

AGENDA

Meeting: Strategic Planning Committee
Place: Council Chamber - County Hall, Trowbridge BA14 8JN
Date: Wednesday 24 April 2019
Time: 10.30 am

Please direct any enquiries on this Agenda to Stuart Figini, of Democratic Services, County Hall, Bythesea Road, Trowbridge, direct line 01225 718221 or email stuart.figini@wiltshire.gov.u

Press enquiries to Communications on direct lines (01225) 713114/713115.

This Agenda and all the documents referred to within it are available on the Council's website at www.wiltshire.gov.uk

Membership:

Cllr Fleur de Rhé-Philipe (Chairman)	Cllr David Jenkins
Cllr Derek Brown OBE (Vice-Chairman)	Cllr Christopher Newbury
Cllr Ernie Clark	Cllr James Sheppard
Cllr Andrew Davis	Cllr Tony Trotman
Cllr Stewart Dobson	Cllr Fred Westmoreland
Cllr Sarah Gibson	

Substitutes:

Cllr Ian Blair-Pilling	Cllr Chris Hurst
Cllr Clare Cape	Cllr Nick Murry
Cllr Christopher Devine	Cllr Stewart Palmen
Cllr David Halik	Cllr Stuart Wheeler
Cllr Russell Hawker	Cllr Graham Wright
Cllr Ruth Hopkinson	

Recording and Broadcasting Information

Wiltshire Council may record this meeting for live and/or subsequent broadcast on the Council's website at <http://www.wiltshire.public-i.tv>. At the start of the meeting, the Chairman will confirm if all or part of the meeting is being recorded. The images and sound recordings may also be used for training purposes within the Council.

By entering the meeting room you are consenting to being recorded and to the use of those images and recordings for broadcasting and/or training purposes.

The meeting may also be recorded by the press or members of the public.

Any person or organisation choosing to film, record or broadcast any meeting of the Council, its Cabinet or committees is responsible for any claims or other liability resulting from them so doing and by choosing to film, record or broadcast proceedings they accept that they are required to indemnify the Council, its members and officers in relation to any such claims or liabilities.

Details of the Council's Guidance on the Recording and Webcasting of Meetings is available on request.

Parking

To find car parks by area follow [this link](#). The three Wiltshire Council Hubs where most meetings will be held are as follows:

County Hall, Trowbridge
Bourne Hill, Salisbury
Monkton Park, Chippenham

County Hall and Monkton Park have some limited visitor parking. Please note for meetings at County Hall you will need to log your car's registration details upon your arrival in reception using the tablet provided. If you may be attending a meeting for more than 2 hours, please provide your registration details to the Democratic Services Officer, who will arrange for your stay to be extended.

Public Participation

Please see the agenda list on following pages for details of deadlines for submission of questions and statements for this meeting.

For extended details on meeting procedure, submission and scope of questions and other matters, please consult [Part 4 of the council's constitution](#).

The full constitution can be found at [this link](#).

For assistance on these and other matters please contact the officer named above for details

AGENDA

Part I

Items to be considered when the meeting is open to the public

1 **Apologies**

To receive any apologies or substitutions for the meeting.

2 **Declarations of Interest**

To receive any declarations of disclosable interests or dispensations granted by the Standards Committee.

3 **Chairman's Announcements**

To receive any announcements through the Chair.

4 **Public Participation**

The Council welcomes contributions from members of the public.

Statements

Members of the public who wish to speak either in favour or against an application or any other item on this agenda are asked to register by phone, email or in person no later than 10.20am on the day of the meeting.

The rules on public participation in respect of planning applications are detailed in the Council's Planning Code of Good Practice. The Chairman will allow up to 3 speakers in favour and up to 3 speakers against an application and up to 3 speakers on any other item on this agenda. Each speaker will be given up to 3 minutes and invited to speak immediately prior to the item being considered.

Members of the public will have had the opportunity to make representations on the planning applications and to contact and lobby their local member and any other members of the planning committee prior to the meeting. Lobbying once the debate has started at the meeting is not permitted, including the circulation of new information, written or photographic which have not been verified by planning officers.

Questions

To receive any questions from members of the public or members of the Council received in accordance with the constitution which excludes, in particular, questions on non-determined planning applications.

Those wishing to ask questions are required to give notice of any such

questions in writing to the officer named on the front of this agenda no later than 5pm on **Monday 15 April 2019** in order to be guaranteed of a written response. In order to receive a verbal response questions must be submitted no later than 5pm on **Wednesday 17 April 2019**. Please contact the officer named on the front of this agenda for further advice. Questions may be asked without notice if the Chairman decides that the matter is urgent.

Details of any questions received will be circulated to Committee members prior to the meeting and made available at the meeting and on the Council's website.

5 **15/00401/WCM - Parkgate Farm Waste Management Facility, Purton, Swindon, SN5 4HG - Retention of existing composting facility and associated access, and increase throughput (Pages 5 - 30)**

A report by the Case Officer is attached.

6 **Date of Next Meeting**

To note that the next meeting of this Committee is due to be held on Wednesday, 22 May 2019 at County Hall, Trowbridge, starting at 10.30am.

7 **Urgent Items**

Any other items of business, which in the opinion of the Chairman, should be taken as a matter of urgency.

Part II

Item during whose consideration it is recommended that the public should be excluded because of the likelihood that exempt information would be disclosed

NONE

REPORT FOR STRATEGIC PLANNING COMMITTEE

Date of Meeting	24 April 2019
Application Number	15/00401/WCM
Site Address	Parkgate Farm Waste Management Facility, Purton, Swindon, SN5 4HG
Proposal	Retention of existing composting facility and associated access, and increase throughput
Applicant	Hills Waste Solutions Ltd
Town/Parish Council	BRAYDON PC & PURTON PC
Electoral Division	PURTON – Cllr Jacqui Lay
Grid Ref	407612 188669
Type of application	Full Planning
Case Officer	Andrew Guest

Reason for the application being considered by Committee

The application has been ‘called-in’ by Cllr Jacqui Lay for the following stated reasons:

Concerns on the increased volume of waste being processed at the site. Currently site operates on a temporary permission as the access is via a temporary bridge over the railway line which is required to be removed by condition on the landfill permission by 2024. The initial permission in 2007 for composting was for temporary permission due to the end date of the permission of the adjoining landfill site. Hence this new application should be only for temporary permission and not permanent if the same access route is to be used.

Previous application dismissed at appeal and concern is that this application does not address all of the Inspector’s points raised at dismissal. Detail of HGV numbers and sizes are required plus the effect on Cricklade with regard to the amenity and safety impacts. Is it sustainable to transport green waste around the county to a site to the furthest point north in the county? Is it sustainable to bulk up waste at one facility and then transport it? How will any changes in the collection of green waste from kerbside affect the volumes? Impact on the wider road network and users of the roads and towns the vehicles travel through in particular Cricklade and Royal Wootton Bassett but also the villages between Calne and RWB with the transfer of bulk waste. Impact on the rural road network currently being used between Cricklade and Mopes Lane. Impact on the residents of the village with regard to odour particularly with processing such a large volume of green waste.

1. Purpose of Report

The purpose of the report is to assess the merits of the proposal against the policies of the development plan and other material considerations, and to set out the recommendation that the application be approved.

2. Report Summary

This is a full application to permanently use the application site for the composting of green waste, and to increase the quantity of green waste so composted from 25,000 tonnes per annum (pa) to 50,000 tonnes pa.

Temporary planning permission was granted in 2007 to use the site for the composting of green waste and tyre recycling. The temporary 'end date' is 2024.

The application has been made to rationalise the 2007 temporary permission for composting only (with an increase in quantity of green waste so composted); to remove references to tyre recycling, and to seek permanency for the development (including retention of a haul road and railway over-bridge).

The main issues in the consideration of this application are:

- Principle of the development
- Highway safety and capacity
- The effects of odours

The application site lies within Braydon CP and Purton CP. Braydon PC object; Purton PC raise no objection. Nearby Cricklade TC object; Royal Wootton Bassett TC raise no objection.

When originally submitted (in 2015) the application generated objections from 17 third parties and no supports. Re-consultation in 2019 has generated 13 objections (at 21 March). All representations remain relevant.

