

## REPORT TO THE STRATEGIC PLANNING COMMITTEE

<b>Date of Meeting</b>	22 January 2014
<b>Application Number</b>	N/13/01916/WCM
<b>Site Address</b>	Parkgate Farm Waste Management Facility Purton Swindon Wiltshire SN5 4HG
<b>Proposal</b>	Retention of Existing Composting Facility, Access & Increase in Throughput
<b>Applicant</b>	Hills Waste Solutions Ltd
<b>Town/Parish Council</b>	PURTON
<b>Grid Ref</b>	407555 188659
<b>Type of application</b>	County Matter
<b>Case Officer</b>	Jason Day

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### Reason for the application being considered by Committee

a) Councillor Jacqui Lay has requested that this application be determined by the Committee for the following reasons:

- Scale of development
- Visual impact upon surrounding area
- Environmental/highway impact
- Other (see below)

b) The Applicant has submitted an appeal in respect of this application on the grounds of non-determination, that is the Council's failure to determine the application by the agreed date of 13 November 2013. As a consequence no formal decision can be made by the Council in respect of this application. However, in order to progress with the appeal and in light of the call-in request, officers seek the opinion of the Committee in respect of the application had they been in a position to determine it and on what grounds the Committee wish to contest the scheme at appeal, if at all.

### 1. Purpose of Report

To consider the above application and to recommend that, had the Council been in a position to determine the application, planning permission be REFUSED.

## **2. Report Summary**

The main issues in the consideration of this application are as follows:

- Principle of the development
- Odour impact
- Transportation of waste

The application has generated 2 letters of objection from local residents.

Purton Parish Council raises no objections, but expresses some concerns. Cricklade Town Council strongly objects to this application.

## **3. Site Description**

The site is located to the north of Purton, adjacent to Parkgate Farm Landfill site. The application site is 4 hectares in area and is currently used for open-air turned-windrow composting operations. The wider Parkgate Farm site comprises a collection of derelict farm buildings to the west of the site area and landfill operations to the east.

The site is 1km north-west of the village of Purton and approximately 500 metres north of the settlement of Paven Hill.

Access to the site is via a temporary haul road and over a railway bridge associated with the Landfill site, which links the site with Mopes Lane, a private road connecting the Mopes Lane Industrial Estate with the C414. Due to there being a 7.5 tonnes weight limit at Purton, vehicles entering or leaving Mopes Lane have to use the north bound section of the B4553.

The River Key runs along the northern edge of the site. A bridleway runs immediately west of the site boundary and there is a footpath along the southern boundary. The Gloucester to Swindon railway line runs 600 metres to the north west of the application site. There are no residential properties within 500 metres of the boundary of the application site.

## **4. Planning History**

N/07/07008 – Composting Facility and Tyre Recycling Operation

N/08/07022 – S73 application: Composting Facility and Tyre Recycling Operation without compliance with Condition 15 of Permission N/07/07008

## **5. The Proposal**

The proposal is to 'replace' the existing temporary planning permission for a composting and tyre shredding facility with a permanent composting facility. The capacity of the composting operation would increase from the current permitted 25,000 tonnes per annum to 50,000 tonnes per annum. The proposal would result in the loss of 12,000 tonnes per annum permitted tyre shredding capacity, although this element of the existing permission has never been implemented.

The Applicant also proposes to retain, on a permanent basis, the existing haul road that was been constructed as part of the implementation of the adjacent landfill site.

The composting operations would comprise a series of open windrows, which are turned on a weekly basis on an approximate 12 week cycle to turn the green waste into high grade compost.

### Environmental Impact Assessment

The Council has adopted a screening opinion that EIA is no required for the proposed development.

### Application timeline

The planning application was originally submitted in June 2013, without any recent pre-application discussion/s taking place before submission or to establish what supporting information was likely to be required with an application.

In light of the call-in for determination by committee, an extension of time to 13 November 2013 for the Council to make a decision was agreed with the Applicant.

The proposals for the Parkgate Farm site include replacing a temporary permission with a larger permanent permission. The appropriateness of making permanent a development that was previously granted a temporary/time-limited permission is currently the subject of legal debate around the planning application for the Applicant's facility at Lower Compton. Accordingly, due to there being similarities/relationship between the two proposals the Planning Authority considered it appropriate to wait until conclusive legal advice on the matter had been received before presenting the Parkgate Farm application to the Strategic Planning Committee. Having been informed that this delay would result in the application not being presented to the December 2013 meeting of the Committee, Hills Waste Solutions lodged the appeal against non-determination of the application within the prescribed time period.

