sent to landfill or incinerated without recovering energy. Defra's aims for C&I waste set out in the recent Statement of Aims and Actions are the same as for household waste and other types of waste, namely to:

- Reduce the amount of waste that arises in the first place,

- Increase the proportion of the waste that does arise which is productively re-used, recycled or recovered;
- Reduce significantly the amount of waste that is sent to landfill or incinerated without recovering energy; and
- Maximise the investment opportunities for business from commercial and industrial waste management.

7.26 There are already in place a number of well publicised voluntary agreements, notably the "Courtauld Commitment" which seeks to reduce food and packaging waste in the grocery retail sector; and agreements with the newspaper, magazine and direct mail sectors primarily aimed at increasing the recycling of paper. In addition, consumer demand, a voluntary agreement with retailers, and 'Get a Bag Habit' campaigns have combined to cut the number of new plastic bags being handed to shoppers. These initiatives would all help in reducing further the production of household waste as well as decreasing the quantity of commercial wastes produced by the retail sector.

7.27 There is evidence that over the past few years, waste companies have invested in material recycling facilities (MRFs) as a result of increases in landfill tax, which means treatment of commercial waste is now more economical, and because they require less capital than other processes such as anaerobic digestion, mechanical-biological treatment and EfW. The lack of long-term contracts for commercial waste means it is difficult to gain finance for such relatively expensive plant.

7.28 It is likely, therefore, that the management of commercial and industrial wastes would receive greater attention in the future to divert materials away from those options low in the waste hierarchy and in time there would be a reduction in the amount of residual commercial and industrial waste needing to be disposed of by landfill. This may have operational implication for the proposed EfW facility.

Construction/Demolition Waste and Hazardous Waste

7.29 With regards construction and demolition wastes, the Government's approach to those wastes is set out in the joint government industry Sustainable Construction Strategy, with the overarching target that *"By 2012, a 50% reduction of construction, demolition and excavation (CD&E) waste to landfill compared to 2008".*

7.30 The current application does not specifically address construction and demolition waste, although some wastes arising from that sector could be treated if separated either at source or through processing at a materials recycling facility.

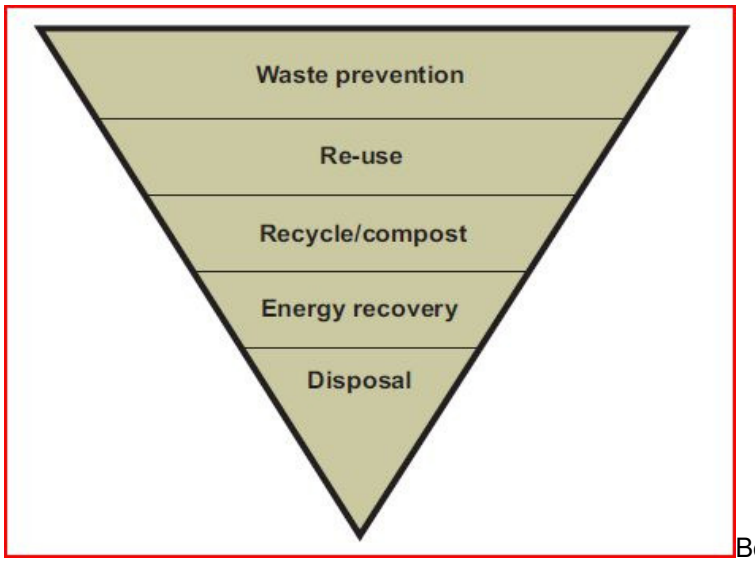
7.31 With regards hazardous waste, the application does not relate to the treatment of hazardous waste, therefore hazardous wastes are not considered further here. However, the proposed EfW facility would produce fly ash, classed as a hazardous waste output, and as there are no treatments

facilities in the Borough, this waste would be transported to specialist facilities elsewhere.

7.32 In summary, as the Council strives to meet its increased recycling targets with the continuing influence of LATS, and as both national and local measures are introduced as part of waste management strategies that aim to encourage waste reduction and minimisation, recycling and re-use, it is likely that the amounts of municipal, commercial and industrial waste generated within the Borough and needing to be disposed of via landfill or in an EfW facility are likely to reduce over time despite an increase in population being assumed in the Telford area in the future.

b) Waste Management Policy, Links with EfW and Waste Treatment Gap

7.33 The national Waste Strategy for England 2007 and PPS10 set out the preferred waste hierarchy as a framework to guide waste management options (see fig 2 below).



Bottom

Fig 2: The Waste Hierarchy

7.34 The Waste Hierarchy supports waste prevention and reduction as the first approach to waste management at the top of the hierarchy. This is followed by re-use, then recycling and composting, then energy recovery (in the form of heat and/or power from treating waste and which would include this EfW proposal) and finally at the bottom of the hierarchy, only disposing of waste in landfill as a last resort. Waste treatment options should therefore move up though the hierarchy from the bottom and away from disposal (such as landfill).

7.35 Hence the focus of the national Waste Strategy and the West Midlands Regional Waste Planning Strategy is the diversion of municipal and non-municipal waste away from landfill. WMRSS2 proposes to "*deliver sustainable development thorough delivering waste management up the waste hierarchy, addressing waste as a resource and looking to disposal as the last option*" (para 8.77).

7.36 Whilst the Landfill Tax and LATS are intended to encourage this process, other treatments up the hierarchy have to be explored and there is an expectation that EfW would account for some 25% of the UK's municipal waste by 2020 (Waste Strategy p.71). Therefore there is policy support in principle from the 2007 national Waste Strategy 2007, PPS10, WMRWPS Policy SP7B and WMRSS2 Policy W1 for the utilisation of EfW technology, such as the proposed application, as just one option of a greater package of waste management solutions.

7.37 EfW is also supported by the Draft National Policy Statements for Energy (EN-1) and Renewable Energy Infrastructure (EN-3) given the role that it could have in meeting the UK's energy needs by renewable means in the future, in accordance with the waste hierarchy (EN-3, Paragraph 2.5.2). The application does not, however, include provision for a heat recovery facility.

7.38 EfW facilities are nationally recognised as one of various waste management options to provide an alternative to landfill and are one of various energy recovery methods that lie above landfill disposal in the Waste Hierarchy (see fig 2 above). Energy recovery from waste, such as the proposed EfW plant, can take the form of a number of technologies and would also include anaerobic digestion; direct combustion (incineration); Secondary recovered fuel (an output from mechanical and biological treatment processes); Pyrolysis; Gasification; and Plasma arc heating. Mechanical Biological Treatment (MBT) includes mechanical sorting and separation of the waste stream to separate the biodegradable materials from the non-biodegradable materials. The biodegradable materials are then treated by a biological process such as anaerobic digestion (AD) or In-vessel Compositing (IVC). See Appendix 4 for description of the different technologies.

7.39 In considering technology choice, the Waste Strategy for England emphasises the Government's preference for anaerobic digestion but notes that *"the Government does not generally think it appropriate to express a preference for one technology over another, since local circumstances differ so much"* (para 27).

7.40 The applicant's ES recognises that EfW is not the only potential technology for managing the residual municipal waste and IVC and AD treatments are considered. However, the applicant states that IVC and AD focus on the treatment of biological fractions of waste and that given the limited nature of the inputs that can be managed by these technologies, and their reliance on pre-sorting wastes to remove recyclable and non-recyclable materials such as metals, glass, soils and rubble and plastics, the applicant considers they do not offer a comprehensive alternative to the preferred EfW technology put forward in the application. The ES does, however, recognise that these technologies have a potential role to play as part of an integrated waste management system for the Council operating alongside incineration with energy from waste, recycling and safe disposal of residues. The applicant also referred to and considered other technologies for the treatment of wastes including MBT, Autoclaving/Mechanical Heat Treatment, Pyrolysis and

Gasification, but points out that pre-processing is required for both technologies to remove non-combustible materials such as metals, glass and inert materials.

7.41 One of the reasons cited in the applicant's ES against Pyrolysis and gasification treatment methods is that they are both still at the research and demonstration stages of development in the UK and *"with little experience of these technologies as a commercial method of managing wastes … this option is not considered as an alternative"* (ES Para 5.104) to the EfW technology proposed at Granville. However it is noted that SITA has recently announced on its website that it is entering into a joint venture for the development of six gasification and recycling-led resource parks, with the first four at Avonmouth, Derby, Sheepbridge and Dagenham. If SITA are actively pursuing these other technologies, then this would appear to undermine their argument, put forward in the ES that the technology is at the research and demonstration stages of development in the UK. There seems to be a clear commercial case for this other technology. The resource parks would apparently be designed to treat commercial and industrial wastes and would have "front end" materials recycling facilities, which is promoted in the ES as a negative aspect in comparison with the EfW. This again demonstrates that there must be a commercial as well as policy argument in favour of encouraging waste management higher up the hierarchy.

7.42 In the TWC Municipal Waste Management Strategy the Council identifies that flexibility is an important consideration in selecting a treatment technology and has decided to further evaluate both EfW and Mechanical Biological Treatment (MBT) waste options.

Treatment Gap

7.43 The ES submitted with the application draws attention to the "treatment gap" for Telford & Wrekin predicted in table 7 of the WMRSS2. This predicts that approximately 0.49 million tonnes per annum of municipal, commercial and industrial wastes should be "treated" at the end of the plan period in 2025/26. Treatment defined in the treatment gap includes all treatment options, including EfW and Materials Recycling Facilities (MRFs), which would reduce the amount of residual waste requiring diversion from landfill.

7.44 Within the West Midlands, settlements including Telford are identified as being *"well placed to accommodate facilities of a regional and/or sub regional scale to reprocess, re-use, recycle or recover value from waste, allowing for the requirements of different technologies" (WMRSS2 Policy W3)*. Energy recovery, such as the proposed EfW incineration plant, is thus just one option in a wider package of waste management solutions (such as anaerobic digestion, gasification and recycling) required to ensure that Telford & Wrekin's waste management needs are met.

7.45 However, as the predicted "gap" was based on waste arisings data for the years up to 2002/2003 and the treatment capacity on treatment facilities throughput data for 2004/2005 the extent of the "gap" should be approached

with some caution. Indeed the Report of the WMRSS2 Examination in Public (EiP) (2009) recommended *"Flexible interpretation of the targets in Tables 5, 6 and 7 in the light of the latest and best available monitoring information"* (Recommendation 6.4). This followed concerns raised that *"the amounts of waste requiring to be managed would turn out to be over-estimated, resulting in over provision of facilities in the middle of the waste hierarchy, such as waste to energy plants"* (Paragraph 6.4). The report by the Council's consultants ATM Safety & Environment demonstrates at para 1.3.2 that the predicted short fall or treatment gap is significantly lower in the short to medium term than the 0.49 million tonnes referred to in the ES and the WMRSS2.

7.46 Paragraph 8.87 of the WMRSS2 states: "*A number of authorities have been identified as having a significant shortfall in facilities to manage an equivalent tonnage of waste to that arising in their area. These particular authorities should make provision for larger facilities of a regional and sub-regional nature in the MUAs, Settlements of Significant Development or other large settlements identified in the Broad Locations for Waste Management Facilities Diagram, or, depending on the characteristic of the waste management facility, by identifying a range of sites of different sizes in a variety of locations to assist in meeting the shortfall in the tonnages which have been indicated*".

7.47 It is clear from this that the WMRSS2 does not place sole reliance on the provision of larger waste management facilities, but recognises that provision for waste management may be made through identification of a range of sites. With the provision of recycling facilities and allowing for different technologies, it cannot be taken from this policy that each of the settlements, including Telford, must make provision within its area for an EfW, but that provision can be on a regional or sub-regional basis.

7.48 This report will later go on to examine in section c) the capacity of waste management facilities in the region that officers consider could cater for Telford & Wrekin's waste at least for the short-medium term.

<u>Undermining the waste hierarchy</u>

7.49 Notwithstanding the acceptance in PPS10 that EfW has a partial role within future waste management, PPS10 also advises that waste disposal facilities should not *"undermine the waste planning strategy through prejudicing movement up the Waste Hierarchy"* (Paragraph 25). The WMRSS2 states that "*Planning Authorities should consider EfW where options higher up the waste management hierarchy (as set out in the national Waste Strategy) are not available*" (para 8.51c)). From this, officers therefore consider that priority is for the various other forms of waste management further up the Waste Hierarchy, such as recycling/composting, re-use and ultimately waste prevention, rather than for EfW which is just above landfill (see fig 2 above).

7.50 This is further reiterated within the WMRSS2 EiP Panel Report in 2009, which recommends a revision to the supporting text of Policy W1 'Waste Strategy' by including *"mention the Region's need to* ***reduce its reliance on methods***

of waste management that are towards the bottom of the waste hierarchy, such as waste disposal and energy recovery" (Recommendation 6.2). EfW facilities, such as the proposed application, lie close to the bottom of the hierarchy just above disposal (landfill).

7.51 The Waste Strategy for England 2007 does recognise that energy from waste can be compatible with high recycling rates and facilities are being brought forward throughout the country where pre-sorting of waste occurs before energy recovery. However, the proposed EfW application does not include any method by which the waste stream is interrupted so as to reduce the amount of residual waste. Nor does it include pre-sorting of waste to remove potentially recyclable materials, nor is it put forward in combination with other recycling arrangements in Telford & Wrekin. Local disposal of residual wastes is not identified and no consideration is given to the source(s) of waste arisings – either domestic or commercial wastes. This would be contrary the national Waste Strategy which expects waste management options to move up through the hierarchy.

7.52 Mechanical treatment of MSW as part of an alternative process would be likely to increase the quantity of biodegradable material recovered beyond solely kitchen waste, increasing further the reliance on non-T&W municipal wastes to render the proposed EfW viable, even assuming the applicant were awarded the contract for the remaining residual waste. The proposed EfW, without removal of the biodegradable fraction for biological treatment or the absence of a materials recycling facility at the "front end", can therefore be seen to be lower down the Waste Hierarchy and only one step up from landfill than waste management techniques that separate and biologically treat the biodegradable waste.

7.53 Hence the proposed EfW, being further down the waste hierarchy and it not providing flexibility for waste management options and solutions, does not support national waste policy or the emerging WMRSS in reducing reliance on methods of waste management towards the bottom of the waste hierarchy, nor does it give the Council flexibility it needs to manage the different wastes by different methods as and when needs arise.

7.54 The T&W Council Municipal Waste Management Strategy 2005-2021 explains that the authority has *"invested heavily promoting recycling and composting and it is therefore important that a treatment technology does not undermine this approach and is not seen as an alternative to source segregation".* In considering various treatment options the Council came down in favour of further evaluating EfW and MBT with variants based on refuse derived fuel (RDF), autoclave and anaerobic digestion.

7.55 In addition "*flexibility would also be an important consideration in selecting treatment technology*". The EfW plant is not modular (i.e. it cannot be enlarged or reduced) and its viability apparently relies on maintaining 62,000tonnes per annum throughput (or equivalent calorific value) throughout its operational life. Hence the proposed EfW plant does not have the flexibility to be expanded or reduced to respond to changes in waste

treatments or amounts of waste and would not provide the Council with the flexibility it is seeking, nor take the Council's waste management strategy higher up the waste hierarchy. Alternatively, the plant would draw in waste from other parts of the region

7.56 If the Council adopts a Waste Development Plan Document (DPD) or procurement strategy in line with the national Waste Strategy, the volume of residual municipal waste for treatment available for disposal at the proposed plant could decline as recycling initiatives improve and hence there would be greater reliance on the need for non-T&W municipal waste to operate the EfW plant. As mentioned in para 7.10 composting kitchen waste could further divert some 13,000 tonnes from landfill. Further increased waste reduction through increased capture rate of recyclables could reduce the waste to be disposed of to landfill or alternative techniques to below 40,000 tonnes/annum, which is less than the 62,000 tonnes of waste that the proposed EfW plant needs to operate at capacity.

7.57 There is therefore a potential for the proposed EfW plant to prejudice movement up the waste hierarchy and prejudice the evolution of a preferred waste management strategy for Telford & Wrekin that could lead to the government's objective of minimising waste (and the transfer of waste) becoming unviable in the local area. In addition, the flexibility to utilise appropriate treatment technology would be inhibited as waste, which could be treated by alternative means higher up the waste hierarchy, would be incinerated regardless in order ensure that the EfW plant remains commercially viable. As such the proposed EfW plant and the treatment of all T&W residual MSW by EfW, as proposed by this application, would not be in accordance with the national Waste Strategy, PPS 10, WMRSS2 policy W1, JSP policy 65and T & Wrekin Council Municipal Waste Management Strategy.

<u>Change of waste in application</u>

7.58 The applicant's ES assumes that all of the Council's residual MSW is treated at the facility, but the Council has not secured any contracts with the applicant to dispose of waste through this proposed facility. It has also been confirmed by SITA that the Granville EfW plant has the potential to accept and incinerate commercial and industrial waste, but this is a matter for the operator. Officers asked the applicant to demonstrate that there was sufficient waste arisings to operate the plant, which needs 62,000 tonnes per annum (subject to the calorific value of the wastes received).

7.59 In a response letter (1st May 2009) SITA stated that if MSW was not taken into the proposed site, there is still sufficient commercial and industrial waste arising available, *"evidenced by the commercial and industrial inputs into the adjacent Granville landfill site".* No such evidence is provided in Chapter 5 to the ES, although it was subsequently requested**.** In a further reply (24th

September 2009) SITA refer to the Secretary of State's decision of 16th September 2008 on the INEOS Chlor EfW development in Runcorn, in particular *"The sourcing of fuel for the generating station is a commercial matter for the company"* and that *"The SoS* (Secretary of State) *is content that fuel sourcing is not a grounds for refusing the Development*".

7.60 It is considered that the current application is different to the INEOS Chlor application in that it prejudices movement up the waste hierarchy, whereas the Runcorn plant is designed to burn refuse derived fuel, which is the end product of the treatment of raw municipal waste.

7.61 The availability or abundance of commercial and industrial waste may not normally be a material factor in determining an application of this nature, as the viability of a facility is a question for the marketplace to determine. However, it is of concern in the circumstances pertaining to this site. In the event that waste were diverted to the plant from the adjacent landfill, there would be likely to be an impact on the ability to complete the restoration of the landfill in the timescale required under the planning permission. This would lead to a delay in bringing the landfill site back into a use compatible with the countryside and Green Network setting within which the application area lies. This consequential impact has not been considered in the applicant's Environmental Statement, but will be considered later in section g) of this report.

c) Waste Treatment Capacity in the West Midlands Region

7.62 Notwithstanding officer opinion that the EfW proposal would undermine national and regional waste management strategies and policies, there would appear to be spare capacity in the West Midlands Region to deal with the Council's residual municipal waste in the short-medium term until the Council has prepared its Waste Management Strategy as part of the Local Development Framework.

7.63 There would appear to be spare capacity in the West Midland Region from the five existing EfW plants currently operating for the treatment of municipal wastes in the West Midlands. Table 2 below shows their capacity and throughput.

Waste Planning Authority (WPA)	**Authorised (tonnes/annum)**	**Throughput (tonnes/annum)**	**Date**	**% utilisation and source of information**	
Cov/Solihul	252,000	230,000	2007	92%	EA returns
B'ham	350,000	341,000	2007	97%	EA returns
Dudley	105,000	92,800	2008	88%	EA returns
Wolverhampton	110,000	*80,000	2008	72%	Black Country WM Forum
Stoke	210,000	166,044	2007	79%	EA returns
Total	**1,027,000**	**916,600**			

Table 2: Existing capacity from existing West Midlands EfW facilities

* This represents MSW. The total throughput is currently 109,000te/annum, but this comprises 29,000te taken under short term contract to make up the short fall in MSW throughput. A reduction of

up to 20,000 te/a of the 80,000te/a MSW is anticipated in 2011/12 as a result of planned increases in kerbside collection and separate kitchen waste collection.

