

The No2Waste Campaign Group

4 August 2011

Minerals & Waste Policy,  
Spatial Planning, Economy and Enterprise  
Wiltshire Council, County Hall  
Bythesea Road  
Trowbridge,  
Wiltshire BA14 8JD

Dear Sirs

**Wiltshire & Swindon Waste Site Allocations Development Plan Document (DPD)**

We have viewed the above document and note Castledown Business Park, Ludgershall, and Pickpit Hill, Tidworth are listed as viable sites for waste management facilities (WMFs). In our opinion both sites are unsuitable for such use.

Therefore, we wish to make the following comments regarding the soundness of their selection in the Waste Site Allocations DPD:

(NB: References have been made to Hills Waste Solutions (HWS) and their outlining planning application to build a waste transfer station on the Castledown Business Park. Although not part of the Waste Site Allocations DPD the plans have highlighted the impact WMFs will create)

**Impact on human health, safety and amenities:**

- Firstly, WMFs will impact on human health and amenities on these sites due to their close proximity to the prestigious new Wellington Academy, its playing fields, existing/future B1 class businesses and existing/future planned residential areas. This will be detrimental to the Academy and the health and safety of its students; detrimental to the B1 class businesses; and detrimental to the residential areas
- Waste will attract flies, vermin and other creatures thus creating health hazards and nuisance for occupants of neighbouring sites. When coupled with air pollutants containing a cocktail of volatile organic compounds, dust, chemical sprays (inc. odour control sprays and insecticides) and traffic emissions, this will impact on human health, especially for those suffering from bronchial and skin complaints.
- Mitigation measures to increase the hedgerows and tree lines may not be sufficient protection for immediate neighbours (i.e. Academy students, existing B1 class and future businesses, and existing/future residents).
- NB: The Drummond Park housing development site is less than 150m from Castledown Business Park.
- Prevailing winds will blow odours, dust, fumes and litter across Ludgershall. Older residents of the town recall the landfill operation in the early 1970s, when the railway cutting near Pickpit Hill was in-filled. Pungent odours regularly wafted across Ludgershall and reached as far as Faberstown.

- Although the HWS proposal would mean waste would be stored in a large warehouse the doors would have to be opened for vehicular access and exit. At peak times it would be impractical to keep opening and shutting doors because the frequency of traffic would be too great. So odours, dust etc would escape into the atmosphere.
- The Waste Site Selection & Site Appraisal Methodology Document (SSAM) dated August 2009 clearly states under Appendix D "...assess suitability for development against: the physical and environmental constraints on development, including existing and proposed neighbouring land uses" and "to avoid detrimental impact on land in or allocated for B1 employment uses".
- Under Appendix E: Exclusionary Objectives: "To avoid development that would lead to impacts on human health" where indicators are proximity to residential areas, schools and associated land/playing fields, proximity to urban businesses and proximity to concentrations of urban development.
- NB: SSAM Appendix E, Discretionary objective 5: "To minimize potential detrimental impacts of nuisance (vermin, pests, litter...)." and Discretionary objective 4: "To minimize potential detrimental impacts of odour, dust and fumes."
- Increased noise and vibration from RCV, LGV and HGV traffic will impact on immediate neighbours, i.e. the Academy students, occupants of existing B1 class and future businesses, and existing/future residents.
- NB: SSAM Appendix E, discretionary objective 3: "To minimize detrimental impacts related to noise and vibration."
- The HWS plan for a WTS at Castledown shows peak traffic movements will coincide with the Wellington Academy opening and leaving times impacting on students' safety.
- Any attempt by HWS to rearrange their timetable would not be practical as collection vehicles must start at a given time in the morning and will have to travel further to offload. Also, the Academy has a long working day from early in the morning to the evening hours. Thus, there will be people coming and going throughout the whole day.

#### **Economic/Employment impact:**

- The Castledown Business Park is intended for innovative businesses and enterprises.
- Existing B1 class businesses on the site will almost certainly relocate if the site is formally adopted for WMF use. Several, including a catering company, have already stated they would relocate if HWS built a WTS on the site.
- There are currently in excess of 70 people employed either on site or as a direct result of the businesses now located at Fitz Gilbert Court, the first phase of the Park's development in an area of similar size planned for the WTS. By comparison, the WTS would only employ a small fraction of people locally as most of the 30 personnel would be existing employees of HWS. This small but crucial employment site cannot be 'wasted' by granting permission for this proposed WTS that promises to deliver minimal local employment.
- Future businesses from most sectors would be deterred from moving onto a site formally adopted for WMF use, impacting on future employment opportunities and development of the business park itself. For example: a local coach company, previously interested in moving onto the park, has recently

been approached to establish if the proprietor still wishes to relocate. However, although it is still a consideration, he would not contemplate moving if the site is formally adopted as suitable for WMFs.

