# Proposed Submission Draft Waste Site Allocations DPD

Summary of key points raised through formal consultation stage

# General comments on approach/front end of the DPD

- The different systems/technologies for handling waste should be explained.
- Waste should be thought of as a resource (i.e. a benefit).
- Waste treatment should be encouraged across the county (including small scale EfW).
- The council should consider more options at the local level nearer to main population centres (flexibility of local sites to meet recycling targets is sensible and essential).
- Waste uses are not compatible with and will restrict other development uses (B1, B2 and B8).
- Waste sites create fewer jobs than most B1 and B2 developments.
- Waste sites should not be located next to housing/gypsy and traveller sites.
- The DPD prioritises existing sites irrespective of whether they use sub-optimum technology.
- The DPD mentions policies of the Waste Core Strategy (WCS1/2/3/4/7) but it does not explain what these policies are.
- As new technology comes forward waste levels are likely to reduce this effect on likely timescales of operation should be taken into account.
- There should be greater working between the Parish and Wiltshire Council.
- Agreement that the approach should not be too prescriptive issues relevant to particular sites can be dealt with at the planning application stage.
  - Agreement that set and specific boundaries cannot be applied to the distribution of waste management facilities.
  - Implications (e.g. developments in the pipeline) that may affect the development plan should be assessed.

# **Comments in order of DPD site profile**

## Description of the site

• It is recommended that Public Rights of Way (PRoW) are safeguarded – there may be scope to enhance the PRoW network (Natural England).

## Planning context

• The councils need to consider whether there are any existing minerals (or waste) restoration plans that would be prejudiced by this DPD (Natural England).

### **Traffic and transportation**

- Highways Agency are unable to support a number of the sites that are in close proximity to the SRN without the provision of detailed transport assessments to identify the potential impact of development on the safe and efficient operation on our network.
- Highways Agency recommends that future proposals for waste management facilities should be assessed in terms of their impact on the SRN and whether they comply with sustainable transport policy objectives and relevant guidance.

- Greater emphasis could be given to maximising opportunities for transporting waste by rail or water, with many of the sites located adjacent to rail facilities (Highways Agency).
- Has the potential transportation impact of waste sites on AONBs been assessed?
- All applications should be accompanied by a robust Transport Assessment (TA) and Travel Plan (TP) (Highways Agency) to ensure there is no detrimental impact on the SRN.

#### Water environment

- Aquifer terminology DPD should refer to principal aquifers, secondary aquifers and unproductive strata, as the former classifications major, minor and non aquifers are no longer used. These former designations of major and minor aquifer have largely transferred across to principal and secondary. However some of the aquifers that were designated as non-aquifers have been subdivided into secondary aquifers and unproductive strata (Environment Agency).
- It is not the responsibility of a developer to undertake a Surface Water Management Plan (SWMP) to support an individual planning application. This should be undertaken by County Councils or Unitary Authorities and will consider flood risk from surface water, groundwater and ordinary watercourses (Environment Agency).
- Concern that all sites have suitable surface water drainage systems, and that there is a potential risk of pollutants entering the River Avon SAC advise that this is flagged up for planning application process (Natural England).

#### Any other issues or comments

• The MOD is satisfied that birdstrike issues have been taken into account (Defence Infrastructure Organisation).

### New sites put forward

- 1. Land at Keypoint (Site K145), Swindon (Legal and General)
  Potential site for strategic waste management uses. The site is accessed via the A420, which adjoins the M4 via the A419 approximately 6.5km to the south (Junction 15). The land at Keypoint offers potential for the full range of waste management uses, including energy from waste.
- 2. 20 Mills Way, Boscombe Business Park, Amesbury (Hills Waste Solutions) Deliverable strategic site in southern hub of the county.
- 3. Sahara Sandpit (Sahara Melksham Ltd)
  It is a small but locally strategic site. Without it the Council is promoting a DPD that is based on an incorrect data base. The site does not have any ecological, geological or hydro-geological issues. Access is excellent.

# **Area-based comments**

## **Westbury Community Area**

- Belief that Westbury has a disproportionate allocation of (strategic) sites compared with the rest of Wiltshire which are not within 16km of a 'strategic centre' (Chippenham or Salisbury).
- Priority should be given to establishing a Household Recycling Centre in the Westbury Community Area.
- No more than one Mechanical Biological Treatment (MBT) Plant should be built in the Westbury Community Area. Local uses for the product of a

MBT Plant should be explored.

- Consideration should be given to exploiting the use of rail and not road transport for the transhipment of waste.
- Comprehensive safety procedures should be introduced to mitigate any risk to the public as a result of the proposals to process such a wide range of waste materials.

## **Wootton Bassett and Cricklade Community Area**

- The area around Purton has an undue density of sites compared to the rest of the county.
- The road infrastructure in Purton is inadequate and there are limited alternative routes. The HGV route from Swindon is via Ridgeway Farm however a current planning application for 700+ houses on this route will affect the road layout and divert the road through a new housing estate, with traffic calming and a primary school on route not suitable for waste HGV traffic.
- Potential for rail link between Swindon Borough and Purton sites.
- Will waste uses in Purton be used solely for Swindon?

## **Tidworth Community Area**

• Ludgershall is well outside of this 16km of all the named towns and it is not in the local need. 16km is clearly the intended definition of 'local' ergo for this strategy to succeed the Council must comply.

## The evidence base

- The distances and HGV routes have not been assessed properly the sites should be evaluated holistically taking into account future growth of communities and the impact that future developments may have on adding strain to existing weak infrastructure.
- If any of the sites are found to be unsuitable what would the impact be on the overall strategy and would there be a shortfall?
- The evidence base should cover how the poor transport and road infrastructure is impacted, how emerging plans are considered and how changes in waste legislation will be accommodated.
- Highways Agency welcomes the evidence base for each site, however, "traffic and transportation" is not mentioned in the list in 1.7 request that this should be included in the evidence base list.

# Site selection and appraisal

- Geographical distribution waste facilities should be more evenly spread around the county. There are gaps of provision in Marlborough, Melksham, Devizes, Pewsey, Tidworth and Mere.
- The Cranborne Chase and West Wiltshire Downs AONB is concerned that AONB matters have not been fully or properly considered in the preparation of the draft waste site allocations DPD.

# Strategic and local sites

- Difference between strategic and local sites should be clearer.
- Strategic sites should be located on good arterial routes / rail links to ensure that the rural network of roads is not used.
- Map should be included to show road categories and interconnections with major routes.

- The allocations of the strategic and local sites are unbalanced, especially as the main population areas are in west and south Wiltshire. Strategic: North Wiltshire: 6, West Wiltshire: 4, South Wiltshire: 2, Swindon: 2.

  Local: North Wiltshire: 6, West Wiltshire: 5, East Wiltshire: 8, South Wiltshire: 6, Swindon: 4.
- There is a contradiction in the plan; strategic facilities are expected to serve large areas but some of the sites are remote from the rest of the county.
- Has the relationship with facilities in neighbouring counties been assessed?
- What is the impact on neighbourhood recycling facilities and implementation of kerbside collection?
- It is noted that the majority of strategic and local sites are outside of the AONB but there is concern the policy relating to the limited geographical catchment of local waste management facilities and avoidance of AONBs has not been complied with.
- Why are waste sites that have recently been approved in the AONB (and are beyond 16km of Salisbury) not identified within this document?
- Sufficient weighting should be applied to the possible impact of strategic sites on the SRN (Highways Agency).

## Where should new waste facilities be located?

- Support shown for paragraph 1.23 (to avoid the most harmful forms of waste development from being within the protected landscapes of the three AONBs in Wiltshire).
- Local facilities should only be located in an AONB where no alternative sites are available.
- How is the 16km 'strategic centre' buffer zone calculated (i.e. as the crow flies or from edge of settlement)? The DPD should quantify distances and identify HGV route to be used.
- Agreement that set and specific boundaries cannot be applied to the distribution of waste management facilities.

# The need for additional waste management sites by 2026

- Concern that the Councils are dealing with old data in relation to capacity projections set out in Waste Core Strategy.
- Highways Agency welcomes use of capacity projections set out in Waste Core Strategy to inform the requirement for sites.
- Document does not provide any deliverable, strategic sites in the southern hub of the County, despite need for such sites being identified.
- Why has Sahara Sandpit (a long-standing, small but locally strategic site) been excluded from the DPD?
- DPD is self-contradictory on the subject of the need for inert recycling. Table 1.3 shows a projected requirement of zero for inert waste but this use is identified for sites in the document.

# Site profiles and maps

• Built historic environment issues have not been identified/addressed in the individual site assessments. Heritage assets should be identified within the final document.

## **Monitoring**

- There is no mention of how to deal with waste created by hospitality trade and food producers.
- Highways Agency would like to ensure that sites are neither built if they are not needed or over used if there is a lack of supply as both scenarios

will potentially have a negative impact on the SRN.

# **Comments by site: South**

## Solstice Business Park, Amesbury

The site is undeliverable. Remove site from DPD.

## **Traffic and transportation**

• The site is located adjacent to the A303 and the junction with Solstice Business Park - concern that a waste facility in this location might generate a significant number of movements through the junction. A robust evidence base would be required to demonstrate if there is an impact on the safe and efficient operation of the A303 and the Solstice Business Park junction (Highways Agency).

### Historic environment and cultural heritage

- SMs located directly to east, north and south of site (County Archaeologist).
- Development of the site may impact on currently unrecorded remains associated with known and unknown sites of buried archaeological features,
  if any development takes place in areas which have not been previously mitigated. A programme of archaeological evaluation will need to be
  undertaken to assess the nature, extent and significance of any surviving remains. The site should be subject to archaeological evaluation in
  advance of any proposed works in this area. Further mitigation may be required depending on the outcome of that evaluation (County
  Archaeologist).

## Human health and amenity

• Potential impacts on neighbouring/sensitive receptors (odour and bioaerosols) would need to be considered as part of any planning application (Environment Agency).

#### Water environment

- No objection to allocation (Environment Agency).
- A satisfactory FRA would be required if the development area exceeds 1 hectare (Environment Agency).
- SPZ1 is located 1.2km to the north of the site and the closest groundwater abstraction is 1.8km appropriate measures would need to be put in place to protect the water environment (Environment Agency).
- Risk of polluting groundwater sources robust design measures should be put in place to ensure the appropriate levels of protection are considered to protect public water resources (Wessex Water).
- Foul water discharges from these waste management facilities can be connected to the public sewer system where available subject to a capacity appraisal and agreement upon a point of connection (Wessex Water).

#### **Cumulative effects**

• Suggest cumulative detrimental effects of development on the landscape are mentioned in the 'cumulative effects' section of site profile (Natural England).

# **CB Skip Hire, St Thomas Farm, Salisbury**

### Historic environment and cultural heritage

- Development of the site may impact on currently unrecorded remains associated with known and unknown sites of buried archaeological features. A programme of archaeological evaluation will need to be undertaken to assess the nature, extent and significance of any surviving remains. The site should be subject to archaeological evaluation in advance of any proposed works in this area. Further mitigation may be required depending on the outcome of that evaluation (County Archaeologist).
- Potential environmental impact on listed properties in the centre of Laverstock, to the south from noise etc. should be considered. The C18 St Thomas Bridge, on the A30 to the north is also a grade II listed structure however, as this already serves a major route I assume that further traffic use is unlikely to cause any issues (Principal Conservation Officer).

### **Human health and amenity**

- Potential impacts on neighbouring/sensitive receptors (odour and bioaerosols) would need to be considered as part of any planning application (Environment Agency).
- Concern about an increase in dust.
- Concern about vehicle noise (particularly residents of Church Road) construction of an earth bund (sound attenuation) should precede further expansion of operations.