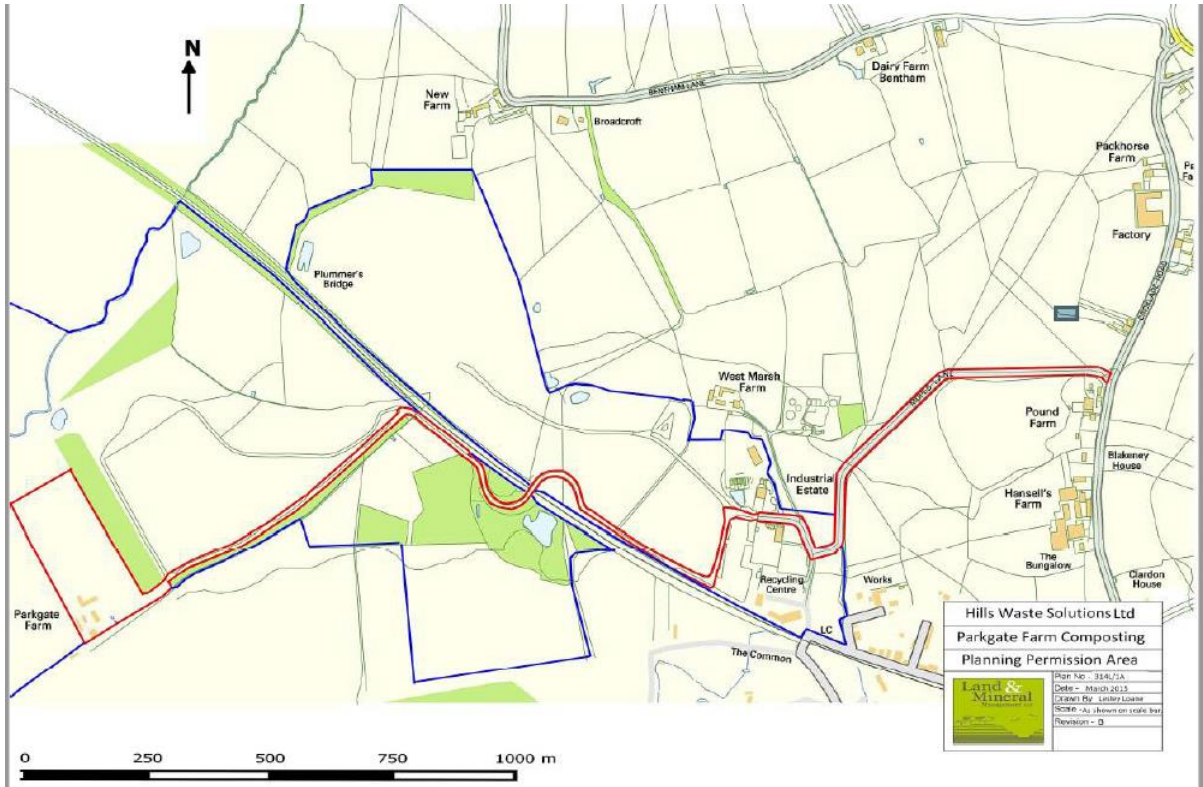
3. Site Description

The site is located to the north of Purton, adjacent to Parkgate Farm Landfill site and close to the Purton Household Recycling Centre (HRC) and Mopes Lane Industrial Estate. The application site is 4 hectares in area and is currently used for open-air turned-windrow composting operations. The site includes a collection of former farm buildings.

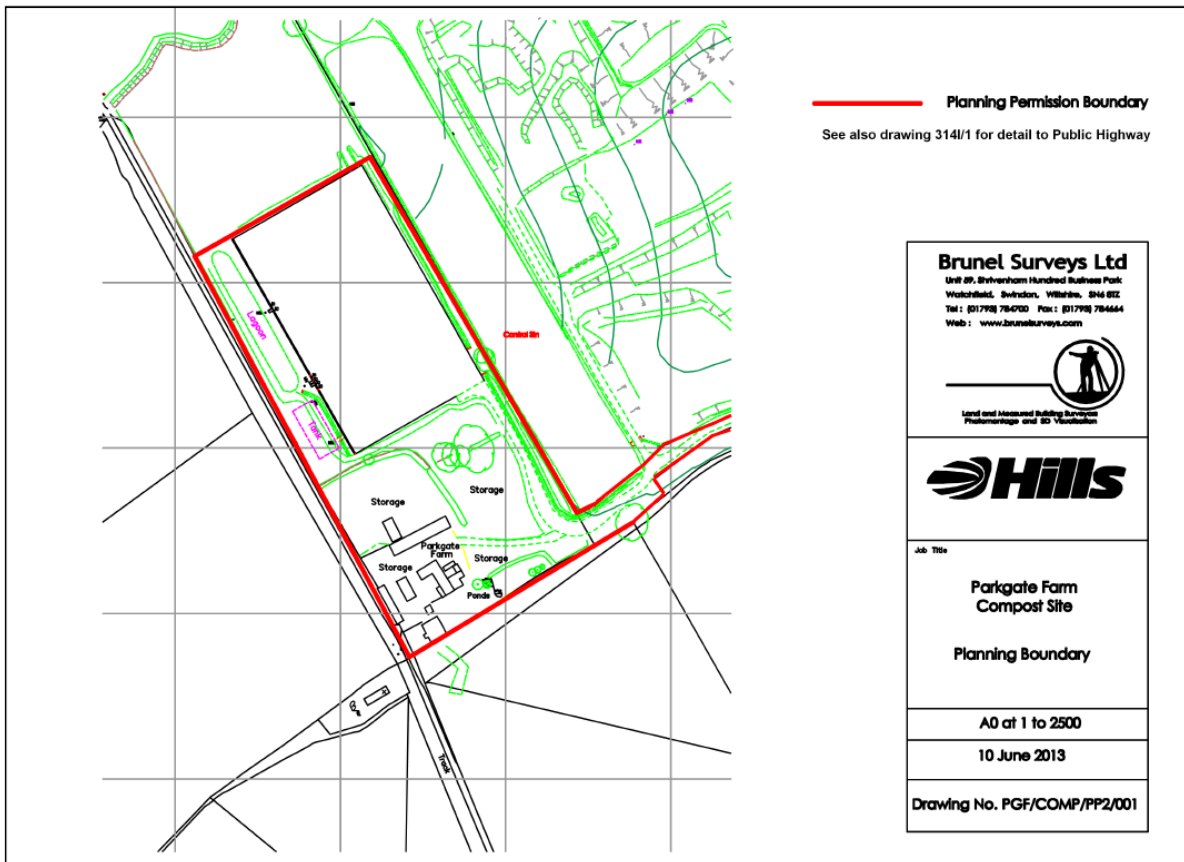
The site is 1km north-west of the village of Purton and approximately 500 metres north of the settlement of Paven Hill, in open countryside.

Access to the site is via a temporary haul road and over a railway bridge (associated with the landfill site and existing composting facility only) 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, 'heavy' vehicles entering or leaving Mopes Lane have to use the north bound section of the C414 linking to the B4553 (Cricklade Road and Packhorse Lane).

The River Key is c.100m from 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.



Site Access Plan



Site Plan

4. Relevant Planning History

N/07/07008/FCM - Composting facility and tyre recycling operation – 07/06/2007

N/08/07022/FCM - S73 application: Composting facility and tyre recycling operation without compliance with condition 15 of permission N/07/07008 [to permit changes to the standoff to the hedges surrounding parts of the site] – approved 03/12/2008

N/13/01916/WCM - Retention of existing composting facility, access & increase in throughput – non-determination appeal dismissed 13/06/2014

[This appeal was dismissed for two detailed reasons – firstly, because there was no Odour Impact Assessment accompanying the application; and secondly, because there was insufficient clarity in the traffic impact assessment].

18/04069/VAR - Variation of condition 3 of N.08.07022 relating to operating hours [to allow for waste management on Bank Holidays in line with other facilities across Wiltshire] – approved 06/07/2018

5. Proposal

The proposal is to ‘replace’ the existing temporary planning permission for a composting and tyre shredding facility with a permanent planning permission for a composting facility only. The throughput of the composting facility would be increased from the current permitted 25,000 tonnes per annum to 50,000 tonnes per annum. The proposal would result in the loss of 12,500 tonnes per annum of permitted tyre shredding capacity, although this element of the existing permission has never been implemented.

The application also proposes to retain, on a permanent basis, the existing haul road and railway bridge that were constructed as part of the 2007 permission and/or to serve the adjacent landfill site. The bridge is subject to a separate legal agreement between the applicant and Network Rail – this agreement allows its retention until 2038 at which time the agreement will be reviewed and/or renewed if/as appropriate. The circumstances of the bridge are a private matter between the parties concerned, and so are not relevant to the determination of this planning application.

The composting facility consists of open windrows (80m long x 5m wide x c. 4m high), on a large concrete pad, that are turned on a daily basis for about 12 weeks before screening, after which there is a maturation period prior to bagging and sale to the public or in bulk to landscapers and growers. The permitted but unused tyre shredding area is within the now proposed extended composting area on the concrete pad. Drainage from the pad is to an underground tank linked to a lagoon.

The reason for the application – and specifically, for the additional 25,000 tonnes pa composting capacity – is explained by the application agent as follows:

“Parkgate Farm has been a green waste composting facility since 2012 and been receiving the majority of the green waste generated by Wiltshire residents, both from the kerbside collections and the HRCs since that date. The amount from the kerbside collections reduced very slightly in 2015 when the chargeable service was introduced, but this was offset by the increased amount deposited at the HRCs. The site has peaked at over 35,000 tonnes of green waste per annum.”

