



EnviRecover

Responses to Concerns and Issues – Planning Matters

Community Liaison Group 17 February 2010

Planning Matters

- General planning issues
- Policy relating to Hartlebury Trading Estate (Q: A2, A4, A5 & A6)
- Traffic & transportation (Q: C1, C2, C3, C5 & C6)
- Site selection (Q: E1, E2 & E14)
- Devaluation of property prices (Q: F3)

General Planning Issues

- Development requires both planning permission and Environmental Permit
- Planning application will comprise:
 - Application forms and drawings;
 - Design and access statement;
 - Planning statement;
 - Consultation statement;
 - Transportation Assessment;
 - Environmental Impact Assessment (EIA).
- Covered by Schedule 1 of EIA Regulations 1999
- EIA Scoping Request made to Worcestershire County Council (WCC) Planning Department in November 2009
- EIA Scoping Opinion adopted by WCC Planning Department 29th January 2010
- Application to be submitted early April 2010 – will include statutory consultation period

General Planning Issues

- The EIA will cover the following topic areas:
 - The Need for the Scheme and Alternatives Considered
 - The Site and Planning History
 - Detailed Scheme Description
 - Planning Policy
 - Traffic and Transportation
 - Landscape and Visual Impact
 - Ecology and Nature Conservation
 - Geology and Hydrogeology
 - Surface Waters and Flood Risk
 - Noise & Vibration
 - Air Quality & Human Health
 - Archaeology and Heritage
 - Cumulative Effects

Policy Relating to Hartlebury Trading Estate

- Policy SR8 of the adopted Wychavon District Local Plan
- Major Developed Site in the Green Belt
- The name 'Trading Estate' has no planning relevance
- Site allocated for employment uses and is an established industrial estate
- Characterised by predominantly B2 (industrial) & B8 (warehousing, storage & distribution) uses
- PPS10 (national policy for waste planning) identifies industrial estates as likely to be suitable locations for waste management development
- EnviRecover site benefits from planning permission (permanent) for industrial units (including B2 & B8). Estech Autoclave permission expired 3/2/10
- MWM must demonstrate very special circumstances

Traffic & Transportation

Rail

- All municipal waste in the two counties is currently collected by road from individual households.
- Collected waste is either 'direct delivered' for treatment / disposal or is bulked and hauled to disposal sites from Waste Transfer Stations / Household Waste Sites. There are over 20 WTS or HWS facilities across the two counties – none of which are currently rail served.
- Given the county waste collection regime and available transfer facilities, transport of waste to EnviRecover will be via road haulage.

Traffic & Transportation

Transport Assessment

- Full details of predicted EnviRecover operational HGV movements and likely route options will be provided within a formal Transport Assessment (TA) Report which will be prepared to accord with DfT guidelines.
- Analysis of relevant environmental effects of predicted EnviRecover traffic demand (eg: noise & vibration, air quality, etc) will be considered in the EIA.
- The scope of assessment to be included within the TA & EIA report has been agreed with Highway Department officers at Worcestershire County Council.

Traffic & Transportation

Predicted Vehicle Demand

- The TA report will include for a robust 'worst case' assessment of EnviRecover traffic to meet the requirements of the network capacity assessment.
- The traffic estimates utilised in the TA appraisal are likely to be an over-estimate of actual operational figures by approximately 10%.
- Taking into account variations in waste delivery profiles for County districts, recently updated population forecasts from the RSS and vehicle payload assumptions, the TA predicts:
 - 'peak week' daily HGV arrivals at Mercia EnviRecover of approximately 110 HGVs
 - 'alternate week' daily arrivals of less than 80 HGVs.

Traffic & Transportation

Vehicle Routeing

- Operational HGV routeing is largely self selecting, particularly in the immediate vicinity of the proposal site due to the presence of existing HGV restrictions.
- All vehicles will be directed to utilise Crown Lane in order to access the A449.
- It is anticipated that all bulk haulage vehicles will utilise the A449 (S) of Hartlebury to access the M5 at J6.