## **Traffic and transportation**

- Concern regarding the impact of HGV traffic on Laverstock (movements should be restricted to A30 via planning condition).
- Existing road network is not suitable.
- Concern about road safety.
- The site is in proximity to population it serves (approach supported by Highways Agency).
- Potential impact on A36 needs to be investigated (Highways Agency).
- Potential for site to be served by rail (Highways Agency).

- No objection to allocation (Environment Agency).
- Site does not lie within a SPZ1 change in previous response provided. A SPZ1 is 1.2km from the site (Environment Agency).
- The site is underlain by a Principal aquifer (Environment Agency).
- A satisfactory FRA would be required (Environment Agency).
- Risk of polluting groundwater sources robust design measures should be put in place to ensure protection of public water resources (Wessex Water).

# Sarum Business Centre, Salisbury

The site is undeliverable. Remove site from DPD.

### Historic environment and cultural heritage

- Development of the site may impact on currently unrecorded remains associated with known and unknown sites of buried archaeological features. A programme of archaeological evaluation will need to be undertaken to assess the nature, extent and significance of any surviving remains. The site should be subject to archaeological evaluation in advance of any proposed works in this area. Further mitigation may be required depending on the outcome of that evaluation (County Archaeologist).
- The Grade II listed Station HQ and Workshops are identified within the site profile on this occasion but the group of 3 Grade II\* listed Hangars which are also on the site appear to have been missed. The Sarum Airfield Conservation Area has been identified. The impact on the heritage assets and their settings will need to be very carefully considered in any proposals for the site (Principal Conservation Officer).

#### **Traffic and transportation**

- This site is close to the population it would serve (approach supported by the Highways Agency).
- Need to understand the impact of a waste facility in this location on the A36 (Highways Agency).

# **Human health and amenity**

• Any potential waste facility will have to assess potential impacts on the neighbouring receptors, in particular odour and bioaerosols (Environment Agency).

- No objection to allocation provided adequate measures put in place to protect groundwater (Environment Agency).
- Site is partially within SPZ1 and SPZ2 adequate assessment would be needed and measures put in place to protect groundwater (Environment Agency).
- A satisfactory FRA would be required if the development area exceeds 1 hectare (Environment Agency).

## **Thorney Down WTS**

The site is undeliverable. Remove site from DPD.

#### Potential use/s

• Not clear if it is an open windrow system or a contained plant?

#### **Biodiversity and geodiversity**

- Concern about potential impact on wildlife, in particular birds the site is within 200m of the Porton Down SPA (which contains the Stone Curlew) and is 30m of the Thorney Down Road Verge County Wildlife Site.
- Suggestion that, according to RSPB guidance there should be a 1500m wide buffer zone around development to protect nesting birds.
- Has Aspergillosis Fumigatus (a known pathogen of birds) in bio-aerosol form from the composting centre been considered as a potential risk to the protected bird species?

#### **Human health and amenity**

- Potential for impacts on local resident's (particularly those living within 250m of the site) health/quality of life (vulnerability to bioaerosols, smells, noise and vermin).
- Germany, Denmark and Austria all restrict composting operations to areas 500 metres from residential areas.
- There is little conclusive evidence relating to widespread health effects. For most healthy people living 250 metres away, an efficient well run composting plant should not present significant hazards. However, there are those who may well be more susceptible to the presence of bio aerosols generated by such plants during the turning of the windrows (Professor of Microbiology).

## **Traffic and transportation**

- Site is relatively isolated and not in close proximity to the population it would serve (an approach not supported by the Highways Agency).
- The potential impact of the site on the A36 would need to be considered through a full transport assessment (Highways Agency).
- Concern for traffic increase and impact on the A30 (dual carriageway) and highway safety.

- No objection to allocation (Environment Agency).
- The site overlies the Nodular Chalk Formation, a principal aquifer, and lies within the groundwater SPZ2 for the Clarendon Borehole. Potable supplies are therefore at risk from pollution at the site. The potential uses identified for this site will only be acceptable if it can be demonstrated

## **Thorney Down WTS**

through risk assessment that pollution of groundwater will not occur and risks can be mitigated against (Environment Agency).

• The site lies in FZ1. The site is over 1 ha in size therefore any application will require a FRA to be submitted which should include a strategic drainage plan. This will need to show how surface water runoff will be controlled and therefore not increase flood risk to third parties (Environment Agency).

## Any other issues or comments

- DSTL are the landowner of Thorney Down. Wiltshire Council are a tenant. Wiltshire Council will be in breach of lease conditions if any of these proposals are undertaken.
- The site is located above a former landfill site. Therefore land contamination is a potential issue and will need to be given consideration at the planning stage. PPS23 states that a thorough understanding of the nature and extent of the risks of pollution associated with a site is demonstrated and that suitable measures to deal with it are proposed prior to the determination of the application.

# Salisbury Road Industrial Estate, Downton

The site is undeliverable. Remove site from DPD.

#### Historic environment and cultural heritage

• The Downton Conservation Area and listed buildings within it are identified within the site profile. The potential visual impact on the setting of the heritage assets has been noted – however, adverse impacts on their environmental quality, including tranquillity and air quality may also be an issue and these would need to be assessed (Principal Conservation Officer).

## **Human health and amenity**

• Potential impacts on neighbouring/sensitive receptors (odour and bioaerosols) would need to be considered as part of any planning application (Environment Agency).

## Landscape, townscape and visual

- Significant attention would need to be paid to the scale of any development because the high ground of the AONB to the west overlooks the site.
- Consideration should be given to the housing of equipment and machinery in a purpose built building.
- Apart from the implications of traffic through the National Park there is no reference made to the potential landscape impacts, impacts on tranquillity and people's quiet enjoyment of the National Park.

## **Traffic and transportation**

- The site is in close proximity to population it serves (approach supported by Highways Agency).
- Need to understand the impact a local waste facility in this location may have on the A36 (Highways Agency).
- Concern about potential adverse impacts of traffic assessing the site via the AONB and impacting negatively on the character of the rural roads and

the tranquillity of the AONB.

- Concern about lorry movements, through Downton and other neighbouring villages such as Godshill, Hale and Redlynch.
- Minimise adverse traffic impacts on the residential amenity of Downton, Redlynch and the New Forest National Park area through appropriate HGV routing via local and strategic lorry routes. Vehicles accessing the proposed site at Downton should be routed along the strategic lorry routes (A338), rather than the restricted cross-Forest roads (unfenced B3078, B3079 and B30800), which are used as short cuts to the M27.

#### Water environment

- No objection to allocation (Environment Agency).
- Groundwater Appropriate measures need to be put in place to protect the water environment (Environment Agency).
- Satisfactory FRA required if the development area exceeds 1 hectare (Environment Agency).

#### Any other issues or comments

- Objection to any planning application which involves the transfer of any waste from the Salisbury Road Site to Pound Bottom or vice versa.
- Request to only consider the site once other more suitably located sites have been considered and discarded.

# **Brickworth Quarry and Landfill, Whiteparish**

#### Potential use/s

- Potential use should be limited to inert landfill reinstatement only / ancillary IWR/T in accordance with the conclusion of Inspector enquiry into Wiltshire and Swindon Waste Local Plan 2011). An application in 2006 for an IWR centre was refused because it would not be ancillary and would delay restoration of quarry site.
- 'Recycling/transfer' should be deleted as a potential use.

## Current use/s

• Brickworth Quarry requires the delivery of un-recyclable and unusable inert waste for landfill for the reinstatement of the void created by sand and mineral extraction. Site should be quarried and infilled in accordance with extant planning permission.

## Historic environment and cultural heritage

• Development of the site may impact on currently unrecorded remains associated with known and unknown sites of buried archaeological features in areas which have not been previously mitigated. A programme of archaeological evaluation will need to be undertaken to assess the nature, extent and significance of any surviving remains. The site should be subject to archaeological evaluation in advance of any proposed works in this area. Further mitigation may be required depending on the outcome of that evaluation (County Archaeologist).

# **Human health and amenity**

- Impact on health and amenity of local residents (Whiteparish) and on the New Forest National Park.
- Concern about increased levels of noise and dust.
- Request that consideration should be given to housing of equipment and machinery in a purpose built building suitable for its rural surroundings.

## **Brickworth Quarry and Landfill, Whiteparish**

### Landscape, townscape and visual

• Full visual impact assessment of a waste proposal should be required as part of any planning application (New Forest National Park Authority)

#### **Traffic and transportation**

- Routeing agreement (in relation to sand extraction and landfill activities) should be a requirement.
- DPD does not demonstrate proximity based principle for allowing a general IWR plant on the site (which should be located where waste arises).
- Where will the waste come from/go? Suspicion that waste will be imported from outside the county even though this is a 'local' facility.
- The site is relatively isolated and not in close proximity to the population it would serve (approach not supported by the Highways Agency).
- Potential impact of site on A36 would need full transport assessment (Highways Agency).
- Potential impact on the New Forest National Park local highway network.

#### Water environment

- No overall objection to allocation (Environment Agency).
- Site falls within groundwater Source Protection Zone 3 (Environment Agency).
- Site is located on a secondary aquifer potable supplies therefore at risk from pollution (Environment Agency).
- Potential uses must demonstrate through risk assessment that pollution of groundwater will not occur and risks can be mitigated against (Environment Agency).
- Careful consideration will need to be given to the surface water drainage arrangements (Environment Agency).
- A satisfactory FRA would be required to support any planning application (Environment Agency).

- The DPD should show the completion date for Brickworth Quarry restoration (30 April 2020).
- There is potential for delay in restoration of site and a condition should be imposed on any planning consent.
- Reinstatement of ancient woodland after sand extraction is impossible over an acceptable time frame (reference to Dr Woodruffe ecology report).
- Support the first sentence of this section and recommend adding at the end "now or in the future".
- Concern that there is no link between this DPD and the Minerals Site Allocations DPD. Concern that there may be a shortfall of inert waste available to adequately restore the proposed extensions to Brickworth Quarry.
- Brickworth Quarry is less than 500 metres from the National Park boundary general duty to have regard to the purposes of the National Park.

# **Employment Allocation, Mere**

#### Historic environment and cultural heritage

- Development of the site may impact on currently unrecorded remains associated with known and unknown sites of buried archaeological features. A programme of archaeological evaluation will need to be undertaken to assess the nature, extent and significance of any surviving remains. The site should be subject to archaeological evaluation in advance of any proposed works in this area. Further mitigation may be required depending on the outcome of that evaluation (County Archaeologist).
- There are no built heritage assets in the immediate vicinity although Mere village is designated as a conservation area and includes numerous listed buildings which will be vulnerable to increased noise, dust and vibration etc. To the west and south-west of the site are listed buildings associated with Zeals House, including the Lodge and gate piers close to the A303 junction (Principal Conservation Officer).

#### Landscape, townscape and visual

- The DPD does not mention that the site is adjacent to the Cranborne Chase and West Wiltshire Downs AONB.
- Detailed landscape assessment required to assess whether the site can be adequately screened so as not to impact on the setting of the AONB or views to the AONB.

## **Traffic and transportation**

- Where will waste be coming from? Will it involve travel through the AONB?
- The site is in proximity to population it serves (approach supported by Highways Agency).
- Potential impact on the A303 and junction with the B3092 (Highways Agency).

#### Water environment

- No objection to allocation (Environment Agency).
- A satisfactory FRA would be required to support any planning application if the development area exceeds 1 hectare (Environment Agency).