- If adopted a precedent would be set for similar undesirable industries to move onto the site.
- As the Pickpit Hill site comprises mature woodland and undeveloped grass land, the cost of developing this site and providing access is likely to be prohibitive.
- NB: SSAM Appendix D: Economic: “In deciding which sites and areas to identify for waste management facilities, waste planning authorities should assess their suitability for development against the physical and environmental constraints on development, including existing and proposed neighbouring land uses.” Discretionary: “To avoid detrimental impacts on land in or allocated for B1 employment uses.”
- The Draft Core Strategy document puts a primary emphasis on creating jobs within principal settlements and market towns. Tidworth and Ludgershall are included in the Market Towns list in Core Strategy Policy 1.
- Para 5.15.3: “Castledown Business Park is an important allocation that will fulfil the employment requirements of Tidworth/Ludgershall in the short and medium term.”
- The HWS proposal would mean extra travelling distances for RCVs and kerbside collection vehicles. This would incur additional fuel and labour costs. It would also increase carbon emissions. NB: Policy WDC11: Sustainable Transportation of Waste: “Minimize transport distances, reduce carbon emissions...”

#### **Biodiversity and Cultural Heritage:**

- Pickpit Hill and Windmill Hill are chalk grassland habitats supporting wildlife including butterflies, brown hare, badgers, bats, and reptiles, including grass snakes and slow worms. Castledown Business Park borders land which creates a green corridor for this wildlife. Waste operations nearby would impact on wildlife.
- The Old Castle heritage site in Ludgershall is downwind of the two proposed waste sites and could be harmed by air pollution.
- Collingbourne Woods, an ancient woodland, is situated to the north east of the sites and vulnerable to air pollution.
- Mitigation measures to increase the hedgerows and tree lines may not be sufficient protection for the ancient woodland, the Old Castle and wildlife
- Waste will attract flies, vermin and other creatures which will require mitigation and control measures, i.e. poisons and insecticides. When coupled with air pollutants containing a cocktail of volatile organic compounds, dust, chemical sprays, and traffic emissions, this will impact on wildlife and domestic animals roaming the area.
- NB: Policy WDC8: Biodiversity and Geological Interest and Policy WDC9: Cultural Interest
- NB: <http://planetearth.nerc.ac.uk/news/story.aspx?id=973> and <http://planetearth.nerc.ac.uk/news/story.aspx?id=510> re rat poison impact on owls and hedgehogs respectively [Appendices 1a & 1b]

### **Water Environment:**

- Both Castledown Business Park and Pickpit Hill overlie a major aquifer and there are potential contamination issues to ground water and water supplies.
- Whilst mitigation measures can be introduced to reduce the risk of contamination to the underlying major aquifer there will always be a degree of risk which is unacceptable.
- [NB: Policy WDC3: Water Environment](#)

### **Transport/Location:**

- There are many traffic and congestion issues in Ludgershall and Tidworth already. The volume and timing of traffic indicated by Hill Waste Solutions in their outlining plans for a WTS on the Castledown Business Park will exacerbate the existing traffic issues.
- The existing traffic problems areas are primarily:
  1. Butt Street corner– difficult for lorries to negotiate
  2. The Memorial junction/Prince of Wales – lorries negotiating between parked vehicles
  3. Mid High Street – parking each side and the narrow carriageways mean only small cars can use both lanes at same time; a lorry takes up both lanes
  4. Ludgershall Road in Tidworth is frequently single lane due to roadside parking and the steep incline adds to negotiating difficulties
  5. The steep railway bridge in Ludgershall in adverse/winter weather conditions
  6. Tidworth Hill in adverse/winter weather conditions
  7. Roadside parking along A342 Andover Road, especially near Bell Street
  8. Tesco and Co-Op – large delivery vehicles, bus stops, coaches, zebra crossing and shoppers all converge on this small length of the Andover Road
  9. Bus Stops: one opposite the Car Park and the other near Biddesden Lane – when buses are stopped vision is restricted making it extremely difficult for other traffic to pass
  10. Future issues surrounding the impact of increased traffic on local roads when Drummond Park, and possibly Granby Gardens and the Empress Way expansion are developed.
- LGV/HGV/RCVs will have particular problems negotiating 4, 5 & 6; especially in adverse/winter weather conditions as snow and ice on the steep inclines make the roads treacherous, and often impassable.
- Sites should avoid impacting on residential roads. The A342 has in excess of 150 drains and manhole covers along the Andover Road through Ludgershall that regularly collapse under the current flow of heavy vehicular traffic. The type and volume of traffic suggested by the HWS plan would exacerbate the problem.
- [NB: SSAM Appendix E: Discretionary: “Avoid locations that access through residential areas and sensitive land.”](#)
- Based on the figures supplied by HWS there will be congestion problems at peak times, estimated one vehicle every 2 minutes when it takes 3-4 minutes to clear a weighbridge. This will create a backlog of traffic which will build up on the A3026. A similar backlog has been witnessed at peak times (around

2.30pm) on the A30 generated by vehicle movements accessing the existing Thorny Down site.