The application seeks a self-imposed limit of 50,000 tonnes /yr to provide a basis for the transport assessment which was seen as a possible concern in relation to these proposals. As a strategically allocated waste facility, with substantial scope for expansion on the rest of the allocated land, this seemed to be a reasonable figure. It also was considered to provide some future proofing for the site. We know that Wiltshire residents currently produce around 40,000 tonnes of green waste per annum, with a current, but not permanent arrangement, of some going to Hampshire for composting. When Wiltshire offered the tender for green waste collection, they set the annual figure at up to 45,000 tonnes per annum.

Additionally commercial landscapers and council contractors generate green waste in their businesses which can be accepted at the site. Parkgate Farm is also close to Swindon Borough and green waste generated in that authority can also be accepted for composting. They are currently looking for tender offers for an additional 10,000 tonnes per annum.

A further point is the rate at which green waste generation will grow. Wiltshire Core Strategy Policy 2 requires 42,000 new homes to be built in the County between 2006 and 2026. Post 2026, there is not likely to be a significantly reduced rate of housebuilding. With an increasing number of houses there will be increasing amounts of waste, including green waste, generated each year.

We also know from experience that initial estimates on tonnages, should not be set at current levels. When the Lower Compton Composting facility was planned in 2004, it was anticipated that Wiltshire would then provide around 12,000 tonnes of green waste per annum. We now know it generates 40,000 tonnes per annum. When the Lower Compton MRF was planned, a maximum of 28,000 tonnes of recyclable material per year was anticipated. Around 45,000 tonnes per year are now generated.

To seek a tonnage figure at Parkgate Farm which did not include some room for increases would be poor planning, particularly when the tonnage in the application has been demonstrated not to have any unacceptable impact”.

Determination of this application (it was originally submitted in January 2015) has been delayed for a number of inter-connected reasons – notably, as a consequence of issues surrounding the determination of other related applications at the Hill’s Lower Compton waste management site, including a waste bulking facility (for municipal solid waste and green waste transfer), eventually resolved in 2018; and the knock-on effect of this on the up-to-date-ness of supporting reports.

The original 2015 submissions included a ‘Planning Supporting Statement’, ‘Transport Statement’ and ‘Odour Impact Assessment’ / ‘Odour Management Plan’. In February 2019 a revised ‘Planning Supporting Statement’ and ‘Transport Statement Update’ was submitted (and subjected to a further consultation exercise).

Environmental Permitting

In view of the existing composting facility at the site, an Environmental Permit, issued and regulated by the Environment Agency, is in place for relevant activities. This controls the detailed descriptions of the wastes to be composted and the processes undertaken, as well as covering ground and surface water protection, dust, odour, noise and pests. The applicant does not anticipate changes to the existing permit as a consequence of this planning application.

Environmental Impact Assessment

This proposal is not 'EIA development'. The application is accompanied by technical reports which set out the details of the existing operation and proposed operation of the facility and mitigation measures used and/or proposed to be used to ensure the effects of the development are not significant effects requiring EIA.

6. Planning Policy and Guidance

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

Wiltshire Core Strategy 2015

- Core Policy 19: Royal Wootton Bassett and Cricklade Area Strategy
- Core Policy 50: Biodiversity and geodiversity
- Core Policy 51: Landscape
- Core Policy 55: Air quality
- Core Policy 57: Ensuring high quality design and place shaping
- Core Policy 60: Sustainable transport
- Core Policy 61: Transport and new development
- Core Policy 62: Development impacts on the transport network

Purton Neighbourhood Plan 2018

Transport objective –

- To ensure potential traffic/transport implications from new developments are identified and steps taken to mitigate negative impacts, through improvements to roads, footpaths and traffic management.

Cricklade Neighbourhood Plan 2026

Traffic and Transport objectives –

- HGV Operators should be encouraged to avoid passing through Cricklade
- The road network should be improved to accommodate the extra traffic generated by any new development

Policy TT1: Traffic Impact

Proposals for industrial and commercial development will be supported where their traffic movements in general, and HGV movements in particular, can be satisfactorily accommodated in the strategic and local highway networks. Where appropriate, proposed developments should include measures to mitigate any identified traffic impacts in general terms, and those that would have impacts on pedestrians, cyclists and other vulnerable road users in particular.

Other

Wiltshire Waste Management Strategy (2016)

National Guidance

National Planning Policy Framework
National Planning Policy for Waste

7. Consultations

The actual composting facility element of the application site lies within the parish of Braydon; the operational landfill site and related haul road on immediately adjoining land also lie within Braydon CP. The access road to the application site and landfill site, running between Cricklade Road and the landfill site, lies within the parish of Purton.

Braydon Parish Council: In 2015, objection –

Odour Management Plan / Increase in capacity –

There has been a very offensive odour coming from the composting site on a number of occasions over the last year which a number of Braydon residents have noticed and which has been reported both to the Environment Agency and, on occasion, to the site manager. The odour was particularly bad at the end of June, during September and early October 2014.

Logically, there is every likelihood that this extremely unpleasant odour will increase in direct relation to the increase in tonnage of green waste composting being applied for.

The current Odour Management Plan which Hills has in place does not appear to be working and the Odour Impact Assessment prepared by Isopleth is unconvincing.

Temporary to Permanent Consent –

The consent given for the composting facility ... has been granted until August 2024 on a temporary basis. We feel that any review of this should be done in the context of a much broader, county-wide search area as there are better, long-term sites in the county (for example, the site near J17 of the M4). For this application to become permanent would lead to continuing use of the open countryside between Purton and Braydon (a rural and almost uninterrupted view from the top of Pavehill stretching towards the ancient Braydon Forest

and for miles beyond) for industrial purposes. Based on developments in the last 20 years, it is likely that this would lead to further applications for industrial development which would be detrimental to the countryside.

We feel that composting should be carried out either locally or at better-accessed and connected sites; to bring in green waste from across Wiltshire (or, indeed, Swindon or other counties) to the subject site would appear to be based on poor management of strategic sites within the county, of which there are a number.

Increase in HGV Traffic –

The increase in heavy goods vehicles will be detrimental to the access route.

Purton Parish Council: No objection

Cricklade Town Council (nearby parish): In 2015, objection –

The site currently has permission to process 25,000 tonnes of green waste annually and Hills now wish to increase this to 50,000 tonnes. As partial offset, an existing consent to recycle tyres (which has never been implemented) will be set aside. The current green waste consent only runs to 2024 and Hills now wish to make this permanent.

A similar application was submitted in 2013 which was refused (on appeal) because of the absence of a Transport Statement and an Odour Impact Assessment.

A Transport Statement does now form part of the documentation with this application but it is seriously flawed on two counts:

- Whilst it does refer to the 7.5t weight limit through Purton there is no consideration given to the obvious implication that most, if not all, of the additional HGV movements will therefore come through Cricklade to access the A419.
- There are statistics included using an annual average basis but the movement of green waste in and out of the site has an obvious seasonal peak which will produce much higher HGV movements at certain times of the year.

The Planning Supporting Statement document makes reference to certain sections of the Wiltshire Core Strategy, it fails to mention Core Policy 19 which states that “Development proposals in the RWB&C Community Area will need to demonstrate how the relevant issues and considerations listed in paragraph 5.99 will be addressed” one of these states “recognise local concerns regarding the impacts of HGV traffic on the local road network.” This forms part of CP19 because of the specifically identified problems in our Community Area and Cricklade in particular.

The applicant mentions that HGV traffic from the site has fallen in recent years because of lower activity by some users. Whilst this may be true the effect may only be temporary and cannot be a factor in considering this application.

Cricklade is faced with the continuing problem of HGV traffic coming through the congested town centre causing inconvenience and danger for pedestrians and other road users as well as shaking the numerous listed buildings that line the roads in and out of the town. Residents bring these issues to our attention on a regular basis.

In 2019, continuing objection –

Cricklade Town Council (CTC) have previously objected to this application and the lengthy submissions that we made at the time are still on record and continue to be relevant. Our previous objections, amongst other concerns, centred around the increase in HGV movements as a result of the increase in capacity. CTC have no objections to the principle of the site and its operations, just the traffic impacts. The applicant has now completed a very lengthy traffic study which gives greater details on HGV movements as well as a 33 page Planning Statement supporting the application. As we have previously stated Wiltshire Core Strategy (WCS) CP19 identifies that local concerns regarding the impact of HGV traffic on the local road network as an important factor when considering developments.

In answer to this the applicants traffic statement states: ‘Vehicle movements associated with the proposal will not have additional significant impact on the local road network and therefore it is considered no mitigation measures are required’. We would point out that any small increase to an already near or at capacity road network can have a significant impact for local residents.