#### **Cumulative effects**

• Cumulative effect of development on Greenfield site and existing employment use nearby.

## Former Imerys Quarry, Quidhampton

#### Potential use/s

• Proposed that entire Quidhampton site is allocated for waste management development and that range of potential uses is broadened to include inert infill which would provide for both an improved restoration scheme for the site and greater opportunity for its after use (landowner response).

#### Planning context

• DPD allocation does not consider site as a whole – could build upon current restoration scheme of this former mineral working.

#### Historic environment and cultural heritage

- Development of the site may impact on currently unrecorded remains associated with known and unknown sites of buried archaeological features in areas which have not been previously mitigated. A programme of archaeological evaluation will need to be undertaken to assess the nature, extent and significance of any surviving remains. The site should be subject to archaeological evaluation in advance of any proposed works in this area. Further mitigation may be required depending on the outcome of that evaluation (County Archaeologist).
- The Grade I Wilton Registered Park lies to the south-west of the site and although the allocated site appears to be visually contained from southern aspects care will be required to assess any impact (noise, dust, vibration etc.) upon the Park's environmental quality and that of its setting. There are also a number of listed buildings within the centre of the village (Principal Conservation Officer).

### **Human health and amenity**

• Potential impacts on neighbouring receptors (odour and bioaerosols) would need to be considered as part of any planning application (Environment Agency).

# **Traffic and transportation**

- The site is in proximity to population it serves (approach supported by Highways Agency).
- Potential for impact on the adjacent A36 (Highways Agency).
- Potential for site to be served by rail (Highways Agency).

- No objection to allocation (Environment Agency).
- Site falls within groundwater SPZ2 include this in DPD (Environment Agency).
- Site is underlain by a Principal (not major) designated aquifer (Environment Agency).
- A satisfactory FRA required to support any planning application if the development area exceeds 1 hectare (Environment Agency).
- Conflicting statements in relation to hydrological connectivity need to be reconciled HRA states that there is no hydrological connectivity between the site and the river Avon SAC, and the DPD states "There are a number of streams flowing into the River Wylye [part of the River Avon SAC] towards the south of the site" (Natural England).

# Former Imerys Quarry, Quidhampton

#### Any other issues or comments

• More consideration needs to be given to the potential impact of large scale treatment. If there is the potential for heat and/or power generation this should be explored due to the potential local customers (Environment Agency).

# **Comments by site: North**

## Parkgate Farm, Purton

#### Scale

Site is not suitable for strategic use.

#### Potential use/s

- There should be a more pro-active approach to encouraging small scale EfW facilities through written expression in the site allocations site suitable for EfW given its large area and proximity to the M4.
- The site exceeds the local need.

### Current use/s

- Site extends beyond original site permission requires verification.
- The time limit of existing operations at this site has been extended and there is no demonstrable improvement to the road infrastructure.

### **Description of site**

• The description of the site should include the composting operation moving from Lower Compton.

## **Biodiversity and geodiversity**

- Agreement that wildlife would be relatively undisturbed from waste development/human activity.
- The River Key runs close to the site. The waterbody is currently failing its Water Framework Directive (WFD) objectives with regards water quality. Although the likely uses are unlikely to provide a significant risk with regards contamination of the watercourse, all relevant safeguards should be employed. The likely uses are unlikely to have a significant impact on the ecological value of the site given the described mitigation covered in the draft allocation plan (Environment Agency).

### Historic environment and cultural heritage

- Scheduled Monument located c 500m to south of site (County Archaeologist).
- Development of the site may impact on currently unrecorded remains associated with known and unknown sites of buried archaeological features. A programme of archaeological evaluation will need to be undertaken to assess the nature, extent and significance of any surviving remains. The site should be subject to archaeological evaluation in advance of any proposed works in this area. Further mitigation may be required depending on the outcome of that evaluation (County Archaeologist).

## Parkgate Farm, Purton

#### Human health and amenity

- The cumulative effect on the community should be ameliorated and the site should be closed.
- Waste uses provide little employment.

#### Landscape, townscape and visual

• Concern for visual impact on land around the site, particularly to the west (which forms part of the Ancient Forest of Braydon and green watercourse of the River Key).

# Traffic and transportation

- The site is not ideally placed to serve as a strategic site because it is located outside of the Swindon urban area (Highways Agency).
- Any planning application would need to look at the impact on the M4 Junction 16 and A419 dependent on scope of geographical area the facility would serve (Highways Agency).
- Potential for site to be served by rail (Highways Agency).
- The site is remote and is served by a poor road infrastructure and access arrangements.
- The B4553 (route from Swindon) is subject to being re-routed and having traffic calming measures put in place (subject to Ridgeway Farm planning application).
- Concern for additional HGV traffic through Purton/Cricklade.
- There is a 7.5 tonnes weight limit to the village of Purton.

#### Water environment

- No objection to allocation (Environment Agency).
- Site is close to the River Key, which is a main river. There are a number of non-main river watercourses on and adjacent to the site. Opportunities to maintain and enhance these watercourses should be sought as part of any development (Environment Agency).
- Groundwater British Geological Maps show the site is located on the Ampthill and Kimmeridge Clay formation which is classed as unproductive strata. The western half of the site is shown to be underlain by Alluvium drift deposits (secondary Aquifer). Watercourses in the vicinity of the site (including the River Key which runs alongside the site) are potential controlled water receptors. Any contamination risks identified would need to be appropriately dealt with (Environment Agency).
- A flood risk assessment/surface water drainage scheme will be required to support any planning application at this location (Environment Agency).

## Any other issues or comments

- Use of site would increase driver journey times economic and environmental impact.
- Composting should be carried out locally to the source (multiple sites).
- Land further south towards Lower Pavenhill could be considered as further employment land for the village if this waste site allocation goes ahead.

## **Links to Waste Core Strategy**

• Challenge the assertion that this site is within 16km of Swindon.

# **Purton Brickworks Employment Allocation, Purton**

#### Scale

• Site should be listed for local use only – MRF and HRC for high value goods in a local context should be encouraged.

#### Current use/s

• The site is within the only industrial employment area in Purton. The allocation will limit the use of the land to generate further employment opportunities.

#### Historic environment and cultural heritage

- Scheduled Monument located c 650m to south-west of site (County Archaeologist).
- Development of the site may impact on currently unrecorded remains associated with known and unknown sites of buried archaeological features. A programme of archaeological evaluation will need to be undertaken to assess the nature, extent and significance of any surviving remains. The site should be subject to archaeological evaluation in advance of any proposed works in this area. Further mitigation may be required depending on the outcome of that evaluation (County Archaeologist).
- No.33 New Road, Widham is a grade II listed building located immediately to the south-east corner of the site. Its setting should be taken into account in any proposals for works to upgrade site boundaries etc (Principal Conservation Officer).

### **Traffic and transportation**

- The site is not ideally placed to serve as a strategic site because it is located outside of the Swindon urban area (Highways Agency).
- Any planning application would need to look at the impact on the M4 Junction 16 dependent on scope of geographical area the facility would serve (Highways Agency).
- Potential for site to be served by rail (Highways Agency).
- The local road infrastructure in inadequate.
- Routes to Swindon are likely to be affected by planning applications for major housing development.

#### Water environment

- No objection to allocation (Environment Agency).
- A FRA/surface water drainage scheme will be required to support any planning application at this location (Environment Agency).
- Contamination may be present (dependent of previous activities). Any contamination risks would need to be appropriately dealt with (Environment Agency).

## Any other issues or comments

• Support for the site where it works in conjunction with Parkgate Farm and Whitehills Industrial Estate.

## **Links to Waste Core Strategy**

• Challenge the assertion that this site is within 16km of Swindon.

# Hills Resource Recovery Centre, Compton Bassett

## Potential use/s

• Further consideration needed if there is potential for CHP (Environment Agency).

## Parkgate Farm, Purton

- Why is EfW excluded as a potential use?
- Request for council to encourage small scale EfW facilities through written expression in the site allocations.
- Waste Transfer Station (WTS) should be listed as a potential use planning application anticipated for a WTS at the site.

#### Current use/s

- Support for continuation of existing uses (which reduce the need for waste to travel).
- Reference to a consolidated composting operation should be removed as this operation appears to be relocating to Parkgate Farm.

#### Historic environment and cultural heritage

• The grade II listed Tudor Lodge, Compton Bassett Road lies a short way to the east of the allocated site and potential impact upon its setting, including to environmental quality, should be considered (Principal Conservation Officer).

#### **Human health and amenity**

- Potential impacts on neighbouring receptors (odour and bioaerosols) would need to be considered as part of any planning application (Environment Agency).
- Current description in site profile underestimates the effect on existing/proposed residential properties 214 dwellings in Lower Compton, 180 in Quemerford, further housing at Cherhill and new development of 285 houses which will border the site (currently under construction at Sandpit Lane).
- There are discrepancies in acceptable distances between waste facilities and residential properties.

#### Landscape, townscape and visual

• Concern about the potential impact on North Wessex Downs AONB.

## **Traffic and transportation**

- No overriding objection to allocation in principle the site is situated relatively close to population it serves (Highways Agency).
- Road safety concerns regarding increased use of B4069 potential for weight limit on this road (Lyneham Banks).
- Current site access is inadequate improvements/new access to north or west needed.
- Current HGVs are not using the recommended routes concern that more development will increase levels of HGV traffic using the A4, travelling through Calne town centre and other local villages.

#### Water environment

- No objection to allocation (Environment Agency).
- Southern fringe of site may enter FZ2 may be advisable for any site layout to avoid locating buildings/equipment in the site's southern fringe (Environment Agency).
- A satisfactory sequential test by the LPA will be needed (Environment Agency).
- A FRA should support any application (Environment Agency).
- Site lies within an area 'Susceptible to Surface Water Flooding' (Environment Agency).

## **Parkgate Farm, Purton**

- Concern that the site will be used by companies outside of Wiltshire.
- WTS sites should be closer to the M4.
- Remove reference to RAF Lyneham as this is now closed.
- In relation to paragraph 1.13 and the reference to SA/SEA, we would want to see a report which has examined the effects on a range of social, economic and environmental factors with regards the expansion of the Lower Compton site and its effect on Calne town centre.

#### **Cumulative effects**

• Cumulative effects of the combined operations at this site must be taken into account.

## Land East of HRC/WTS, Stanton St Quintin

### Potential use/s

- Support for MRF if sufficient landscape is available.
- WTS at this site should combine operationally with site at Land West of HRC/WTS, Stanton St Quintin.

#### **Description of site**

• Site is strategically well placed to serve existing communities and future growth.

### **Human health and amenity**

- Potential impacts on neighbouring receptors (odour and bioaerosols) would need to be considered as part of any planning application (Environment Agency).
- Minimal amenity damage arising from use of this site.

## Landscape, townscape and visual

• Commercial/industrial sites are located adjacent to motorways throughout the country with minimum screening – tree planting may reduce the area for waste operations and other forms of baffle or screening (acoustic type) which are less land hungry should be considered.

# **Traffic and transportation**

- Site located outside the urban area and not ideally placed to serve as strategic site (Highways Agency).
- Concern that a waste facility in this location might generate a significant number of movements through Junction 17 of the M4. A robust evidence base will need to demonstrate if there is an impact on the safe and efficient operation of Junction 17 (Highways Agency).
- Location near to major road routes (M4 and A350) means the site is ideally placed for HGV movements.
- Concern for road safety (particularly if access to the site is from an easterly direction) recent HGV accident history on Lyneham Banks (B4069).
- Recommend traffic control modifications (e.g. access arrangements, roundabout).

#### Water environment

• No objection to allocation (Environment Agency).

