

Wiltshire Council

Cabinet

17 January 2012

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## Public Participation

### Response to the Statements and Questions from Mr and Mrs Greenwood on behalf of the NO2Waste Campaign Group

#### Wiltshire and Swindon Waste Site Allocations DPD – Proposed Submission Arrangements (Item 7)

#### Pickpit Hill

#### Comments / questions

There are some changes to the details on Pickpit Hill since the consultation DPD last year which are puzzling:

- The underlying aquifer is no longer described as **‘major aquifer of high vulnerability’**. Instead it is now simply described as **‘a principle aquifer’**. Why, is it suddenly not of **‘high vulnerability’** any more?
- Text that stated there was **‘no mains surface water sewers in close proximity’** has been replaced with text stating **‘foul water discharges from any development can be connected to the public sewer system where available...’** Can we assume the Beech Hill area in Tidworth would be the site of the nearest main sewer and how costly would it be to run a pipeline that distance?
- Under ‘Cumulative Effects’ the statement **‘Potential for cumulative effects on air quality, human health and amenity, traffic and transportation’** has been replaced with **‘No cumulative effects identified at the plan-making stage’**. Can we have an explanation, please?

Whilst these changes may seem relatively insignificant one gets the impression it is an exercise to soften the potential impacts from waste management facilities (WMF), and make the site appear more viable than it actually is, to the reader.

#### **Response**

The amendments made to the plan (and referenced above) in relation to aquifer terminology have been made to address comments raised by The Environment Agency during the pre-submission consultation. The changes focus on changes to the terminology used to describe aquifers set out in Environment Agency policy (GP3) and thereby the site profiles in the latest plan present the most up to date information.

In terms of the comment in relation to connectivity to foul water drainage systems, the proposed amendment to wording is again a result of comments received at the pre-submission stage. However, for the purposes of clarity, it is suggested that

additional wording be added to the **Water Environment** section of the plan to fully establish the scope of the assessment work required to support any subsequent planning application. The wording would therefore read (7<sup>th</sup> sentence):

**The assessment will need to ensure that** foul water discharges from any development can be connected to the public sewer system, where available, subject to a capacity appraisal and agreement upon a point of connection.

With respect the issue of cumulative effects, there would appear to be some confusion over how this element of the plan has been drafted. The cumulative effects assessment considered the impact of cumulative effects with other waste site allocations within the plan, rather than a combination of environmental factors. With the allocation at Castledown Business Park proposed for removal from the draft plan, the cumulative effect of **two** waste facilities operating in the Ludgershall / Tidworth area is effectively removed.

### **Comment / question**

The potential impact on the A303 is now recognized in the text. This is also a cross-boundary matter and is particularly relevant because it is suggested all traffic should be diverted away from Tidworth travelling to and from the site via the A3026, A342 and A303 crossing the Wiltshire/Hampshire border. It also lengthens travelling distances considerably adding to cost and carbon emissions.

All traffic would travel the length of Tidworth Rd and Andover Road in Ludgershall which are primarily residential areas so would be contrary to policy.

When Castledown Business Park (CBP) was considered for WMF the volume of traffic argument was countered by the fact there would have always been a certain amount of traffic generated from the park when full developed. We must now reconsider the traffic issue as there will be an increase in traffic when CBP coupled with the major housing schemes in the area, i.e. Eastern Quadrant, Tidworth and Drummond Park, Ludgershall, are fully developed. Any WMF on Pickpit Hill will exacerbate the traffic issues.

### **Response**

The assessment work undertaken by the council in preparation of the draft plan identified a range of highway matters to be addressed through any subsequent planning application process. The draft plan presents the findings of the initial transport assessments and sets out indicative design standards for access/ egress. In addition, it [*the plan*] also identifies the requirement for a full Transport Assessment (TA) to be prepared in support of any subsequent planning application. Matters in relation to potential cumulative highway impacts associated with planned housing and employment development in the area will need to be addressed through the application and TA process.

### **Comment / question**

Given Pickpit Hill's highly elevated position on a hill top any development would be notably visible when viewed from the east despite surrounding trees. This would greatly harm the character and appearance of the area.

### **Response**

Again, based upon the evidence gathered through the site assessments undertaken to date, it is the view of the council that the proposed site is currently well screened by existing vegetation. Clearly, further assessment and mitigation work would be requested at any subsequent planning application stage.

### **Everleigh\Thorny Down**

#### **Comments / questions**

The questions relating to permit extensions up to 2036 (Hills planning applications in 2007, K/56792/WCC and S/2007/8008 respectively) for WTS operations at Thorny Down and Everleigh have never been answered (questions originally raised by R Greenwood in his letter dated 4 August 2011 and at an Area Board meeting on 19 September 2011):

- Why have WTS operations been removed from Everleigh's potential uses when the permit for this use was extended to 2036?
- Why have the landowners of Thorny Down changed their plans for the site when there were no objections to the WTS permit extension use up to 2036?