7.64 The existing EfW facilities in the West Midlands Region therefore have a combined spare capacity in excess of approximately 110,400 (0.11 million) tonnes/year, which could be used to treat the Council's residual MSW in the short term.

7.65 In addition to the existing spare capacity, planning permission has been granted for a 300,000 tonne capacity incinerator at Four Ashes in South Staffordshire, due to become operational in 2014. It is understood that agreement in principle has been reached with neighbouring Waste Planning Authorities to receive 280,000 tonnes/annum in the following amounts of MSW set out in table 3 below.

WPA	Authorised (te/a)	MSW projected (te/a)	Projected % utilisation
Staffs		140,000	
Warwickshire		40,000	
Walsall		50,000	
Sandwell		50,000	
Total	**300,000**	**280,000**	**93**

Table 3: "In principle" capacity allocations for the Four Ashes incinerator

7.66 Thus, as table 3 shows, there is likely to be a surplus of at least 20,000 tonnes/annum treatment capacity at the Four Ashes facility, assuming that all the capacity reserved by Local Authorities is taken up. This is yet to be finally determined. This spare capacity could be used to treat some of the Council's residual municipal waste.

7.67 Permission has also recently been given for additional thermal treatment capacity for waste derived fuel at the Cemex Rugby Cement works. This utilises "Climafuel" derived from non-recyclable paper, cardboard, carpet, textiles and plastics at a rate of up to 15 tonnes/hour, or approximately 13,000tonnesannum. Further significant expansion of Climafuel is proposed (see Para 7.70 below). In addition, there is a merchant anaerobic digestion (AD) facility opening in 2010 located at Gnosall, South Staffordshire with the capacity to the process 30,000 tonnes/annum of food waste.

7.68 These figures demonstrate that there is spare capacity of some 140,000 tonnes at existing and permitted facilities (see table 4 below) that could be utilised as part of an integrated waste management strategy to treat municipal wastes arising in Telford & Wrekin at least in the short to medium term (5-10 years) and until the Council has prepared its Waste Management Strategy as part of the Local Development Framework.

7.69 With regards future waste treatments plants, a planning application has been lodged for a proposed 90,000 tonne EfW plant at Battlefield on the northern urban edge of Shrewsbury, which in the short-term would have a potential

surplus capacity of approximately 9,000tonnes/annum. Planning applications have also been made for a 300,000 tonnes/annum mechanical biological treatment (MBT) plant in Warwickshire at Rugby and Southam, intended to take municipal and commercial/industrial waste and to provide refuse derived fuel (Climafuel) for the rugby cement works. However, it is understood that the intention is to develop only one of the sites. It is not known whether contracts have been entered into for wastes. However, the WMRSS2 identifies that in 2010/11 the requirement for diversion of Warwickshire's MSW waste from landfill is projected at 181,000 tonnes/annum. Even assuming the whole of the Warwickshire's residual MSW were to be diverted to the Cemex site, other than the waste proposed for diversion to the Four Ashes EfW plant, it would leave capacity of in excess of 140,000 tonnes/annum. In addition, it is understood that proposals for anaerobic digestion facilities at Harper Adams University College near Newport are likely to be progressed.

7.70 A summary of the actual, permitted and proposed treatment facilities and their capacities is provided in Table 4 below.

EXISTING Facilities	**Approximate surplus capacity (tonnes/annum)**
Cov/Solihul EfW	21,000
B'ham EfW	3,000
Dudley EfW	12,000
Wolverhampton EfW	30,000
Stoke EfW	44,000
TOTAL existing spare capacity	**110,000**

PERMITTED Facilities	**Approximate surplus capacity (tonnes/annum)**
Four Ashes EfW	20,000
Gnosall AD	9,000
TOTAL permitted spare capacity	**29,000**

PROPOSED Facilities	**Approximate surplus capacity (tonnes/annum)**
Shrewsbury Battlefield EfW	9,000
Harper Adams AD	Unknown

Cemex Rugby/Southam MBT	140,000+
TOTAL proposed spare capacity	**149,000+**

Table 4: Spare capacity from existing, permitted and proposed treatment facilities in the West Midlands

.

7.71 All of the facilities discussed above could either accommodate part of Telford & Wrekin's municipal waste stream, or displace waste from existing EfW plants, releasing capacity that could be utilised by Telford & Wrekin. The Council are currently in discussions with other treatment providers.

7.72 The additional spare capacity identified above in table 4 above does not include permissions granted or lodged for Materials Recycling Facilities (MRF's). No comprehensive study has been carried out of the West Midlands Region as part of this review, but it is known that there are a number of MRF's that have been granted planning permission and become operational in the West Midlands Region since the WMRSS2 was published in 2007, some of which may take a proportion of municipal waste. Hence it is likely that spare capacity available to treat T&W Council's waste would be greater than that shown in Table 4 above.

7.73 Not only is there spare treatment capacity in the West Midlands region, but following a composition analysis carried out by the Council, it is estimated that 22% of residual waste in household bins comprises material types which the Council currently collect from the kerbside, which could be recycled and the Council has plans to further increase recycling rates to 47% as already mentioned in para 7.9. This all serves to reduce the amount of residual municipal waste the Council would have to dispose of. This spare regional capacity can by used by the Council in the short term until it has developed its own Waste Management Strategy.

d) Prematurity

7.74 PPS10 confirms that 'positive planning' has an important role to play in delivering sustainable waste management *"by providing sufficient opportunities for new waste management facilities of the right type, in the right place and at the right time"* (Para 2). Joint Structure Plan policy P65 allows waste facilities where there is a clearly established need for the additional capacity and of the kind of facility being proposed.

7.75 Telford & Wrekin Council's latest predictions for municipal waste generation indicate that the amount of residual waste being generated is at present in decline in view of reduced household waste generation rates. This finding appears to be consistent across the West Midlands region and was noted in the WMRSS2 EiP Panel Report at Paragraph 6.4, albeit not based on the latest figures, although to 2026 there appears to be a small increase in waste projections given the higher regional housing provision now proposed *(WMRSS2 EiP Panel Report Paragraph 6.6).* This means that the existing Granville landfill will therefore take longer to reach capacity and so can

contribute to managing waste for longer than previously predicted. In addition, there are a number of EfW and other waste disposal facilities which are likely to come on stream in the Region over the next 10 years with spare capacity.

7.76 As well as giving consideration to any Treatment Gap within the Borough, the WMRSS2 emphasises the *'continued importance'* of *"coordinating waste planning at the Regional level"* (Paragraph 8.80). This key point was also raised during the WMRSS2 EiP, where the panel noted that *"several WPAs may 'share' a strategic facility for dealing with their requirements"* (WMRSS2 EiP Panel Report Paragraph 6.15).

7.77 In order to respond to local needs and local circumstances, an up to date Telford & Wrekin waste management strategy needs to be prepared and the Council's Waste management Strategy is being revised. This will form part of the emerging Local Development Framework for the Borough taking into account regional capacity and strategic requirements. Whilst the current adopted Local Development Framework Core Strategy DPD does not contain waste policies (in response to the report of the independent inspector on the Telford & Wrekin Core Strategy, where the Secretary of State agreed to the Council's request to withdraw the Waste Policies and Proposals Submission DPD), future waste policies would need to be integrated into the Telford & Wrekin Council LDF Revision. A Revised Core Strategy would include general overarching waste policy and it is anticipated that there would later also be a separate Minerals and Waste DPD providing more detailed policies on this subject.

7.78 Future policy would be based on the consideration of local and regional need and a review of all technologies and potential locations for required facilities. In order to deliver a robust and proper strategy all options would be considered and assessed on their relative merits and shortcomings. As the Council is just beginning the options assessment, it is the view of officers that the proposal for the Granville EfW is premature.

7.79 Significantly there remains sufficient continuing treatment capacity within existing waste management facilities both within the Borough and the West Midlands Region to allow the Council adequate time to properly undertake its LDF Review, adopt a waste management strategy and provide required waste management facilities to provide a continuous service. This is reaffirmed within the recent Landfill Capacity Study, which confirms that *"a shortfall in overall capacity would occur around 2019/2020".* The absence of any pressing short term need means that there is no basis for overriding this basic issue and the proposed EfW plant remains premature.

e) Co-location

7.80 Chapter 5 of the applicant's ES considers one of the advantages of siting the proposed EfW at Granville to be that it would be co-located with the existing adjacent waste management activities of the Granville Landfill Site and

Community Recycling Centre. However, the fact that SITA has control over the application site area should not be given significant weight if there is no clear or beneficial co-location benefits, as well as other policy site selection criteria (see section f below).

7.81 PPS10 does not consider the implications or arguable benefits of co-locating waste management facilities, although it does require local planning authorities to consider a broad range of locations, including industrial sites, for new waste management facilities *(Paragraph 20)*. PPS10 Paragraph 21(i) goes on to note the impact that waste management facilities can have on the wider locality and identifies 'existing and proposed neighbouring land uses' as something for local planning authorities to consider when considering location(s) for waste management facilities.

7.82 The "co-location" of EfW and landfill is not identified within WMRSS2 Policy W5 as a relevant criterion for assessing the suitability of proposed waste management sites. However, Policy SP 2C of the non-statutory WMRWPS notes that, in 'some circumstances', co-locating waste treatment, recycling and landfill facilities may be appropriate.

7.83 Saved JSP Policies P65 and P69 identify co-location as potentially beneficial, noting environmental benefits that co-location could secure such as reducing overall traffic volumes and the costs of transportation *(*JSP Paragraph 16.29*),* neither of which are necessarily relevant with the current application.

7.84 There are two potential advantages of "co-location" of the proposed EfW and the landfill site namely, i) the diversion of untreated wastes in the event of "down-time" for maintenance; and ii) the potential disposal of incinerator bottom ash (IBA).

7.85 There is no evidence that co-location with the Granville landfill site would bring any significant benefits. Plant down-time would be kept to a minimum to maximise the efficiency of the plant. During plant closure it would be necessary to divert delivery vehicles to the landfill, but that would be for a small proportion of the time and those vehicles would use the landfill if the EfW facility were not developed, at least in the short to medium term. The landfill has permission for the deposit of waste for a temporary period, until the end of 2025; hence this apparent synergy would be lost part way through the life of the plant.

7.86 The applicant has expressed its preference for the recycling of bottom ash (IBA) rather than landfill; hence there would be no co-location benefit in the absence of an adjacent IBA aggregate end user, such as block making plant. Further, it is not clear whether the IBA from the plant would be classified as hazardous or non-hazardous. In the event that it is hazardous it would not be suitable for disposal at the Granville landfill as it has an Environmental Permit only for the disposal of non-hazardous wastes.

7.87 The EfW would be located adjacent to the Granville Community Recycling Centre (CRC). There is one potential advantage associated with the "co-

location", namely the diversion of residual waste deposited at the CRC to the EfW plant. This would be an advantage if its co-location caused a reduction in wastes which would otherwise go to landfill over and above that which occurs currently. Neither has been demonstrated, nor can they be assumed.

7.88 It is understood that the provision of CRC sites in the Borough is currently being reviewed. The original Council contract with SITA for the CRC site at Granville has ended and the Council is currently reviewing its overall provision of CRC sites for Telford and the Borough, including searches for appropriate sites. In any event, the optimum location for a CRC is yet to be determined and no benefit of co-location would arise if the Granville CRC were either not to be continued or the locations of other CRCs would cause overall additional journey length from them to Granville. The optimum locations for CRCs for Telford has not been demonstrated and would depend upon journey length and throughput volumes.

7.89 The proposal will generate heat energy which could be utilised by nearby land uses; however the application does not include the provision of a heat recovery facility. The applicant's Supporting Statement does not identify an end user for the heat energy and the application does not provide any details or assessment of the additional pipe work that would be required to export the heat energy beyond the boundary of the site. The benefits of this are there for only assumed and have not been proposed, justified or tested by the applicant.

7.90 There are no demonstrated co-location benefits arising from the siting of the EfW adjacent to the landfill - or indeed the proximity to other land uses which could utilise the waste heat energy produced at the site - which have been submitted and can be assumed, nor are there demonstrated co-location benefits arising from the siting of the EfW adjacent to the Community Recycling Centre.

f) Location of waste management facilities

7.91 Even if there is evidence that additional waste treatment capacity is required, there would still be a need to assess whether the proposed site is appropriate for the proposed use. Just because the applicant owns the site and the adjacent Granville landfill site, is not justification alone that the development should be sited at Granville.

7.92 The criteria for the identification of suitable sites for waste management facilities are provided nationally in PPS10 at Paragraph 21. Sites should be assessed against the following criteria:-

- *the extent to which* [the development] *supports policies in this PPS;*
- *the physical and environmental constraints on development, including existing and proposed neighbouring land uses (see Annex E of PPS10);*
- *the cumulative effect of previous waste disposal facilities on the well-being of the local community, including any significant adverse impacts*

on environmental quality, social cohesion and inclusion or economic potential;

- *the capacity of existing and potential transport infrastructure to support the sustainable movement of waste, and products arising from resource recovery, seeking when practicable and beneficial to use modes other than road transport".*

7.93 In addition priority should be given *"to the re-use of previously developed land, and redundant agricultural and forestry buildings and their curtilages"*.

7.94 Regional policy W5 in WMRSS2 develops the criteria in PPS10 and requires sites in the first instance to meet local environmental and amenity criteria and to be:-

- *Sites with current use rights for waste management purposes*
- *Active mineral working sites or landfills where the proposal is both operationally related to the permitted use and for a temporary period commensurate with the permitted use of the site;*
- *Previous or existing industrial land*
- *Contaminated or derelict land*
- *Land within or adjoining a sewage treatment works or*
- *Redundant agricultural or forestry buildings and their curtilage."*

7.95 The proposed site does not have current use rights for waste management purposes. It is neither an active mineral working site nor a landfill facility. The proposed EfW facility would be a permanent rather than temporary use. The land does not have a previous or existing industrial use and is neither contaminated nor derelict. It is not within or adjoining a sewage treatment works and it does not include redundant agricultural or forestry buildings and/or their curtilage. The proposed site is none of these locations as it is predominantly greenfield land adjacent to the Granville landfill site. Hence the location of the proposed EfW on the site at Granville is contrary to WMRSS2 policy W5 and PPS10.

7.96 In addition, Regional policy W7 of the WMRSS2 sets out criteria that must be met if waste management facilities are to be permitted on open land, such as the proposed site at Granville. Facilities would be permitted in the following circumstances:-

- *Where they* ***are close to the communities producing the waste*** *and*
- *Where there are* ***no preferable alternative sites*** *and*
- *Where it would* ***not harm the openness of land*** *or the objectives of greenbelt*
- *Where it can be demonstrated to be* ***necessary to support an existing essential activity*** *and to facilitate other key development*
- *Would assist* ***in agricultural diversification*** *or*
- *Would* ***not adversely affect the biodiversity*** *and geodiversity value of the area."*

7.97 The applicant has not demonstrated that the proposed EFW plant is necessary to support an existing essential activity and to facilitate other key

development. The applicant makes reference to co-location benefits of locating the proposed EfW adjacent to the landfill site so that residual bottom ash could be disposed of in the adjacent landfill site. However, this argument is somewhat limited as the applicant says they prefer to recycle the bottom ash, and so there is no benefit of being next to the landfill site. In any event the existing landfill site does not need or depend on the proposed EfW and no argument to this affect has been forwarded and this has already been discussed in section d). No argument has been put forward that the proposed EfW plant is a necessary agricultural diversification. Officers do not consider that the proposal would significantly or adversely affect the biodiversity and geodiversity value of the area. The application site does not fulfil the locational criteria in WMRSS Policy W7 – alternative sites and openness of land are discussed in detail in sections g) and h) below.

7.98 With regards preferable alternative sites, this will be discussed later in section h) below. The applicant has looked at other sites and these are examined in their ES. The ES concludes that "*the application area would generate a Slight/Moderate landscape impact on the surrounding landscape, mainly through aesthetic and perception changes to the local landscape as a result of the large scale nature of the proposed building. The increased level of activity caused by additional vehicle movements would also add to any change caused".*

7.99 However the Council has commissioned work by external planning and landscape consultants to look at alternative sites and the effect on the openness of surrounding land and these are examined in more detail later in sections g) and h). The section concludes that more preferable sites exist on existing industrial and brownfield land, without the need to encroach into Green Network or harm the openness of the surrounding area and delay the restoration of the landfill site back to open land.

7.100 It is necessary to comment here that the proposed EfW site at Granville did feature in a report prepared in 2005 by consultants Heaton Planning Ltd on behalf of the Council for the preparation of the Preferred Options Waste DPD. The Heaton report identified the proposed Granville EfW site as one of the preferred locations and the most suitable in land use terms for MBT and EfW facilities. The Heaton Report was the basis on which the Preferred Options Waste Development Plan Document was published in September 2005. However the Waste DPD was withdrawn (see 7.102 below) and has no weight.

7.101 The proposed EfW site at Granville was not identified in a 2006 Entec report entitled "Identification and Assessment of Suitable Waste Treatment/Resource Waste Management Sites" in Telford & Wrekin, which was a confidential report prepared for the Waste Procurement Process.

7.102 The Council's Core Strategy (CSDPD, adopted December 2007) does not contain waste policies in response to the report of the independent inspector for the strategy (12th November 2007) and that the DPD was withdrawn following criticism from the Inspectors responsible for the Independent

Examinations of Telford and Wrekin Core Strategy and Waste Development Plan Documents. Of particular note is a comment in the Inspector's report: " *Paragraph 2.10 of PPS12 says that broad locations should be indicated for the delivery of strategic development, including essential public services. Whilst most of the waste management and treatment sites areas would be within the areas defined for development in the spatial development strategy, the main landfill site to be used for the disposal of municipal, commercial and industrial waste during the plan period is outside this area. A separate statement may be needed in the plan about this site. In addition the core strategy could be more specific in emphasising the role of existing industrial areas as locations for waste treatment and energy recovery*".

7.103 In their Informal Comments on the Waste DPD, the Inspectors state: "*Whilst the spatial development strategy guides development to the existing urban areas, the Granville site is outside this area and therefore a statement needs to be included specifically about the broad locations for the development of waste facilities. The justification for the development of the allocated sites for specific types of waste development could be included in the DP*".

7.104 Thus there is clear guidance from the Inspectors that waste development outside the urban areas defined for development requires clear justification. No such justification was given in the Entec report or draft DPD for those areas and the draft DPD has been withdrawn and has no weight in the consideration of the Granville EfW planning application.

g) Impact on Green Network and Landscape

7.105 Site selection criteria for waste management facilities are set out in regional policy W7 of the WMRSS2, (as already mentioned in section f) and require, in addition to other criteria, that the development does "*not harm the openness of land"*. In addition, JSP Policy P67 and WLP Policy NR1 both only permit the siting of waste management proposals where it can be demonstrated that the proposal will not have unacceptable adverse impacts on interests of acknowledged importance.

7.106 Para 16.35 JSP Policy P67 states "*Telford & Wrekin have a range of international, national and locally sensitive sites or areas of wildlife, landscape, historical, archaeological or geological importance. If a more sustainable approach to waste management is to be achieved such sites and species need to be properly protected".* The *'locally sensitive sites'* would include Telford's Green Network.