## Land East of HRC/WTS, Stanton St Quintin

- A FRA would be required to support a planning application (Environment Agency).
- Site lies within an area identified as being 'Susceptible to Surface Water Flooding' (Environment Agency).

#### **Cumulative effects**

• Waste development at this location may exacerbate traffic issues in area caused by existing HRC and an active Truck Stop.

## Land west of HRC, Stanton St Quintin

### Potential use/s

- Potential to generate sustainable forms of energy.
- WTS at this site should combine operationally with site at Land East of HRC/WTS, Stanton St Quintin.
- Support for MRF if sufficient landscape is available.

#### Current use/s

• Land is Greenfield but not 'natural' – comprises material which was dug out during construction of the M4.

## **Description of site**

• Site is strategically well placed to serve existing communities (Chippenham and several nearby communities).

### **Biodiversity and geodiversity**

- Site not constrained by designations relating to biodiversity or geodiversity.
- Site surrounded by trees and hedgerows which serve as wildlife commuting corridors tree lines and hedgerows to be maintained.
- Landowner is happy to comply with requirements for site level survey, extended Phase I habitat survey and ecological surveys.

# **Human health and amenity**

- There will be minimal amenity damage arising from use of this site mitigation measures to address potential impacts on human health will be dependent on type of waste facility.
- Odour impacts may be addressed by screen fencing or through the application of neutralising agents.
- Potential impacts on neighbouring receptors (odour and bioaerosols) would need to be considered as part of any planning application, particularly if there is the potential for heat and power that could be used to supply the local companies and inhabitants (Environment Agency).
- Potential for site to provide additional employment.

## Landscape, townscape and visual

- Site has capacity to accommodate change by virtue of its isolated and enclosed setting. Planting of native and evergreen trees and hedgerows along the site boundaries will improve screening and reduce visual impact.
- The western area of the site comprises higher ground and it is proposed that it should remain as a form of visual bund and landscaped backdrop to the waste management facility to be developed on the site.

## Land west of HRC, Stanton St Quintin

• Commercial/industrial sites are located adjacent to motorways throughout the country with minimum screening – tree planting may reduce the area for waste operations and other forms of baffle or screening (acoustic type) which are less land hungry should be considered.

#### **Traffic and transportation**

- Site located outside the urban area and not ideally placed to serve as strategic site (Highways Agency).
- Concern that a waste facility in this location might generate a significant number of movements through Junction 17 of the M4. A robust evidence base will need to demonstrate if there is an impact on the safe and efficient operation of Junction 17 (Highways Agency).
- Location near to major road routes (M4 and A350) means the site is ideally placed for HGV movements.
- Concern for road safety (particularly if access to the site is from an easterly direction) recent HGV accident history on Lyneham Banks (B4069).
- Potential to improve existing local highway infrastructure recommend traffic control modifications (e.g. access arrangements, roundabout).

#### Water environment

- No objection to allocation (Environment Agency).
- A FRA would be required to support a planning application (Environment Agency).
- Site is among the least constrained sites in North Wiltshire in relation to flood risk issues.

#### Any other issues or comments

• Site is in line with a flexible approach - the council should make provision for a higher number of strategic sites than would appear to be required by the RSS and Waste Core Strategy.

#### **Cumulative effects**

• Waste development at this location may exacerbate traffic issues in area caused by existing HRC and an active Truck Stop.

## Park Grounds Farm, Wootton Bassett

#### Potential use/s

• Any potential landraise and or landfill will need to consider the Environment Agency guidance on landfills.

## Historic environment and cultural heritage

• Development of the site may impact on currently unrecorded remains associated with known and unknown sites of buried archaeological features. A programme of archaeological evaluation will need to be undertaken to assess the nature, extent and significance of any surviving remains. The site should be subject to archaeological evaluation in advance of any proposed works in this area. Further mitigation may be required depending on the outcome of that evaluation (County Archaeologist).

## **Human health and amenity**

• Potential impacts on neighbouring receptors (odour and bioaerosols) would need to be considered as part of any planning application (Environment Agency).

## **Traffic and transportation**

- Additional traffic may exacerbate existing congestion issues at M4 Junction 16 at peak times. Any proposals for a waste site at this location would need to be assessed and be cognisant of the junction improvements proposed at Junction 16 resulting from the Wichelstowe development (Highways Agency).
- A full Transport Assessment would be required to understand the impact of a waste facility on the SRN (Highways Agency).
- Potential for site to be served by rail (Highways Agency).

- No objection to allocation (Environment Agency).
- A satisfactory FRA will be required to support any planning application (Environment Agency).
- Site lies within an area identified as being 'Susceptible to Surface Water Flooding' (Environment Agency).
- Safeguarding groundwater abstractions and the surrounding watercourses must be appropriately addressed.

# **Barnground, South Cerney**

#### Historic environment and cultural heritage

- No reference is made to the Scheduled Monument located c 400m to the south-west of the possible site (Settlement E of Ashtonfield; ref. 1004691) (English Heritage).
- Development of the site may impact on currently unrecorded remains associated with known and unknown sites of buried archaeological features. A programme of archaeological evaluation will need to be undertaken to assess the nature, extent and significance of any surviving remains. The site should be subject to archaeological evaluation in advance of any proposed works in this area. Further mitigation may be required depending on the outcome of that evaluation (County Archaeologist).

### Landscape, townscape and visual

Potential changes in setting require careful consideration (English Heritage).

#### **Traffic and transportation**

- Site appears relatively isolated (Highways Agency).
- Site appears to have the potential to attract trips on the A419 and junction with the B4696 (Highways Agency).
- Requirement for a full Transport Assessment (Highways Agency).

#### Water environment

- No overall objection to allocation (Environment Agency).
- Site classed as a secondary aguifer and overlies SPZ2 (Environment Agency).
- A tank is shown on maps of the site dependent on what this tank is used to store there may be contamination issue. It is also not clear what the site is currently used for. Any development would need to address any contamination risks from this sites proposed and past usage (Environment Agency).
- A FRA/surface water drainage scheme will be required to support any planning application (Environment Agency).

#### Other comments

• Appropriate waste facilities may already exist in Cirencester, Gloucestershire (Highways Agency).

# Whitehills Industrial Estate, Wootton Bassett

### **Human health and amenity**

• Potential impacts on neighbouring receptors (odour and bioaerosols) would need to be considered as part of any planning application (Environment Agency).

# **Traffic and transportation**

- Site is located in close proximity to the population it will serve (an approach commended by the Highways Agency).
- Need to fully understand the likely impact on M4 Junction 16 (Highways Agency).
- Potential for site to be served by rail (Highways Agency).
- Concern that HGVs heading north would impact existing town centre and proposed new housing.

#### Water environment

- No objection to allocation (Environment Agency).
- A satisfactory FRA will be required to support any planning application (Environment Agency).
- Safeguarding the surrounding watercourses should be appropriately addressed (Environment Agency).

- Links should be developed between this site and Parkgate Farm.
- Support for a strategic Waste Site in Wootton Bassett.

# **Bumpers Farm Industrial Estate, Chippenham**

#### Potential use/s

- Support for HRC which could serve Chippenham and Melksham.
- Does the site have potential for small scale energy from waste facility?

## **Human health and amenity**

- Waste site should be positioned as far away from neighbouring residential areas as possible.
- Concern for increased noise and pollution affecting neighbouring businesses and residential areas.
- Any potential waste facility will have to assess potential impacts on the neighbouring receptors, in particular odour and bioaerosols (Environment Agency).

## **Traffic and transportation**

- Transport Assessment will be required to determine the impact on traffic in the area and assess adequacy of road network.
- The site is in proximity to population it serves (approach supported by Highways Agency).
- Need to understand impact on M4 Junction 17 (Highways Agency).

- No objection to allocation (Environment Agency).
- FRA required to support any planning application (Environment Agency).
- Site lies within an area identified as being 'Susceptible to Surface Water Flooding' (Environment Agency).
- Risk of polluting groundwater sources robust design measures should be put in place to ensure protection of public water resources (Wessex Water).

# Thingley Junction, Chippenham

#### Potential use/s

- Support for a HRC to serve Corsham.
- Support for small scale composting.

#### **Biodiversity and geodiversity**

• A full ecological survey would be required (Environment Agency).

## **Human health and amenity**

- Any waste facility will have to assess potential impacts on the neighbouring receptors, in particular odour and bioaerosols (Environment Agency).
- Concern about the potential health impacts on the adjacent residential Travellers site (e.g. odour and noise which has greater transference through walls of trailers and caravans).
- Concern that waste development might have an impact on how Gypsies and Travellers feel they are perceived and treated by the wider community. Inclusion of the site is contrary to PPS1, as it does not promote social inclusion and does not support a sustainable, liveable community.

### Landscape, townscape and visual

• Concern that there would be a visual impact on residents of Gypsy and Travellers site adjacent to the site.

## **Traffic and transportation**

- The site is in proximity to population it serves (approach supported by Highways Agency).
- Need to understand impact on M4 Junction 17 (Highways Agency).
- Potential for site to be served by rail (Highways Agency).
- Concern that single-track lane from A350 will be used to access the site (not suitable for HGVs).
- Potential impact on North Wiltshire Rivers Cycle Route.

#### Water environment

- No objection to allocation (Environment Agency).
- FRA required to support any planning application (Environment Agency).
- Site lies within an area identified as being 'Susceptible to Surface Water Flooding' (Environment Agency).
- Risk of polluting groundwater sources robust design measures should be put in place to ensure protection of public water resources (Wessex Water).

- The site is crossed by one of National Grid's high voltage overhead electricity transmission lines.
- Concern that written consultation exercises may not elicit responses from residents of the Gypsy and Travellers site, and it would be useful to demonstrate how the opinions of the site residents have been recorded and how these concerns have been considered, in any report on the consultation process. This would accord with the Wiltshire Statement of Community Involvement.

## **Thingley Junction, Chippenham**

• Suggestion that a site at Copenacre, Corsham (on the A4) would be a more suitable alternative (previously discounted due to landownership but MOD now wishing to sell the land).

# **Leafield Industrial Estate, Corsham**

#### Potential use/s

• Support for the site. It will be necessary over the plan period if the potential housing growth figures for Chippenham are accepted.

### **Traffic and transportation**

- The site is in proximity to the population it will serve and is unlikely to have an impact on the SRN (approach supported by Highways Agency).
- Potential for site to be served by rail (Highways Agency).
- Concern that development would overload the existing transport infrastructure, particularly Potley Bridge.

#### Water environment

• Risk of polluting groundwater sources – robust design measures should be put in place to ensure protection of public water resources (Wessex Water).

- The site is crossed by one of National Grid's high voltage overhead electricity transmission lines.
- Suggestion that a site at Copenacre, Corsham (on the A4) would be a more suitable alternative (previously discounted due to landownership but MOD now wishing to sell the land).

# Porte Marsh Industrial Estate, Calne

#### Potential use/s

- Support for the site. It will be necessary over the plan period if the potential housing growth figures for Chippenham are accepted.
- No need adequate facilities already exist at Lower Compton.
- Support for a HRC to serve the north side of Calne.

## Historic environment and cultural heritage

• The grade II listed former Bricklayers Arms lies a short way to the south of the allocated site, although as development currently extends up the closest boundary, proposals are perhaps unlikely to have a significant additional impact on the setting or environmental quality of the heritage asset (Principal Conservation Officer).

## **Human health and amenity**

- The site profile does not have a 'human health and amenity' section. The industrial estate is bordered on three sides by residential properties and is within proximity to two primary schools.
- Any potential waste facility will have to assess potential impacts on the neighbouring receptors, in particular odour and bioaerosols (Environment Agency).