Cricklade’s Neighbourhood plan TT1 states:

‘Proposals for industrial and commercial development will be supported where their traffic movements in general, and HGV movements in particular, can be satisfactorily accommodated in the strategic and local highway networks. Where appropriate, proposed developments should include measures to mitigate any identified traffic impacts in general terms, and those that would have impacts on pedestrians, cyclists and other vulnerable road users in particular’.

The application also states that this aspect has been addressed by recent traffic counts and the increase will not have any significant impact on Cricklade and the surrounding area.

Some of the figures relating to HGV counts in their Transport Planning document (Feb 2019) are attached below:

ATC Site	ATC Location	Surveyed HGVs	Additional HGVs from the development	% change
Site 1	High Street, North of Cricklade	55	+2	4%
Site 2	Calcutt Street, East of Cricklade	398	+4	1%
Site 3	B4553 Cricklade Road, Purton Stoke	150	+14	9-10%

The counts took place between 12th to 18th December which has been used as a base figure and they estimate on average 15 additional movements a day, but importantly the survey was conducted in Winter and one week before Christmas when less movements would be expected. CTC considers any increase in HGV traffic to be of concern as vehicle traffic through Cricklade, especially HGVs, is already very high and is causing considerable damage to the built environment within the town, this concern has been raised by residents in surveys conducted for the Neighbourhood Plan (NP). The Transport Planning document does not directly refer to the NP however it does say that they ‘recognise there will be a

degradation of amenity for properties fronting the haul route in so far as it affects Cricklade Town Centre'. This would seem to contradict their earlier statement.

Our previous objections in 2015 where the concerns of HGV traffic numbers and odour from the site was outlined, have only been partially answered by new documentation.

In our previous representations we were particularly critical of the Traffic Studies and so we are pleased to see a more comprehensive document this time. However, there is one aspect where it is sadly lacking in rigour. It is obvious to the layman that a green waste site will be subject to substantial seasonal variations in throughput. However, the submitted study gives scant reference to this feature stating in paragraph 5 that the applicant's figures show the busiest month being 35% above the average. The operator has been running the site for a number of years now and so has exact figures for the input and output on a month by month basis (and the number of HGV/RCV trips) which could easily be incorporated in Tables TN-5 and TN-6 to produce some 'real world' figures.

This decision was delayed until another application for a site in Lower Compton near Calne had been decided. Permission for this has now been granted and we have noted that to obtain permission at Lower Compton an internal road has to be built to avoid traffic through Calne Town Centre. Would it therefore be an option to get the link through Braydon re-established as a proposal to lessen traffic through Cricklade?

We appreciate that the temporary nature of the existing consent meant that the level of capital expenditure required would show that the scheme would not be viable. However, if permission is granted for the facility to become permanent (and with the higher volumes anticipated) then the economics would surely change. There would be a significant reduction in time and distance for most vehicles accessing the site as well as the reduced level of disruption to residents on the existing route.

Paragraph 7.3 in the Transport Study Update states that the bulk imports from Lower Compton do not come through Cricklade town centre, using Malmesbury Road instead. If consent for the application is granted we would like to see this made a condition, ie all vehicles from Lower Compton to avoid Cricklade town centre except for emergencies such as road closures elsewhere.

We understand that run off 'slurry' from the site is taken away by HGV tanker, but it is not clear how these trips are dealt with in the Transport studies.

All the assumptions in the Transport Study are predicated on the future transport movements being the same (apart from the increased number) as the existing. The implication being that there will be no change to the area currently served by the site ie Wiltshire and Swindon. If consent is granted, we would like to see a condition applied restricting the use of the site to the W&S area to prevent the possibility of contracts being sought by the applicant to service neighbouring authorities.

Wiltshire Council in its desire to increase 'green' waste management within the county should not neglect its duty to protect a local community and fragile conservation area from other environmental issues.

CTC believe the proposal does not satisfy the following criteria in National Planning Policy Framework, Wiltshire Core Policy and Cricklade Neighbourhood Plan:

*NPPF Ch 9 Promoting Sustainable Transport
S 102, 103 and 107*

NP TT1 Traffic Impact

Royal Wootton Bassett Town Council (nearby parish): In 2015, no objection

Wiltshire Council Highways: No objection, subject to condition

Further information was requested with regard to the proposals at Parkgate Farm Waste Management Facility, namely amendments to the information contained within the Planning Statement and Transport Statement, so that the current permitted tonnage on site was taken account of and to provide a worst case scenario.

Following this request, updated traffic data through recent ATC surveys including the identification of HGV's and their distribution has been compiled, and an updated technical note as an addendum to the previous Transport Statement has been submitted. Within this note it is identified that previous calculations had doubled the anticipated vehicle trip generation associated with the additional tonnage proposed on site. The amendments to trip increases are based upon a 25,000 tonne baseline for the green waste, which is proposed to be doubled to 50,000 tonnes. It is assumed that the vehicular trips equate to the tonnage in HGV loads, which is doubled to show the two way trip generation on a yearly basis for the existing and proposed within table TN1-5. Table TN1-6 then breaks down the yearly trip generation for the increases in tonnage to show the predicted daily trip generation based on an operational week of 5 ½ days and a 50 week year. This shows that for a whole day, the anticipated two way trips would be in the region of 15 HGV's. Table TN1-7 takes into account that during the busiest month some 11.25% of the annual tonnage is received at the site, and Table TN1-8 uses the number of working days during August (as this was identified as being the lesser number of working days within 2019, and a worst case scenario) to break down the trip generation to daily vehicular movements, this table has identified that there will be a total of 18 two-way HGV trip per day within the busiest month. This is only a slight increase of the previously suggested 16 two-way vehicle trips, which was acceptable to the Highway Authority in a previous response.

The Figures and subsequent tables go on to discuss the distribution of traffic based on the ATC data gathered, ultimately Table TN1-10 shows a summary of the change in two-way HGV traffic, represented as a percentage increase and based on the busiest month of the year. This shows that the highest impacted road would be the B4553 Cricklade Road and the section of Cricklade Road north of Mopes Lane at 9-13% increase in HGV traffic, which would be expected as these roads are closest to the site however as the HGV traffic distributes around the road network the impact becomes less. The Table TN1-10 pays particular attention to the impact upon Cricklade Town Centre, which has been represented by looking at the increases on High Street and Calcutt Street as a whole, it is shown that there would be anticipated to be some 6 additional HGV trips associated with the proposal, representing only a 1% increase on the existing HGV traffic in this location.

Point 7.11 and Point 7.13 within the technical note both make reference to the general traffic levels, this is not a consideration when looking at a site which will primarily be increasing the levels of HGV traffic on the network. Point 7.11 in particular seems to try to suggest a lower impact in the change of traffic generation relative to all vehicular traffic on Cricklade Road at 0.4%, claiming that the 'change on this section where HGV's would be most concentrated would be imperceptible'. It has previously been pointed out by the Highway Authority that the HGV traffic increases are perceived more so than smaller domestic vehicles which is why there was a request to compare the increases in HGV traffic alone, which allows for an assessment of HGV increases with respect to perceived amenity. Therefore I do not

consider this comparison of importance when assessing the impact of the proposal on the public highway. However the proposed increase in HGV traffic is not considered to be cause for concern or of a significant enough level to be of detriment to the public highway.

A previous permitted use which has not been implemented with regard to an approved application and the recycling of tyres would be required to be removed from the site permissions in the interests of highway safety. If this permission is not removed there would be the potential for a much greater amount of HGV traffic associated with the site. I would therefore wish to request a condition requiring the abandonment of the former 2007 permission insofar as it permitted the recycling of tyres on the site.

Wiltshire Council Rights of Way: No objection

Wiltshire Council Public Protection: No objection

The predominant concern is that there is potential for odour complaints. The accompanying documentation contains a comprehensive odour management plan which seeks to control and minimise odours. Having checked the records for the site and seen only 2 complaints in the past 12 months, it would appear that the site is generally doing a good job of controlling the odour. In addition, the odour management plan suggests the company welcome the public complaining directly to them which indicates a proactive approach to odour management.

The facility is subject to conditions as set out in their permit and this is overseen and enforced by the Environment Agency.

Wiltshire Council Ecology: No objection

Environment Agency: No objection

Network Rail: No objection

8. Representations

In 2015 the original application was publicised by way of site notices, neighbour letters and press advert. Again, in February 2019 the updated Planning Supporting Statement and Transport Supporting Statement was publicised by the same means.

In 2015, 17 third party representations were received, all objections. They are summarised as follows:

- Transport. Proposal would allow green waste to be transported to the site from anywhere, leading to pollution and continuing road/verge damage. Transporting large quantities of waste conflicts with the principle of recycling. Mopes lane and surrounding rural roads are not lightly trafficked. Lack of appreciation of impact of traffic on local villages and Cricklade.
- Odours/pollution. Un-resolved issue of smells from site; Odour Management Plan is insufficiently robust; EA enforcement is inadequate. Other pollution from diesel engines, etc.
- Inappropriate location. Incremental permissions over the years have allowed retention and growth of waste and industrial developments which are cumulatively harmful to the area (open countryside) and more widely unsustainable. This will continue as a consequence of permitting a permanent composting facility.