7.107 The application is for a building of considerable mass located in a commanding position on elevated ground to the north-east of the town. Although the site lies within the defined settlement limit of the town, it is also located in a 'greenfield' location on the town's interface with the open countryside, and this is part of a larger swathe of Green Network that extends northwards to the southern edges of Muxton and eastwards towards Redhill Way

7.108 The application site abuts the Community Recycling Centre and an operational landfill site. The latter will be operational under a temporary planning permission that is valid until 2025. Both uses presently have a degrading effect on the physical and perceived character of the site's immediate landscape context, but unlike the proposed EfW scheme, they are not permanent uses. The eventual restoration of the landfill site back to open countryside, when disposal of waste ceases, would enhance its appearance and openness and encourage recreational enjoyment of the area. It is therefore appropriate to consider the suitability of the proposed development in light of present and future appearance of the landfill site. Significantly the applicant's ES conclusions regarding the impact of the scheme on landscape character fail to adequately acknowledge the substantial change that the site and its immediate surroundings would undergo in the medium term as the operational life of the Granville landfill site comes to an end and is restored in accordance with the restoration proposals.

7.109 Officers consider that the development proposals have the potential to directly remove land from the Green Network and to adversely impact on the landscape character and visual amenity of the adjacent parts of the network.

7.110 To assist in the assessment of the degree of impact of the proposed EfW plant on the urban fringe, wider landscape setting and the Green Network, the Council commissioned independent landscape consultants EDP to review the landscape assessments undertaken by the applicant's own consultants (SLR Consulting) in order to understand the local landscape context and to be able to judge the likely significance in landscape terms of the EfW proposal.

Green Network

7.111 Consideration needs to be given as top whether the proposal is compliant with the aims of WMRSS QE4 and with WLP policies OL3 and 4 of the WLP, and Core Strategy policy CS11 which seek the identification and protection of a linked network of urban green space and Green Network. The openness of land in the vicinity of the site is in part due to the Council's designated protective Green Network policies and the location of the site on the urban/countryside fringe. The site and its immediate surroundings (but not the landfill site) lie within allocated Green Network under Wrekin Local Plan Policies OL3 and OL4.

7.112 Within Telford, the Council has identified a 'Green Network' which is protected from unsuitable development. Paragraph 8.2.12 of the WLP describes the Green Network as an *"… interlinked system of open land and landscape within the town, which has a collective value for ecology and nature conservation, recreation, access and visual quality".* Notwithstanding this the Council recognises the issues affecting urban fringe areas, requiring that the *"problem of pressure for development on the open land resource"* is addressed and that appropriate recreational uses are encouraged in this area *(WLP Paragraph 8.2.6)*. Policy OL6 protects locally important incidental open land within or adjacent to built-up areas *"where that land contributes to the*

character and amenity of the area, has value as a recreational space or importance as a natural habitat".

7.113 Land is designated as Green Network because if fulfils one or more of six defined aims. In brief, the aims are (1) to maintain Telford's image as an attractive place to live and work (2) to retain and enhance the individual identity of different parts of the town (3) to provide easily accessible 'green lungs' which relieve congestion and provide visual variety (4) to provide open land to meet recreational needs (5) to protect, enhance and maintain Telford's ecological and geological heritage and (6) to provide open space linkages through which different parts of the town can be joined. Paragraph 8.3.10 of the WLP states that *"Land does not have to meet all six aims and objectives of the Green Network to be included within the designation – it may fulfil only one of the aims or all six, but more usually it will fulfil a combination of several aims".* Indeed this is the case for the application site at the present time, which, in combination with the land around it, fulfils either directly or indirectly most of the six aims and objectives of the Green Network. Indeed its importance to the surrounding Green Network will, arguably, increase once the landfill site is reclaimed and publically accessible, offering enhanced views across the site.

7.114 The Green Network is recognised as providing a characteristic and important asset for recreation purposes as well as offering a landscape backdrop to developed parts of the urban area. A 2003 assessment of the Green Network considered it to be a resource that should be *'protected'* and *'enhanced'* (LDF Environment Technical Paper, September 2005, Section 5, Page 8). Accordingly land within the designated Green Network is protected in order to achieve the six important aims set out in para 8.2.12 of the WLP, although land does not have to meet all six aims and objectives to be included within the designation (Paragraph 8.3.10).

7.115 It is evident that all, apart from the fifth Green Network aim, are fulfilled by the application site in its current state and indeed all would be fulfilled once the adjacent landfill site has been restored following its cessation in 2025. Furthermore, construction of a permanent EfW facility at the proposed site would visually and physically fragment the area and would have a greater effect on this vulnerable greenfield, Green Network urban fringe area than the site itself.

7.116 The development of an EfW facility at the Granville site, with its large building (105m x 65m x 32m high) and a 65m high chimney stack, would introduce a permanent structure and reduce the quality of the environment and cause a major setback to the regeneration of this area over time following the closure and restoration of the adjacent landfill to beneficial recreation use for the wider community. It would instead establish the Granville locality as the 'waste management' area of Telford, undermining the future aspirations of a high quality environment of an area which includes Granville Country Park and helps attract investment into the Town. Whilst the existing landfill site is a sizeable operation with various temporary office buildings and car parking,

these features would eventfully be removed when the landfill site ceases receiving waste and the land is restored to open countryside.

7.117 Policy QE4 of the WMRSS1 provides advice to LPAs regarding the protection afforded to 'Greenery, Urban Greenspace and Public Spaces". It states that LPAs should "*develop appropriate strategies to ensure that there is adequate provision of accessible, high quality urban greenspace"*. It also states that development plan policies should '*create and enhance urban green networks*' by '*ensuring adequate protection is given to key features'* of the greenspace networks and ' *linking new urban greenspace to the wider countryside*'.

7.118 The importance of the aims of the Green Network was emphasised in the Inspector's Report published in April 1998 for the Wrekin Local Plan Public Inquiry (held in 1997), which stated that *"the importance of the concept's environmental thread cannot be overemphasised: part of it comprises not just the retention of ecological and wildlife interest with its links via corridors, woods and open space to other areas, important as that is; but it also includes significantly the key to sustain the attractiveness of Telford itself, for residents, visitors and investors, as part of Telford's own investment in the future*".

7.119 The Council *"wants to protect the open land resource of Telford that has been the legacy of the planning of the 'new town'"* (WLP Paragraph 8.3.13), however there may be occasions when the release of Green Network land could be accommodated, provided that the development meets the three stringent and overlapping criteria set out within Saved Policy OL4 of the WLP, namely that:

- *there are exceptional circumstances;*
- *it contributes or is complementary to the aims of the Green Network; and*
- *environmental and community benefits are an integral part of the proposal.*

7.120 In addition, CS Policy CS11 protects all open space, including Green Network, unless it can be demonstrated that the proposal would deliver significant community and environmental benefits (and the land does not contribute to open space standards).

7.121 The proposed EfW facility does not meet the first test of Policy OL4 of 'exceptional circumstances'. Para 8.3.13 of WLP policy OL4 states that "*Exceptions should be restricted to predominantly open land uses*" and goes on to give examples of open land uses as open areas of nurseries/garden centres; composting and recycling schemes; solar panels and other renewable forms of energy production; or alternative transport systems, such as Light Rapid Transit. Renewable forms of energy suitable for the Green Network are intended as 'low key' energy production (i.e. solar panels), and not major built infrastructure such as the proposed EfW plant.

7.122 The proposed EfW facility also does not meet the second test requiring development to contribute to or be complementary to the aims of the Green

Network to ensure that the interlinked system of open land and landscape within Telford (the Green Network) is not compromised.

7.123 The importance of protecting the integrity of the Green Network in this location will increase and be given further meaning once the landfill site (the only parcel of land in the immediate vicinity not designated as Green Network) is restored, thus restoring the integrity of open space uses in the area. The Green Network in this area '*feels'* more rural than urban and accentuates the sense that the site lies not within the urban area, but in a rural fringe location.

7.124 This rural feel is presently dispelled only by the operational landfill site which is the only parcel of land in the area not to have been designated as part of the Green Network. But in due course, the approved land reclamation scheme at the landfill site will create an informal/semi-natural appearance through the planting of broadleaved woodland, scrub, reed beds and grassland, all bisected by footpaths connecting the area to the Country Park and golf course. When restored, the landfill site will return to a use compatible with the purposes of the Green Network at which time, it may be appropriate to consider including the restored landfill site within the Green Network to unify it this side of the town.

7.125 With regards the third criteria officers consider that the proposed Efw facility does not provide a "community benefit". Policy OL4 describes examples of community benefits such as community and recreational facilities, pocket parks, access points, footpaths, cycle/bridleways; environmentally friendly public transport systems; signing and interpretation; lighting; road safety measures. Although the proposed visitor centre would play a small role, officers do not consider this to be an overriding community benefit to justify departure from policy OL4 and CS11.

7.126 An EfW plant would provide a facility for the incineration of waste generated by the 'community' of Telford and its region and is not considered a community benefit itself. Nowhere in the WMRSS or in the Council's Core Strategy DPD is there the suggestion that an EfW site would be within the definition of a "community facility" itself. Indeed, paragraph 8.89 of WMRSS2 makes it clear that waste management facilities should not be considered in the context of community facilities and advises that the two should not be developed close to each other.

7.127 An EfW facility at the Granville site would be detrimental to the wider setting of the urban fringe and countryside to the east of Telford, including Granville Country Park, which is considered "*one of the largest and most wildlife diverse areas in Telford, with its pit mounds, canal, woodland and relics of industrial activity. Hidden among the bird filled woodland are treasures such as an old engine house and furnace. Paths, which have recently been resurfaced, and bridleways… offering visitors a pleasant stroll through a landscape transformed from grim and uninviting industry to green and open countryside"* (Telford & Wrekin Council Website – Parks and Open Spaces – Granville Country Park).

7.128 The strong link between the Granville landfill site and Granville Country Park is reiterated in the Council's Committee Report for the extension of the Granville landfill site (W2006/0232 - 12th December 2007). This acknowledges that the application *"cannot be considered in a vacuum without regard to the surrounding area. It is very important to remember that Granville landfill site lies adjacent to Granville Country Park, a very important recreational area for the local community…"* Given that the proposed site lies between the Granville landfill site and the Country Park, the link between the EfW application site and Granville Country Park becomes a more relevant consideration to this application.

7.129 The landfill restoration proposal is fully in accordance with JSP Policy P69 which 'looks favourably' upon restoration schemes that *"contribute to improving landscape character"* or *"encourage or enhance public access"*. Furthermore JSP Paragraph 16.40 places the duty on developers to *"demonstrate that their proposals would protect and where possible enhance the overall quality of the environment once extraction or disposal has ceased"*.

7.130 These policy aims were considered within the Plans Board report for the more recent application at Granville for an extension of the landfill site, which noted that the restoration proposals offer *"far greater ecological and recreational value than the current pasture fields and therefore represents ecological and community gain"*. Therefore, once established, the characteristics of the Granville landfill site would revert back to urban fringe/countryside and the new paths would improve access to and the amenity value of this area further. Indeed, the restoration of the landfill site for public open space has been a public expectation for some years; the Committee Report for the original landfill planning permission (Ref: CC88/40) notes that:- "*The proposed restoration and after-use for public open space accords with the planning policies for the area. The western stockpile would be progressively restored for use as part of the Granville Country Park...*" *(Paras 6.13-6.15).*

7.131 To achieve this Conditions 25-30 imposed on planning permission CC88/40 relate to restoration and aftercare and seek to ensure an ordered and progressive working and restoration of the site within established timescales, with due regard to the proposed after uses. Condition 27 requires the area to be soiled and seeded to an agreed specification within six months of any phase of the Disposal Site attaining final soil levels, following which a five year aftercare period commences (Condition 28).

7.132 Whilst the proposed EfW facility would not affect the improved access to the adjacent land *per se*, the desirability of the land as a recreation route would diminish and the quality of experience would be significantly affected. Should the proposed EfW facility be developed it would have a permanent and negative impact on the area due to the industrialising nature of the development, the continued use of local roads by HGV traffic and the scale of the development proposed would visually dominate the area. The future use of the area as a public recreation resource would also be undermined. This would conflict with the future character that the Council envisages for this

area, being an amenity area for quiet enjoyment of the countryside and open space recreation.

7.133 The proposed scheme would provide some limited environmental benefits immediately at the site, such as ponds for wildlife, water storage and water attenuation ponds, as well as a landscaped earth screen bank, woodland planting along the northern and eastern site edges, and infill hedgerow planting. However, officers do not consider these provisions in themselves are of such a significant scale, nature or purpose to warrant justification of the proposed EfW on environmental benefits.

7.134 The overall conclusion of officers on this matter, shared by landscape consultants EDP, is that the EfW facility would significantly encroach into the Green Network and would erode the individual identity of this part of the town, would conflict with the aim of providing an appropriate supply of open land and indeed would remove the site from the Green Network whilst also having a negative impact upon the future recreation area that would be adjacent to the site following completion of the landfill reclamation proposals. It is therefore contrary to the aims of the Green Network (policy OL3) and to the tests for acceptable development within it (OL4 and CS11). Policy OL5 deals with 'extensions and redevelopment' within the Green Network. In no meaningful sense could the proposal qualify as an 'extension' under the provisions of this policy; even if the EfW were to be looked at in planning terms as an 'extension' to the landfill site it does not meet the tests for acceptability within OL5, particularly the test which requires development to be compatible with the long term aims for the Green Network in the locality. Officers consider that there are no material considerations to justify going against Green Network and Open Space policy and hence is contrary to WMRSS2 Policies QE4 and W7 and WLP policies OL3 and OL4, Core Strategy policy CS11.

Landscape

7.135 The Council's consultants The Environmental Dimension Partnership (EDP) comment that the applicant's landscape methodology and fieldwork is substantially compliant with relevant 'best practice' guidance as used by landscape practitioners, but have a number of reservations about the landscape chapter of the ES itself. EDP considers that whilst the issues do not individually comprise 'fatal flaws' in the ES, they leave the reader unclear about the true visual effects of the proposal and their significance in landscape terms. EDP suspects that the applicant's conclusion that the "*Visual impact of the proposed development would be widespread...although in most cases the level of impact would be very low"* underestimates the magnitude and significance of the impacts likely to be experienced.

7.136 These concerns relate to a number of factors including (a) viewpoints within the urban areas are considered to be under-represented in the assessment (b) the fact that some of the photomontages do not illustrate the scheme in wintertime 'worst-case' circumstances (as is required by published guidance) (c) the failure to adequately define clear thresholds between one level of

impact and another, resulting in some opacity regarding the degree to which the magnitude and sensitivity to change is defined and (d) the landscape chapter of the ES does not provide an adequate assessment of potential night time effects of the proposal.

7.137 There are a number of relevant policies in terms of the proposal's siting in landscape terms. Relevant policy related to the siting of waste management proposals includes JSP Policy P67 of the JSP and WLP Policy NR1 – both of which permit the siting of waste management proposals where it can be demonstrated that the proposal will not have unacceptable adverse impacts on interests of acknowledged importance.

7.138 The site lies in a commanding position on elevated land to the north-east of the town. As such, development of the scale and mass proposed has the potential to affect both the setting of the town and the character of the wider rural landscape as the site would be visible from across wide areas within the town, the Green Network and landscapes to the north of the town.

7.139 There are several location considerations to assess. First is whether the proposed location development is compliant with JSP policy P67 and WLP policy NR1 both of which require that "...p*roposals for waste management development must not impact on interests of acknowledged importance.."* - such 'interests' include landscape character. Second, whether the proposal is complaint with the aims of Policy QE6 of the WMRSS with regard to the effects of the proposal on landscape character and the *'use, management and enhancement' o*f the urban fringe.

7.140 JSP Policy P67 deals with the environmental considerations to be considered when assessing applications for waste management and states "*Proposals for waste management development will only be considered where it can be demonstrated that there will be no impacts on interests of acknowledged importance other than in exceptional circumstances and where it has been demonstrated that development is in the public interest"*. One of six 'key interests' is landscape character. The policy further states "*Areas of designated landscape or nature conservation value will be protected from waste management development unless there are exceptional circumstances and where it has been demonstrated that development is in the public interest*".

7.141 Policy QE6 of the WMRSS requires LPAs to adopt policies and proposals which "...*conserve, enhance and where necessary restore the quality diversity of the landscape character throughout the region's urban and rural areas."* Mention is made specifically to the objective of taking a *"...positive and integrated approach to the management and enhancement of the urban fringe" (*para (ii)) and giving due regard to factors such as tranquillity and the minimisation of noise and light pollution. (para (v)).

7.142 WLP Policy NR1: Location of Renewable Energy Developments states that the Council would assess proposals for renewable energy generation on a site by site basis. Proposals should meet a number of conditions, the first of

which is that the proposal "*should accord with other policies in the Plan, particularly those regarding Countryside and Open Land and the Historic environment*

7.143 The site will be seen from the open countryside as well as from within the town and it therefore has the potential to affect the character and visual amenity of the wider rural landscape as well as the urban 'Green Network' of which the application site forms part. The site's location at the interface of town and country is evidenced by the site's location on the boundary of two landscape character areas as defined in the 'Shropshire Landscape Typology' - to the east lies the open and contiguous rural landscapes of the 'Estate Farmlands', while to the west lie the 'Coalfields'. The proposed development of this mass has the potential to affect both landscape types.

7.144 Beyond the landfill site to the north and east, the general landscape context for the proposed EfW site is farmland, characteristically greenfield land with sporadic small-scale development such as single dwellings and businesses linked to 'the land' such as horse riding stables and kennels. There are no large scale buildings in the vicinity of the site that could provide an appropriate location and landscape context for an EfW facility. While some large industrial buildings do exist nearby, this is not justification alone for a building of the mass of then proposed EfW building as there are locational differences. The buildings at the Business Park buildings are different because they are on land that is significantly lower than the application site meaning that they are not seen as a skyline feature in the same way as will the EfW proposals; they are closer to and better integrated with the urban area rather than separated from it by the open land of the Green Network; and they are built on allocated employment land rather than in the Green Network and so are tested against a wholly different set of planning criteria.

7.145 Paragraph 8.2.7 of the WLP states that "*The Council does not want to see the edges of the town eroded or spoilt and has therefore undertaken landscape appraisals of Telford's urban fringe… The north east (*of the town) *includes the attractive and sensitive landscape between Telford and Lilleshall with a mixture of future housing development, Granville Country Park and recreational uses".*

7.146 A recent assessment of housing capacity around the fringes of Telford undertaken for the Council by White Consultants in May 2009 looked at possible areas for residential expansion around Telford and commented that land in the vicinity of the proposed EfW site "*has no capacity for housing as it is a rural use away from the settlement edge. The tip and pylons are no justification for housing development nearby"*.

7.147 In summary officers consider, and the consultants concur that there are 'interests of acknowledged importance' in landscape terms which would be harmed by the siting of an EfW plant in this location and as such the proposed development is not compliant with the requirements of WMRSS2

Policies W7 and QE6, JSP policy P67 nor with the requirements of WLP Policy NR 1.

7.148 Turning to the issue of designated landscapes, the relevant policy here is Policy OL2 'Designated Areas'. The site does not lie within any national or local landscape designations; the closest statutorily protected landscape, the Shropshire Hills Area of Outstanding Natural Beauty (AONB), is located approximately 7kms south-west of the site. There is very limited, if any, indivisibility between the application site and the statutorily protected landscape of the AONB and hence officers are satisfied that the proposals will not have an adverse impact on the AONB.

7.149 The 'Strine Levels' Area of Special Landscape Character (ASLC) lies approximately 4.5km to the north west of the site. There are locations within the Strine Levels from which the site and the development proposed will be clearly visible and the Council's consultants consider that the applicant's ES has underestimated the significance of views from the Strine Levels. However, due primarily to the considerable distance between the viewer and the development, it is considered that any effects on the character and visual amenity of the Strine Levels will not amount to a 'significant effect' in landscape terms

h) Alternative Strategy and sites

7.150 It is only necessary to consider alternative sites where a proposed site is found to cause harm in policy terms (i.e. in conflict with the aims of the Green Network). A requirement of alternative sites is therefore that they cause less harm or are acceptable in policy and locational terms. Sites that cause equal or worse harm as the site originally proposed should automatically be discounted.