## **6. Planning Policy**

The following Development Plan documents are considered to be most relevant to the proposal:

Wiltshire & Swindon Waste Core Strategy Development Plan Document July 2009

Policy WCS1:	The Need for Additional Waste Management Capacity and Self Sufficiency
Policy WCS2:	Future Waste Site Locations
Policy WCS3:	Preferred Locations of Waste Management Facilities by Type and the Provision of Flexibility
Policy WCS5:	The Wiltshire and Swindon Waste Hierarchy and Sustainable Waste Management

Wiltshire and Swindon Waste Development Control Policies Development Plan Document  
Adopted September 2009

Policy WDC1:	Key criteria for ensuring sustainable waste management development
Policy WDC2:	Managing the impact of waste management
Policy WDC3:	Water Environment
Policy WDC5:	Canals and Railways
Policy WDC7:	Conserving Landscape Character
Policy WDC8:	Biodiversity and Geological Interest
Policy WDC11:	Sustainable Transportation of Waste

Wiltshire and Swindon Waste Site Allocations Local Plan February 2013

WSA1:	Presumption in Favour of Sustainable Development
Inset map:	N1 – Parkgate Farm, Purton
Table 2.1:	Parkgate Farm, Purton

Other

Wiltshire Municipal Waste Management Strategy (2012), which reviews and updates the Joint Wiltshire Municipal Waste Management Strategy from 2006.

National Guidance

National Planning Policy Framework (March 2012)

Planning Policy Statement 10 – Planning for Sustainable Waste Management (revised March 2011)

**7. Consultations**

Local Member, Councillor Jacqui Lay – in addition to the key issues identified for call-in of the application, raises the following other concerns: The biggest concern is the HGV movements in the area on roads which are B and C roads and are already damaged. Traffic coming through Cricklade and Royal Wootton Bassett. Is there a need for increased volume at this site as composting should be handled locally to where it is created and not transported across the community areas in articulated vehicles. Have alternative routes been looked at? Prefer temporary permission and not a permanent permission. The site is in an area where there are outstanding views, and having such operations in this area blight the countryside. The River Key which feeds into the Thames is very close by and smells coming from the site impact local residents on route and in the neighbourhood.

Purton Parish Council - raises no objections to the proposed change of use from that of a tyre shredding to green waste management. It was noted that the size of the site will not change. There are some concerns however about the volume of HGV traffic that may arise as a result of the proposal. Traffic assessments are based on estimated figures and time scales in relation to the various operations and all are subject to change. A further concern is that permission is sought for permanent use rather than restricted and the estimated volumes of HGV traffic will continue on that basis. In view of this the Council would like to

see a dedicated vehicle route to the site, potentially via Braydon/Braydon Cross Roads this would also help to reduce HGV movements through Cricklade.

Cricklade Town Council - strongly agreed to object to this application. The application is located in Purton Parish, but has obvious implications for Cricklade. The main concern for Cricklade is any increase in HGV movements to the site. The documentation attached to the application suggests that there could be a 33% increase in composting materials and traffic movements. The applicants have produced figures suggesting that as the number of already agreed movements for the whole site are not currently being fully used this application will actually mean a reduction in the existing approved movements. The fact remains that there will be an actual increase in composting lorries and will inevitably lead to more movements going through the town. At a recent liaison meeting with Hills we were advised that the number of movements generally was being reduced due to the use of larger HGVs. This has an adverse affect on our Town as they cause greater pollution, damage to property and quality of life of residents as they attempt to negotiate Calcutt Street and High Street South, often in excess of the 20mph limit, particularly at the junction by the clock.

Environment Agency - no objection to the proposed time extension and the proposed new tonnage is within limits of the existing environmental permit.

Network Rail – no objection in principle to the proposal; advising that the applicant has completed a lease agreement in 2013 in regard to the bridge over the railway. In relation to the safe operation of the railway and protection of the adjoining land, a number of requirements are set out relating to drainage; safety; heaping, dust and litter; lighting; and safety barrier.