- No economic benefits. The proposal would provide no additional employment.
- Rights of way. These must be kept open and remain tranquil.
- Temporary railway bridge. It was widely understood that this would be removed when landfill works ended.

In 2019, 13 representations have been received (at 21 March). They are summarised as follows:

- Unsustainable development. Increasing composting is unsustainable.
- Permanent v temporary planning permission. No evidence to back-up statements that there would be no significant effects on the environment or residents. Impact of temporary use and operational development (notably the bridge) not relevant when considering a permanent use/development. The bridge originally only permitted on a temporary basis for the life of the landfill. Permanent retention of the bridge opens-up the area for further developments. Change to permanent means this is EIA development.
- Residential amenity. The degradation of amenity for properties fronting the haul route not quantified.
- Transport. Local roads unsuited to additional heavy traffic. Weight restrictions disregarded by some lorries.
- Amenity. Visually harmful in local and distant views (from both close-by and distant, well-used rights of way). Noise from processing equipment. Rubbish from site spread across rights of way.
- Wiltshire Council's 'Climate Emergency' motion. The Council is seeking to make the county carbon neutral by 2030. The continual 'trucking' of green waste from elsewhere in the county to the far north of the county would be non-compliant with the motion.

9. Planning Considerations

The issues to be considered in this case are, firstly, the principle of the proposal; and, secondly, the detailed impact of the proposal on matters including highway safety / capacity, and amenity (including the potential effects of traffic and odours).

9.1 Principle

Policy WCS1 ('The Need for Additional Waste Management Capacity & Self Sufficiency') of the Wiltshire & Swindon Waste Core Strategy 2009 (W&SWCS) states that over the plan period to 2026, Wiltshire and Swindon will address the issue of delivering sufficient sites to meet the needs of the municipal waste management strategies and sub-regional apportionments by providing and safeguarding a network of Site Allocations, this to manage the forecast increase in waste associated with the planned growth in the Strategically Significant Cities and Towns (SSCTs) of Swindon, Chippenham, Trowbridge and Salisbury. It further states that the need will be met locally whilst balancing the importation and exportation of waste within the principles of sustainable development and in accordance with the principles of sustainable transport.

Policy WCS2 ('Future Waste Site Locations') of the W&SWCS addresses, at a strategic level, how, and broadly where, the need for the additional waste management capacity identified by Policy WCS1 will be met. The policy's explanatory notes set out two levels, or tiers, of waste management facilities – that is, those that are of a 'strategic' scale and those that are of a 'local' scale. Strategic waste management facilities are defined as large and/or more specialist facilities that operate in a wider strategic manner by virtue of spatial scale,

high tonnage of waste managed, specialist nature of the waste managed and/or a wider catchment area served. They are generally considered to include:

- Strategic materials recovery facilities (MRFs)
- **Strategic composting facilities**
- Energy from waste facilities (EfW)
- Mechanical biological treatment facilities (MBT)
- Landfill

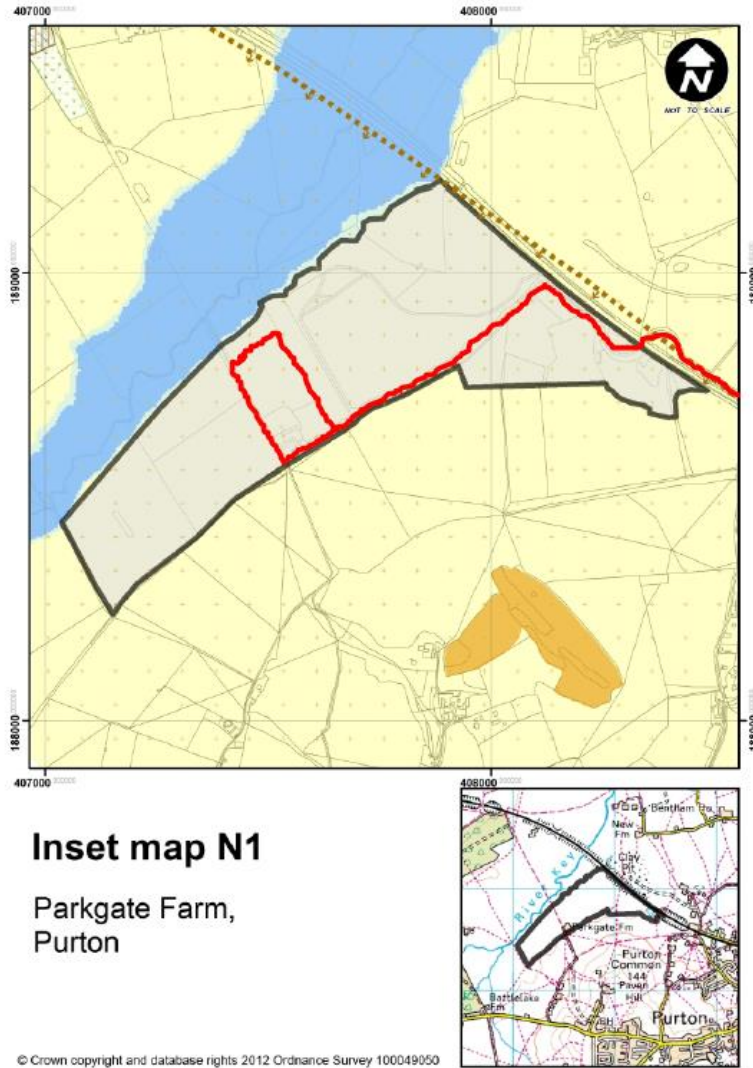
The explanatory notes with the policy state that *“It will be expected that strategic facilities would serve either large areas within, or the entire Plan area. Additionally, they may also serve areas of Wiltshire and Swindon and surrounding local authorities in a more sub-regional context. Such sites will have characteristics that will prevent them from being accommodated on small and/or sensitive sites and locations”*. The policy states that strategic waste site allocations will be located as close as practicable (*“... within 16 km ...”*) to the SSCTs of Swindon, Chippenham, Trowbridge and Salisbury.

Policy WCS3 of the W&SWCS sets out preferred locations for each type of waste management facility, and also identifies the estimated capacities that will need to be delivered, as indicated by the Evidence Base, through the Waste Site Allocations Local Plan. This included the Joint Municipal Waste Management Strategy (JMWMS) for Wiltshire adopted in February 2006 which stipulated that a number of new facilities would be required in order to meet landfill diversion targets. Principle 4 of JMWMS stated that this would include:

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

The ‘Waste Capacity Gap’ report published in October 2011, prepared to support the Waste Site Allocations Local Plan, updated the capacity position by taking into account permitted waste management development since 2006. The report noted that additional composting facilities had been permitted, including one at Parkgate Farm approved in 2007 providing a capacity of 25,000 tonnes per annum. The Waste Site Allocations Local Plan therefore takes into account these existing facilities in its assessment of the ‘capacity gap’ figures that the Council needs to provide for over the plan period to 2026.

In accordance with Policies WCS1 and WCS2, the Waste Site Allocations Local Plan 2013 allocates land/sites for waste uses. Land at Parkgate Farm, Purton – extending to c. 43.6 ha – is defined in the Allocations Local Plan as suitable for strategic scale “Materials recovery facility / waste transfer station, local recycling, inert waste recycling and waste treatment”. The Local Plan acknowledges that the site operates as a strategic landfill site and that permission has also been granted for a composting facility and a tyre recycling facility. Policy WCS3 also identifies Site Allocations and Current Waste Management Facilities as the preferred location for outdoor composting facilities.



Extract from Waste Site Allocations Local Plan 2013
[grey shaded area: Parkgate Farm, Purton allocated 'Strategic Scale Waste Site';
red-edged area: application site]

In terms of Policy WCS2, the proposal in this application would be a strategic waste management facility. On the basis that strategic scale waste management facilities are acceptable at this site and allocated as suitable for such facilities, the proposal complies with the requirements of these aspects of the Waste Core Strategy and the Waste Site Allocations Local Plan as a matter of principle. Essentially, the proposal would provide sufficient strategic capacity to compost all Wiltshire's garden waste collections and green waste arisings from commercial and industrial sources, these both bulk-transferred to the site from waste transfer stations across the county or delivered directly using refuse collection vehicles.

Additionally, as Policy WCS2 allows strategic facilities to serve 'large areas' (that is, areas within the Plan area or the entire Plan area *and* within surrounding local authorities "... in a more sub-regional context ...", the operation of the facility in this way, if ever intended, would not conflict with the policy.

In view of the designation of Parkgate Farm to provide for strategic scale waste facilities, there is no necessity for planning permissions for permanent facilities (such as this composting operation) to be subjected to time limited conditions. National 'Planning Practice Guidance' states - "A condition limiting use to a temporary period only where the proposed development complies with the development plan, or where material considerations indicate otherwise that planning permission should be granted, will rarely pass the test of necessity". The circumstances of the bridge over the railway line is a private matter between the parties concerned, and so is not relevant to the determination of this planning application.