7.151 Alternative sites should be considered in the context of policy and then against effects upon amenity and the likelihood of them being acceptable locations. An alternative site assessment was initially done by the applicant and is contained in the ES – the short-list of the applicant's sites are in Para 3.37 above; however the Council's consultants also undertook their own independent assessment of alternative sites.

7.152 The most favourable alternative sites would be allocated employment sites of sufficient size where there would be no encroachment into Green Network, no harm likely to be caused to residential or other amenity and which have acceptable or good access by heavy goods vehicle and are sustainable in terms of Telford.

7.153 The alternative site assessments undertaken by the applicant and the Council's consultants focused on potential sites within the Telford area that could accommodate an EfW facility of the size and scale proposed by the applicant. However if a comprehensive waste management alternative sites assessment were undertaken a multiple stage approach could be adopted which would consider all waste management options (e.g. Anaerobic

Digestion) and indeed may find that EfW is not the optimal or best waste management solution for Telford. This waste management 'strategy approach' would also consider utilisation of spare capacity elsewhere, and has not yet been undertaken as the need is not substantial at the present time. To second guess the outcome of this is therefore premature (as already discussed at section d).

7.154 For the sake of the site selection process undertaken by the Council's consultants, 2 hectares was established as a site of sufficient size to accommodate an EfW facility of the size and scale proposed. The option of redeveloping vacant buildings was not explored. This does not mean that waste management facilities could not be accommodated on smaller sites or through the redevelopment of vacant buildings; rather these parameters were set to focus the initial alternative site search in order to establish whether there are preferable alternative site(s) to the application site in principle.

7.155 The applicants short listed 13 alternative sites as part of an initial desk based assessment, of which they selected 9 (including the application site) for further evaluation and appraisal. The sites are listed in Para 3.45 above.

7.156 The applicants concluded that the application site was the most appropriate site because it had been allocated at one time in the emerging Waste Development Plan Document (now withdrawn). They considered the site to be away from significant built up areas and residential development, it is an existing waste management site, has good access to the primary road network and that the Green Network and landscape impacts can be addressed.

7.157 The Council's consultants looked at the applicant's alternative sites and any others they considered would be appropriate. The consultants' report contains details of their methodology, site selection and site discounting and this can be inspected. A summary of that process and main findings on alternative sites is set out below.

7.158 A four-stage site assessment methodology was employed in order identify and discount less suitable sites at an early stage and ensure that a detailed assessment was undertaken of those sites that could be realistic appropriate alternatives to the proposed application site.

7.159 Stage 1 was a desk based exercise that identified 95 potential sites.

7.160 Stage 2 discounted 23 sites for being below a 2ha size threshold, leaving 72 sites. The 2 ha threshold was identified in order to limit and restrict the search to those sites that could more readily accommodate a waste management facility (either an EfW facility or one based on alternative waste management technologies). This size is also the approximate size of that part of the application site which accommodates the built development and associated uses but excludes the landscaped bund and mounding area.

7.161 Stage 3 sought to identify which of the 72 remaining potential alternative sites were *unavailable* and/or *unsuitable*. Sites were identified as *unavailable* if they were currently occupied, currently being developed and known to be currently promoted for alternative uses. Importantly, sites which have been developed but which are vacant or for sale on the market were not included and would be additional to the sites considered. Sites were identified as *unsuitable* if they met identified criteria in relation to proximity to sensitive receptors such as residential uses or community facilities; landscape impact; site conditions such as land stability, presence of land raising materials or large on-site water bodies; poor access, Local Plan allocation; allocation within the Central Telford Area Action Plan (i.e. as a Gateway site) and distance from Telford's built up boundary (sites further away from this boundary are less preferable as they are more likely to be in the Green Network/have other open space/greenfield land protection). This filtering process then left a remaining 17 sites considered as being potentially appropriate for a waste management facility. Significantly the application site was discounted at this stage and hence is not considered suitable, but that there are alternative more preferable sites. The proposed EfW site would have been discounted as this stage for being within the Green Network.

7.162 Stage 4 undertook a fuller planning assessment on the remaining 17 sites to determine whether they were clearly suitable for development of the type, scale and height as proposed at Granville. Although the Granville site itself was discounted within Stage 3, a detailed assessment of the application site was also undertaken in order to allow comparisons to be drawn.

7.163 The remaining 17 alternative sites selected by the Council's consultants are listed in table 5 below.

Site and Group	**Site No.**	**Site Name**
Group 1 Halesfield Industrial Estate	21	Land west of Horton Lane
	23	Land east Hortonwood 40
	24	Land east of Horton Lane
	25	Land SE Hortonwood 60
	26	Land SW Hortonwood 60
	44	Land west A518
	46	Land north of Hortonwood 60
Group 2 West Hortonwood Industrial Estate	12	Land south Queensway (A442)
	11	Land west Silkin Way
	11A	Land east of Silkin Way
Group 3 Allscott	96	Land at former sugar beet factory
Group 4 Halesfield Industrial Estate	19	Land east of Queensway (A442) – former rail freight allocation
	90	Land north of Halesfield 16
Group 5 Nedge Hill	37	Land south of A464
	38	Land west Naird Lane
Group 6 Donnington Wood Bus Park	2	Land south Granville Road
	3	Land north Granville Road

Table 5: Preferable alternative sites (selected by the Council's consultants NLP)

7.164 Generally, a location on the northern and/or eastern outskirts of Telford is most appropriate given the prevailing wind direction being from the south west, away from the main residential areas.

7.165 All of the alternative sites appraised above are allocated for employment use apart from the former British Sugar Beet factory site near Allscot (Site 96) and Site 19 (Halesfield) which is allocated for a rail freight terminal but is no longer required following the development of the RFT at Hortonwood. This is in stark contrast to the Granville EfW site which is allocated as part of the Green Network by the Local Plan. In addition, these sites would not involve the loss of so much 'best and most versatile' agricultural land, which PPS7

7.166 Suitable sites within Hortonwood Industrial Estate (Group 1 sites) and sites located west of Hortonwood Industrial Estate (Group 2 sites) were found to be more accessible than the Granville site and less sensitive with regards to landscape/visual considerations. Development of sites at Group 2 were however, not considered suitable based on the sites' proximity to sensitive uses (i.e. nursery and residential development). The former British Sugar Beet factory at Allscott (Group 3) is brownfield in nature, although it is not as accessible as the Granville site.

7.167 The two sites within Halesfield Industrial Estate (Group 4 sites) are more appropriate for a waste management facility than the Granville site given their location within the established Halesfield Industrial Estate, which make them a suitable alternative location for a waste management facility. Pedestrian and cycle links under the railway and Queensway are provided on land adjacent to the sites, creating a good link with the large residential areas of Brookside and Stirchley.

7.168 Road access to two sites at Nedge Hill (Group 5 sites) is good with quick links to the M54 and Queensway (A442). Group 5 sites are also more appropriately located away from sensitive land uses and, being located at a lower elevation, Site 37 is less exposed than the Granville site which would minimise the visual impact of a waste management facility at this location.

7.169 Both sites 2 and 3 in Group 6 are similar to Granville in terms of road accessibility, although public transport and cycle/pedestrian linkages are considerably better. Both sites are not as exposed as the Granville site given their flat topography and elevational setting in the landscape.

7.170 Site 2 is a brownfield development plateau whereas Site 3 is previously developed land. Notwithstanding this, further investigation would be needed to ascertain the availability of Site 2 given it is owned by the adjacent dairy.

7.171 The assessment shows that having considered a limited number of sites there are appropriate alternative available sites which could better accommodate a waste management facility than the proposed site at Granville. Most identified sites exhibit clearly more suitable site characteristics and would be in accordance with policy. The Council's consultants consider the alternative site assessment undertaken by the applicant to be flawed. Indeed, had the

Granville site been included as a potential alternative waste management site at the outset of the consultant's assessment, it would have been discounted at Stage 3 given its inappropriate Local Plan allocation as Green Network.

i) Air Quality and Health Impact Assessment

7.172 There is much concern amongst residents about the emissions from the proposed EfW and the harmful affects they may have on human health, particularly to those residents living closest to the plant. There are two matters here to mention. The first is the way in which incineration facilities require permits to operate and are regulated and monitored to ensure they operate within the safe emission levels set by European Directives in order not to harm health and the environment; and second the various scientific research on pollutant and particulate emissions from incinerators.

7.173 All waste facilities including EfW incinerators are regulated to prevent or minimise risks to the environment or health. The requirements of the EU Waste Incineration Directive (2000/76/EC) are incorporated into the Environmental Permitting (England and Wales) Regulations 2007 (EPR) (which in April 2008 replaced *the Pollution Prevention and Control (PPC) (England and Wales) Regulations 2000).* Under these regulations the proposed EfW facility would require an environmental permit before it can operate. These permits are issued by the Environment Agency (EA).

7.174 Operators of waste incinerators are required to monitor emissions to ensure that they comply with the limits set out in the Waste Incineration Directive, which sets strict emission limits for pollutants. Waste incinerators used to be some of the largest producers of harmful substances like dioxins, but the EA advises that now these facilities are amongst the lowest polluters. The EA would be involved in the monitoring of emissions to ensure they fall within the strict European limits. In addition, the National Air Quality Strategy (NAQS) defines air quality standards and objectives setting out air quality concentrations of various emissions that must not be exceeded. These are implemented in various statutory instruments.

7.1765The EA's position statement says it *"would not issue an environmental permit…if we consider that it would cause significant pollution to the environment or harm human health"*. On receiving an application for a permit the EA consults other bodies including the Primary Care Trust and the local community on their views on the potential affect on the environment and public health. An environmental permit would only be issued if the plant is designed, constructed and operated in a way that would not significantly pollute the environment or harm human heath.

7.176 part of the environmental permit process the EA requires:-

- continuous monitoring of emissions of pollutants, such as sulphur dioxide, oxides of nitrogen, hydrogen chloride, carbon monoxide, total organic compounds and particulates matter.

- twice yearly monitoring of hydrogen fluoride, heavy metals and dioxins, dioxins like PCB's (polychlorinated biphenyl's) and PAH's (polyaromatic hydrocarbons).
- check monitoring of pollutants on-site.
- auditing of operator monitoring.
- and regular site inspections, including unannounced inspections.

7.177 Operators must inform the EA if any emissions exceed the limits set in the environmental permit. If the operator does not comply with the environmental permit, the EA would take enforcement/prosecution action.

7.178 The EA currently monitors a similar EfW installation near Grimsby by the applicant and advises that it operates on a technically sound basis and complies with its EPR permit conditions, including meeting the required emission limit values (ELV's) set out in the Waste Incineration Directive. These ELV's set out in the Directive protect the environment and public health to a high standard resulting in minimal risk to both.

7.179 Some members of the public advise the Council to adopt a precautionary approach and refuse the application whilst there exists some doubt in the scientific community about safe emission levels set and the potential harm to human health from EfW facilities and their emissions. Whilst "fear "can be a material factor, officers consider that this stance cannot be applied in this instance because of the national policy position found in PPS10, PPS23 and the advice of the Health Protection Agency (HPA), whose role it is to provide expert and authoritative advice on public health matters to Government and stakeholders.

7.180 PPS23 advises that whilst the *"planning and pollution systems are separate but complementary"…"The planning system should focus on whether the development itself is an acceptable use of the land, and the impacts of those uses, rather than the control of processes or emissions themselves. Planning authorities should work on the assumption that the relevant pollution control regime will be properly applied and enforced.*" (Para 10). PPS10 offers similar advice in its para 27.

7.181 The HPA has reviewed research undertaken to examine the suggested links between emission from municipal waste incinerators and effects on health, and recently published in September 2009 its latest position statement entitled "The Impact on Health of Emissions to Air from Municipal Waste Incinerators". The statement acknowledges that "*it is not possible to rule out adverse health effects with complete certainty*", but concludes that "*Modern, well managed incinerators make only a small contribution to local concentrations of air pollutants. It is possible that such small additions could have an impact on health but such effects, if they exist, are likely to be very small and not detectable. The Agency, not least through its role in advising Primary Care Trusts and Local Health Boards, would continue to work with regulators to ensure that incinerators do not contribute significantly to ill health*".

7.182 Therefore officers are in no position to doubt the advice of the HPA that these facilities can operate safely, nor to question the scientific research findings upon which the HPA formed its latest position. Nor are officers in a position to doubt the competence of the regulatory and monitoring process and the role of the EA to ensure that the EfW facility would operate within the strict European and national emissions guidelines. Nor do the Council's own Environmental Health Officers have reason to object on air quality grounds. Hence officers do not consider that there are grounds for refusal based on air quality and emissions, or fear to human health.

Health Impact Assessment

7.183 There has been a call from some members of the public and the Primary Care Trust that a Health Impact Assessment (HIA) is carried out on the proposed facility. The Council did ask the applicant to undertake an HIA. Whilst an HIA would allow a qualitative assessment to be carried out, including the cumulative effects of the development over its future life, there is no statutory requirement, even in any of the EU Directives, for an HIA to be carried out even for a planning application. The ES submitted with the application covers the quantitative elements of the proposed development.

7.184 Officers have given this matter further consideration in light of the HPA's recently published (Sept 2009) position statement and their advice that "S*ince any possible health effects are likely to be very small, if detectable, studies of public health around modern, well managed municipal waste incinerators are not recommended".* The advice in PPS23 and PPS10 that "*Waste planning authorities should work on the assumption that the relevant pollution control regime would be properly applied and enforced*" further endorses this position.

7.185 Officers therefore concur with the applicant that any potential environmental impacts can be adequately dealt with by conditions, if planning permission is granted, and by the EA under the environment permitting process. Therefore officers no longer consider it necessary to undertake an HIA.

j) Noise

7.186 The main sources of noise are likely to be from construction noise, which would be would be for a limited time period, and then this would be replaced by operational noise and additional traffic noise. .

7.187 The Council's environmental health officers (EHO's) requested clarification of various noise matters, including noise levels, noise monitoring assumptions and data collection and predications. They required assurances that the noise measurements and predications based on the Grimsby plant were applicable to the size of plant proposed for Telford, as well as noise levels relating to construction works and construction traffic, in order to demonstrate that the propose development would not cause unacceptable levels of noise.

7.188 The applicant has confirmed that the noise modelling undertaken, based on the Grimsby plant, accurately reflects the layout, size and operation of the Telford plant.

7.189 The Council's EHO's are satisfied that noise levels will be acceptable and there are no grounds for refusal. Conditions can be imposed to restrict construction hours and hours for delivery of waste, as suggested by the applicant, should planning permission be granted, including the applicant's intention to produce a Construction Environmental Management Plan.

k) Highways/traffic generation

7.190 The site already attracts HGV's bringing waste to the landfill site with 19,091 HGV's visiting the site per year, which equates to 38,182 HGV movements allowing for return journeys. In addition there are some 75,000 private cars visits (150,000 movements) to the adjacent Community Recycling Centre. Most of the HGV vehicles initially visiting the proposed EfW facility would be the same vehicles just diverted from the landfill site and so initially there would be limited impact on traffic flows. Using alternative sources of waste could lead to greater traffic movements i.e if the waste is commercial then municipal and landfill waste will come to Granville, which raises some sustainability and local amenity concerns. The existing site sees approximately 190,000 traffic movements per year. Peak flows occur between 8am-9am and 5pm-6pm.

7.191 With regards variations in traffic, these are likely to arise from changes in traffic flows to and from the site and/or changes in vehicle type. Assuming a worst case scenario of an additional 62,000 tonnes of waste per year being transported to landfill in HGV's, the proposed EfW centre could indirectly result in an additional 2-3 HGV's per hour. Considering vehicle trips to remove waste ash and metal from the EfW centre, this could result in 832 lorry vehicles a year, equating to almost 4 extra vehicles a day. This could therefore introduce an additional 7,032 HGV's (or 14,064 movements) to the local road network per year. Based on the existing HGV activity of 19,091 vehicles (38,182 movements), this represents a 38.8% increase. Construction traffic would be a localised increase. However, the traffic assessment concludes that the proposed increase in traffic movements is within the existing day-to-day operating capacity of the road network and the existing landfill site.

7.192 Council's highways engineers requested additional information to clarify some of the assumptions and figures in the applicant's Traffic Assessment. The further additional information (correspondence dated 3/2/09) addressed the initial deficiencies in the original submission hence the Council's highways engineers had no objection to the proposed EfW facility at Granville. The average increase from the EfW site amounts to about 10 two way movements per hour, or 1 additional vehicle every 6 minutes. Even with the worst case scenario of the landfill traffic continuing along side incinerator traffic, Highway engineers are satisfied that the surrounding road network (including A5) would operate within designed capacity.

7.193 Should planning permission be granted highway engineers have recommended a condition that the access, internal roads and parking/turning areas are all surfaced in a bound material (not a loose material such as chippings). They have also requested £15,000 towards traffic management/safety measures on the A5. This money would be secured by a Section 106 agreement should planning permission be granted. The applicant would implement a Travel Plan which would be made a condition of any planning permission.

l) Historic conservation

7.194 The ES confirms that no Prehistoric, Roman, Early-Medieval or Medieval features or finds have been recorded within the site. However within the wider study area and within some 700m of the site there are various archaeological features that include a crop mark enclosure of possible prehistoric or Roman; a small number of prehistoric worked flints at the Roman small town of *Uxacona* (Scheduled Monument); the nearby Watling Street (the A5(T) is a Roman road and remains of Watling Street Grange about 250 m south of the site, comprising a square moated enclosure with farm buildings, which is a Grade II Listed Building.

7.195 WMRSS1 Policy QE5 (Part B iii) and Core Strategy policy CS14 seek to protect the historic environment, reiterating the commitment to protecting and enhancing the historic environment and recognising the role that these assets can play in delivering wider objectives and creating *"local character and distinctiveness"*.

7.196 Scheduled Monuments may still be affected if there is a change in the nature or visual characteristics of their surroundings. Given the physical prominence of an EfW facility of the scale proposed it is likely that the setting of the nearby Scheduled Monuments could be affected. The need to transport significant amounts of waste for incinerating at the facility would also increase the number of heavy goods vehicle movements along the local road network, which could subsequently affect the setting of the Scheduled Monuments.

7.197 However, officers do not consider that these protected sites would be adversely or detrimentally affected to such a significant degree as to be a reason for refusal, taking into account the current activities and transport movements in relation to the CRC and landfill site.

m) Ecology

7.198 At the regional level, WMRSS1 Policy QE7 encourages the 'maintenance and enhancement' of biodiversity resources, prioritising *"specific species and habitats of international, national and sub regional importance"*. Saved Policy OL2 of the WLP precludes proposals with direct or indirect adverse effects on Areas of Special Landscape Character, Local Nature Reserves, County Wildlife Sites or Ancient Woodland. Policy CS12 of the CSDPD also provides protection for the natural environment more generally.

7.199 The ES only identifies significant effects at the site level through the removal of the pond. Officers note that there remains a potential for some negative effects on local biodiversity interest such as the Local Nature Reserve and nearby SSSIs given the distance that emissions from the stack can travel, increased HGV movements and the increases in built development in the area. However, Natural England has no objection with regards legally protected species and relevant licences would still need to be obtained should planning permission be granted.