Highways – initially concerned that whilst a reduction in overall HGV movements from the site maybe the case, it was not known whether there was any controls to ensure the other activities could not resume – if they could resume, then overall situation could not be considered a reduction in vehicle movements. Further information was requested. Having considered the Applicants response that the traffic figures reflect the full permitted tonnages and it was unlikely these levels of vehicles estimated in 2006 would ever be achieved, advised that as an appeal situation would be difficult they did not wish to raise a highway objection.

Environmental Health – no adverse comments raised.

Landscape Officer – no comments received

County Ecologist – considers the increase in composting in place of the tyre recycling unlikely to result in any adverse impact on the ecology of the site. However, comments that it is difficult to predict any long term effects that might arise from making the site permanent, since there are few composting facilities of this size that have been operational for any considerable length of time. Suggests that a time limit is applied to any permission granted. This would give opportunity to review how resilient the surrounding habitats are to this type of facility, especially the River Key which runs very close to the northern boundary of the site.

## 8. Publicity

The application was advertised by site notice, press advert and neighbour consultation.

2 letters of objection were received in response to the application.

Summary of key relevant points raised:

- Concern over ever-increasing numbers of HGVs, causing damage to local roads and verges and diminishing local amenity through smell, noise and vibration.
- When Hills ceases to use the permitted HGV loads those surplus to requirements should be retired not transferred to some other operation.
- The additional volumes of composting material will be coming from further afield.
- An alternative route should be sought into the Mopes Lane complex.
- Site is an eyesore and blights views from adjacent high ground.
- Often the smell of rotting waste is noticeable when using local footpaths.
- Rubbish has blown from the site to surrounding areas.
- Site is in an inconvenient location in the county with poor access from main roads.
- Facility brings few in any benefits to Purton or Braydon
- No more permissions should be granted and the sites should be closed after current licences expire.

## 9. Planning Considerations

Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that all applications for planning permission to be determined in accordance with the development plan unless other material considerations indicate otherwise.

### Principle of the development

The wider Parkgate Farm site operates as a strategic landfill facility for hazardous and non-hazardous waste. Planning permission to develop the application site, on land adjacent to a landfill site, as a composting facility and tyre shredding/recycling facility was granted in November 2007. The composting operation commenced in April 2012. The tyre recycling is no longer required due to industry changes in the way waste tyres are now managed. The existing planning permission is for limited period ending in 2024.

In February 2013, the Council adopted the Waste Site Allocations Local Plan which presents a framework of 35 strategic and local scale sites offering a range of potential waste uses to flexibly meet the capacity requirements of Wiltshire and Swindon up to 2026. Some 43 ha of land at Parkgate Farm (comprising the landfill operations, the composting facility and other land for additional potential waste management use/s) is allocated in the Local Plan as a 'strategic' scale site.

In principle the Council will be supportive of applications for appropriate waste management facilities within the locations set out in the Local Plan, although any proposals that come forward on the sites will be subject to a detailed planning application process.

The Applicant currently holds a contract with Wiltshire Council to manage all municipal waste generated in the County. The Joint Municipal Waste Management Strategy (JMWMS) adopted by the former County Council and four District Councils in 2006, sets out Wiltshire Council's approach to managing municipal waste in Wiltshire. The JMWMS included proposals (Principle 4) to increase municipal waste management facilities in pursuit of recycling, composting and overall recovery targets. Facilities required to meet targets included:

- Maximisation of capacity at the Lower Compton outdoor composting facility (30,000 tonnes per annum)
- Provision of additional outdoor composting capacity (up to 20,000 tonnes per annum)

The composting facility proposed in the 2007 planning application for Parkgate Farm was to receive a maximum of 25,000 tonnes of green waste per annum from household recycling centres and kerbside collections in and around Swindon.

The Wiltshire Municipal Waste Management Strategy (WMWMS), approved in November 2012, reports the progress made in providing the associated built capacity for municipal waste treatment since the JMWMS was adopted. This notes that significant progress has been made in providing capacity and that this is likely to meet most forecast needs to 2020, subject to:- i) changes in the rate of growth of MSW, ii) changes in statutory requirements [e.g. introduction of landfill bans] and iii) the outcome of outstanding planning applications.