9.2 Sustainability

A number of third party representations refer to the proposal being unsustainable, this in terms of the proposed scale of the facility itself *and* the levels of lorry movements (and 'waste miles' travelled) to serve it. Some concern has also been expressed that there may be other, more-suited sites available, such as the existing composting site at Lower Compton, Calne. In response to this the application agent makes the following statement:

"The primary composting operation for the County switched from Lower Compton to Parkgate Farm in 2012 as it had become apparent that the amount of material generated by residents could not be adequately managed at Lower Compton. The underlying reason was the proximity of residents to the composting area at Lower Compton and that some were downwind of the site (ie village of Compton Bassett to the north east). The Environment Agency considered any residences (and workplaces) within 250m of a compost operation to be at risk of exposure to unacceptable levels of bio-aerosols released from the composting material. Additionally, to achieve the PAS100 approved compost product, regular turning and management of the compost is required which gives rise to visible vapour and occasional odour. Regular complaints had been made by residents around Lower Compton and Compton Bassett and despite extensive mitigation measures, including fans and odour control sprays, the scale of the composting was exceeding the site location.

Parkgate Farm was established as a landfill and designated in the Wiltshire and Swindon Waste Local Plan 2011 as a preferred area for strategic waste management, particularly for outdoor composting. At the time of the planning application it had been envisaged that the waste would be sourced from in and around Swindon, but it was instead re-focused on replacing the Lower Compton site to address the issues that had arisen there. Parkgate Farm offered a 4ha site, considerably more remote than Lower Compton with no residences within 500m. An odour assessment has been carried out and since the site started operation in 2012, very few complaints have been received either by the operator or by the EA.

It has been noted that green waste should be managed on a larger number of smaller scale sites. However, this would reflect back to the way in which small quantities were managed several decades ago, when it was essentially simply piled up in farmers' fields and left to rot with no management. In order to achieve a recognised specification of compost, adequate management is required, including regular turning and monitoring of the windrows through each stage of the 12 week process. Specialist equipment is required. In order to adequately protect the environment, extensive concrete surfacing is required for all of the stages of the process, including storage of the compost. That concrete surfacing needs to be served by a purpose designed contained drainage system which is emptied by specialist contractors and the liquids taken to authorised treatment facilities.

Historically small on farm composting facilities could be operated under the regulatory radar by registering exemptions from Waste Licensing. That is no longer the case and all,

legal, composting facilities must now apply for and obtain an environmental waste permit with the associated upfront and annual subsistence costs. The Permit requires comprehensive written management systems including details of monitoring and mitigation from potential emissions.

The aim of the diversion of green waste from landfill is to actually recover the waste to a useable product; to do that properly requires considerable cost and experience. To revert to the historical degradation of green waste at small scale locations, followed possibly by spreading on farmland, is not sustainable, it is not the best possible option and is no longer achievable in regulatory terms.

The management and the infrastructure are expensive and economies of scale necessitate that facilities have a higher level of throughput to be able to sustain themselves. This is not unique to composting and can be seen across the range of waste management options”.

So, for reasons of economy and regulation, this proposed larger scale composting operation at Parkgate Farm is, in fact, the sustainable solution which allows green waste to be viably recovered as compost rather than be disposed of to landfill or in an un-regulated capacity. Parkgate Farm itself provides a suitable location by reason of its relatively remote location and by reason of the ability of the environment hereabouts to absorb the operation without detrimental impacts or effects.

The Wiltshire Waste Management Strategy (2016) notes that the concentration of landfill, materials recovery facility and composting capacity in the north of the county has been reduced under current contracts by developments at Amesbury (waste transfer station) and Westbury (MBT plant), plus the use of the Newbourne Farm (Hampshire) composting site.

9.3 Highways and Transport

Policy WCS2 ('Future Waste Site Locations') of the Wiltshire & Swindon Waste Core Strategy 2009 states that in the interests of achieving the objectives of sustainable development, priority will be given to proposals for new waste management development 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.

Policy WDC1 ('Key criteria for ensuring sustainable waste management development') of the Wiltshire & Swindon Waste Development Control Policies DPD 2009 sets out key criteria for assessing planning applications for waste development, this including the need for the impact of transporting waste to and from sites to be minimised. Policy WDC2 ('Managing the impact of waste management') has a similar requirement. More specifically Policy WDC11 states the following:

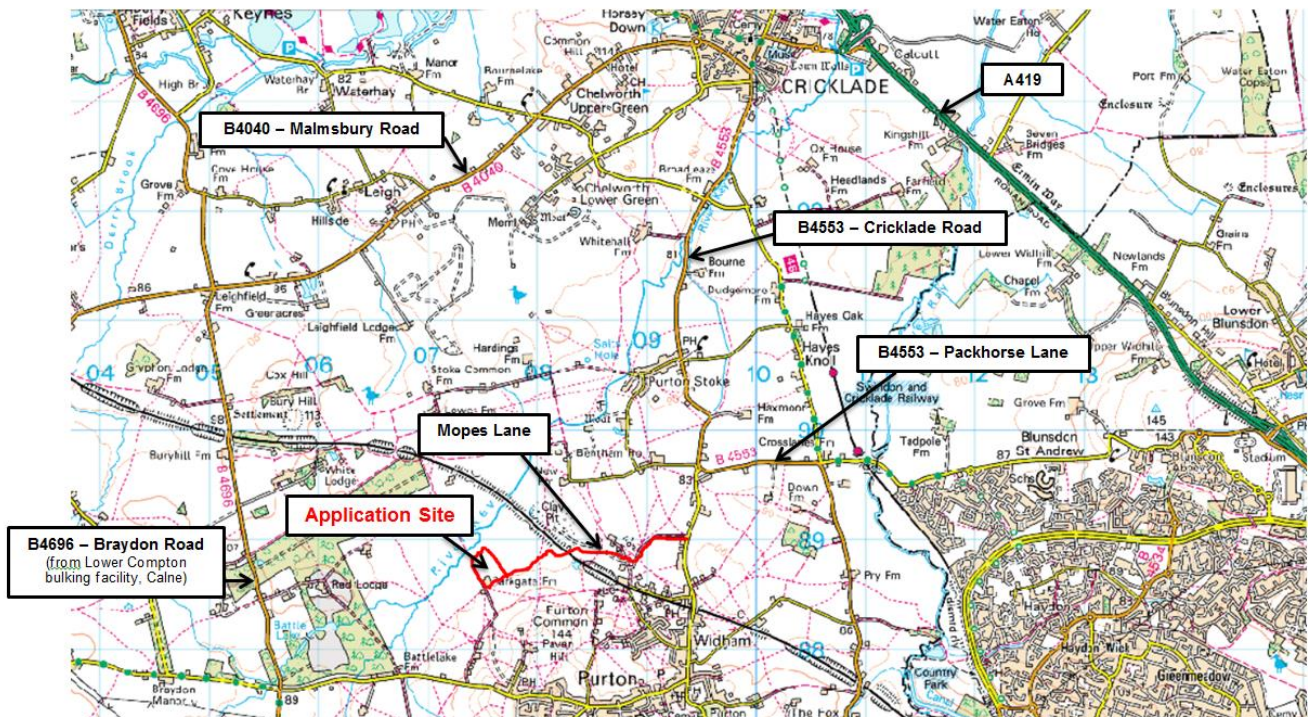
Waste management development will be permitted where it is demonstrated that the proposals facilitate sustainable transport by (where they are relevant to the development):

- *Minimising transportation distances*
- *Maximising the use of rail or water to transport waste where practicable*
- *Minimising the production of carbon emissions*
- *Ensuring a proposal has direct access or suitable links with the Wiltshire HGV Route Network or Primary Route Network*
- *Establishing waste site transport plans*
- *Mitigating or compensating for any adverse impact on the safety, capacity and use of a highway network.*

The Wiltshire Core Strategy contains similar general transport policies.

The application is accompanied by a Transport Statement and Transport Statement Update (the 'Update') (2019). The purpose of the Update is to provide up to date traffic survey results (surveys undertaken in December 2018) and to allow the increase in HGV traffic resulting from the proposal to be compared with existing HGV movements.