8.0 CONCLUSION

Waste hierarchy

8.1 Notwithstanding the prematurity of the submission of the planning application, it is considered that the site itself is wholly unsuitable for the development of a permanent waste management facility of this size and effect. Indeed, there is no clarity that the proposal is either a suitable or best practicable means of contributing to local waste management needs.

8.2 EfW as a waste management option is, in principle, more acceptable than landfill as it is higher up the waste hierarchy. It should however form part of a combined waste management strategy which prioritises options further up the hierarchy, such as recycling or biological treatment, and only resorts to incineration (and landfill) once these options have been exhausted. There is therefore a potential for the proposed EfW plant to prejudice movement up the waste hierarchy and prejudice the evolution of a preferred waste management strategy for Telford & Wrekin that could lead to the government's objective of minimising waste (and the transfer of waste) becoming unviable in the local area.

8.3 In addition, the flexibility to utilise appropriate treatment technology would be inhibited as waste, which could be treated by alternative means higher up the waste hierarchy, would be incinerated regardless in order to ensure that the EfW plant remains commercially viable. Officers therefore consider that the proposed development is contrary national Waste Strategy, PPS10, WMRSS2 Policy W1 and Joint Structure Plan Policy P65

8.4 A benefit of EfW as a waste management option is its creation of energy by providing heat and electricity outputs. The application does not, however, include proposals for the export of the heat generated to any industrial or other user.

Sufficient capacity and prematurity

8.5 There is sufficient capacity within existing and committed local and regional waste management facilities to accommodate part of Telford &Wrekin's municipal waste stream, or displace waste from existing EfW plants, releasing capacity that could be utilised by the Council at least in the short to medium term (5-10 years). This would allow the Council to undertake a full and robust

appraisal of the various waste management options open to them and to produce a waste management strategy to meet future requirements. It therefore cannot currently be proven that the proposed EfW facility is *'the right type'*, *'in the right place'*, or *'at the right time'*, as required by PPS10 (Paragraph2).

8.6 Future policy would be based on the consideration of local and regional need and a review of all technologies and potential locations for required facilities. In order to deliver a robust and proper strategy all options would be considered and assessed on their relative merits and shortcomings. As the Council has only begun the options assessment, the proposal for the Granville EfW remains premature.

Co-location

8.7 There are no demonstrated co-location benefits arising from the siting of the EfW adjacent to the landfill nor are there demonstrated co-location benefits arising from the siting of the EfW adjacent to the Community Recycling Centre.

Green Network and Landscape

8.8 The proposal site is not allocated for any form of development within the Local Plan. Indeed, the site is greenfield and is specifically protected against built development as part of the Green Network in the east of the Telford urban/rural fringe area and has amenity, recreation and landscape value. There is a presumption in favour of preserving the Green Network and the proposed EfW does not meet any of the criteria established within the Local Plan, as it is not for exceptional circumstances, it will not contribute to the aims of the Green Network and there are no demonstrated environment or community benefits that would justify the release of land within the Green Network for this development *(WLP Policy OL4 and CS Policy CS11).*

8.9 The site occupies an elevated location that is visible from a number of viewpoints such as the neighbouring golf course, and whilst there are some buildings in the vicinity of the site, these are on allocated employment land, are located lower and further away and should not justify this facility within the Green Network.

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

8.11 The availability or abundance of commercial and industrial waste may not normally be a material factor in determining an application of this nature, as the viability of a facility is a question for the marketplace to determine. However, it is relevant in this particular instance as the restoration of the

Granville landfill site back to countryside with amenity and recreation value would be delayed. The landfill site has a temporary planning permission to receive waste until 2025. Current landfill operations at Granville have a degrading effect on the perceived character and quality of the local landscape, but these are temporary. In light of the temporary planning permission for landfill operations (which expires in 2025), landfill activity would continue for (at most) the first 15 years of the EfW plant's proposed operational life. However, the EfW facility would be a permanent form of development, which would have an impact on the area when the landfill site is eventually restored to open countryside, in accordance with the Council's long term countryside/recreation aims for this area of Telford and where there is public expectation that this would happen.

8.12 There is 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.

8.13 If the EfW facility were developed this would thereafter remain a permanent feature on its own, after the landfill use had ceased, and would become as an uncharacteristic and intrusive development in the local and wider open landscape. The existing CRC site may be removed in the future as the Council is currently reviewing its overall provision of CRC sites for Telford and the Borough, including searches for appropriate sites and the optimum location for a CRC is yet to be determined. Furthermore, this CRC facility is small in comparison to the proposed EfW. The planning balance should consider the site as an open land resource within the protected Green Network and, following the cessation of the landfill, its future as a public recreation asset with strong links to Granville Country Park

Alternative sites

8.14 Based on an initial assessment of alternative sites available, it is evident that there are a number of sites that are preferable to the proposed Granville. There is currently over 200 hectares of vacant employment land within the Borough, a large proportion of which is within established and expanding industrial estates on land that has been allocated for employment uses within the adopted Local Plan and which would not involve the loss of 'best and most versatile' agricultural land There are vacant allocated employment sites within Donnington Wood Business Park, Hortonwood Industrial Estate and the Halesfield Industrial Estate including the site that was formerly allocated for the rail freight terminal. Planning policy favours the development of waste management facilities within such employment/industrial areas or on brownfield land, as stated in PPS10 *(paragraph 20)* and the WMRSS2 *(Policy W5 and paragraph 8.91).*

8.15 It is therefore considered that there are alternative preferable sites and that the applicant has not fully considered alternate locations and has failed to demonstrate that alternative sites exist.

Air quality

8.15 With regards air quality and emissions, officers are not in a position to doubt the advice of the Health Protection Agency that these facilities can operate safely, or to question the scientific research findings upon which the HPA formed its latest position. Nor are officers in a position to doubt the competence of the regulatory and monitoring process and the role of the EA to ensure that the EfW facility would operate within the strict European and national emissions guidelines. Nor do the Council's own Environmental Health Officers have reason to object on air quality grounds. Hence officers do not consider that there are grounds for refusal based on air quality and emissions, or fear to human health.

8.16 With regards issues relating highways, traffic, nature conservation, historic conservation water and noise officers consider that any issues could be adequately controlled by the imposition of conditions should planning permission be granted.

8.17 The application has been advertised as a departure from the Development Plan and the public consultation period expires on 11th December.

RECOMMENDATION: following expiry of the departure time period on 11th December 2009 Delegate to the Head of Planning 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 is 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 identity of this part of the town, would conflict with the aim 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 and 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", has 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 transfer 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 is considered premature to the consideration of the emerging LDF waste policies and there is no urgent local or regional need for the proposed EfW facility that would warrant pre-empting the LDF Review

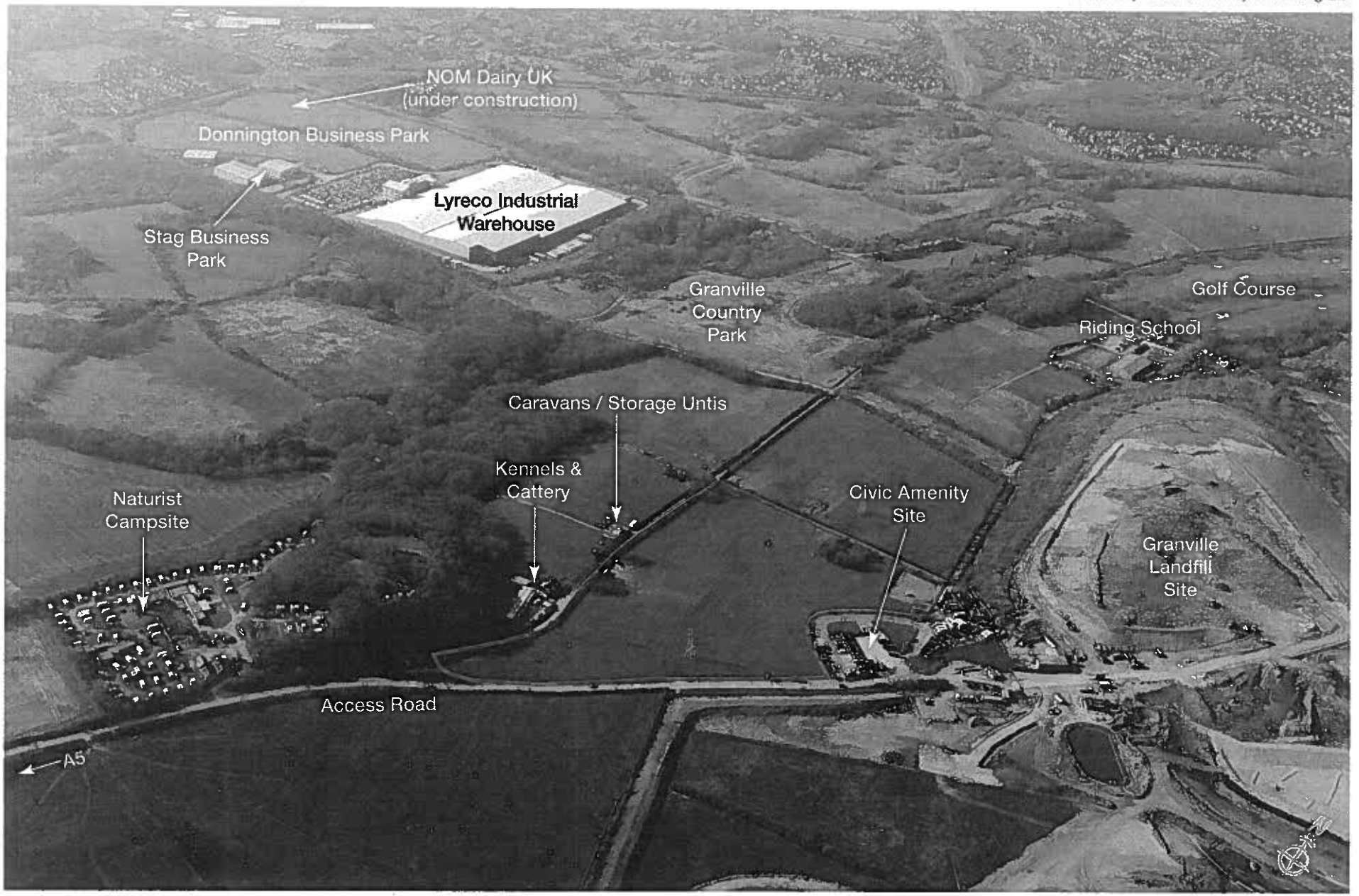
5. Alternative sites

The applicant has inadequately considered and failed to demonstrate that there are no preferable alternative sites and hence the proposed development would be contrary to PPS10 and WMRSS2 Policies W5 and W7.

Notes

Figure 2.1: **Aerial Photograph of Site**

Drawn By: Adams Hendry Consulting Ltd



Photograph by Roger D Smith ABIPP, Gosport

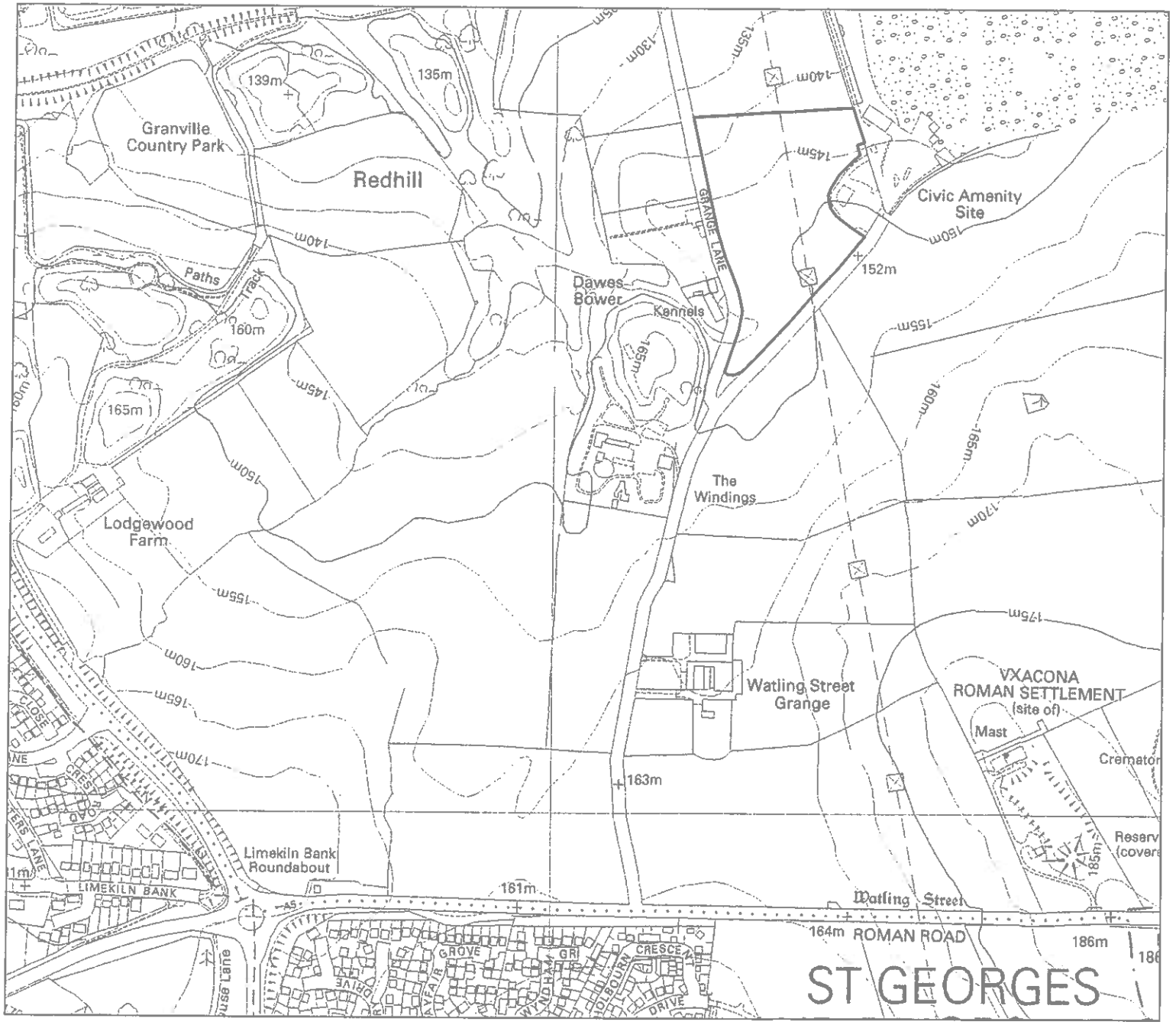
Figure 7.4: **Landscape Context**

Drawn By: SLR Consulting Ltd

Site boundary

Not to Scale

N



Drawing AH/4 **Site Location for Validation**

Drawn By: Adams Hendry Consulting Ltd

Application Area

N

Date: 18-09-08 Scale: 1:5000

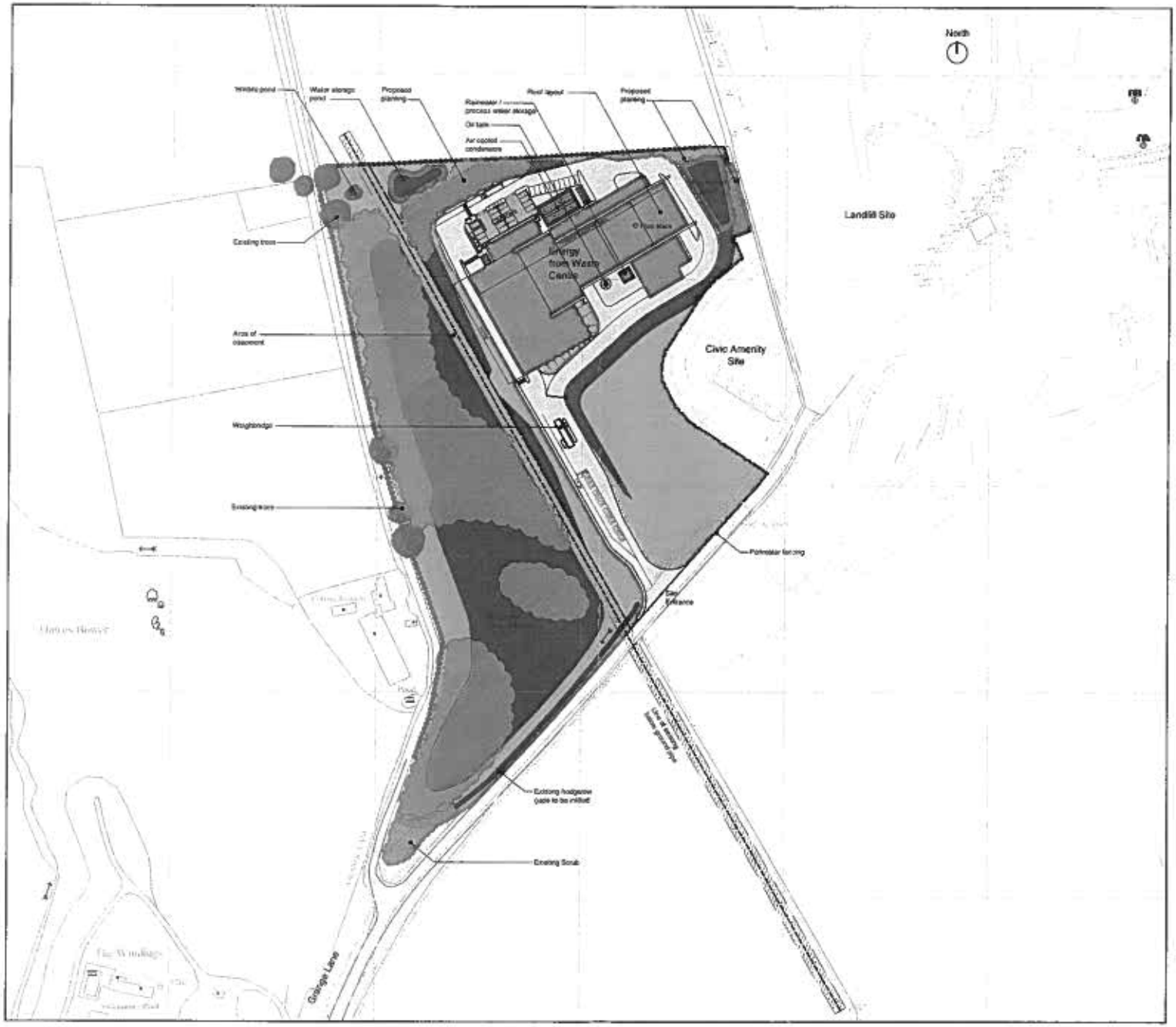


Figure 3.1: **Proposed Site Layout**

Drawn By: RPS Group Plc

(see also landscape drawing Figure 3.6)