In relation to point iii), the WMWMS reports that from 2007/08 the composting operation at Lower Compton handled more than 30,000 tonnes from Wiltshire. To deal with pressure on available space at this site and the forecast increase in garden waste tonnage arising from April 2012 onwards due to the Council's new collection service, the Council and Hills Waste Solutions have worked together to open the additional composting pad at Parkgate Farm, which includes the bulk transfer of garden waste tipped at Lower Compton to the new site at Parkgate Farm. It is stated in that if the planning application being prepared (during 2012) for Parkgate Farm is permitted [i.e. the application that is now subject of this report], there will be sufficient capacity to compost the Council's collections.

The capacity of the composting operation would increase from the current permitted 25,000 tonnes per annum to 50,000 tonnes per annum. Responses received to consultation and publicity of the proposals have queried whether there is a need for increased volume at this site, as composting should be handled locally to where it is created and not transported across the community areas in articulated vehicles.

In policy terms, the Parkgate Farm facilities are allocated in the Waste Site Allocations Local Plan as a 'strategic' scale site. The Local Plan states strategic-scale sites are generally considered to include (but not exclusively):

- Large-scale waste treatment facilities - e.g. energy from waste, mechanical biological treatment (MBT), pyrolysis, gasification, anaerobic digestion and in-vessel composting;
- Strategic materials recovery facilities (MRFs) - e.g. collecting, separating, sorting and bulking a significant quantity and wide range of waste materials prior to transfer (includes waste from black box collections) received from a wide area - e.g. an amalgamation of municipal waste collection rounds serving a number of towns across Wiltshire and Swindon;

- **Strategic-scale composting facilities - e.g. on large waste management sites receiving inputs from a wide area;**
- Landfill/landraise facilities.

It is explained at paragraph 5.7 of the Waste Core Strategy that strategic facilities are expected to serve either large areas within, or the entire Plan area (county and borough). Additionally, they may also serve areas of Wiltshire and Swindon and surrounding local authorities in a more sub-regional context. Consequently, the principle of locating a strategic composting facility at Parkgate Farm to manage a large area of Wiltshire and Swindon's municipal green waste is in accordance with the provisions of the Development Plan.

The WMWMS reports that the Council and Hills Waste Solutions are working to maintain use of the on-farm composting site at Grateley (a site located just over the County boundary in Hampshire, between Amesbury and Andover), to provide some capacity to serve the south of the county. The WMWMS notes that further on-farm sites would be beneficial in reducing 'waste miles', but there is limited interest in provision currently - this is believed to be due to the capital investment required.

#### Permanent retention

The application seeks to 'permanently' retain the existing green waste composting facility, due to there being no unacceptable impact or detriment to surrounding land users identified to merit the current temporary consent for the facility. Permission is also sought to retain the access/bridge 'permanently' in connection with the composting facilities and potential future development of the land allocated for strategic waste management use/s in Waste Site Allocations Local Plan.

The composting and tyre shredding/recycling facility was granted planning permission for a limited period in November 2007. Planning Condition Number 2 requires the discontinuance of the use and reinstatement of the land by 15 August 2024.

The reason stated on the decision notice for the imposition of the condition is "to comply with section 91 of the Town and Country Planning Act 1990". This is clearly erroneous as section 91 is concerned with the time period within which a development is to be begun. However, it is noted that the report considered by the Council's then Regulatory Committee in 2007 suggested the use would be temporary as the permission for the landfill to the east requires removal of the haul road and bridge over the railway by 15 August 2024. It was stated that if the application was approved then the composting and tyre shredding/recycling facility would be tied to that end date (i.e. the bridge over the railway providing access to the composting site would have been removed).

The end date of August 2024 is a consequence of the Applicant's planning application, submitted in 2005, to extend the life of the landfill site from 12 years from the date of commencement to 18 years. This extension of time was to take into account the change in use of part of the landfill site to allow for disposal of hazardous waste and the implications this and other factors had on input rates and site restoration timescales.



Circular 11/95: 'Use of conditions in planning permission' advises that in deciding whether a temporary permission is appropriate, three main factors should be taken into account. First, it will rarely be necessary to give a temporary permission to an applicant who wishes to carry out development which conforms with the provisions of the development plan. Next, it is undesirable to impose a condition requiring the demolition after a stated period of a building that is clearly intended to be permanent. Lastly, the material considerations to which regard must be had in granting any permission are not limited or made different by a decision to make the permission a temporary one. Thus, the reason for granting a temporary permission can never be that a time-limit is necessary because of the effect of the development on the amenities of the area.