To assist understanding of the Update key roads and junctions in the vicinity of the application site are shown on the following 'snip' from the Ordnance Survey map



Context map showing key roads and junctions within the vicinity of the application site

The Update begins by comparing the numbers of HGV movements (both loads and trips) generated by 25,000 tonnes of waste per annum as existing with the predicted numbers of HGV movements from 50,000 tonnes of waste per annum as proposed. The results are set out in the following table taken from the Update:

		Vehicle Type	Existing			Proposed		
			Quantity (tonnes)	Loads	Trips	Quantity (tonnes)	Loads	Trips
Green Waste Imports	23	tonne RCV	22,307	970	1,940	44,614	1,940	3,879
	7.3	tonne RCV	2,693	369	738	5,386	738	1,476
	Total		25,000	1,339	2,678	50,000	2,678	5,355
Compost Exports	25	tonne artic	12,857	514	1,029	25,714	1,029	2,057
	10	tonne artic	1,429	143	286	2,857	286	571
	Total		14,286	657	1,314	28,571	1,314	2,629
All Material			-	1,996	3,992	-	3,992	7,984

Table TN1-5: HGV Predictions with Revised Baseline (25,000-50,000 Tonnes)

The Update then uses this data to calculate the change on a daily basis (based on the site operating 50 weeks per year at 5.5 days a week, with the additional 25,000 tonne pa); the following table sets out the results:

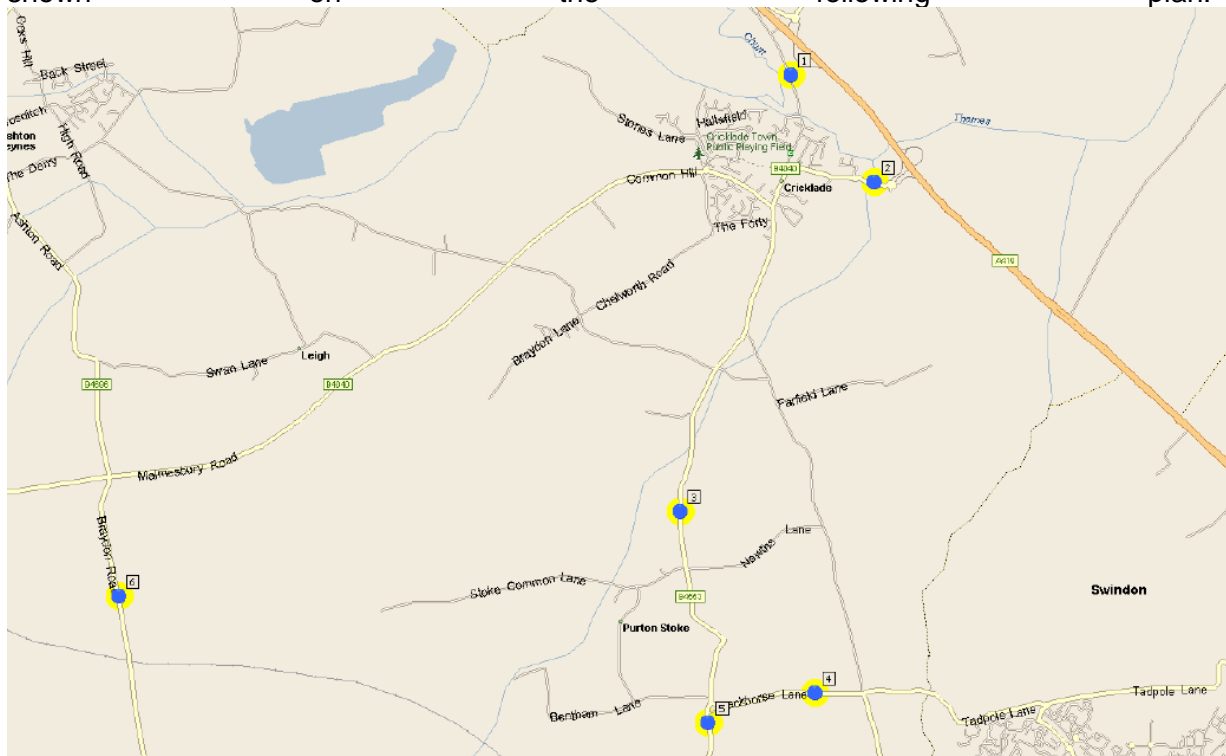
		Vehicle Type	Change					
			Quantity (tonnes)	Loads	Trips	Days/Year	Loads/Day	Trips/Day
Green Waste Imports	23	tonne RCV	22,307	970	1,940	275	4	7
	7.3	tonne RCV	2,693	369	738	275	1	3
	Total		25,000	1,339	2,678	275	5	10
Compost Exports	25	tonne artic	12,857	514	1,029	275	2	4
	10	tonne artic	1,428	143	286	275	1	1
	Total		14,285	657	1,314	275	2	5
All Material			-	1,996	3,992	-	7	15

Table TN1-6: Change in HGV Predictions with Revised Baseline (25,000-50,000 Tonnes)

As is evident, the predictions lead to an average daily increase in HGV movements of 15 (where a single ‘movement’ by an HGV is either the ‘in’ or the ‘out’ trip made by the HGV); factoring in the existing movements from the site (for the permitted 25,000 tpa of composted material), this means the total average number of daily movements would be c. 30, (15 + 15 trips).

As the facility is/will be subject to seasonal variation, the Update also assesses this, concluding that in the peak month – August – the extra daily movements may increase to 18, but with a corresponding drop-off in the lowest month.

With this baseline data, the Update then considers the impact of the additional movements on the wider road network, in particular within Cricklade. In order to do this a series of automatic traffic counts (ATCs) were undertaken, (taking into account the ‘MacGas’ site which was still operational at the time of the assessment). The location of the ATCs is shown on the following plan:



The ATC took place from 12 to 18 December 2018. The locations covered main routes that are not subject to weight restrictions (there is a 7.5 tonne restriction on the Cricklade Road to Purton, south of the access to the application site, so ‘forcing’ heavier HGV traffic to enter and leave the site from/to the north).

The following table from the Update shows the overall results from the ATC, these in terms of average weekday daily traffic:

Time Period	Site 1 High Street		Site 2 Calcutt Street		Site 3 B4553		Site 4 Packhorse Lane		Site 5 Cricklade Road		Site 6 Braydon Road	
	All Veh's	HGVs	All Veh's	HGVs	All Veh's	HGVs	All Veh's	HGVs	All Veh's	HGVs	All Veh's	HGVs
Daily 24-Hour	2647	55	10036	398	4170	150	4906	105	5736	152	4480	219

Table TN1-9: ATC Summary: Average Weekday Daily Traffic

From this data the Update draws the following initial reasonable conclusions:

- That HGV activity in Cricklade (at Sites 1 and 2) is far higher than on the approach to the application site itself (at Site 5). Some 453 HGV movements were recorded in the town, but 152 on Cricklade Road;
- The HGV traffic on Cricklade Road at Site 5 is mostly associated with the facilities accessed off Mopes Road (the access to the application site and the Mopes Lane Industrial Estate). This because of the weight restriction to on Cricklade Road to the south of Mopes Lane.

Applying the predictions on additional HGV traffic which will be generated by the proposal (as set out in the earlier tables), the Update then assesses the impact of the proposal on the existing situation, as recorded by the ATC. In doing this a number of reasonable statements and/or assumptions are made:

- The imported and exported material is transported by a variety of vehicles, including 25 tonne articulated HGVs, 23 tonne rigid lorries, 10 tonne rigid lorries and 7.3 tonne refuse collection vehicles (RCV);
- The routes used by each type of vehicle will vary depending on the origin of incoming material or the destination to which material is being exported, while some routes will be influenced by weight restrictions;
- At present, the bulk material imports by 23 tonne HGV come from the Lower Compton bulking facility at Calne, routed via Braydon Lane and Malmesbury Road (ATC site 6). Those vehicles do not enter Cricklade, but instead they route to the south of the town on the road serving Chelworth Industrial Estate. The development might add an average of 4 movements a day each way to that route, 8 in total;
- The majority of RCV imports come from the Swindon area, using the shortest route via the B4553 Packhorse Lane (ATC site 4);
- Other export movements are less predictable as they are dependent on customer locations, but as a worst-case scenario they have all been assumed to route via Cricklade (ATC sites 1 and 2).

The Update sets out the impact of the additional traffic on each ATC site in the following table:

ATC Site	ATC Location	Surveyed HGVs	Additional HGVs from Development	%age Change
Site 1	High Street, North of Cricklade	55	+2	4%
Site 2	Calcutt Street, East of Cricklade	398	+4	1%
Site 1 + 2	Cricklade Town Centre	453	+6	1%
Site 3	B4553 Cricklade Road, Purton Stoke	150	+14	9-10%
Site 4	B4553 Packhorse Lane	105	+4	4%
Site 5	Cricklade Road, north of Mopes Lane	152	+18	11-13%
Site 6	B4696 Braydon Road	219	+8	4%

Table TN1-10: Summary of Change in 2-Way HGV Traffic based on Busiest Month of the Year

From this table the following key conclusions can be drawn –

- Within Cricklade town, using worst-case assumptions for additional HGV traffic routed through the town, the change in the busiest month of the year is only likely to amount to about 6 additional HGV movements a day, which is about 1% of the existing HGV traffic and just 0.05% of all traffic.
- Furthermore, and also in a theoretical worst-case scenario, if all additional HGV traffic was to be routed through Cricklade, then in the busiest month of the year HGV traffic would increase by just 4% and general traffic by 0.14%, which would still be imperceptible.