Scale 1:2000

100m

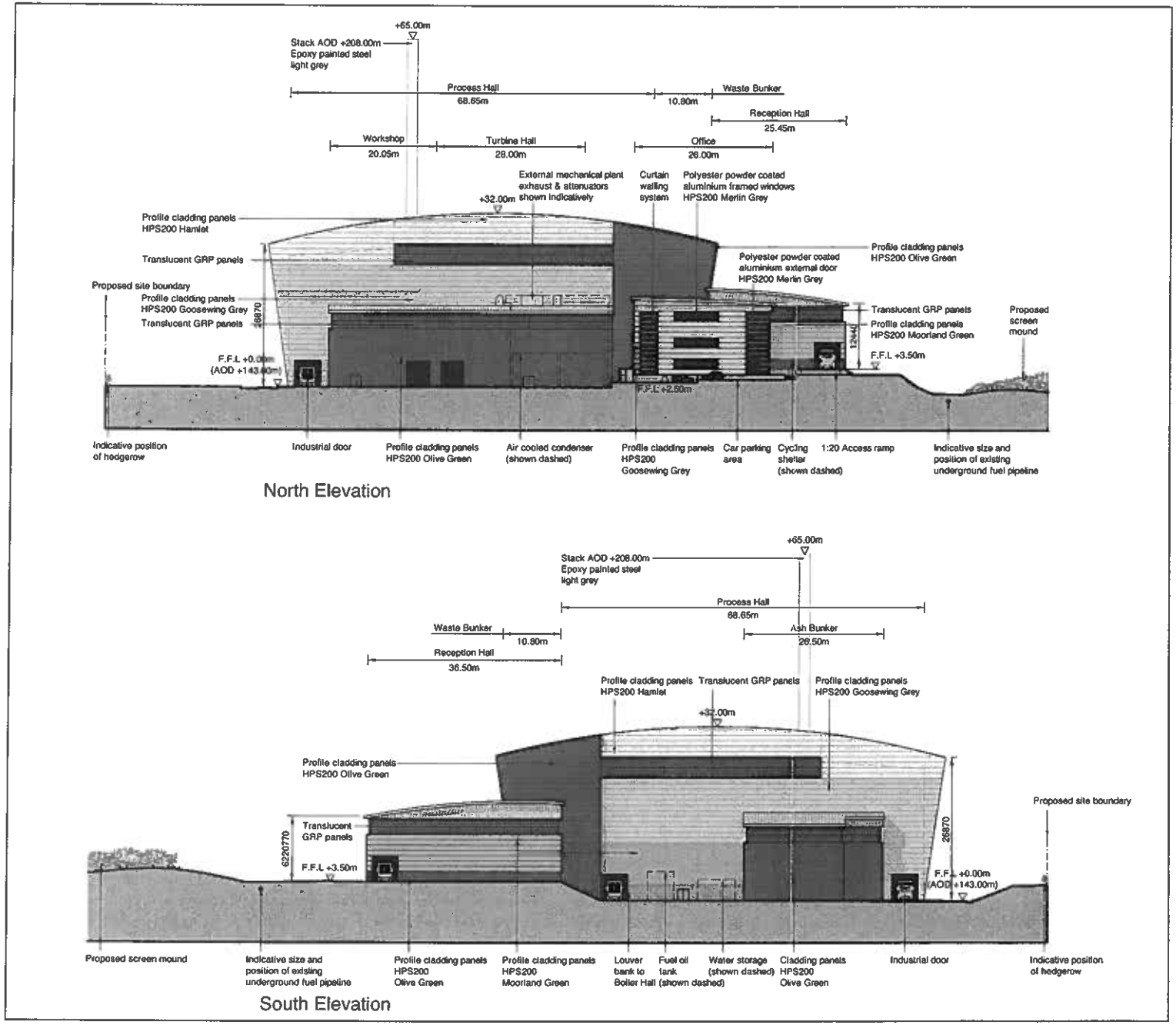


Figure 3.2a **Building Elevations North and South**

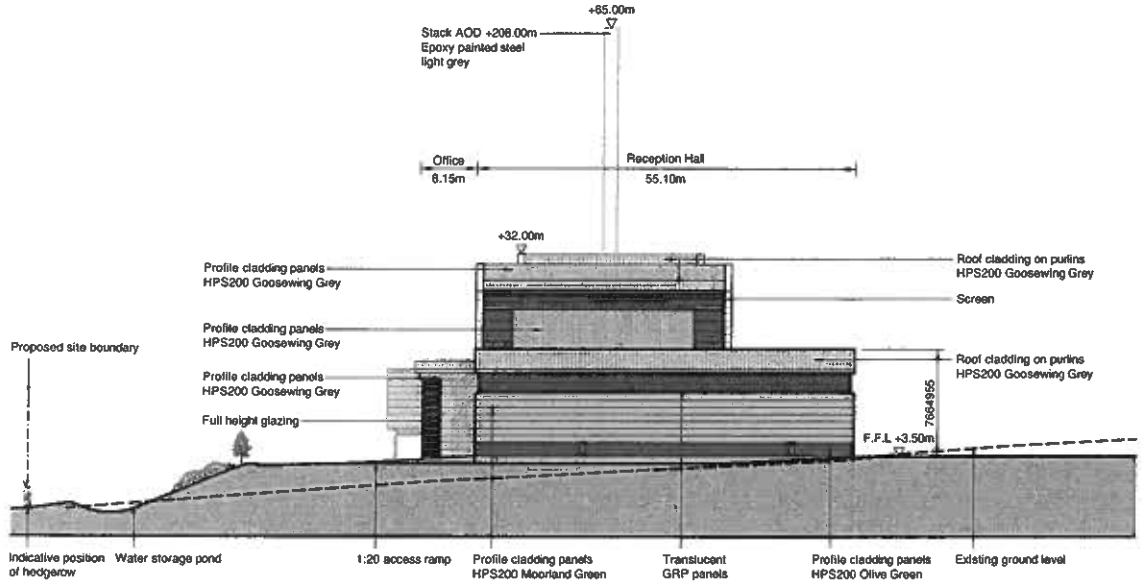
Drawn By: RPS Group Plc

Notes:
Finished floor level is +0.00m at Process Hall Slab, AOD +143.00
(Above Ordnance Survey Datum)

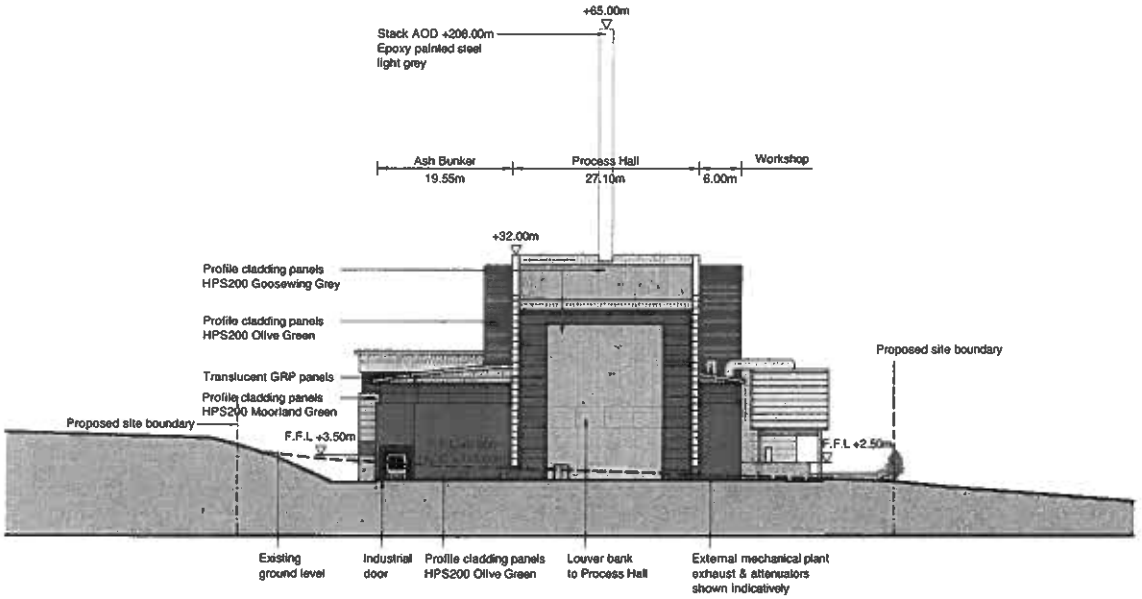
All dimensions to external wall

All louvers subject to ventilation study

50m



West Elevation



East Elevation

Figure 3.2b: **Building Elevations East and West**

Drawn By: RPS Group Plc

Notes:
Finished floor level is +0.00m at Process Hall Slab, AOD +143.00
(Above Ordnance Survey Datum)

All dimensions to external wall

All louvers subject to ventilation study

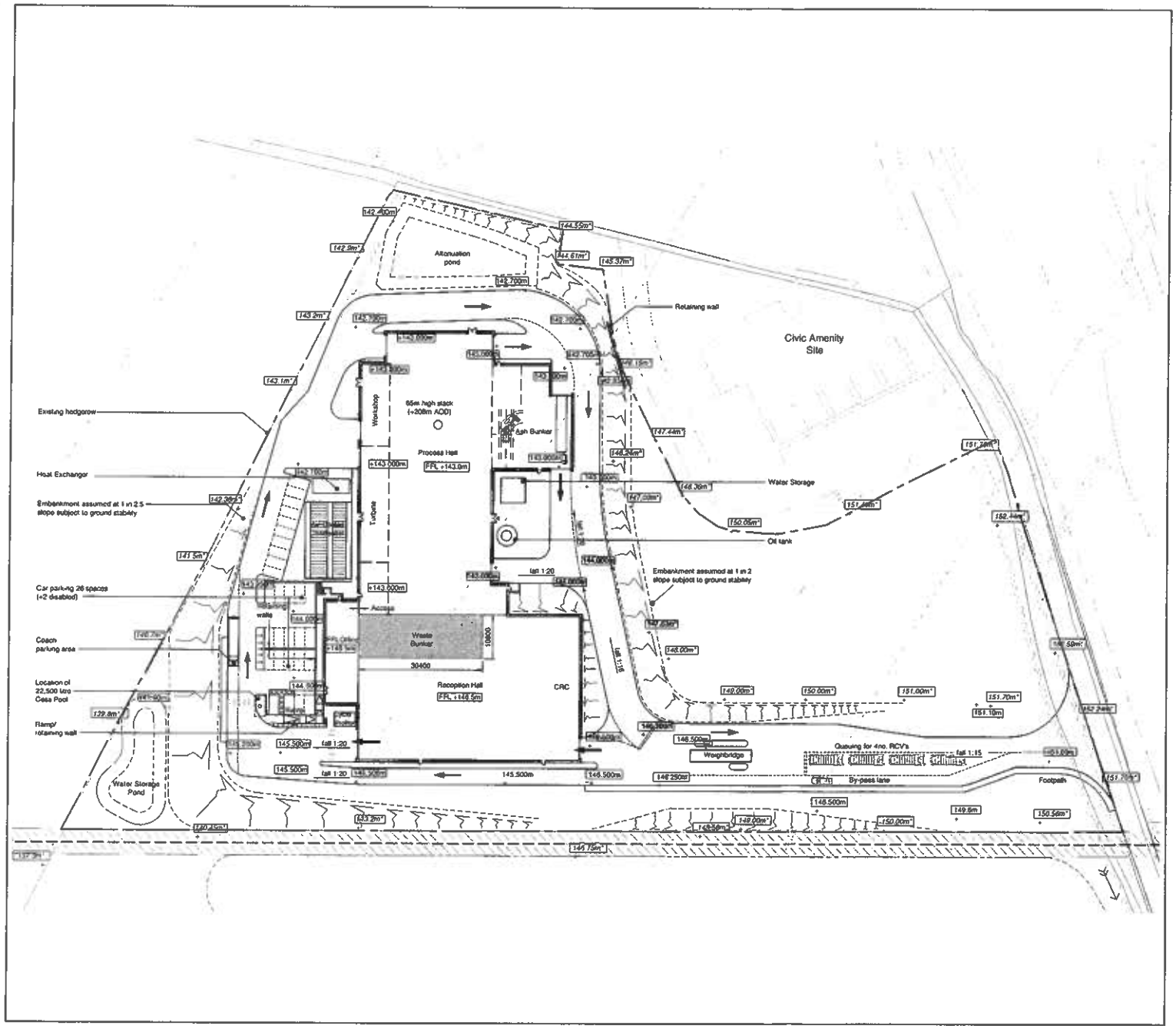


Figure 3.4: **Site Layout Proposed Levels**

Drawn By: RPS Group Plc

FFL	Finish Floor Level
145.500m	Proposed level
148.00m*	Proposed level (Same level as existing)
fall 1:20	Direction of fall and approximate gradient
	Direction of vehicle cirulation
CA	Civic amenity site residue area

Levels are based on Ordnance Survey Datum

Scale 1:1000

=500m

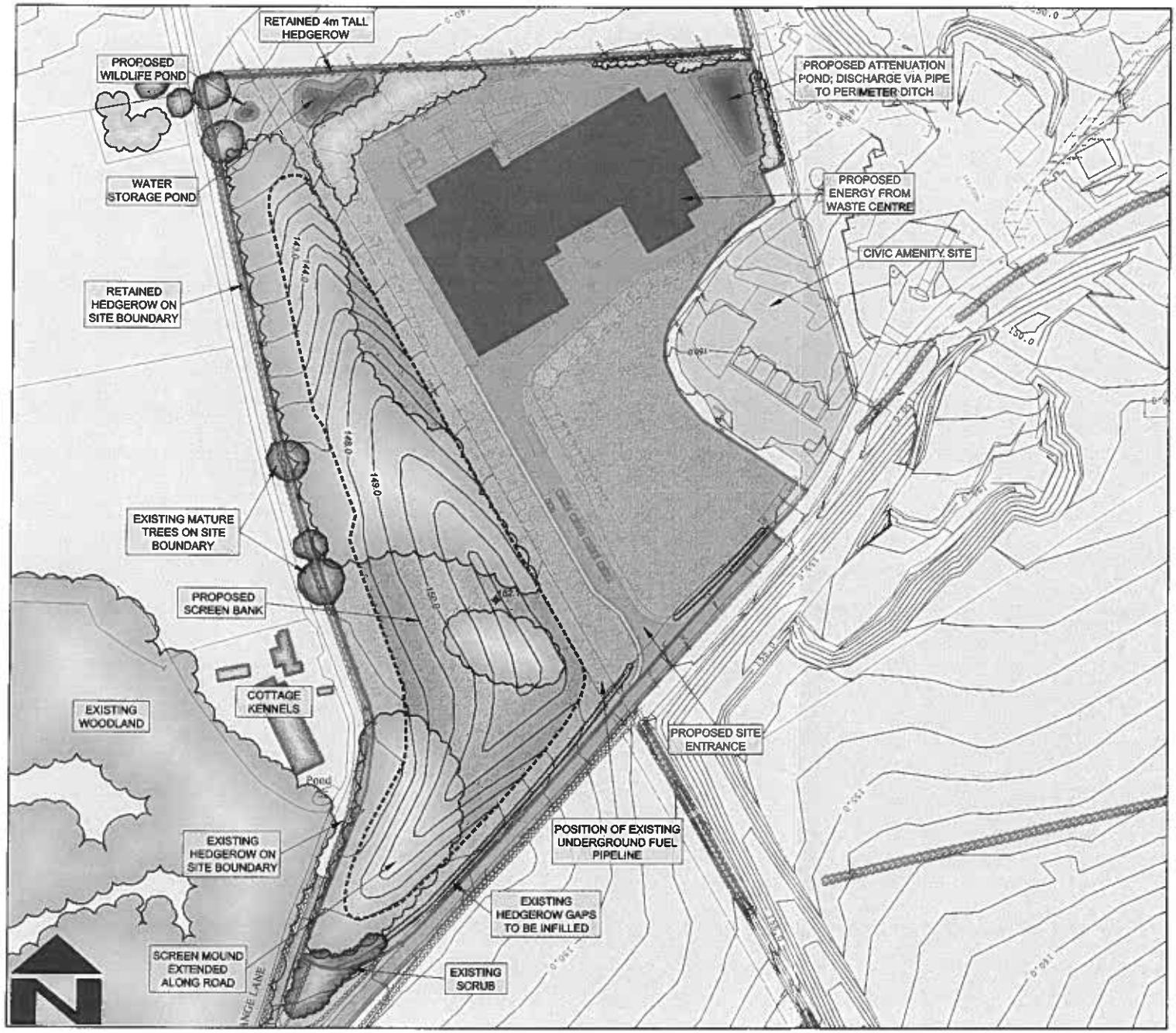


Figure 3.6: **Landscape Mitigation Scheme**

Drawn By: SLR Consulting Ltd

PLANTING DETAILS

Mix A - Woodland Planting

Species	Common Name %
Quercus robur	Common Oak 25
Fraxinus excelsior	Ash 25
Betula pendula Silver	Birch 20
Crataegus monogyna	Hawthorn 15
Corylus avellana	Hazel 10
Ilex aquifolium	Holly 5

Mix B - Hedgerow Planting

Species	Common Name %
Crataegus monogyna	Hawthorn 50
Prunus spinosa	Blackthorn 20
Acer campestre	Field Maple 15
Corylus avellana	Hazel 10

All tree andd shrub planting to be 'notch' or pit planted and protected with a suitable tree / shrub shelter

Grass Seeding Mix

The mix to be used for the seeding of this area would be DLF Trifolium Pro 120 'Slowgrowth' which is a low maintenance mix with Ryegrass which would produce a lush, dense and attractive reduced maintenance lawn. The cultiver Paradise has the highest rating for slow re-growth, therefore reducing mowing requirements.

Species	Cultivar %
Perennial Ryegrass	PARADISE 60
Slender Creeping Red Fescue	SAMANTA 35
Brownlop Bent	HIGHLAND 5

Technical Information
Sowing Rate: 35-50g / m2 Oversowing: 25g / m2
Mowing Height: 12-50 mm as necessary

PLANTS / TREES - GENERAL
Condition: Materially undamaged, sturdy, healthy and vigorous.
Appearance: Of good shape and without elongated shoots.
Hardiness: Grown in a suitable environment and hardened off.
Health: Free from pests, diseases, discoloration, weeds and physiological disorders.
Budded or grafted plants: Bottom worked.
Root system and condition: Balanced with branch system.
Standard: The relevant parts of BS 3936.
Species: True to name.
Origin/ Provenance: Local provenance.

CULTIVATION OF PROPOSED PLANTING AREAS
Compacted topsoil: Break up to full depth.
Cultivation: Loosen, aerate and break up soil into particles of 2-8 mm to a depth of 250 mm.
Timing: Within a few days before planting.
Weather and ground conditions: Suitably dry.
Surface: Leave regular and even.
Levels: Not to exceed 100mm above adjoining areas.
Undesirable material brought to the surface: Remove visible weeds, roots and large stones with any dimension exceeding 100 mm.
Soil within root spread of trees and shrubs to be retained: Do not dig or cultivate.

PLANTING WORK GENERALLY
Services: Check for below and above ground services, including land drainage, in the vicinity. Give notice if they may be affected and obtain instructions before proceeding.
Safety: Comply with Arboriculture and Forestry Advisory Group Safety leaflets.

SETTING OUT (WOODLAND PLANTING)
Planting density: Planting to be carried out as described below in areas shown on this drawing.
Layout: Woodland planting to be carried out as described in 'Creating New Native Woodlands' Forestry Commission Bulletin112, 1994. Species to be planted in single species groups of 5-12 in number, at 1-1.5 metre intervals with gaps, this would be consistent with an average spacing of 2 metres.

PLANTING MAINTENANCE GENERALLY
Weed control: Maintain weed free area around each tree and shrub.
Diameter (minimum): The larger of 1 m or the surface of original planting pit.
Keep planting areas clear of weeds: By use of approved non-residual herbicides.
Precautions: Ensure that trees and shrubs are not damaged by use of mowers, nylon filament rotary cutters and similar powered tools.
Staking: Check condition of stakes, ties, guys and guards.
Broken or missing items: Replace.
Rubbing: Prevent.
Ties: Adjust to accommodate growth.
Damage to bark: Cut back neatly with sharp knife. Prevent further damage.
Frequency of checks: As per agreed schedule.
Firming up: Gently firm loosened soil around trees / shrubs. Straighten leaning trees / shrubs.
Watering: As required / agreed in schedule.