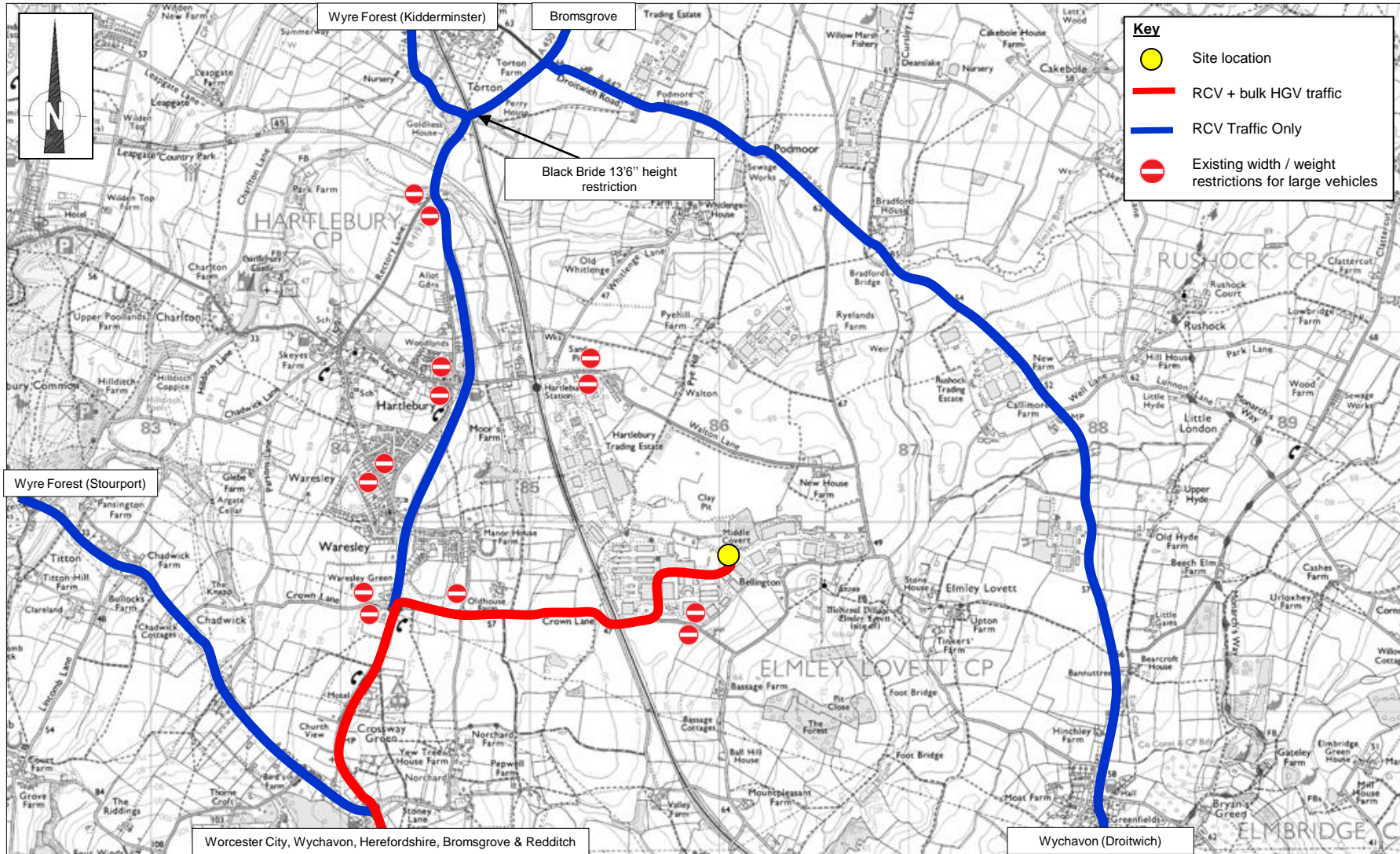


Figure 1

Anticipated Routing Options For Operational HGV Traffic To Mercia EnviroRecover Site At Hartlebury

900-01

Mercia EnviRecover, Hartlebury Trading Estate

January 2010



Camellia House
76 Water Lane,
Wilmslow
Cheshire, SK9 5BB

Site Selection

- Comprehensive site search exercise, commenced in 2007.
- Involved exhaustive research which was undertaken for the owners of MWM by independent Planning Advisors, who were in turn supported by Senior Legal Counsel (a Planning QC).
- Methodology agreed with WCC Planning Department officers.
- Considered all employment allocations in Worcestershire & Herefordshire.
- Long list of 56 locations and circa 80 sites.
- Comprised desk study and site visits / assessments.
- The search took into account local and national planning policies.