These key conclusions are agreed, and have led to the ‘no objection’ to the proposal from the Highways Department. Having regard to the magnitude of change and the impact of this change in context (including Cricklade town), an objection based on the impact of the additional HGV traffic generated by the proposed development and, any associated amenity or safety implications, could not be sustained. In this respect the application fully accounts for, and satisfies, the highways reason for dismissal of the earlier appeal. And furthermore, the proposal complies with all relevant development plan policies, including Policy TT1 of the Cricklade Neighbourhood Plan, in that traffic movements associated with the proposed development can be satisfactorily accommodated in both the local and strategic highway networks.

9.4 The effects of odours

The supporting text to Policy WDC2 of the adopted Wiltshire and Swindon Waste Development Control Policies Development Plan Document (WDCPD) states that the legislative control of odour is often outside the scope of controls exercised by Councils but the issue of air quality is an important material consideration.

Policy WDC2 Managing the Impact of Waste Management, seeks to permit waste management developments where it can be demonstrated that the proposal avoids,

adequately mitigates or compensates for significant adverse impacts relating to (among others) air emissions (which include odours). The policy states that, where necessary, proposals for waste management development should be accompanied by assessments of the impacts relating to the issues listed.

The application is accompanied by an Odour Impact Assessment and an Odour Management Plan.

The Odour Impact Assessment identifies the odour sources present at the existing facility, assesses the effectiveness of the proposed primary odour control measures, estimates the residual odour emissions from the proposed facility, quantifies the impacts on sensitive receptors, assesses the significance of these impacts, and identifies further options for mitigation and the requirement for these. On sources, as would be expected, the compost which is at the sanitisation stage and undergoing windrow turning is expected to be the dominant odour source. Receptors comprise rights of way (some relatively close) and residential properties (the closest c. 650m from the site).

In assessing impacts the Assessment concludes that 'green waste composting' odours are generally of moderate offensiveness in any event. Following dispersion modelling, the Assessment concludes that this odour would be detected on occasion, but it is unlikely that a statutory nuisance would be caused.

The Odour Management Plan sets out measures to control odour in the context of this specific facility. Its purpose is to ensure that potential odours from each part of the process are minimized through effective management. Accordingly, it sets out control measures for every stage.

Read together, the Odour Impact Assessment and the Odour Management Plan confirm that odours from the site should not give rise to statutory nuisances, but in any event can be controlled through appropriate management of activities on the site. This is accepted by the Council's Public Protection service which raises no objections. The level of information provided in the OIA addresses the detailed objection raised by the planning inspector in the earlier appeal.

In any event, the site's existing Environmental Permit sets out details of permitted activities, waste types and quantities. The site is regulated by the Environment Agency under the Environmental Permitting regulations, and is subject to stringent environmental standards for the preparation of 'quality compost'. The standard permit allows up to 75,000 tonnes of green waste to be processed. Green waste typically comprises garden trimmings, leaves, shrubs, plants, grass, trees, trunks, and branches and similar materials such as might arise from households, parks, landscape gardens, etc.. No other municipal black bag, industrial, hazardous or other wastes may be composted.

9.5 Other matters

Within its former agricultural and farmyard context, the proposal poses no adverse visual or countryside impacts. In considering the earlier appeal the inspector raised no concerns in this regard. Specifically he stated "*The haul road railway crossing bridge to the landfill and the composting has been in place for a number of years. It resembles many farm bridge rail crossings. The visual and landscape impact of the proposals on this allocated strategic site would be acceptable, subject to appropriate planning conditions*". There have been no changes in circumstances in this regard.

The hours of operation are already limited by planning conditions, and no changes are proposed. Noise generated by processing equipment is not considered to be so significant

to warrant an objection for this reason – the circumstances of the noise will not change from the existing situation.

10. Conclusion

This proposal – for a strategic waste recycling facility on a site allocated for this purpose, and for a type of facility previously approved at this location – is acceptable as a matter of principle. Detailed issues relating to the impact of the proposal on highway safety and capacity, and the effects of odours, have been fully addressed in the application, and confirmed as acceptable in the context of the site. There are no other material considerations that ‘tip the balance’ away from granting planning permission. Accordingly, the application is recommended for approval.

RECOMMENDATION

To grant planning permission subject to the following conditions –

- 1 The development to which this permission relates shall be begun not later than the expiration of 3 years beginning with the date of this permission. Written notification of the date of commencement shall be sent to the Local Planning Authority within 7 days of such commencement.

REASON: To comply with Section 91 of the Town and Country Planning Act 1990.

- 2 The development hereby permitted relates to the following submitted plans:

No. 3141/1A dated 12/2014 (red-edged site plan)

No. PGF/COMP/PP2/001 dated 10/06/13 ('Planning Boundary' plan)

REASON: For the avoidance of doubt and in the interests of proper planning.

- 3 The waste material to be processed (composted) at the site shall comprise ‘green waste’ only.

REASON: To comply with the terms of the application (which seeks to process green waste at the site only, and not other waste categories, including tyres), and other waste materials raise environmental and amenity issues that would require consideration afresh.

INFORMATIVE: For the purposes of this condition ‘green waste’ is defined as those materials listed in Table 3-1 of the Parkgate Farm Composting Facility Odour Management Plan, ref: EPR/AP3196EK, and dated 08.01.2015 prepared by Hills Waste Solutions Limited.

- 4 The total tonnage of green waste delivered to the site shall not exceed 50,000 tonnes in any twelve month period.

REASON: To comply with the terms of the application and to ensure that the development substantially accords with the terms of the Transport Assessment Update dated January 2019 which accompanies the planning application and its conclusion that this scale of operation would not pose highway safety or capacity issues in the locality.

- 5 A record of quantity (in tonnes) of waste materials delivered to the site and all the waste-derived products despatched from the site shall be maintained by the operator of the site and made available to the local planning authority on request. All records shall be kept for at least 36 months.

REASON: In order that the local planning authority can monitor the approved development.

- 6 No vehicle shall enter or leave the site and no working or operations shall take place at the site except between the hours of:

07:30 - 18:00 Monday to Friday

07:30 - 12:00 Saturdays

07:30 - 18:00 Bank Holidays

No working shall take place at any time on Sundays or on Christmas Day, Boxing Day or New Year's Day

REASON: For the avoidance of doubt and in the interests of local amenity

- 7 The plant associated with the development hereby approved shall be permanently sited and/or screened to ensure that noise emissions shall not exceed a Rating level of 40dB (over any 15 minute period) when measured free-field in any residential garden. Measurements and assessments shall be carried out in accordance with BS4142:1997.

REASON: To safeguard the amenity of the area and local residents.

- 8 The haul roads, stockpiles, processing areas shall be watered down or treated with an approved dust laying agent at times as may be necessary to prevent dust nuisance arising from the site.

REASON: To safeguard the local environment

- 9 No floodlighting shall be erected at the site until a scheme of floodlighting has been submitted and approved in writing by the Waste Planning Authority. The scheme shall include details of the height of the lighting posts, intensity of the lights (specified in lux levels), spread of light, including approximate light spillage to the rear of the lighting posts, any measures proposed to minimise the impact of floodlighting or disturbance through glare and the times when such lights will be illuminated. Any floodlighting/external lighting shall be used only in accordance with the Michael Woods Associates Bat Survey dated October 2007.

REASON: To safeguard the amenity of the area.

- 10 Any above ground storage tank(s) shall be sited on an impervious base and surrounded by a suitable liquid tight bund. No drainage outlet shall be provided. The bunded area shall be capable of containing 110% of the volume of the largest tank and all fill pipes, draw pipes and sight gages shall be enclosed within its curtilage. The vent pipes shall be directed downwards into the bund.

REASON: To minimise the risk of pollution of groundwater.

- 11 All waste tipping, handling, sorting, storage and composting shall be carried out upon an impervious concrete base which shall drain to the surface water lagoon.

REASON: To minimise the risk of pollution of watercourses

- 12 The height of any stockpile or machinery shall be restricted to a maximum of 4 metres.

REASON: In the interests of visual amenity.

- 13 In order to protect the existing habitats, all existing trees and hedges shall be permanently fenced off to prevent encroachment and damage from site operations in accordance with the details shown on Drawing number 3141/Hedges/16 02 09/V6 dated 16 February 2009. No placement of goods, fuel or chemicals, soils or other materials shall take place in the fenced area.

REASON: To ensure that the development does not encroach on existing planting causing root damage and to conserve the habitat at the woodland/hedge edge as a feeding/refuge corridor for wildlife.

- 14 Vehicular access to the application site shall be via Mopes Lane and the existing haul road and railway bridge only. There shall be no access to the site via any other routes.

REASON: To comply with the terms of the application and to ensure that the amenities of residents within the wider area are protected.

This page is intentionally left blank