As Everleigh is still in the DPD we presume the lease can be extended beyond 2016. Also, in the DPD under 'Biodiversity and Geodiversity' expansion on the site is considered. Obviously, expansion has not been ruled out for this site. This means the site could potentially be expanded to accommodate operations like MRF/WTS etc instead of Pickpit Hill, which is too close to the Academy and residential areas, whereas Everleigh is in a more suitable location.

- Why has this not been considered in more depth?

### **Response**

The issue of lease arrangements have been investigated and discussions are ongoing between the MoD and the council's Waste Management Service. Thorny Down and Everleigh currently operate as Waste Transfer Stations and, as such, there is no need in the draft plan to allocate these sites. Their continued and/or expanded use can be determined through the renewal of lease arrangements and the planning application process. The draft plan is intended to provide opportunity and choice for waste uses to come forward, as such and given that there are no overriding constraints to the development of Pickpit Hill it should be retained as an allocation.

## **Strategic/Local**

### **Comments and questions**

The criteria used to determine Strategic and Local operations is unclear and open to interpretation. This was profoundly apparent when Hills Waste Solutions planned a WTS operation at Castledown Business Park, in **East Wiltshire**, to handle waste from **South Wiltshire**:

- How binding is the 16 km recommendation for the location of Strategic sites from SSCTs?
- Is there a clear definition of Strategic and Local operations, e.g. scale of operation in tonnage, area deemed local within how many km radius, etc?
- MRF's are generally classed as Strategic operations so why is it one of the potential uses for Pickpit Hill?

### **Response**

The definition of 'strategic' and 'local' scale was never designed to be complex. The concept stems from draft Regional Spatial Strategy policy and was designed to direct larger scale development towards the main centres of growth (ie within 16 kilometres of the main towns across Wiltshire and Swindon). Any development falling outside of these catchment areas would then only ever be considered as offering local-scale support to the overall waste sites network.

It is not appropriate to set tonnage thresholds to the definitions of strategic and local-scale development. Waste facilities can, and do operate, at various different scales depending upon the type of material being processed and the choice of technology being employed. It is perfectly reasonable to assume that a Materials Recovery Facility (MRF), for example, could operate at a local or a strategic scale. However, the current adopted waste policy framework seeks to ensure that a strategic-scale MRF would be located as close as practicable (and within 16 km) of Chippenham, Trowbridge, Swindon and Salisbury.

## **Public Awareness**

### **Comments and questions**

We are concerned about the very limited time given for the public and interested groups to raise questions and statements for 17 Jan meeting.

- How are they meant to know when it will be on the agenda for one of these meetings when the topic has been deferred twice?

Most of the general public have been totally unaware of the earlier consultations because it was poorly publicized. It is extremely regrettable that they were denied the opportunity to comment from the very beginning of the consultation process. Due process has not been given.

## **Response**

The process of preparing the draft Wiltshire and Swindon Waste Site Allocations DPD has been undertaken in accordance with legislative and local policy requirements. All consultation activity, dating as far back as the creation of the Waste Forum (2005), has been undertaken in accordance with legal requirements and, more recently, the councils Statements of Community Involvement (SCIs). All Parish Councils across Wiltshire and Swindon (and adjoining) have been actively consulted throughout the process.

## **General**

### **Comments / questions**

- Is it possible at this stage to amend the intended uses for a site in the DPD before 7 February meeting?
- Why has Solstice Park been removed from the list?
- Where will Hills locate their WTS for South Wilts waste? \*

[\* It is noted:

1. A new deliverable **strategic** site has been identified at 20 Mills Way, Boscombe Business Park, Amesbury (Proposed Submission Draft Waste Site Allocations - Appendix B)
2. Imery's Quarry at Quidhampton has the potential for WTS operations and is within 16km of Salisbury
3. The site at Mere has the potential for WTS operations]

## **Response**

**Bullet Point 1** – the plan has been presented to Cabinet for consideration and approval. Councillors may consider and recommend amendments be made to the draft plan before it is presented to full council (7 February).

**Bullet Point 2** – Solstice Business Park has been removed on the basis that the landowner no longer wishes to see any form of waste use on the land.

**Bullet Point 3** – that is a matter for Hills to determine.

## **Conclusion**

The no2waste campaign group consider the inclusion of Pickpit Hill in the Waste Site Allocations DPD is unsound. Our reasons are more explicitly detailed in the group's letter dated 4 August 2011 (ref: ZW725762682GB), copy attached.

The inclusion of Everleigh is considered sound and has the potential for expansion to accommodate the operations intended for Pickpit Hill on a local scale.

If Pickpit Hill must be included in the DPD its potential use should be limited to HRC as this would be less damaging to public amenities and quality of life than any of the other operations listed.