Site Selection

- Assessment criteria comprised:
 - The size of the site - at least two hectares is needed
 - The site had to be commercially available
 - The site needed to be on allocated employment land
 - the site should be in close proximity to the main areas of waste arisings
 - It should be close to, or linked to the major road network
 - It must not be in a floodplain
 - It should not create unacceptable landscape or visual effects
 - The area of land must not be constrained by nationally important ecological areas such as Sites of Special Scientific Interest (SSSI).
 - There should be no potential to impact upon any important heritage sites.
 - Ideally should be within or close to an industrial area to give the potential to use heat energy.
 - As far as is possible, it should be away from residential development so that amenity would not be unacceptably impacted.
 - There should be reasonable access to a connection to the national grid to allow electricity to be used.

Site Selection – Strategy Input

MWM proposal based upon:

- Single facility serving both counties;
- Use of proven mass-burn incineration technology;
- Reasoning:
 - Accords with technology type in JMWMS BPEO study;
 - Support in National Waste Strategy (Waste Strategy for England 2007);
 - Proven / bankable technology;
 - Well established throughout the UK;
 - Extensive corporate experience;
 - Reduced planning risk;
 - Within financial parameters.

Site Selection – Strategy Input

- In 2009, the Councils undertook the JMWMS First Review including comprehensive assessment of future residual waste treatment options.
- Involved assessment of seven different treatment options using different technologies and either **multiple** or **single** sites.
- Each assessed against: environmental; financial and risk; and social criteria, including use of the Environment Agency's life cycle assessment tool: Waste and Resources Assessment Tool for the Environment (WRATE). The criteria used were:
 - **Environmental Criteria** - (Resource Depletion; Air Acidification; Greenhouse Gas Emissions; Freshwater aquatic ecotoxicity; Eutrophication)
 - **Financial and Risk Criteria** - (Financial Costs; Reliability of Delivery; Planning Risk; Compliance with Policy; Flexibility & End Product Liability)
 - **Social Criteria** - (Transport & Health)
- Three highest scoring (best performing) options **all** based on single large facilities serving both Counties. Two of the three highest scoring options comprised EfW (incineration with energy recovery).

Site Selection - Outcome

- Requirement for single site in Worcestershire (circa 75% of waste arisings);
- Site to be suitable for EfW (with energy recovery);
- Plot H600 at Hartlebury Trading Estate is the only suitable, available site;
- Planning application will contain the full site selection report.

Devaluation of Local Property Prices

- Private Interests (The Planning System: General Principles – ODPM February 2004)
29. The planning system does not exist to protect the private interests of one person against the activities of another, although private interests may coincide with the public interest in some cases. It can be difficult to distinguish between public and private interests, but this may be necessary on occasion. The basic question is not whether owners and occupiers of neighbouring properties would experience financial or other loss from a particular development, but whether the proposal would unacceptably affect amenities and the existing use of land and buildings which ought to be protected in the public interest.
- No firm independent evidence in the UK that incinerators lead to decreased property values

Devaluation of Local Property Prices

- Research in Hampshire, before and after the construction of 3 incinerators in the last 6 years, found that there was *"no noticeable or lasting adverse affect on the property markets in those locations due to the presence of the incinerators"*.

"In all three locations values have continued to rise in line with other areas in their local markets. In addition, there has been substantial investment/development in both the residential and commercial sectors in the areas around the plants in the periods following grant of planning consent and construction. This has continued once the plants have become operational". Cluttons Surveyors

Devaluation of Local Property Prices

Study was undertaken for the Nottingham Eastcroft EfW Public Inquiry (an existing EfW which was to be extended):

- Based on postcode analysis using land registry data;
- Since 2001 – 2007 the 4 postcodes immediately around the EfW house price increase exceeded neighbouring study areas;
- The 4 postcodes had 109.5% increase (2001 – 2007), City of Nottingham as a whole 98.8% and Nottinghamshire County 96.4% (also 2001 -2007);
- NG2 3 postcode (within which EfW located) outperformed other 3 surrounding postcode areas with 116% increase (2001 -2007).