Not to Scale

Figure 3.8 Longitudinal section of a complete combustor

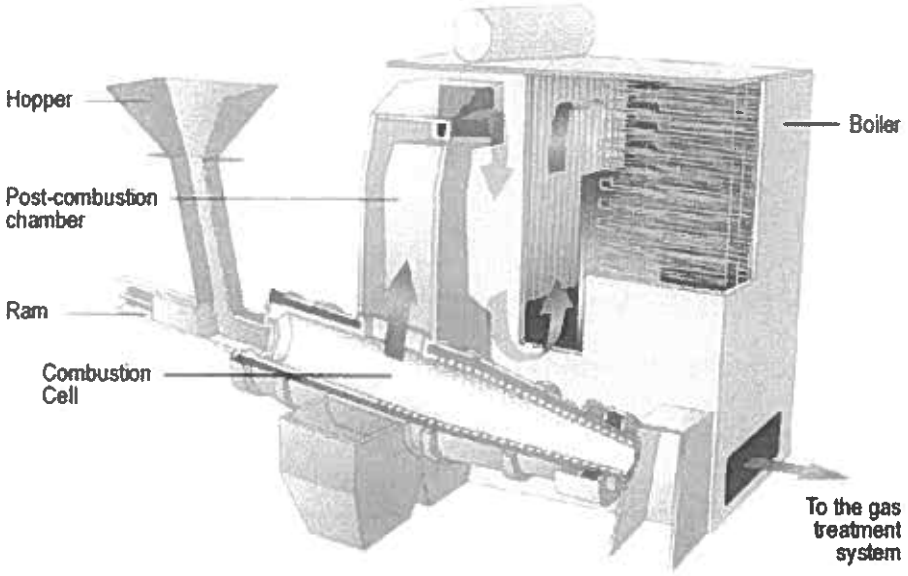
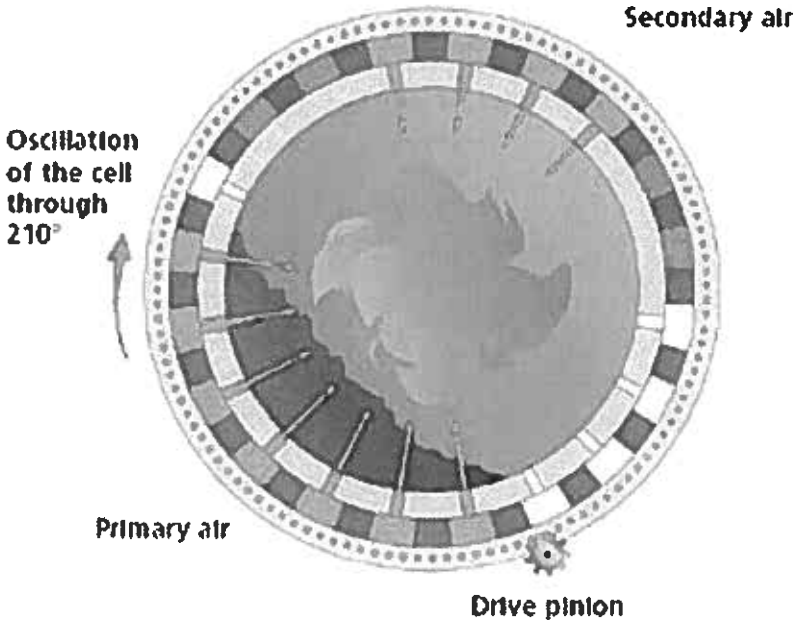


Figure 3.9 Cross Section of the Combustion Cell



3.27 Municipal Solid Waste (MSW) is a very variable fuel for a combustion process and contains a variety of sizes and shapes of materials, not all of which are combustible. The oscillating kiln rocks slowly backwards and forwards on its longitudinal axis and this motion causes the waste inside the kiln to roll around and break up. This constantly provides fresh material at the surface for combustion and ensures a very efficient burn.

3.28 Waste is fed in at one end and the rocking motion of the kiln causes it to gradually move down the length, by the time the waste has reached the end

Appendix

5.0 Conclusions

5.1 The proposal site is a greenfield site in the urban fringe not allocated for any form of development within the WLP; indeed, it is specifically protected against built development and allocated as part of the Green Network in the east of the Telford urban area. It is in or capable of beneficial agricultural or other countryside use and has clear and strong amenity, recreation and landscape value, especially in the longer term. There is a policy presumption in favour of preserving the Green Network *(WLP Saved Policy OL3)* and the proposed EfW does not meet any of the criteria established within the Local Plan that might justify the release of land within the Green Network for development *(WLP Saved Policy OL4)*.

5.2 Notwithstanding the prematurity of the submission of the planning application, it is considered that the site itself is wholly unsuitable for the development of a permanent waste management facility of this size and effect. Indeed, there is no clarity that the proposal is either a suitable or best practicable means of contributing to local waste management needs.

5.3 EfW as a waste management option in principle is more acceptable than landfill as it is higher up the waste hierarchy. It should, however, form part of a combined waste management strategy which prioritises options further up the hierarchy and only resorts to incineration (and landfill) once these options have been exhausted. It should also be noted that there are different types of EfW technology, some of which (as has been discussed in EfW cases elsewhere) are more advanced and are more preferable to traditional waste incinerators such as that proposed at Granville as they are cleaner, less polluting, smaller scale and more similar in nature to general industrial land uses.

5.4 Benefits of co-location can arise where waste management facilities (i.e. recycling, composting, energy recovery and landfill) are located adjacent to each other or form part of a single operation, however there are no demonstrated co-location benefits at the Granville EfW site.

5.5 The adjacent Granville landfill site has a temporary planning permission which lapses in 2025. Whilst this could be active for some 15 years going forward whilst an EfW were operational this must be considered against the restoration of the site which, within 15-17 years, should be restored to open countryside with significant public access in accordance with the Council's long term countryside/recreation aims for this area of Telford. If the

EfW facility were developed this would thereafter remain permanently as an uncharacteristic and intrusive development in the local and wider open landscape.

5.6 It is potentially the case that the adjacent permanent CRS will be removed following the development of a new facility at Hortonwood and following the review of all CRSs within Telford that is currently being undertaken. In any event, even if it were to remain, this facility is small in comparison to the proposed EfW and the planning balance should consider the site as an open land resource within the protected Green Network and, following the cessation of the landfill, its future as a public recreation asset with strong links to Granville Country Park.

5.7 The proposal also does not allow for pre-incineration sorting and minimisation of waste that can be dealt with further up the waste hierarchy. This undermines the PPS10 requirement that *"the envisaged facility will not undermine the waste planning strategy through prejudicing movement up the waste hierarchy"* (Paragraph 25).

5.8 A benefit of EfW as a waste management option is its creation of energy by providing heat and electricity outputs. This application, however, does not include proposals for the export of the heat generated to any industrial or other user.

5.9 There is sufficient capacity within local and regional waste management facilities to allow the Council time to undertake a full and robust appraisal of the various waste management options open to them and to produce a waste management strategy to meet future requirements. It therefore cannot currently be proven that the proposed EfW facility is *'the right type'*, *'in the right place'*, or *'at the right time'*, as required by PPS10 (Paragraph 2).

5.10 Other than isolated residential buildings to the west and the crematorium to the south, the nearest buildings are on Donnington Wood Industrial Estate. These are large industrial buildings but should not justify this facility within the Green Network. Unlike the current proposal, they are on allocated industrial land and not on an elevated site that is visible from a number of sensitive viewpoints such as the neighbouring golf course.

5.11 There is acknowledged significant development pressure on land within the urban fringe *(WMRSS1 Paragraph 8.25)* and the EfW facility would increase this, forming an island of built development separate within the Green Network isolated from

the built up areas of Telford. It is further not justified in terms of exceptions in the Development Plan. 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.

5.12 Based on an initial assessment of alternative sites available, it is evident that there are a number of sites that are significantly preferable to the release of the Granville site for the proposed development. There are currently over 200 hectares of vacant employment land within the Borough, a large proportion of which is within established and expanding industrial estates on land that has been allocated within the adopted Local Plan for employment uses. Planning policy favours the development of waste management facilities within such employment/industrial areas, as stated in PPS10 *(paragraph 20)* and the WMRSS2 *(Policy W5 and paragraph 8.91).*

5.13 For example, there are vacant allocated employment sites within Donnington Wood Business Park which would be able to accommodate the proposed development, notably land adjacent to the Dairy which appears to comprise a prepared development plateau that could well be appropriate for a waste management facility and employ waste heat in the immediately adjacent Dairy building use. Adjacent land to this site has the potential for co-location with an EfW (if this were determined after due consideration to be the suitable choice of waste disposal facility) for development for other forms of waste reduction and recycling.

5.14 There are also vacant allocated employment sites within Hortonwood Industrial Estate. Surrounding land uses are appropriate for a waste management facility, the Industrial Estate has excellent road links and a Rail Freight Terminal has been developed adjacent to the estate making it highly accessible in rail terms. Whilst it is understood that most waste entering the facility would arrive by road, the rail freight terminal could be particularly beneficial for the transport of bottom ash and fly ash away from the site.

5.15 The 'old' site that was formerly allocated for the rail freight terminal within Halesfield Industrial Estate also remains vacant. This has excellent road links to the M54 and would also provide an appropriate alternative location for a waste management facility.

5.16 **Based on the above analysis, it is therefore evident that:**

- **The proposed Granville EfW site is located within the protected and allocated Green Network of Telford and the proposed use would be contrary to Development Plan policy;**
- **The proposed EfW facility does not meet the criteria that would justify the release of Green Network land;**
- **There are no demonstrated advantages of co-location with the Granville Landfill site or CRS;**
- **Releasing Green Network land for an EfW facility would increase pressure for the release of further Green Network land in the urban fringe;**
- **The planning application is premature in that it would serve to undermine the consideration of a robust and tested waste management strategy;**
- **In the absence of integrated pre-treatment facilities to reduce and recycle waste and also without the demonstrated use of the waste incineration product of heat, the proposals do not raise the disposal of waste significantly up the waste hierarchy;**
- **The length of time for restoration of the adjacent Granville landfill site could be affected and has not been assessed;**
- **The EfW facility would on a permanent basis alter the character of the urban fringe countryside and recreational area detrimentally;**
- **There are vacant, available and significantly preferable alternative sites that could accommodate an EfW or other form of waste management facility elsewhere within the Telford area;**
- **There is no substantial urgency for releasing the land in the proposed location for the development; and**
- **There are no overriding reasons why Development Plan policy should not be followed**

5.17 **If the Council were minded to refuse the planning application, there is a justifiable basis for the refusal.**

5.18 Following a short-term vision of considering the proposed waste management option (which may or may not be part of the future strategy) would be to pre-empt the content of the future Revised LDF.

5.19 It is therefore considered that the right way forward would be to avoid approval of the application until a revised Core Strategy is in place which would include generic overarching waste policies. This would be supported by an approved and adopted Minerals and Waste DPD providing more detailed policies on waste issues. This option would enable the application to be assessed against a publicly-agreed strategy that identifies the local waste management needs of the Borough of Telford & Wrekin within the local and regional capacity context.

5.20 Such delay would have no material effect on overall waste management and treatment planning and could ensure an optimal solution based on full understanding of needs and alternative opportunities.

5.1 The application proposes the diversion of approximately 62,000te/a of wastes from landfill by utilising direct combustion Energy from Waste technology. Energy from waste is above landfill in the waste hierarchy and in that respect the application is in accordance with the Waste Strategy for England.

5.2 The need for alternative methods for diverting residual waste from landfill is not disputed, nor is the potential role of Energy from Waste as part of an integrated waste management strategy dismissed. However, the selection of a single Energy from Waste facility for the current residual municipal waste arisings is not considered the most sustainable option. It does not maximise techniques higher up the waste hierarchy such as recycling or biological treatment. In developing a long term strategy for municipal waste management, it will first be necessary to determine the options available utilising existing or planned treatment capacity and having regard to maximising options higher up the waste hierarchy.

5.3 The adoption of a municipal waste strategy based on single technology solutions brought forward by "ad hoc" or "stop gap" development proposals such as the current one is likely to lead to inflexible solutions that are detrimental to the promotion of options towards the top of the hierarchy, in particular recycling and anaerobic digestion. Any strategy or proposals based on seeking to maximise waste reduction and recycling would be undermined by a single technology solution such as the current EfW proposal at Granville.

5.4 There are no demonstrated advantages of co-location of the proposal with adjacent Granville landfill site or CRC. In any event, the landfill is temporary until 2025. Further, the propensity for failing to restore the landfill in accordance with the timescale in its March 2008 planning permission exists by reason of diversion of wastes to the EfW facility. This has not been considered in the ES.

5.5 Whilst the utilisation of treatment facilities outside of the Borough could be seen as less sustainable on the basis of proximity in comparison with the proposed development, the utilisation of surplus capacity can be seen to be more sustainable in maximising energy recovery or treatment capacity at those facilities, thus making them more viable. Once the capacity of existing or permitted facilities is taken into account, the optimum waste management strategy can be determined. There is likely to be substantial spare capacity for waste disposal in the region existing or coming on stream in the next few years. Further, the requirements for waste disposal capacity in terms of volume of waste arisings has been significantly overestimated in the recent past as the volume of waste reduction and recycling has been underestimated.

5.6 The application proposal must be considered against Government waste management policy, in particular the waste management hierarchy. The current proposal has no capacity for removing materials from the waste stream for management by methods higher up the waste hierarchy, such as recycling or biological treatment.

5.7 Alternative technologies are available and becoming more widely used in the UK, both for municipal waste and commercial and industrial wastes. The argument that those technologies are at the research and development stage and do not represent viable options is being dispelled by the development on a commercial scale of those types of waste management facilities within the West Midlands Region, such as the proposed large MBT plant in Warwickshire and gasification plants with resource recycling elsewhere in the UK, including by the Applicant Company in Avonmouth, Derby, Sheepbridge and Dagenham.

Section 5
Discussion and Conclusions

5.1 Following on from EDP's review of the landscape planning context, the ES and our own field appraisals the following conclusions can be drawn:

Landscape Matters as Addressed in the Environmental Statement

5.2 SLR's methodology and fieldwork is substantially compliant with the '*Guidelines for Landscape and Visual Impact Assessments*' which landscape practitioners use as a reference document for the preparation of ES material. EDP does have a number of reservations about the landscape chapter of the ES:

- The photographs used as a basis for the assessment have not been taken on a clear day; some of the photomontages of the development do not illustrate the scheme in wintertime circumstances, so it is doubtful that the material within the ES illustrates the scheme at its most visible. There is a risk therefore that SLP have underestimated the potential visual impacts of the scheme;

- SLR have failed adequately to define clear thresholds between one level of impact and another, so there is some opacity regarding the degree to which the magnitude and sensitivity to change is defined;

- The conclusions regarding the impact of the scheme on landscape character fail adequately to acknowledge the substantial change which the site and its immediate surroundings will undergo in the medium term as the operational life of the landfill comes to an end and is restored in accordance with the restoration proposals;

- Viewpoints within the urban areas are under-represented in the assessment; some selected viewpoints do not fully illustrate the impact of the proposals; and

- The landscape chapter of the ES do not provide an adequate assessment of potential night time effects of the proposal.

5.3 These issues do not individually comprise 'fatal flaws' in the ES but rather, leave the reader unclear about the true visual effects of the proposal and their significance in landscape terms. EDP suspects that the SLR conclusion that the "*Visual impact of the proposed development would be widespread...although in most cases the level of impact would be very low*" underestimates the magnitude and significance of the impacts likely to be experienced.

Compliance with Policy

Green Network

5.4 The Green Network (protected by saved policies OL3 and OL4 of the WLP), of which the site forms part, remains a coherent structure to the east of Telford unlike other parts of the Network which have become fragmented. This is for good reason; the nearby Granville Country Park and Shropshire Golf Club, both of which also lie within the Network are important open space and recreational areas. Other land surrounding the application site is characterised by a wildlife site to the north and west of the site and two scheduled ancient monuments close by. The Green Network in this area '*feels*' more rural than urban and accentuates the sense that the site lies not within the urban area, but in a rural fringe location. This sense is presently dispelled only by the operational landfill site which is the only parcel of land in the area not to have been designated as part of the Green Network.

5.5 Even here, in due course, the approved land reclamation scheme will create an informal/semi-natural appearance through the planting of broadleaved woodland, scrub, reedbeds and grassland, all bisected by footpaths connecting the area to the Country Park and golf course. When restored, the landfill site will return to a use

compatible with the purposes of the Green Network at which time, it may be appropriate to consider including the restored landfill site within the Green Network to unify it this side of the town.

5.6 The importance of incidental open spaces to the fabric of towns, particularly their interface with rural areas, is acknowledged at all levels of policy:

- Policy P20 of the JSP was not saved but addressed the need to identify and protect a network of open space within the defined built up areas;

- More recently Policy QE4 of the WMRSS '*Greenery, Urban Greenspace and Public Spaces*' endorses the identification of urban green spaces. Policy QE4 states that development plan policies should ensure that adequate protection is given to urban green spaces; and

- As such, policy QE4 directly underpins and endorses saved policies OL3 and OL4 of the WLP which protect the Green Network and provides control of development within it.

5.7 To comply with policy OL4 '*Development in the Green Network*' development proposals must comply with three criteria:

- There must be exceptional circumstances;
- The development must be complimentary to the aims of the Network; and
- There must be environmental and community benefits as part of the proposal.

5.8 It is beyond the remit of this report to determine whether 'exceptional' circumstances exist; certainly in landscape terms, given the availability of so much allocated employment land on sites less sensitive in landscape terms than the application site, it seems improbable that such circumstances exist in landscape terms. Although the applicants propose a visitor centre (thus meeting the third of the above tests), the proposals do not meet any of the six

aims of the Green Network defined at para 8.2.12 of the WLP. The proposed development therefore fails at least one and probably two of the three tests for permitted development in the Green Network.

5.9 Policy OL4 does permit exceptions, including "*Solar panels and other renewable forms of energy production*". Even if energy from waste fulfils the definition of a 'renewable energy' source, such exceptions must still be '*restricted to predominantly open land uses*' (para 8.3.14 of the WLP) and '*Any proposal must also be of a sensitive design and layout' (para 8.3.17).*

5.10 Having regard to all these matters, our conclusion is that the proposed development :

- Does not meet the tests for development to be permitted in the Green Network and is therefore not compliant with saved policy OL4 of the TWLP;
- Is not consistent with the six aims of the Green Network set out at para 8.2.12 and is therefore not in accordance with saved Policy OL3 of the TWLP; and therefore
- Is not in accordance with Policy QE4 of the WMRSS which encourages LPAs to develop and protect urban open space such as Telford's Green Network.

<u>The Siting of Proposals for Waste Management : Landscape Considerations</u>

5.11 Relevant policy related to the siting of waste management proposals includes saved Policy P67 of the JSP and saved Policy NR1 of the WLP – both of which permit the siting of waste management proposals where it can be demonstrated that the proposal will not have unacceptable adverse impacts on interests of acknowledged importance. In the case of P67, such interests include '*landscape character*' while in the case of NR1the requirement is to accord with other policies in the Plan regarding Countryside and Open Land and the Historic Environment'. The Open Land policies have not been

saved, but taken collectively, it is clear that any waste management proposal must demonstrate that there will be no unacceptable adverse impacts on the landscape.

5.12 As noted in Section 3, the site lies in a commanding position on elevated land to the north-east of the town. As such, development of the scale and mass proposed has the potential to affect both the setting of the town and the character of the wider rural landscape.