### **Traffic and transportation**

- The site is in close proximity to the population it will serve and is unlikely to have an impact on the SRN (approach supported by Highways Agency).
- Concerns related to traffic and parking issues at peak school drop off and collection times.

#### Water environment

- No objection to allocation (Environment Agency).
- FRA required to support any planning application (Environment Agency).

- Remove reference to RAF Lyneham as this is now closed.
- Stanton St Quinton sites should be preferred over this site.

# **Comments by site: West**

# Hampton Business Park, Melksham

#### **Biodiversity and geodiversity**

• An extended Phase 1 survey should be done (Environment Agency).

### Historic environment and cultural heritage

• Adjacent WWI airfield which should be evaluated via a Desk Based Assessment (DBA) (County Archaeologist).

## **Human health and amenity**

• Any potential waste facility will have to assess potential impacts on the neighbouring receptors, in particular odour and bioaerosols (Environment Agency).

### Landscape, townscape and visual

• Potential visual impact on the 'gateway' to Melksham.

### **Traffic and transportation**

- No overriding objection to allocation in principle the site is in proximity to population it serves (Highways Agency).
- Concern about the impact on the A350 and an increase in HGV traffic going through the village of Beanacre.

- No objection to allocation (Environment Agency).
- A satisfactory FRA would be required to support any planning application (Environment Agency).
- Risk of polluting groundwater sources robust design measures should be put in place to ensure protection of public water resources (Wessex Water).

# West Wilts Trading Estate, Westbury

#### Size of site

• The stated area of the site (68.1ha) has been increased by over 8ha from that included in the Waste Local Plan 2011 and Issues and Options report (2006). The boundary realignment includes the landscaped and bunded area to the south east of the Trading Estate taking the boundary closer to the residential properties of Hawkeridge Park.

### **Biodiversity and geodiversity**

• A site level survey should be undertaken (Environment Agency).

#### Historic environment and cultural heritage

- Potential for the Scheduled Monument (ref. 12048) to become further isolated in the centre of the site which will have implications for public access and management (English Heritage).
- Potential for a change in setting to the Grade I Listed Building located c 350m to the north of the site (Early Wing at Brook Hall; ref. 128501).
- Brownfield site set around Scheduled Monument moated site that will need protecting. Opportunity to enhance its setting? Pre-application Desk Based Assessment (DBA) should be produced as a minimum (County Archaeologist).
- The Brook Hall complex (including the Grade I listed early wing and Grade II listed Hall and barn) lie to the north of the site. Brook Hall is a long-standing Building at Risk and it is imperative that changes in the vicinity do not further prejudice the possibilities for finding a new use/owner for the site. The Grade II listed Storridge Farm and its model farmyard lies immediately to the south-west of the allocated site and any impact upon its setting will also need to be considered (Principal Conservation Officer).

# **Human health and amenity**

- Any potential waste facility will have to assess potential impacts on the neighbouring receptors, in particular odour and bioaerosols (Environment Agency).
- Omission of text designed to safeguard the amenity of nearby residential properties by restricting waste uses in the south east portion of the Trading Estate (see page 76 of the 2006 Issues and Options (I&O) report, inset map 19 planning issues, first bullet point).

# **Traffic and transportation**

- The site is in close proximity to the population it will serve (approach supported by Highways Agency).
- Need to understand the impact on the A36 (Highways Agency).
- Potential for using the adjacent rail interchange at Westbury (Highways Agency).
- Concern about inadequate traffic and access arrangements, particularly following the cancellation of the Westbury Bypass Scheme in 2009.

- No objection to allocation (Environment Agency).
- Site profile says "no risk of fluvial flooding" however the site is located partly in flood zones 1 and 2, which is the floodplain associated with Biss Brook request sentence is amended (Environment Agency).

## West Wilts Trading Estate, Westbury

- Site specific FRA would be required to support any planning application (Environment Agency).
- Site lies within an area identified as being 'Susceptible to Surface Water Flooding' (Environment Agency).
- No specific constraints in relation to groundwater protection issues and designations and no objection to the principle of development at this location. However areas of the site are contaminated and the site is next to Biss Brook, a potential receptor for this contamination. If development or redevelopment occurs then areas being redeveloped will need to be assessed for their contamination potential and measures taken to address these issues (Environment Agency).
- Risk of polluting groundwater sources robust design measures should be put in place to ensure protection of public water resources (Wessex Water).

# **Northacre Trading Estate, Westbury**

#### General

• Planning permission has been granted for a MBT plant on the site – no additional strategic facility should be allowed.

#### Size of site

• The stated area of the site (43ha) has been increased significantly from that included in previous documents.

#### **Biodiversity and geodiversity**

• An extended Phase 1 survey and water vole survey should be undertaken (Environment Agency).

## Historic environment and cultural heritage

- Site contains Brook Deserted Medieval Village (DMV) Scheduled Monument and other, probably related, significant heritage assets (County Archaeologist).
- Development of the site may impact on currently unrecorded remains associated with known and unknown sites of buried archaeological features. A programme of archaeological evaluation will need to be undertaken to assess the nature, extent and significance of any surviving remains. The site should be subject to archaeological evaluation in advance of any proposed works in this area. Further mitigation may be required depending on the outcome of that evaluation. Advise not using site west and south-west of existing Industrial Estate. Otherwise, evaluation required as above (County Archaeologist).
- The Grade II listed Brook Farm, Brook Lane, Westbury lies immediately south of the allocated site (and is correctly identified in this case) (Principal Conservation Officer).

## **Human health and amenity**

• Potential impacts on neighbouring receptors (odour and bioaerosols) would need to be considered as part of any planning application (Environment Agency).

## **Traffic and transportation**

• Issues of access and traffic management all impact substantially on the amenity of dwellings within Heywood Parish in Storridge Road and The Ham

# **Northacre Trading Estate, Westbury**

- these should be included as key planning issues.
- New MBT plant on the site will increase traffic densities on local roads and junctions.

#### Water environment

- No objection to allocation (Environment Agency).
- The site boundary has changed since the previous March 2010 Waste Allocations DPD consultation. The site now appears to be fully in Flood Zone 1. The Water Environment section in the document needs to be updated to reflect the boundary changes (Environment Agency).
- A satisfactory FRA from the developer would be required (Environment Agency).
- It is recommended that a strip of land at least 8 metres wide adjoining all watercourses is left clear of all buildings, structures, fences and trees to facilitate access, essential maintenance and possible future improvements to the drainage system. Ground levels should not be raised within this area (Environment Agency).
- Part of the site is identified as being 'Susceptible to Surface Water Flooding'. Further investigation should be carried out to assess the true nature of this risk (Environment Agency).
- Risk of polluting groundwater sources robust design measures should be put in place to ensure protection of public water resources (Wessex Water).
- Foul water discharges from these waste management facilities can be connected to the public sewer system where available subject to a capacity appraisal and agreement upon a point of connection (Wessex Water).

# **Lafarge Cement Works, Westbury**

#### General

- Lafarge Cement supports this allocation.
- Heywood Parish Council objects to the allocation because if/when cement production discontinued permanently, the whole site should be returned to agricultural uses (its former state), subject only to possible land filling, capping and restoring the remaining voids at the existing Clay Pit in Bratton Parish.

## Potential use/s

- Any treatment that will produce heat and power should consider how this can be used locally, perhaps in a heat distribution network (Environment Agency).
- Any proposed landfill would need to meet the Environment Agency guidelines on the location of landfills.
- The DPD should not include uses that could not be implemented (or allocate areas such as the Clay Pit) if the resumption of cement production is still a possibility.

# **Human health and amenity**

• Potential impacts on neighbouring receptors (odour and bioaerosols) would need to be considered as part of any planning application (Environment

# **Lafarge Cement Works, Westbury**

Agency).

### **Traffic and transportation**

- Site is located in proximity to the population it will serve (approach supported by Highways Agency).
- Need to understand the impact on the nearby A36 (Highways Agency).
- Support for proposals which seek to use the rail link at the site (Highways Agency).

#### Water environment

- No objection to allocation provided the site layout avoids any development/buildings/equipment or ground-raising in flood zone 3b (Environment Agency).
- A site specific FRA from the developer would be required (Environment Agency).
- A strip of land at least 8 metres wide adjoining all watercourses should be left clear of all buildings, structures, fences and trees to facilitate access, essential maintenance and possible future improvements to the drainage system. Ground levels should not be raised within this area (Environment Agency).
- Risk of polluting groundwater sources robust design measures should be put in place to ensure protection of public water resources (Wessex Water).
- Foul water discharges from these waste management facilities can be connected to the public sewer system where available subject to a capacity appraisal and agreement upon a point of connection (Wessex Water).

### Any other issues or comments

• Land contamination and landfilling issues should be appropriately addressed (Environment Agency).

## **Bowerhill Industrial Estate, Melksham**

### Historic environment and cultural heritage

• Christie Miller Sports Centre is a Listed Building. No other impacts (County Archaeologist).

#### **Human health and amenity**

- Potential impacts on neighbouring receptors (odour and bioaerosols) would need to be considered as part of any planning application (Environment Agency).
- Potential impact on local recreation the site is adjacent to an active Youth Club and Sports Field and is in proximity to the Kennet and Avon Canal.
- Location of a waste facility on the northern boundary of the site should be avoided as it could prejudice the promotion and use of land to the north of Bowerhill for other uses, including B1 office use. Request that this recommendation is added to the 'human health and amenity' section.

## Landscape, townscape and visual

• Potential visual impact on the 'gateway' to Melksham.

### **Traffic and transportation**

- Potential impact of additional HGV traffic on the village of Beanacre.
- Access to the site is unsustainable (there is no rail link, only road). Could the site utilise the canal?
- No overriding objection in principle. Site is located in proximity to the population it will serve, minimising potential use of the SRN (Highways Agency).

- No overall objection (Environment Agency).
- A small part of the site is identified as being 'Susceptible to Surface Water Flooding' (Environment Agency).
- Satisfactory FRA from the developer would be required (Environment Agency).

# **Canal Road Industrial Estate, Trowbridge**

#### Scale

• Site should be 'strategic'.

#### **Biodiversity and geodiversity**

• A site level survey should be undertaken to support any application (Environment Agency).

## Historic environment and cultural heritage

• The Kennet and Avon Canal (which should be considered as a heritage asset) forms the western boundary of the site – in this case, the adjacent pound includes a listed road bridge over the canal and listed aqueducts. To the east, Trowbridge Cemetery is included on the Register of Parks and Gardens and includes numerous listed memorials, gate piers and Gate Lodge. There are also listed houses in the vicinity, on Victoria Road. Impact on the setting and environmental quality of all of these heritage assets will need to be carefully considered (Principal Conservation Officer).

### **Human health and amenity**

• Any potential waste facility will have to assess potential impacts on the neighbouring receptors, in particular odour and bioaerosols (Environment Agency).

### **Traffic and transportation**

- No overriding objection in principle. Site is located in proximity to the population it will serve, minimising potential use of the SRN (Highways Agency).
- Concern about HGV movements affecting Trowbridge and Hilperton (B3105 is inadequate and unsuitable). Need for relief road/bypass.

- No objection to allocation (Environment Agency).
- A satisfactory sequential test by the LPA, and a site specific FRA from the developer, would be required (Environment Agency).
- The site lies within an area identified as being 'Susceptible to Surface Water Flooding' (Environment Agency).
- There is a small historic landfill site within the site which is a potential source of land contamination (Environment Agency).