In deciding whether, in this case, a temporary permission is appropriate, the following points are considered relevant:-

- Within the 2007 planning application the Applicant stated the access bridge over the railway is in place with agreement of Network Rail and its consent would be sought when the landfill is completed to retain the bridge in connection with the composting and tyre shredding/recycling facility. Network Rail advises that the Applicant completed a further lease agreement in regard to the bridge over the railway;
- Access is via an industrial estate and the bridge over the railway has been in place for 13 years (though permission for its construction was first granted in 1996) and is consented for a further period of 10 years. The bridge resembles other bridges over the railway for farmers' access and no concerns have been raised in respect of its retention;
- The composting facility, landfill operations and other land have subsequently been allocated for waste management use/s in the adopted the Waste Site Allocations Local Plan, which identifies sites to meet the capacity requirements of Wiltshire and Swindon up to 2026;
- The composting site is not on the landfill site and is not an integral part of the operation of that site; and
- Notwithstanding the status of the site in the Local Plan, Policy WCS3 of the Wiltshire and Swindon Waste Core Strategy identifies 'preferred' locations for outdoor composting facilities to include '*Land in Agricultural or Forestry Use*'. Prior to the creation of the existing composting facility the application site was in agricultural use.

It is considered these factors, taken together, indicate a temporary permission is not appropriate in this case.

### Environmental protection

Waste management facilities have the potential to impact significantly on the setting, character and environment of individual properties, settlements and surrounding land uses, thereby potentially affecting the health and quality of life for people living and working nearby and the use of land for recreation.

Since planning permission for limited period was granted for the composting and tyre shredding/recycling facility, the Council has adopted the Wiltshire and Swindon Waste Development Control Policies DPD (adopted September 2009). The DPD explains that in order to fully consider proposals for waste development, the Council must have sufficient information upon which to base its development control decisions.

Policy WDC2 of the Waste Development Control Policies DPD states that proposals for waste management development will be permitted where it can be demonstrated that the proposal firstly avoids, adequately mitigates against, or compensates for significant adverse impacts. Proposals for waste management development are to be accompanied where necessary by assessments of the impacts relating to the issues as listed in the policy, including amenity, transportation of waste and air emissions (inc. odour).

### Odour

In relation to odour, the Applicant has provided only a commentary within a 'Planning Statement', rather than any specific 'odour impact assessment' to support its application. The statement merely notes that: (i) the prevailing wind direction is south westerly and any airborne emissions are most likely to be blown to the north east: the landfill site and railway line lie to the north east of the site and neither of these receptors have a high sensitivity to air quality issues; (ii) the site is in excess of 500m from any residence and therefore the Environment Agency do not require a site specific risk assessment on bioaerosols; and (iii) Hills Waste Solutions has not received any substantiated complaints arising from the existing operations since opening.

The omission of an assessment of the impacts relating to odour is contrary to the requirements of Policy WDC2 of the Waste Development Control Policies DPD.

The Applicant has provided a copy of the 'odour management plan' (OMP) for the site. The OMP is a requirement of the Environmental Permit for the site, issued by the Environment Agency. As advised in PPS10, planning and pollution control regimes are separate, but complementary. Planning permission determines if the development is an acceptable use of the land. Permitting determines if an operation can be managed on an ongoing basis to prevent or minimise pollution.

An OMP is a working or live documented operational management system detailing the measures employed to anticipate the formation of odours and to control their release from the site. This is just one element of the range of information that should be provided by the Applicant in the format of an Odour Impact Assessment report. It should also be noted that odour is a different consideration to that of bioaerosols.

The Defra guidance document "Good Practice and Regulatory Guidance on Composting and Odour Control for Local Authorities" (March 2009) advises that as part of the planning application process the Planning Authority must consider whether the development will give rise to undue harm to the amenity of local residents. The document states that planning applications for new composting plant or for plant undergoing significant redevelopment have the potential to cause off-site odour impact and should be supported by an evaluation of the expected odour impact and proposals for odour mitigation measures. It is further stated it is now common and accepted practice for planning applications for such composting plant to be supported by detailed odour impact assessments. These assessments are typically based on computer models which predict odour dispersion from the proposed development, based on local weather records and estimated or predicted odour emissions from the proposed development.

No such information has been provided with this application and so the Planning Authority cannot be confident the development will not result in unacceptable risks from pollution when considering if the development is an appropriate use of the land. The information provided by the Applicant is not complete and it has not been demonstrated the 100% increase in the quantity of compost managed at the site can be done so without causing off-site odour impact.