- MRFs are suggested as possible uses for both sites. However, MRFs are generally considered ‘strategic’ operations which should be within 16km of a Strategically Significant City or Town, e.g. Salisbury.
- The WTS operation plans by HWS would bring waste from South Wiltshire which can only be regarded as a ‘strategic’ operation as the waste is generated from a large geographical area outside East Wiltshire, and, therefore, is not ‘local’.
  1. Waste sites should be as close to the primary source of waste (i.e. SSCT of Salisbury) to **minimize transport distances** and **COST**
  2. Thorny Down is ideally situated for strategic operations as it is within 16km of the SSCT of Salisbury
- NB: Policy WCS2: “Strategic waste site allocations will be located as close as practicable (**within 16km**) to SSCTs (Strategically Significant City or Town) of **Swindon**, Chippenham, Trowbridge and **Salisbury** as identified in the Regional Spatial Strategy of the South West. Waste sites situated outside of these areas will be local-scale allocations to serve the demonstrable needs of the local area only....In the interests of achieving the objectives of sustainable development, priority will be given to proposals for new waste management developments that demonstrate a commitment to utilising the most appropriate haulage routes within and around the Plan area and implement sustainable modes and methods for transporting waste materials.”
- The HWS plan for a WTS has highlighted the impact traffic from WMFs would have at peak times and combined with the additional associated costs is unsustainable.
- If Pickpit Hill is adopted the traffic will be diverted away from Tidworth and routed along the A342, impacting on Ludgershall’s residential roads, through to Weyhill and the Hundred Acre Roundabout on the edge of Andover to join the A303. There would be a cross-boundary impact on Hampshire and travel distances lengthened. This is contrary to [Policy WDC11](#).

#### **Major fire risks:**

- Waste is subject to spontaneous combustion, especially organic decomposing waste which can reach temperatures of up to 160°F.
- [Ref: NC Department of Environment and Natural Resources – Waste Management - Emergency/Disaster Site – Spontaneous Combustion Guidance \[Appendix 2\]](#)
- Such a major fire so close to residential areas, an academy and businesses is potentially a serious health and economic risk.
- Examples of spontaneous fires at waste sites (we can provide other examples):
  1. Major fire at HWS site at Chapel Hill, Blunsdon on 26 May 2011
  2. Thirsk Waste Management Depot on 3 May 2011
  3. Colnbrook MRF on 15 May 2009
  4. Birmingham Waste Transfer Station on 15 July 2007
  5. Kirkstall Road Transfer Loading Station, Leeds on 11 September 2002[\[Appendices 3a-3e\]](#)

- Waste sites are subject to arson attacks. Ref: “Spate of fires at waste sector over Bank Holiday” headline May 2011 on [www.letsrecycle.com](http://www.letsrecycle.com) website [Appendix 4]
- Waste could include hazardous materials like asbestos, paints, and chemicals which pose fire and pollution risks.
- NB: Extract from the Pollution Prevention and Control Regulations on the Environment Agency website: **“There is a human health issue that has been identified to be of primary concern, which is the exposure of the public to releases from serious incidents such as fires and unforeseen chemical reactions.”** [Appendix 5]

### **Character:**

#### Castledown Business Park:

- Out of character with the original plan to attract innovative businesses to the Castledown Business Park
- Detrimental to existing businesses and a deterrent to all future businesses
- Sets undesirable precedent for similar undesirable industries to move onto the business park

#### Castledown Business Park and Pickpit Hill:

- Totally out of character and appearance with the surrounding area impacting on amenities, safety and quality of life.
- Pickpit Hill is now vegetated with woodland and a UK BAP priority habitat which should be preserved
- NB: Policy WDC7: Conserve Landscape Character: **“Proximity to settlements must safeguard their character, setting and rural amenity.”**

### **Other sites:**

- We need to know why Solstice Park, Pickpit Hill and Everleigh are still included in the document when we have been given the impression the first was unavailable and the latter two unsuitable
- The lease for Everleigh runs out in 2016 but the DPD takes the County’s strategy plan to 2026. Does this mean the lease can be renewed?
- We also understood Everleigh could not be expanded. However, under ‘Biodiversity and Geodiversity’ for Everleigh in the Site Allocations DPD it states “Any expansion on the site is unlikely to impact on the Ancient Woodland...” It is unclear why this statement is there if expansion is out of the question.
- In our opinion Solstice Park is ideally situated for WMFs as it has immediate access to the A303 and impact on residential roads is minimal. In this respect its inclusion in the DPD is sound.
- The inclusion of Thorny Down is also sound as it is already fully operational, has good access to the A30 and is located away from residential areas, schools and existing businesses and will not impact on immediate neighbours.