# West Ashton Employment Allocation, Trowbridge

The site is not considered deliverable. Remove site from DPD.

#### General

• Persimmon Homes Special Projects (PHSP) who own the land, object to the proposal to safeguard land at Biss Farm, Trowbridge for waste management purposes and consider the proposal is unsound because it is not effective and deliverable. PHSP's aims for West Ashton Business Park are to provide a high quality office park (B1 business uses) and they do not think a waste transfer facility would be appropriate because of the marketing perceptions this will bring.

#### **Biodiversity and geodiversity**

- Possible that if there is a colony of Bechstein's bat roosting in Green Lane Wood the site profile does not concentrate on any single species of creature.
- As stated in site profile, on site mitigation should be provided.

#### Historic environment and cultural heritage

- In the area of Blackball DMV (County Archaeologist).
- Development of the site may impact on currently unrecorded remains associated with known and unknown sites of buried archaeological features. A programme of archaeological evaluation will need to be undertaken to assess the nature, extent and significance of any surviving remains. The site should be subject to archaeological evaluation in advance of any proposed works in this area. Further mitigation may be required depending on the outcome of that evaluation. Advise not using site. Otherwise, evaluation required as above (County Archaeologist).

## **Human health and amenity**

- Concern about impacts on air quality.
- Any potential waste facility will have to assess potential impacts on the neighbouring receptors, in particular odour and bioaerosols (Environment Agency).

# **Traffic and transportation**

- Concern that the existing road infrastructure could not deal with additional traffic nearest junction (C49) and A350 are congested and at capacity.
- No overriding objection to a local waste facility as the site is located in close proximity to the population it will serve minimising the potential use of the SRN (Highways Agency).
- There is no mention of the buffer strip along the edge of the proposed distributor road which is required with any waste facility.

- No objection to allocation provided appropriate layout of site avoids flood risk areas (Environment Agency).
- Site specific FRA from the developer, would be required (Environment Agency).
- It is recommended that a strip of land at least 8 metres wide adjoining all watercourses is left clear of all buildings, structures, fences and trees to facilitate access, essential maintenance and possible future improvements to the drainage system. Ground levels should not be raised within this

# West Ashton Employment Allocation, Trowbridge

area (Environment Agency).

- Part of the site along the watercourse is identified as being 'Susceptible to Surface Water Flooding'. An exclusion zone wider than 8 m may be needed, and will require further consideration (Environment Agency).
- Concern for water contamination of the River Biss.

#### **Links to Waste Core Strategy**

• Challenge the assertion that this site is within 16km of Chippenham.

## Warminster Business Park, Warminster

### Historic environment and cultural heritage

- Within 1km of Arn Hill barrow Scheduled Monument will need Zone of Theoretical Visibility (ZTV) analysis (County Archaeologist).
- Iron Age archaeology on site. Development of the site may impact on currently unrecorded remains associated with known and unknown sites of buried archaeological features. A programme of archaeological evaluation will need to be undertaken to assess the nature, extent and significance of any surviving remains. The site should be subject to archaeological evaluation in advance of any proposed works in this area. Further mitigation may be required depending on the outcome of that evaluation (County Archaeologist).

### **Human health and amenity**

• Any potential waste facility will have to assess potential impacts on the neighbouring receptors, in particular odour and bioaerosols (Environment Agency).

## Landscape, townscape and visual

• There is no landscape section in the site profile. Elements of the site detract from the landscape setting of the Cranborne Chase and West Wiltshire Downs AONB, and opportunities to reduce this impact (or at least not exacerbate it) should be taken (Natural England).

#### Water environment

- No objection to allocation (Environment Agency).
- The site falls within a SPZ2 measures to protect groundwater would be required (Environment Agency).
- Historic uses of the site indicate a contamination risk assessment should be undertaken (Environment Agency).
- A satisfactory FRA would be required as part of a planning application (Environment Agency).
- Risk of polluting groundwater sources robust design measures should be put in place to ensure protection of public water resources (Wessex Water).
- Foul water discharges from these waste management facilities can be connected to the public sewer system where available subject to a capacity appraisal and agreement upon a point of connection (Wessex Water).

## **Traffic and transportation**

• This site is located in close proximity to the population it would serve (approach commended by the Highways Agency).

## **Warminster Business Park, Warminster**

- Need to understand the impact of a waste facility in this location on the nearby A36 (Highways Agency).
- Potential for site to be served by rail (Highways Agency).

# Chitterne Waste Management Facility (Land at Valley Farm), Chitterne

#### Name of site

• There is no existing Chitterne Waste Management Facility – therefore the name of site and term 'improvements' is misleading.

#### Potential use/s

- Welcome Wiltshire Council's initiative in identifying sites for improving waste processing.
- Could a 'Local Recycling Site' be re-designated a 'Strategic Recycling Site'?
- Could the site be considered for the processing of organic waste (EfW)?
- Negligible local need for such a site.

## Current use/s

• The 'large scale inert landfill/land-raise site' (Table 3.9 DPD 2011), is in fact a parcel of agricultural land which was licensed to the landowner, under an Agricultural Improvement Scheme (on Appeal). This site was initially granted license subject to time limitation which expired on 4 September 2004.

#### **Description of site**

- Distance from site to village of Chitterne is 1/1.1km error in Atkins report and DPD.
- Map at start of document does not identify a local lorry route for the site.
- Site is unsuitable because it is on Greenfield land.
- Description of site should be amended to read as follows 'The land adjacent on all sides of the site is also agricultural, predominantly arable, though there is also a large scale inert landfill site within 300m to the East.... otherwise the site is open within a generally rural open landscape. Improvements to the Chitterne Waste Management Facility would involve and would have the potential to impact on the Heritage resource of the site and immediate area.' (B4.9.2 Atkins Joint Waste Site Allocations Site Survey Report May 2010).

### Planning context

• Site not allocated in Local Plan or Emerging Wiltshire Core Strategy.

## **Biodiversity and geodiversity**

- Proposal is at variance with the principles of a current five year organic entry/higher level stewardship agreement with Natural England which commenced on 1 April 2011 proposal will have a direct impact on the Chitterne Brook which holds a CC1 rating.
- Potential impact on species and habitats Chitterne Brook is an important breeding ground for the brown trout of the River Wylye.
- Site is located within a South West Strategic Nature Area.
- Potential impact on Salisbury Plain SPA/SAC/SSSI.

# Chitterne Waste Management Facility (Land at Valley Farm), Chitterne

• Mature trees around site at risk from development.

#### Historic environment and cultural heritage

- Extensive field systems within site, large block of Scheduled Monument field system as well as Knook Castle Scheduled Monument likely to be indirectly affected. Thus, Zone of Theoretical Visibility (ZTV) analysis pre-application and evaluation/mitigation as planning condition is recommended (County Archaeologist).
- The site forms an important link between two Scheduled Monuments and is in an area of high archaeological potential, including tumuli, earthworks and ancient field systems.
- Potential for changes in setting to the Scheduled Monuments located c 300m to the north and c 500m to the south of the possible site (Codford Down Field System, ref. 33522; Knook Castle, ref. 10227) (English Heritage).
- Potential for changes in setting to various Listed Buildings in the settlement of Chitterne (English Heritage)
- Concern about potential impacts on the historic environment of Chitterne (the village is classified as a Conservation Area and many of the buildings are listed) the setting would be threatened by increased HGV use on the B390.
- The site is not visible from any of the scheduled monuments in the study area (500m radius of site) identified in the Atkins report.
- The site lies outside areas designated for cultural heritage.

#### **Human health and amenity**

- Potential for impacts on Chitterne residents (there are properties within 1km of the site) increases in odour, dust, noise, fumes, bioaerosols, vermin/pests, litter.
- Potential for the site to provide additional employment to the area.

### Landscape, townscape and visual

- The site is in proximity to an AONB concern related to traffic disturbance and loss of tranquillity.
- Contrasting views over whether the existing landfill site/new development is/would be visible from Chitterne/B390.
- Dispute over whether the site is outside areas designated for landscape importance. Some belief that the site is in a Special Landscape Area (views across Salisbury Plain).
- The site should be subject to a detailed landscape impact assessment.
- Existing trees along the fence line sheltering Valley Farm are acceptable, but extending these westwards with the intention of hiding the site would also destroy the current view across the plain from the road. Mitigation by planting woodland would be out of character with site surroundings.

## **Traffic and transportation**

- Concern about inadequate road infrastructure, increased (HGV) traffic and associated reduction in road safety on A36/B390. The A36/B390 junction near Knook Camp is an accident black spot and often congested (traffic management needed lights or roundabout), children use bus stops along this narrow stretch of road and there is no footpath/street lighting, 17.5/18 tonnes weight limit not abided by).
- Concern about speeding vehicles (Village Community Speedwatch programme records between 500 and 600 vehicle per hour going through Chitterne).

# Chitterne Waste Management Facility (Land at Valley Farm), Chitterne

- No traffic modelling has been carried out.
- Site is relatively isolated and not in proximity to population it would serve (approach not supported by Highways Agency).
- Full transport assessment required to assess impact on A36 (Highways Agency).

#### Water environment

- No objection to allocation (Environment Agency).
- A satisfactory FRA would be required (Environment Agency).
- The site is on an aquifer which is a major source of water supply via a large pumping station at the northern edge of Chitterne risk of contamination of drinking water high level of engineering containment would be required.
- Concern for safety of residents of Chitterne that have access to wells/not connected to mains drainage.
- Risk of polluting groundwater sources robust design measures should be put in place to ensure protection of public water resources (Wessex Water).
- Potential impacts on (Winterbourne) Chitterne Brook flow and quality, including risk of flooding.
- Site would be in contravention of section 32 (3) of the Water Services Act 2007 and WFD Directive 2000/60/EC and EU Groundwater Daughter Directive 2006.

#### Any other issues or comments

• Evidence is flawed – result of heavy editing of the Joint Waste Site Allocations Site Survey Report by Atkins (May 2010).

#### **Cumulative effects**

- Potential for cumulative effects on traffic and transportation because of additional traffic involved with the development and operation of the Codford Biogas site.
- Misuse of information despite all issues highlighted in Atkins report, DPD concludes that there are no cumulative effects identified at plan-making stage.

## **Links to the Waste Core Strategy**

• The DPD recognises that the site links in within WCS1, WCS2 and WCS3. It could also link in well with WCS5 and WCS6.

# **Comments by site: East**

## Castledown Business Park, Ludgershall

The site is considered undeliverable. Remove site from DPD.

#### Site

• General feeling that the location of the site is unsuitable and the council should find another site or extend an existing site.

#### Scale

• Concern about the scale of operation (e.g. 'strategic' rather than 'local' scale) and the location of the site outside the 16 km 'strategic centre' zones.

#### Potential use/s

- What type of waste will be treated (e.g. hazardous)?
- There is need for a HRC facility closer to Ludgershall than the site at Everleigh.

#### Current use/s

• Concern about the loss of employment opportunities (waste uses will only provide limited local employment).

### **Biodiversity and geodiversity**

• Potential for impacts on nearby Windmill Hill and Pickpit Hill County Willdlife Sites, ancient woodland, fauna and flora.

#### **Human health and amenity**

- Potential for impacts on existing/future local resident's health/quality of life (increases in odour, dust, noise, chemical sprays, vermin/flies/pests, litter).
- Proposed new housing at Drummond Park will increase the number of people affected.
- Concern about fire risk and waste sites being subject to arson attacks.
- Potential for impacts on Wellington Academy the health of safety of staff, students/boarders and other users of the facilities.
- Potential for impacts on businesses and other users of the business park potential relocation of existing businesses.
- Concern that proposals will have a detrimental impact on local house prices
- Waste use/vehicles detrimental to proposed 'green lung' around River Bourne.