The need for the Applicant to submit a full and detailed Odour Impact Assessment report to accompany the planning application is reinforced by comments made by the Environment Agency in the report of the site audit it carried out in October 2013. The audit focussed on management procedures for processing compost and minimising odour generation, and included a discussion on how the Applicant intends to operate and manage these issues should the increased tonnage be permitted. It is noted that in the actions/recommendations section of the audit report from the Applicant was required to review the OMP and to consider the pad capacity and composting best practice (windrow separation, windrow size, window orientation etc) to determine maximum tonnage that can be handled on site whilst controlling emissions.

Concerns regarding smells said to be emitted from the site, and from vehicles importing waste to the site, have been raised by the local member and residents who commented on the application. The Environment Agency audit records that, by October, there had been 12 odour complaints in 2013, relating to 7 separate events. Other information provided by the Environment Agency records a further 6 complaints in 2012. The Environment Agency advises that it has generally not been possible to determine the source of the odour, where an odour has been substantiated. The locations from where the complaints were received are to the east and north east of the composting site.

As noted above, the applicant has commented in the planning statement that the prevailing wind direction is south westerly and so any emissions are most likely to be blown to the north east. However, the site audit records that a mobile odour suppressant unit is positioned on the south east corner of the site for use during north westerly winds that may take any odour towards Purton.

This indicates potential for odour to extend over distance and the need for an odour impact assessment to address how the enlarged composting facility will affect its surroundings.

With regard to smells from vehicles coming to the site impacting on local residents on route and in the neighbourhood, it is noted that during a compliance visit to the site in September 2012, Environment Agency officers experienced a distinct green waste odour coming off an incoming lorry transporting waste from Lower Compton. The procedures to tackle odour from incoming waste were to be reviewed as part of the OMP.

The Applicant has not demonstrated the 100% increase in throughput of green waste managed at the site can be done so without causing off-site odour impact. Insufficient information has been submitted. The omission of a detailed odour impact assessment to evaluate the potential odour impact and confirm any necessary mitigation measures is contrary to the provisions of Policy WDC2 of the Waste Development Control Policies DPD.

## Transport

As with odour, the Applicant has provided only a commentary within the Planning Statement to address the transport and related environmental impacts, rather than any specific assessment. In addition to Policy WDC2, Policy WDC11 of the WDCP DPD requires that applications will need to be accompanied by either a Transport Assessment or Transport Statement, or no formal assessment if the issue of transport is considered to be of limited significance.

The omission of an assessment setting out the issues relating to the transportation of waste is contrary to the requirements of Policy WDC2 of the Waste Development Control Policies DPD.

The proposed increase in composting activity will increase the number of HGVs from 18 to 28 per day (i.e. 36 to 56 movements); a 55.5% increase, and the proposal is to retain the facility permanently. On this basis, the issue of transport cannot be considered to be of limited significance such that no formal assessment is necessary. The DfT Guidance on Transport Assessment indicates that any development generating 100 or more two-way vehicle movements per day will require a full Transport Assessment. Accordingly, a simplified Transport Statement should have been produced.

The DfT Guidance on preparing a transport statement states a developer should provide a full description of existing site information and baseline transport data, and that this information should be accurately established to understand the context of the development proposed.

The commentary in the Planning Statement includes an update of information which the Applicant produced for waste sites community liaison group in 2008. This looks at overall vehicle numbers associated with all of the activities at Parkgate Farm and at Purton Industrial Estate, which it is suggested represents the total HGVs using the public highway of Mopes Lane.

The Applicant surmises that even with additional green waste for composting coming to Parkgate Farm, the total number of HGVs has fallen in recent years due to lower landfill input rates and less clay extraction. The estimated vehicle HGV numbers provided in the Planning Statement are as follows:-

Activity	Estimated HGV numbers per day based on tonnages managed in 2007 (Permitted)	Estimated HGV potential HGV numbers per day based on tonnages managed in 2013 (Proposed)
Parkgate Farm Hazardous Landfill	9	5
Parkgate Farm Non-Hazardous Landfill	36	20
Clay Extraction	14	7
Purton Household Recycling Centre	4	4
Parkgate Composting and Tyre Recycling	18	28
Purton Concrete Plant	30	30
Vehicle Maintenance and Skip Depot	22	22
Booths Fabrication	3	3
MacGas	25	0
Hills Property	4	4
	<b>165</b>	<b>123</b>