### **SCI/Localism:**

- The Petition opposing the proposal for a WTS by HWS on the Castledown Business Park was signed by over 1000 local residents and demonstrates the strength of local opinion regarding the location of WMFs in such close proximity to the Academy, businesses and residential areas.
- The views of local people [supported by the SCI (Statement of Community Involvement) and the forthcoming Localism Bill] should carry proper weight before a decision is made to proceed any further with these proposals.

We also wish to express our disappointment that the previous consultations were not adequately publicized. Most of the general public in this area were unaware the Waste Site Allocation selection process had been under review since 2006. We now know the Council would have advertised each public consultation in the local press. However, not everyone buys the local newspapers, and, of those who do, hardly anyone studies the Council notices.

After discussing this issue with Geoff Wilmslow at the consultation on 20 July we appreciate it would be expensive to notify each householder individually. However, we understand the Council is paying in the region of £25,000 for 192,000 copies of the “Your Wiltshire” magazine which is delivered free to almost every household in the county. If the earlier waste allocation consultations were published in this magazine they should have been more prominent and eye catching. The magazine is the ideal vehicle to reach everyone without incurring extra costs.

It is regrettable the DPD reached its final consultation before we had the opportunity to comment on the sites in our area. Council officials have obviously spent a great deal of time preparing the document and consulting other bodies. Sadly, it did not, until now, reach the attention of local people who will be the ones to suffer the greatest impact should the sites be formally adopted for WMF use.

Whilst we recognize there is a need for waste sites we do not agree with locating operations like waste transfer stations, materials recovery facilities, inert waste recycling, composting, etc. so close to residential areas, schools and businesses. By their very nature these waste operations should be located away from populated areas where the impact is minimized.

### **Policies and Guidelines:**

There are many policies and guidelines in place to justify our concerns and comments. We have already mentioned and quoted from some of these but would like to draw your attention to a few others we consider relevant:

Policy WDC2 addresses the need to reduce impacts associated with issues such as amenity, visual aspects, noise and light emissions, vibration, transport, air emissions and climate change, the water environment and contaminated land.

In the W&S Waste Development Control Policies DPD adopted September 2009 under section 3, Managing the Impacts of Waste Management Development, quote:

1. The Environment: “...Options for sustainable transportation should be encouraged in order to reduce the impacts of transporting waste through Wiltshire and Swindon. Protect human health from adverse impacts.”

2. WDC11: Transportation of Waste: "...Minimizing transportation distances, minimizing the production of carbon emissions.....Consider the potential cross boundary impacts and cumulative impacts of the development with other local developments."
3. 5.3: "Sites will not be encouraged where access is required through residential areas."
4. **3.3: "The avoidance of impacts refers to the need to prevent impacts happening in the first place."**

**Conclusion:**

The cumulative impacts we have identified question the soundness and sustainability of including Castledown Business Park and Pickpit Hill within the Waste Site Allocation DPD. The following list from the Waste Site Allocations Sustainability Appraisal Objectives summarizes most, if not all, of the concerns we have raised:

1. To protect human health and well-being of people living and working in Wiltshire and Swindon as well as visitors to the Plan area;
2. Promote stronger more vibrant communities;
3. Give people in the county access to satisfying work opportunities;
4. Balance the need for growth with the protection of the environment;
5. Encourage more sustainable transport and reduce the impacts of transport;
6. Protect and enhance biodiversity;
7. Promote the conservation and wise use of land;
8. Protect and enhance landscape and townscape;
9. Maintain and enhance cultural and historic assets;
10. Ensure adequate measures are in place to adapt to the impacts of climate change;
11. Reduce greenhouse emissions; and
12. Minimize land, water, air, light, noise and genetic pollution.

We trust you will consider our comments and review the soundness of the inclusion of these two sites in the Wiltshire & Swindon Waste Site Allocations DPD.

Kindly acknowledge receipt of this letter and confirm that our comments have been noted.

Yours faithfully

Anna Greenwood (Mrs)  
on behalf of the no2waste campaign group