## Historic environment and cultural heritage

- Potential for impacts on Ludgershall Conservation Area and Old Ludgershall Castle.
- Potential impact from vibration (vehicle movements) on listed buildings and other properties.

# Landscape, townscape and visual

- The proposals are 'out of character' with the surrounding area and are against the original plan to attract innovate businesses to the park.
- Potential for impacts on the North Wessex Downs AONB.
- Measures to improve hedgerows/trees may not provide sufficient protection and would take time to grow.

### **Traffic and transportation**

## **Castledown Business Park, Ludgershall**

- Concern about the insufficient road infrastructure. HGV traffic will have difficulty navigating local roads, including Tidworth Hill, the railway bridge and Butt Street Corner, especially in winter/adverse weather conditions.
- Potential for increased traffic to increase levels of fumes, vibration, noise which may impact surrounding towns and villages (along the A338/A345).
- Development may exacerbate traffic/congestion at peak times (reference to A342 bottlenecks).
- Potential for cross-boundary traffic impact on Hampshire.
- Development may cause a reduction in road/cycleway safety (particularly children travelling to and from school).
- Concern about historic road flooding incidents. Increase in drainage maintenance required along Andover Road (A342) through Ludgershall.
- Development should avoid impacting on residential roads.
- Potential for additional traffic because the site is on a route for proposed new housing developments.
- Traffic may impede emergency access from Ludgershall fire station.
- Need for relief road/bypass.
- The site's location appears relatively isolated and is not in close proximity to the population it would serve (approach not supported by Highways Agency).
- The potential impact of the site on the A303 would need to be considered through a full transport assessment.

#### Water environment

- No objection to allocation (Environment Agency).
- Concern for use of any system where surface water can infiltrate into the ground as this could cause pollution (Environment Agency)
- Recommended to remove the reference to SuDS, and to rely on the text which includes: 'There will need to be an assessment as to whether there are suitable surface water disposal options available for the site.' (Environment Agency).
- Infrastructure improvements required in relation to sewage pumping to Tidworth sewage works, pipes etc.
- Risk of polluting groundwater sources robust design measures need to be in place to ensure the appropriate levels of protection are considered to protect public water resources (Wessex Water).
- Foul water discharges from these waste management facilities can be connected to the public sewer system where available subject to a capacity appraisal and agreement upon a point of connection (Wessex Water).

### **Links to Waste Core Strategy**

- Belief that the site is contrary to the councils own waste and economic policies.
- Site is not within 16km of a Strategically Significant City or Town Ludgershall is 30-37km from nearest SSCT Salisbury.

## **Hopton Industrial Estate, Devizes**

### **Human health and amenity**

• Any potential waste facility will have to assess potential impacts on the neighbouring receptors, in particular odour and bioaerosols (Environment Agency).

### Historic environment and cultural heritage

- No reference is made to the Roundway Down Historic Battlefield (ref. 1000030) which adjoins the site to the north-west (English Heritage).
- Adjacent Roundway Down Registered Battlefield; setting issues. Existing industrial use and probably no direct impacts (but note, the listed building milestone in the north east of the site). Heritage Statement required (County Archaeologist).

#### Landscape, townscape and visual

• Support for reference to the consideration of possible impact on the setting of the AONB.

#### **Traffic and transportation**

- The site is in proximity to the population it would serve. A local waste facility at this location is unlikely to have an impact on the SRN (approach supported by Highways Agency).
- Concern for increase in traffic on the A361 and A342 sufficient weight not given to traffic impacts.

#### Water environment

- No objection to allocation (Environment Agency).
- A satisfactory FRA would be required (Environment Agency).
- Appropriate measures would need to be put in place to protect groundwater (Environment Agency).
- Risk of polluting groundwater sources robust design measures need to be in place to ensure the appropriate levels of protection are considered to protect public water resources (Wessex Water).
- Foul water discharges from these waste management facilities can be connected to the public sewer system where available subject to a capacity appraisal and agreement upon a point of connection (Wessex Water).

## Any other issues or comments

- Allocation conflicts with Draft Wiltshire Core Strategy Policy 12 which declares the site a Principal Employment Area.
- Waste development at this location would discourage future developments.
- The site is crossed by one of National Grid's high voltage overhead electricity transmission lines.

### **Links to Waste Core Strategy**

• Challenge the assertion that this site is within 16km of Chippenham and Trowbridge.

## **Nursteed Road Employment Allocation, Devizes**

The site is not considered deliverable. Remove site from DPD.

#### Current use/s

• Site is a retail park of commercial retail in the majority, with a few offices and warehouses – not suitable for waste development.

#### **Biodiversity and geodiversity**

• Concern that local wildlife will be significantly affected (badgers, dormice, newts and other less rare species).

#### Historic environment and cultural heritage

- Previous evaluation highlighted potential for archaeology. Development of the site may impact on currently unrecorded remains associated with known and unknown sites of buried archaeological features. A programme of archaeological evaluation will need to be undertaken to assess the nature, extent and significance of any surviving remains. The site should be subject to archaeological evaluation in advance of any proposed works in this area. Further mitigation may be required depending on the outcome of that evaluation (County Archaeologist).
- The allocated site constitutes the last remaining buffer between the modern expansion of Devizes and the historically discreet hamlet of Nursteed which includes a number of listed and non-listed historic buildings and the site has a landscape value for this reason which should not be underestimated. Immediately to the south of the allocated site is the Grade II listed Nursteed House (Principal Conservation Officer).

#### **Human health and amenity**

• Any potential waste facility will have to assess potential impacts on the neighbouring receptors, in particular odour and bioaerosols (Environment Agency).

### Landscape, townscape and visual

- Concern about proximity to residential land and children's play park and nursery.
- Concern for impact on North Wessex Downs AONB, specifically the Ridgeway running over Monument Hill.
- Concern for loss of employment land.

### **Traffic and transportation**

- The site is in proximity to the population it would serve. A local waste facility at this location is unlikely to have an impact on the SRN (approach supported by Highways Agency).
- Concern that waste development will increase traffic congestion in Devizes.

- No objection to allocation (Environment Agency).
- A satisfactory FRA would be required (Environment Agency).
- Appropriate measures would need to be put in place to protect groundwater (Environment Agency).
- Risk of polluting groundwater sources robust design measures need to be in place to ensure the appropriate levels of protection are considered to protect public water resources (Environment Agency).

## **Nursteed Road Employment Allocation, Devizes**

• Foul water discharges from these waste management facilities can be connected to the public sewer system where available subject to a capacity appraisal and agreement upon a point of connection (Wessex Water).

### Any other issues or comments

- The owners of the land have not been consulted and have other plans for the site.
- Allocation conflicts with Draft Wiltshire Core Strategy Policy 12 which declares the site a Principal Employment Area.

### **Links to Waste Core Strategy**

• Challenge the assertion that this site is within 16km of Chippenham and Trowbridge.

## Wiltshire Waste, Tinkfield Farm, Monument Hill, Devizes

#### Historic environment and cultural heritage

- Includes at southern tip the postulated site of former flour mill of 1841 not mentioned in the draft DPD (County Archaeologist).
- Development of the site may impact on currently unrecorded remains associated with known and unknown sites of buried archaeological features. A programme of archaeological evaluation will need to be undertaken to assess the nature, extent and significance of any surviving remains. The site should be subject to archaeological evaluation in advance of any proposed works in this area. Further mitigation may be required depending on the outcome of that evaluation (County Archaeologist).

#### **Human health and amenity**

- Concern for potential impacts on existing/future local resident's health/quality of life (e.g. change in air quality).
- Any potential waste facility will have to assess potential impacts on the neighbouring receptors, in particular odour and bioaerosols (Environment Agency).

### Landscape, townscape and visual

- Consideration should be given to potential impact on North Wessex Downs AONB.
- Concern that waste development and associated traffic would have an impact on Devizes' image and affect the level of visitors to the town.

## **Traffic and transportation**

- The site is in proximity to the population it would serve. A local waste facility at this location is unlikely to have an impact on the SRN (approach supported by Highways Agency).
- Concern for an increase in traffic exacerbating congestion in Devizes (particularly A361, A342) and other local roads.

- No objection to allocation (Environment Agency).
- The site lies within an area identified as being 'Susceptible to Surface Water Flooding'. Further investigation should be carried out to assess the true nature of this risk (Environment Agency).
- Risk of polluting groundwater sources robust design measures need to be in place to ensure the appropriate levels of protection are considered to

## Wiltshire Waste, Tinkfield Farm, Monument Hill, Devizes

protect public water resources (Wessex Water).

• Foul water discharges from these waste management facilities can be connected to the public sewer system where available subject to a capacity appraisal and agreement upon a point of connection (Wessex Water).

#### **Links to Waste Core Strategy**

• Challenge the assertion that this site is within 16km of Chippenham and Trowbridge.

## Salisbury Road Business Park, Marlborough

#### Potential use/s

• Discourage future developments in categories B1 and B2.

### **Biodiversity and geodiversity**

• Site has a significant set of mitigation conditions attached with regards protected species and habitats. These conditions should be developed to be relevant to any proposed new developments on site, to ensure satisfactory protection of the species and sites.

#### Historic environment and cultural heritage

- Previously evaluated site. No further action required (County Archaeologist).
- At the south-west corner of the site is the Grade II listed Salisbury Road Lodge to Tottenham House. The site also borders the northern edge of the Grade II\* Registered Park of Tottenham House and Savernake Forest. Further impact on these heritage assets, including their environmental quality, should be carefully considered (English Heritage) (Principal Conservation Officer).

### **Human health and amenity**

• Concern for potential impacts on resident's health/quality of life (e.g. change in air quality, odour, dust fumes, nuisance/noise levels).

### Landscape, townscape and visual

• No reference to the North Wessex Downs AONB despite the site being within this AONB – include reference in terms of design and landscaping (Natural England).

### **Traffic and transportation**

- The site is in proximity to the population it would serve and will therefore minimise the potential impact on the SRN (approach supported by Highways Agency).
- Concern that development would increase traffic congestion in Marlborough High Street, A4 and A346.

- No objection to allocation provided layout of site takes into account SPZ issues (Environment Agency).
- Groundwater appropriate measures would need to be put in place to protect the water environment. Contamination may be present and any risks would need to be appropriately dealt with (Environment Agency).
- A satisfactory FRA would be required (Environment Agency).

## Salisbury Road Business Park, Marlborough

### Any other issues or comments

• Allocation conflicts with Draft Wiltshire Core Strategy Policy 14 which declares the site a Principal Employment Area.

#### **Links to Waste Core Strategy**

• Challenge the assertion that this site is within 16km of Chippenham and Trowbridge.

# Salisbury Road Business Park, Pewsey

### Potential use/s

• Discourage future developments in categories B1 and B2.

### **Human health and amenity**

- Any potential waste facility will have to assess potential impacts on the neighbouring receptors, in particular odour and bioaerosols (Environment Agency).
- Concern for potential impacts on resident's and neighbouring businesses health/quality of life (e.g. change in air quality, odour, dust fumes, nuisance/noise levels).

#### Landscape, townscape and visual

- Support for reference to the consideration of possible impact on the setting of the AONB.
- Design of a waste facility would have to be of a high standard, taking account of the site's location in the North Wessex Downs AONB.

## **Traffic and transportation**

- No overriding objection in principle. Site is located in proximity to the population it will serve, minimising potential use of the SRN (Highways Agency).
- Concern that the roads to the north, either through Pewsey, Sharcott or Mannington, are not suitable for HGV traffic recommend traffic assessment and routing agreement is needed.
- Concern that development would increase traffic congestion in Pewsey town centre.

