



Our ref: JDR/S.11/P7
 Your ref:
 Date: 6th June 2002

Mr D Rose
 Principal Planner
 Environmental Services Department
 Wiltshire County Council
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Dear Mr Rose,

STUDLEY GRANGE LANDFILL SITE, LYDIARD TREGOZE – VARIATION OF CONDITION 2 OF PLANNING PERMISSION N99/1696 TO ALLOW FOR THE ACCEPTANCE OF MUNICIPAL WASTES

Following our discussions at the last liaison meeting and receipt of the further consultation responses, I thought it might be helpful to make further comment on some of the issues.

I note that permission has recently been granted for an extension to the Compton Bassett site and it could be argued that this now has potential to provide for the shortfall in waste disposal capacity for municipal wastes identified in the Waste Local Plan. However, this does not obviate the local needs/proximity principle arguments advanced in my supporting statement, in respect of the Swindon area. I also understand that Hills have recently contracted an estimated 80 to 100,000 tonnes per annum capacity at the Chapel Farm site to the north of Swindon, to accommodate the South Gloucestershire contract, thereby effectively removing the equivalent capacity from the "voidbank" assumed in the WLP for the Wiltshire and Swindon area. By the same token, there is no guarantee that the additional permitted capacity at Compton Bassett will be available for Wiltshire wastes. This serves to highlight the fact that the planning system cannot control commercial decisions but it *can* attempt to provide opportunities for sustainable waste management, in line with the principles advocated in the WLP and national guidance. As explained in my supporting statement, the ability to accept municipal wastes at Studley Grange would provide an important opportunity for more localised municipal waste management in the Swindon area and would also help improve the commercial viability of recycling initiatives on the site.

I appreciate that CPRE wish to move towards a situation where municipal waste generation is hugely minimised and where the waste which is still produced is recovered or recycled. I also appreciate that they would prefer no more municipal wastes to be landfilled at all from this point on, even in sites such as Studley Grange which have the required pollution control infrastructure. As a campaign group, CPRE are in the fortunate position of being able to campaign for these objectives without the responsibility of having to actually manage the waste in the current circumstances. However, the local waste planning and waste collection authorities are not in such a fortunate position and, like Biffa, acknowledge that landfill is still and will continue to be an important means of disposal, at this point in time and even with the achievement of recycling targets in the future.

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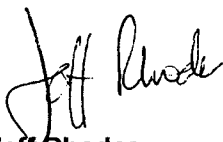
Notwithstanding the Compton Bassett decision, it remains the case that Swindon is the largest urban area in the joint Waste Local Plan area and hence the largest producer of municipal wastes. Studley Grange is ideally located and engineered to accommodate municipal waste arisings from that area, in full accordance with the proximity principle. Even if the collection authorities develop kerbside segregation facilities, the majority of the municipal wastes produced will still require disposal. Alternatively, if no such systems are introduced, there is the potential to invest in further municipal recycling facilities, including composting, at Studley Grange. However, this will only happen if Biffa has access to the quantities of municipal wastes necessary to encourage such commercial investment. To deny those opportunities for no sound planning reason would appear to be at odds with the general thrust of European, national and local waste planning policies which CPRE claim to support. Furthermore, I would suggest that refusing permission for our proposal will not achieve CPRE's wish of reducing the amount of biodegradable waste going to landfill – it will simply mean that waste which might have been disposed of at Studley will, instead, be disposed of somewhere else further away and possibly less suitable.

As regards future inputs of industrial and commercial waste in the event that municipal wastes are accepted, Biffa have proposed maintaining overall inputs at current levels in order to help comply with the planning restriction on lorry deliveries to landfill. At present, the numbers of lorry deliveries to landfill is slightly below the permitted limit and the proposal effectively envisages taking up the shortfall with municipal wastes, rather than reducing input rates of commercial and industrial wastes. However, if your preference was to maintain maximum potential for commercial and industrial waste inputs and allow for a corresponding increase in the average daily lorry limit, this is something which we would be happy to accommodate and which could perhaps be addressed in any new conditions, if permission is granted. The current lorry limit condition was not imposed as a result of highways concerns and I assume this would create no additional problems in that respect. Regardless of the limit on lorries visiting the landfill, some industrial and commercial waste would continue to be directed to the recycling facility, where there is no planning restriction on lorry numbers or related input rates.

In note that the consultation responses from the Environment Agency, your Forestry and Countryside officer, your Transport and Development Manager, Swindon Borough Council, North Wiltshire District Council, Railtrack and Defence Estates all raise no objections. I note the recommendation of Defence Estates regarding bird control but would comment that there is already a detailed, approved bird control scheme in operation at the site and I believe that this deals effectively with the problem. However, if you wish to discuss this point further, please contact me. The objections from Wootton Bassett Town Council are of a general nature and the letter from Lydiard Tregoz Parish Council is almost identical to CPRE's letter. I believe I have already addressed the issues raised in those two letters.

I hope my comments are of interest.

Yours faithfully



Jeff Rhodes
Planning Manager, Biffa Waste Services Ltd

CC - Cllr. Mrs Molly Groom