However, no data, such as vehicle survey counts or weighbridge records has been provided to evidence these figures. The figures also rely on the removal of vehicle numbers resulting from the moth-balling of the MacGas business, with no consideration given to either the possible re-opening of this business or a potential new occupier. Neither is consideration given to the potential for landfill input rates to increase, especially in the case of the hazardous landfill. It is highlighted in the Waste Core Strategy that it is probable additional population, employment and housing growth during the period to 2026 will generate additional construction and demolition wastes, which will potentially result in an increase in hazardous waste in the Plan area. Moreover, Parkgate Farm provides hazardous waste capacity for the South West Region.

The Applicant's claim that the rise in tonnage of green waste would, in the context of total HGV movements on Mopes Lane, lead to a 25% reduction in the daily average compared to 2007 is unsubstantiated. If other activities resume, the overall situation could not be considered a reduction in vehicle movements.

Furthermore, whilst the Applicant's commentary assumes the number of HGVs will decrease, no consideration has been given to the different composition in HGV sizes associated with the bulk transfer of green waste to the site from Lower Compton. The development proposed in the 2007 planning application involved kerbside collection vehicles and skips from household recycling centres, whereas the bulk transfer from Lower Compton uses larger, articulated lorries.

Such larger vehicles are likely to have greater environmental impact in terms of noise, air pollution, visual amenity and pedestrian intimidation.

The Applicant's commentary identifies policies within the waste development plan framework which seek to minimise "waste mileage". However, the commentary does not demonstrate how the development will facilitate sustainable transport. The suitability of providing the proposed facility in this location has not been demonstrated in transport terms relative to other potential sites.

The Applicant has not demonstrated the 55.5% increase in the number of HGVs visiting the site as a result of the increase in throughput of green waste managed at the site will not result in any adverse impact on the safety, capacity and use of the highway network or minimise transportation distances. Insufficient information has been submitted. The omission of a transport statement/assessment is contrary to the provisions of Policies WDC2 and WDC11 of the Waste Development Control Policies DPD.

#### Other issues

Concerns have been raised regarding visual impact, however as the site is currently operating as a composting facility and is adjacent to a landfill site, it is considered the visual and landscape impacts of the proposals are minor. Prior to composting commencing additional landscape planting was carried out strengthen existing boundary hedges, which minimises the visual impact of the composting operations.

### **10. Conclusion**

Planning permission has previously been granted for green waste composting at this site and the wider Parkgate Farm site is allocated in the adopted Waste Site Allocations Local Plan as a site suitable for waste management use. The Wiltshire Municipal Waste Management Strategy states that if the permitted there will be sufficient capacity to compost the Council's green waste collections. Accordingly, there is 'in principle' support for the proposals.

However, whilst the Council will be supportive of applications for appropriate waste management facilities within the locations set out in the Local Plan, any proposals that come forward on the sites are to be subject to a detailed planning application process. In this case, the information provided by the Applicant is not complete and it has not been demonstrated the increase in the quantity of compost managed at the site can be done so without causing off-site odour impact. Neither has it been demonstrated that the resultant increase in the number of HGVs will not result in any adverse impact on the safety, capacity and use of the highway network.

Consequently, taking application as it stands, the recommendation can only be that permission should be refused on basis of the Applicant having not submitted sufficient information, contrary to the provisions of the Development Plan.

### **RECOMMENDATION**

Had the Committee been able to determine this application it would have recommended that Planning Permission be **REFUSED** and that officers be authorised to contest the appeal for the following reasons:

1. Insufficient information has been submitted to demonstrate that the increase in throughput of green waste managed at the site can be done so without causing adverse off-site odour impact. The application is not supported by a detailed odour impact assessment. The omission of an assessment of the impacts relating to odour is contrary to the provisions of Policy WDC2 of the Waste Development Control Policies DPD.
2. Insufficient information has been submitted to demonstrate the proposals facilitate sustainable transport by mitigating or compensating for any adverse impact on the safety, capacity and use of the highway network or minimises transportation distances. The omission of an assessment of the impacts relating to the transportation of waste is contrary to the requirements of Policy WDC2 and Policy WDC11 of the Waste Development Control Policies DPD.

**Appendices:**

Appendix 1: Site Location Plan

Appendix 2: Site layout plan