#### Water environment

- No objection to allocation provided layout of site takes into account SPZ issues (Environment Agency).
- Groundwater appropriate measures would need to be put in place to protect the water environment. Two groundwater abstractions and two surface water abstractions exist within 1km of the site; the closest groundwater abstraction is 200m west of the site (Environment Agency).
- A satisfactory FRA would be required (Environment Agency).

# Any other issues or comments

• Allocation is contrary to paragraph 4.22 of the Draft Wiltshire Core Strategy.

## **Everleigh Waste Management Facility**

#### Potential use/s

• Support shown for expansion/extension of the site as a 'local' scale waste use.

#### Historic environment and cultural heritage

- Three SMs within 700 metres on SW-NW. Any amelioration of impact on their setting will rely on existing or new planting and a restricted height of proposed development (County Archaeologist).
- Would therefore advise not using this site (adjacent to restored landfill site and thus out of bounds for new development) (County Archaeologist).

## **Human health and amenity**

- The site is in an isolated setting this can be viewed as a benefit (less receptors in proximity to the site) or a constraint (the site is not in close proximity to the population it would serve). The latter is not supported by the Highways Agency.
- Some concern about an increase in noise and lighting.

### Landscape, townscape and visual

- The site benefits from existing screening and this should be protected/enhanced.
- North Wessex Downs AONB support reference to consideration of potential impacts on setting of AONB.

### **Traffic and transportation**

• Potential for additional waste related traffic to have an impact on the A303. Potential impact on A303 needs to be considered through a full Transport Assessment (Highways Agency).

- No objection to allocation (Environment Agency).
- Flood risk issues must be considered for any planning application (Environment Agency).
- Risk of polluting groundwater sources robust design measures should be put in place to ensure protection of public water resources (Wessex Water).

## Pickpit Hill, Ludgershall

#### Site

• General feeling that the location of the site is unsuitable and the council should find another site or extend an existing site.

#### Potential use/s

- What type of waste will be treated (e.g. hazardous)?
- Support for HRC closer to Ludgershall than existing site at Everleigh.
- MRF/WTS uses should be considered as 'strategic' operations therefore not suitable.

#### Current use/s

- Concern about previous uses on the site (incinerator).
- Impact on current users of the Business Park.

#### **Description of site**

• General feeling that the location of the site is unsuitable and the council should find another site or extend an existing site.

#### **Biodiversity and geodiversity**

- Potential for impacts on Pickpit Hill County Willdlife Site, Collingbourne Woods, fauna (including UK BAP Priority Habitat) and flora (including sensitive chalk grassland).
- Pest control/tree/hedge management may be damaging to native animals and birds.

## Historic environment and cultural heritage

- Could adversely impact on historic environment from intervisibility with the non-Scheduled barrow on Pickpit Hill. Otherwise, no impacts (County Archaeologist).
- Potential for impact on Ludgershall Conservation Area and Old Ludgershall Castle (vulnerable to air pollution).
- Concern regarding impact of vibration from waste vehicles on listed buildings and other properties.

### **Human health and amenity**

- Potential for impacts on existing/future local resident's health/quality of life in Ludgershall, Tidworth and Faberstown (increases in air pollution, odour, dust, fumes, noise, chemical sprays, vermin/flies/pests, litter/debris).
- Concern about fire risk and waste sites being subject to arson attacks.
- Potential for impacts on Wellington Academy the health of safety of staff, students/boarders and other users of the facilities.
- Concern about the loss of employment opportunities (waste uses will only provide limited local employment).
- Potential impact on cycleway users.
- Concern about the loss of public open space if the site is developed.

### Landscape, townscape and visual

• Potential for impacts on North Wessex Downs AONB

## Pickpit Hill, Ludgershall

- The proposals are 'out of character' with the surrounding area the topography of the site could be an issue.
- Measures to improve hedgerows/trees may not provide sufficient protection and would take time to grow.

### **Traffic and transportation**

- Concern about the insufficient road infrastructure, associated increases in traffic and congestion (increases in fumes, vibration, noise) and a reduction in road safety (exacerbated by planned housing developments).
- Belief that the cost of developing the site and providing access onto A3026 is likely to be prohibitive.
- Waste traffic will have difficulty negotiating local roads (including Tidworth Hill, the railway bridge and Butt Street Corner).
- Request for a bypass.
- Historic road flooding incidents increase in drainage maintenance required along Andover Road A342 through Ludgershall.
- The site is located on the outskirts of Tidworth and therefore in close proximity to the population it serves (approach supported by Highways Agency).
- Need to understand the impact a waste facility in this location may have on the A303 (Highways Agency).

#### Water environment

- No objection to allocation (Environment Agency).
- 'Portable supplies' should read 'Potable supplies' (Environment Agency).
- A FRA will be required for any planning application (Environment Agency).
- Appropriate measures would need to be in place to protect the water environment (Environment Agency).
- Potential for impacts on water resources/supply potential contamination issues as site is on an aquifer. Any contamination risks would need to be appropriately dealt with (Environment Agency).
- Risk of polluting groundwater sources robust design measures should be put in place to ensure protection of public water resources (Wessex Water).
- Foul water discharges from these waste management facilities can be connected to the public sewer system where available subject to a capacity appraisal and agreement upon a point of connection (Wessex Water).

#### **Cumulative effects**

- Potential for cumulative impacts if Castledown site is also developed.
- Potential for transport cross-boundary impacts on Hampshire.

### **Links to Waste Core Strategy**

- Concern that the site is located outside the 16 km 'strategic centre' zones.
- Belief that the site is contrary to the councils own planning/waste polices.

# **Comments by site: Swindon**

# Chapel Farm, Blunsdon

#### Potential use/s

- Will a facility at this location treat chemical waste?
- Pyrolysis is an unproven technology/lack of information.
- Extensive pre-treatment process required to handle Municipal Solid Waste.
- Flexibility within plan allows for development at the site to suit the needs of the area.
- Site will help to plug gaps in the strategic network and serve local need.

#### **Description of site**

• The site is on Greenfield land

#### Historic environment and cultural heritage

- The site should be evaluated, not the archaeological features within it (as stated in the draft DPD) (County Archaeologist).
- Development of the site may impact on currently unrecorded remains associated with known and unknown sites of buried archaeological features. A programme of archaeological evaluation will need to be undertaken to assess the nature, extent and significance of any surviving remains. The site should be subject to archaeological evaluation in advance of any proposed works in this area. Further mitigation may be required depending on the outcome of that evaluation (County Archaeologist).

## **Human health and amenity**

- Potential for 'bad neighbour' impacts (assessments needed for odour, dust, noise, bio-aerosols, emissions and nuisance).
- Concern about proximity to Isambard School, existing residents and the proposed development (1,700 houses and associated business use) at Tadpole Farm (cumulative effects).
- Need for acoustic screening.
- The DPD does not prescribe an established distance to protect local communities.
- Local communities will not receive benefits of the scheme.
- Waste treatment facility should be located away from people.

## Landscape, townscape and visual

- Concern that a waste treatment facility would be an eyesore.
- Lesser potential for changes in setting to designated heritage assets (English Heritage).

# **Traffic and transportation**

- The site is a strategic site in an isolated location (approach not supported by Highways Agency).
- Potential impact on the A419, in particular the Blunsdon/Lady Lane junction need for robust evidence to demonstrate safety and efficiency of location (Highways Agency).

## Chapel Farm, Blunsdon

Potential for an increase in traffic.

#### Water environment

- No objection to allocation (Environment Agency).
- A satisfactory FRA would be required (Environment Agency).

#### Any other issues or comments

• Environmental permit would be required with any EfW (Environment Agency).

## Waterside Park, Swindon

## Historic environment and cultural heritage

• The site allocation makes no reference to the Wilts & Berks Canal (North Wilts Branch). A short section of the original canal remains as part of this site, and there are plans to restore the canal from Mouldon Hill to Swindon Town Centre. The project seeks to protect this route from future development.

## **Traffic and transportation**

- The site is ideally placed to serve the population as a strategic site (approach supported by the Highways Agency).
- Potential for site to be served by rail (Highways Agency).
- Need to understand the impact of the waste facility on the M4 Junction 16 and A419 dependent on the scope of the geographic area the facility would serve (Highways Agency).

- No objection to allocation (Environment Agency).
- Flood risk Environment Agency are undertaking detailed hydraulic modelling of the River Ray which should be used to inform development at this location.
- FRA/surface water drainage scheme will be required to support any planning application at this location (Environment Agency).
- Swindon Borough Council are currently undertaking a Surface Water Management Plan (SWMP).
- Surface water flooding is a particular issue. Any development in the Cheney Manor Industrial Estate should consider the known flood risk from surface water and should include flood resilient design (Environment Agency).
- Groundwater Contamination may be present (dependent of previous activities) and any contamination risks would need to be appropriately dealt with. The River Ray could be a significant controlled water receptor (Environment Agency).

# **Brindley Close/Darby Close Swindon**

### **Traffic and transportation**

- Site is ideally placed to serve population of Swindon as a local waste facility (Highways Agency).
- Potential for site to be served by rail (Highways Agency).
- Any planning application would need to assess the impact on the M4 Junction 16 and A419 dependent on the scope of the geographic area the facility would serve (Highways Agency).

#### Water environment

- No overall objection to allocation (Environment Agency).
- FRA/surface water drainage scheme required to support any planning application (EA).

## Land at Kendrick Industrial Estate, Swindon

### **Traffic and transportation**

- The site is ideally placed to serve the population as a local waste facility (approach supported by the Highways Agency).
- Potential for site to be served by rail (Highways Agency).
- Need to understand the impact of the waste facility on the M4 Junction 16 and A419 dependent on the scope of the geographic area the facility would serve (Highways Agency).

- No objection to allocation (Environment Agency).
- Flood risk Environment Agency are undertaking detailed hydraulic modelling of the River Ray which should be used to inform development at this location.
- FRA/surface water drainage scheme will be required to support any planning application at this location (Environment Agency).
- Groundwater Contamination may be present (dependent of previous activities) and any contamination risks would need to be appropriately dealt with (Environment Agency).

## **Rodbourne Sewage Works, Swindon**

#### **Traffic and transportation**

- The site ideally placed to serve the population as a local waste facility (approach supported by the Highways Agency).
- Potential for site to be served by rail (Highways Agency).
- Need to understand the impact of the waste facility on the M4 Junction 16 and A419 dependent on the scope of the geographic area the facility would serve (Highways Agency).

#### Water environment

- No objection to allocation (Environment Agency).
- Flood risk Environment Agency are undertaking detailed hydraulic modelling of the River Ray which should be used to inform development at this location.
- Groundwater Contamination may be present (dependent of previous activities) and any contamination risks would need to be appropriately dealt with. Watercourses in the vicinity of the site are potential controlled water receptors (Environment Agency).

## Land within Dorcan Industrial Estate, Swindon

### **Traffic and transportation**

- The site ideally placed to serve the population as a local waste facility (approach supported by the Highways Agency).
- The site is located adjacent to, and accessed via the A419. Concern about the potential impact of the site on the A419 and in particular the junction with the B4006 a full transport assessment would be required. This junction does not meet current design standards and an increase in heavy goods vehicle movements may impact on the operation of the junction.

- No objection to allocation (Environment Agency).
- A satisfactory FRA would be required (Environment Agency).
- Groundwater Contamination may be present (dependent of previous activities) and any contamination risks would need to be appropriately dealt with (Environment Agency).