5.13 Various references provide an insight into the level of sensitivity which should be attached to development in this location. Some are from policies which are not saved and to which therefore no 'weight' can now be attached, in the planning balance; they are nonetheless helpful contextual references which add to our understanding of the Council's priorities and objectives past and present:

- Paragraph 8.2.7 of the WLP states that "*The Council does not want to see the edges of the town eroded or spoilt and has therefore undertaken landscape appraisals of Telford's urban fringe*". EDP has not been able to obtain these (now rather dated) assessments but the paragraph continues to state that "*The north east* (of the town) *includes the attractive and sensitive landscape between Telford and Lilleshall with a mixture of future housing development, Granville Country Park and recreational uses*";

- The assessment of housing capacity around the fringes of Telford undertaken for TWC by White Consultants in May 2009 concludes of potential land in the vicinity of the proposed EfW scheme "*the site has no capacity for housing as it is a rural use away from the settlement edge. The tip and pylons are no justification for housing development nearby*";

- The wider landscape to the east of Telford is identified in the Shropshire Landscape Typology as an area for 'repair' of the landscape;

- Policy P42 of the JSP has not been saved but highlighted the importance attached to the conservation of the landscape around the edges of towns. It stated "*The countryside around towns has a particular importance and will be subject to management initiatives that will secure its visual enhancement and its use for access, wildlife, open space....having regard to the setting and character of the town*";

- EDP's own field appraisals confirm that the proposed EfW site occupies a commanding location; development here would be visible from across wide areas within the town, the Green Network and landscapes to the north of the town. While similar large buildings do exist nearby, comparisons need to be carefully made and one could not justify a building of the mass of the EfW scheme on the grounds of the deemed acceptability of the nearby Donnington Wood Business Park buildings This is because:

    - The Business Park buildings are on land that is significantly lower than the application site meaning that they are not seen as a skyline feature in the same way as will the EfW proposals;

    - The Business Park buildings are closer to and better integrated with the urban area rather than separated from it by the open land of the Green Network; and

    - In planning (rather than landscape) terms of course, the Business Park buildings were built on allocated employment land rather than in the Green Network and so fell to be tested against a wholly different set of planning criteria.

- Para 16.35 of the JSP – the supporting text to saved policy P67 states "*Telford and Wrekin have a range of international, national and locally sensitive sites or areas of wildlife, landscape, historical, archaeological or geological importance. If a more sustainable approach to waste management is to be achieved such sites and*

species need to be properly protected" (EDP underlining). The *'locally sensitive sites'* would include Telford's Green Network.

5.14 Taken collectively, these references suggest that there are indeed 'interests of acknowledged importance' in landscape terms which would be harmed by the siting of an EfW plant in this location. Coupled with the findings of our own landscape appraisals these references lead EDP to conclude that the location of the proposed development is not compliant with the requirements of saved policy P67 of the JSP nor with the requirements of Policy NR 1 of the WLP.

Impacts on Designated Landscapes

5.15 As noted above in para. 2.10 there are not considered to be any adverse impacts on the Shropshire Hills AONB.

5.16 There are locations within the Strine Levels from which the site and the development proposed will be clearly visible. EDP's view is that the ES has underestimated the significance of views from the Strine Levels. However, due primarily to the considerable distance between the viewer and the development, we are satisfied that any effects on the character and visual amenity of the Strine Levels will not amount to a 'significant effect' in landscape terms (i.e. one which as a result of the sensitivity of the viewer combined with the likely magnitude of change experienced, gives rise to an effect of 'moderate/substantial' impacts or greater as defined in the ES matrices). The development is therefore not considered to offend policies OL2 of the WLP or CS12 of the Core Strategy.

Conclusions

5.17 Having completed a review of the relevant planning context, the applicant's Environmental Statement (with particular regard to Chapter 7 'Landscape and Views') and undertaken our own field studies, EDP's overall conclusions are:

- That the development would yield greater impacts than predicted in the ES. These impacts are not consistent with the aims of the designated Green Network (saved Policy OL3 of the

WLP) of which the site forms part and are not compliant with the requirements for development within the Green Network (saved policy OL4);

- Based on the work we have conducted to date, we believe that the development does not offend the aims of saved policy OL2 , which protects designated landscapes such as the Shropshire Hills AONB and the Strine Levels ASLC;

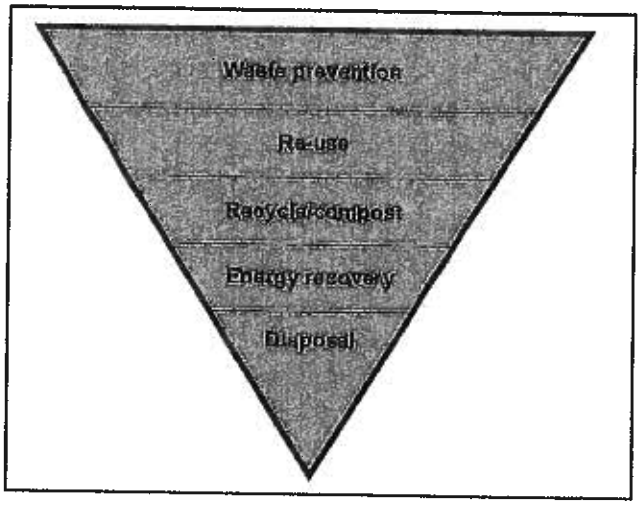
- However, by virtue of its commanding location in an elevated location on the interface between the town and the rural landscape, the proposed development does not comply with the provisions of saved Policy P67 of the JSP and saved Policy NR1 of the WLP, both of which require that proposals for waste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

The Environmental Dimension Partnership, November 2009

Appendix 4

A1.1 Introduction

The Waste Strategy for England 2007 sets out the waste hierarchy, with the preferred method of managing waste, waste prevention, at the top, and least preferred, disposal at the bottom.



The Strategy sets a target to reduce the amount of household waste not re-used, recycled or composted from over 22.2 million tonnes in 2000 by 29% to 15.8 million tonnes in 2010 with an aspiration to reduce it to 12.2 million tonnes in 2020, a reduction of 45%.

The Strategy sets a target for:

- recycling and composting of household waste to at least 40% by 2010, 45% by 2015 and 50% by 2020; and
- recovery of municipal waste to 53% by 2010, 67% by 2015 and 75% by 2020.

Although the same hierarchy is applied to commercial and industrial waste, there are no binding targets for the diversion of these wastes. However, there are strong commercial factors driving the commercial and industrial sectors to reduce waste production and divert waste from landfill.

A1.2 Prevention

Waste prevention is the preferred waste management option. Quite simply, the less waste produced, the less there is a requirement to manage.

Waste prevention must largely be lead by the manufacturing and retail sectors, although on a domestic scale, significant reductions can be made through product choice, for instance showing preference for products with less packaging and by careful shopping and management of food, avoiding kitchen waste through avoiding buying too much and exceeding "use by" dates.

One of the largest sources of waste is packaging used in the provision of industrial goods as well as for the retail market. Legislation and Government initiatives and voluntary schemes are helping reduce the amount of packaging through good design and public awareness. EC Directives implemented through UK legislation, such as the Packaging (Essential Requirements) Regulations have been introduced to reduce waste arising from packing. These regulations place a duty on producers of packaging to ensure that the packaging used around products is kept to the minimum amount necessary without breaching required levels for safety and hygiene and consumer acceptance. An example of a voluntary scheme by the retail sector to reduce waste production is the removal of single use carrier bags from display at supermarkets, encouraging the use of re-useable bags.

These initiatives will help to drive down waste production from current levels and the results are probably being seen already through a small but measurable decrease in household waste arisings over the past 4 years, which contrasts with a growth rate of 3% per year widely predicted in the early part of the decade.

Although rigorous product design and initiatives can be promoted by Government (National and Local) and industry (retail and non-retail sectors) and driven by consumer pressure, there will remain a requirement for the management of wastes.

A1.3 Re-use

Re-use of goods and materials can be carried out at both industry and domestic levels. Industry looks favourably at re-use of, in particular, packaging, with returnable containers, pallets etc. The same is true at a domestic level, but this has largely been left to the retail sector to lead, for instance providing re-useable containers that can either be returned or re-filled at the store.

As a society the western world has become accustomed to "the throw-away society", driven largely by consumerism, in turn driven by rapid advances in technology. An example of the consumer attitude is provided by the mobile 'phone. These came into accessible use only in the last 20 years or so, but the majority of people now either own or contract them and replace them frequently, either to satisfy a craving for enhanced functions or in tune with fashions. A generation ago,

consumer goods such as radios or televisions would be replaced only when they broke beyond repair. However, most mobile phones can be re-used and there are schemes, largely supporting charities, that take mobile phones for reconditioning prior to re-use in emerging economies. Similar schemes are also in place for the re-use of ink cartridges from printers that many homes as well as offices have with the advance of the information technology sector.

Re-use is also encouraged at a domestic level by donating unwanted, but still serviceable items to charity shops.

Just as with waste minimisation, whilst reductions can, and no doubt will, be made through re-use initiatives and EU and central Government legislation such as the Waste Electrical and Electronic Equipment Directive, there will remain for the foreseeable future a need to manage wastes.

A1.4 Recycling/compost

Recycling is the recovery of materials that are suitable for re-using as a resource for making more of the same product or an alternative use. Common examples are the recycling of paper and card to make more paper, and glass for making more bottles. Apart from saving in disposal costs, the principle advantages of recycling are the saving of resources (trees or silica sand in the examples of paper and glass) and the associated environmental impacts, and savings in energy in producing the final product in comparison with producing it from raw materials.

Historically waste, in particular municipal or household waste, was mixed in the household prior to collection. Much of the potentially recyclable materials were contaminated, particularly paper and card, for instance by food wastes, which rendered them of little or much lower value. Segregation at source, by the householder or commercial sector, has lead to improved recovery rates and quality of recyclable material. In some cases, the separately collected material can be sent directly to a reprocessing facility. However, to avoid the provision of numerous bins for the separate storage and collection of recyclable materials, it is more common for those materials to be collected together in a single bin for kerbside collection, "bulked up" and sent to a "materials recycling facility" or MRF. Other recyclable materials are collected at "bring" sites such as bottle banks or at Community Recycling Centres.

At the MRF the materials typically travel along a conveyor belt and the specific fractions are gradually removed. Ferrous metal may be extracted using magnets,

paper taken off by weight and other screening devices used such as eddy current separators to separate aluminium.

Due to the problems of plastic identification, these are still hand separated at many MRFs, however advances in technology are enabling some MRFs to use electronic means to identify and separate different plastics from the waste stream.

MRFs can be of various sizes, depending on the range of wastes and throughput. Typically they are to all intents and purposes no different in appearance to industrial buildings seen on many industrial parks around Telford.

Source: Shanks Waste Solutions

Mechanical Biological Treatment (MBT) processes incorporate mechanical sorting and separation of the waste stream to separate the biodegradable materials, which are sent to a biological process, from the non-biodegradable materials. Non biodegradable materials can be subject to further separation to recover recyclable materials, using similar technologies to those used in materials recycling facilities. Biological treatment can be treated by anaerobic digestion or composting, depending on the nature of the material, which in turn, is a function of the waste input. Depending on the materials the stabilised biological materials can be used as soils conditioners or restoration materials or sent to landfill without counting towards LATS targets for landfilled BMW, provided the material meets certain pre-determined levels of stabilisation. An alternative treatment is bio-drying to produce a refuse derived fuel which can be used to generate heat and power in an energy from waste plant or as an alternative fuel in cement kilns.

MBT plants can be modular and added to or reduced in scale to meet changing waste volumes or waste stream characteristics. They are similar in appearance to MRFs, with the appearance of typical industrial buildings.

Composting is a natural process in which organic material is broken down by the action of micro-organisms. Typical materials suitable for composting include greenwaste (garden waste) and kitchen wastes and other enriched organic waste streams such sewage sludge, agricultural and food processing wastes. The majority of Biodegradable Municipal Waste (BMW) composted in the UK consists of garden type waste collected at civic amenity sites, the remainder being source segregated kerbside-collected garden waste or garden waste co-collected with kitchen waste.

Composting processes for municipal waste management primarily fall into two categories: windrow composting, for green, or garden derived wastes, and in-vessel composting for both garden and kitchen / catering derived organic wastes.

Windrow composting is an established technology for dealing with green wastes in the UK, where the material is piled in elongated rows and aerated through either turning of the windrows or through air forced through the material. This may take place in buildings or externally.

External Windrow Composting. Source WRAP

The term 'in-vessel composting' is used to cover a wide range of composting systems all of which feature the enclosed composting of waste, therefore allowing a higher degree of process control than is possible with windrow composting. In-vessel systems can be broadly categorised into six types: containers, silos, agitated bays, tunnels, rotating drums and enclosed halls.

Tunnel IVC, source WRAP

A1.5 **Mechanical Heat Treatment** is a form of solid waste treatment that utilises heat, steam and pressure (**autoclaving**) in the processing of waste. Waste autoclaves process waste in batches. Saturated steam is pumped into the autoclave at temperatures around 130°C to 160°C. Super heating conditions and steam generation are achieved by variable pressure control, which cycles between ambient and negative pressure within the sterilization vessel. The process causes paper and other fibrous material to disintegrate into a fibrous mass, or flock, and plastic bottles to soften and flatten. The process reduces the volume of the waste by in the order of 60%.

Following the removal of water, fibre, metals, and much of the plastics, the residual waste stream for disposal may be less than 10% by weight of the original stream. The fibre can be made into refuse derived fuel or burned in biomass plants, processed through anaerobic digestion or used as a soil conditioner.

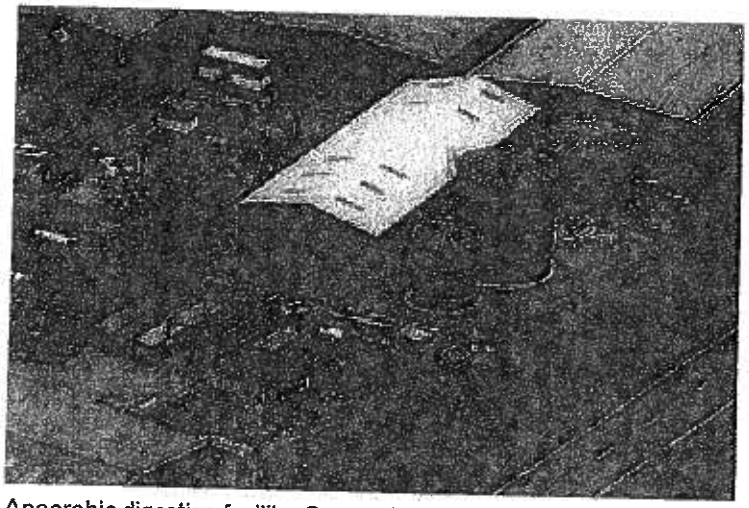
There is currently one operational autoclave plant in the UK, in Rotherham, South Yorkshire, with an initial capacity to treat of in the order of 100,000te year, with permission to expand to 200,000te/year. The plant occupies an unremarkable industrial unit and is indistinguishable from neighbouring industrial units. The same operator has gained planning permission to develop a similar sized facility near Cardiff.

A1.6 Energy Recovery

Anaerobic Digestion (AD) involves the break down of biodegradable material in the absence of oxygen by micro-organisms called methanogens. It has been widely used for many years to treat wastewater in the UK and can also be used to treat other organic wastes, including domestic and commercial food waste, manures and biofuel crops. The process is suitable for treating readily degradable organic wastes, but not for woody wastes including paper and card.

The process of anaerobic digestion provides a source of renewable energy, since the food waste is broken down to produce biogas (a mixture of methane and carbon dioxide), which is suitable for energy production. The biogas can be used to generate electricity and heat to power on-site equipment and the excess electricity can be exported to the National Grid. Other possible uses for the biogas currently being explored in the UK include injection to the gas grid and using it as a vehicle fuel.

Anaerobic digestion plants differ in scale and details of the process, but essentially have the appearance of industrial plants that utilise large tanks, such as dairies and other food processing industries. The development of anaerobic digestion plants generally requires sites between 1 and 1.5 hectares. Typically the plants have capacity to manage 20,000 to 50,000 tonnes of waste per annum.



Anaerobic digestion facility. Source Letsrecycle.com

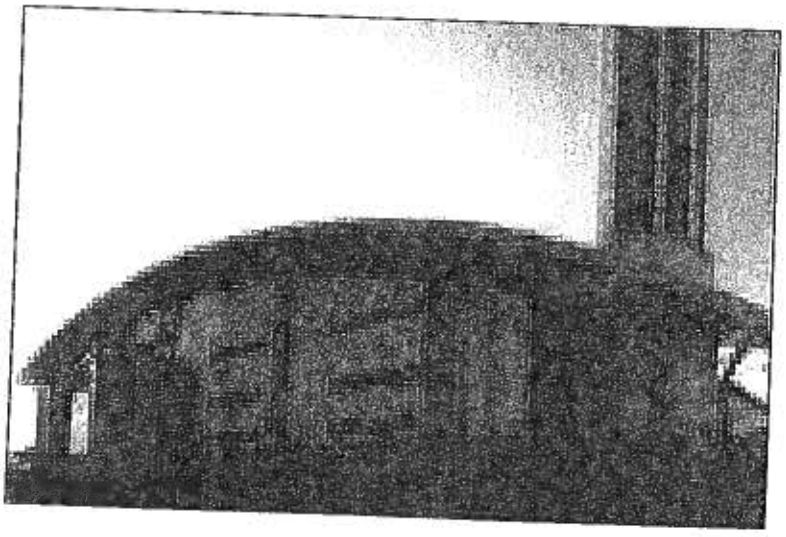
Apart from the biogas, the other main by-product of anaerobic digestion is a digestate, which is stored until required, and can be separated into liquid and solid fractions. Solid fractions can be processed further on site by composting operations for further processing or used directly on land. The liquid may also be used on the land as a biofertiliser.

Energy from Waste

Energy from Waste (EfW) is a collective term for a number of thermal treatment techniques. The most commonly used to date in the UK is referred to as **Mass Burn** or **direct combustion** (incineration), such as the proposed plant at Granville, in which waste is burned to provide heat, which is then used to generate electricity. Some heat can be used for industrial or community heating as well as power generation and this is referred to as combined heat and power (CHP).

Unlike anaerobic digestion, energy from waste plants can burn any organic materials, including those that are not readily degradable such as wood based wastes and plastics. The outputs of direct combustion plants produce incinerator bottom ash (IBC) and fly ash, which is a product of the abatement processes used to remove pollutants from the flue gases. The bottom ash can be used as a secondary aggregate, subject to quality criteria. The fly ash must be disposed of as a hazardous waste.

Due to the configuration of the plant, typically with boilers above the furnace, direct burn EfW plants tend to require tall buildings, with large stacks for the dispersion of waste gases.



Lakeside EfW Plant Slough. Source Institute of Structural Engineers

Gasification and Pyrolysis, sometimes referred to as advanced thermal treatment are both types of thermal treatment where the organic portion of waste is heated either in the complete absence of oxygen (pyrolysis) or with limited oxygen (gasification) to produce a chemical reaction. The gas produced (known as syngas) can be used as a fuel to manufacture steam or electricity. The other output is a low carbon char residue (pyrolysis) or ash (gasification).

Direct combustion, gasification and pyrolysis plants involve similar characteristics. Sites are typically between 2 and 5 hectares and require a large industrial building to house operations depending on the plant capacity. Emissions from gasification and pyrolysis are reported to be lower than for direct combustion, although the actual emissions from all three technologies have to be controlled to meet the same strict emission limits to comply with the Waste Incineration Directive. Due to the configuration of some gasification plant technologies, particularly those using gas engines rather than boilers for electricity generation, buildings for gasification plants tend to be less tall than direct burn EfW plants, with lower chimney height.

Unlike direct combustion energy from waste plants, gasification and pyrolysis plants are modular, hence units can be added or taken away as waste streams or volumes change.