

Supporting Planning Statement

(including the Design and Access Statement, Statement of Community Involvement, EIA
Screening Statement)

For:

Material Recycling Facility ('MRF')

At: Pilsworth Landfill

July 2023

Prepared by :**INNOV8PLANNING**: for:



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Contents

Contents.....	
Planning Application and Application Drawings.....	
Statement of Community Involvement	
Design and Access Statement.....	
Environmental Impact Assessment Screening.....	
Economic Statement.....	
Waste Management Statement.....	
Context.....	
1 Introduction	
2 The site and its surroundings.....	
3 The Proposed Development	
4 Policy Context	
5 Summary of Environmental Impact.....	
6 Green Belt Policy	
7 Conclusions	

Planning Application and Application Drawings

This planning application is for the '*Erection and operation of a Material Recycling Facility and associated works*'

The Planning Application comprises:

- Covering Letter
- Supporting Planning Statement ('SPS') – Produced by INNOV8 PLANNING Ltd (this document) – **This document includes Design and Access Statement, Statement of Community Involvement, EIA Screening Assessment, Waste Management Statement and Economic Statement**
- Phase 1 Desk Study – Produced by Wardell Armstrong
- Dust and Emissions Management Plan ('DMP') – Produced by Wardell Armstrong
- Landscape and Visual Assessment ('LVA') – Produced by Awscape Consulting
- Preliminary Ecological Appraisal ('PEA') – Produced by Environment Business Solutions
- Flood Risk Assessment ('FRA') - Produced by INNOV8 PLANNING LTD
- Climate Change Assessment - Produced by INNOV8 PLANNING LTD
- Construction Management Plan (including waste management strategy)
- Transport Statement ('TS') – Produced by INNOV8 PLANNING LTD
- Travel Plan – Produced by Valencia Waste Management Ltd

Drawings – Produced by Egniol Consulting Ltd

- Proposed MRF Location
- Drainage Plan
- Elevations
- Site Location
- Site Plan and Swept Paths.

Statement of Community Involvement

The development represents a project which is ancillary to the existing landfilling activities that take currently place on the site. The development will increase traffic but noting this increase will not be significant or perceptible and that existing traffic routing does not pass any residential properties. The accompanying assessments conclude that residential amenity will not be affected – detrimentally or otherwise.

Whilst Valencia Waste Management is cognisant to the importance of pre-application stakeholder engagement it was not considered necessary in this particular instance. However, if during the determination of the application it is deemed necessary, Valencia will augment the Council's consultation processes with additional engagement, if required.

Design and Access Statement

The Town and Country Planning (Development Management Procedure) (England) Order 2015 sets out the legislative background for the need (or otherwise) and the content required for a design and access statement.

The procedure confirms that an application for planning permission to which the article applies shall be accompanied by a statement (“a design and access statement”) about—

- (a) the design principles and concepts that have been applied to the development; and
- (b) how issues relating to access to the development have been dealt with.

However, section (4) states that the article does not apply to an application for planning permission which is (inter alia)

- (a) for permission to develop land without compliance with conditions previously attached, made pursuant to section 73 of the 1990 Act(1);
- (c) for engineering or mining operations;
- (d) for a material change in use of the land or buildings;
- (e) for development which is waste development.

The development proposed in this instance is a waste development and therefore a design and access statement is not required.

Environmental Impact Assessment Screening

This proposal exhibits characteristics that would best be related to Schedule 2 Section 11(b) of Schedule 2 which is defined as: "Installations for the disposal of waste (unless included in Schedule 1)" Set against the indicative thresholds and criteria advice the proposal individually and in combination with existing and planned development does not breach the thresholds identified in the particular sections of the Regulations and Planning Practice Guidance. Based on the consideration of both the criteria within Schedule 3 of the Regulations for Schedule 2 Sections 11 (b), and the Planning Practice Guidance it is considered that EIA WOULD NOT BE REQUIRED in this instance.

ECONOMIC STATEMENT

The proposed development will secure economic benefits by way of both direct employment opportunities, indirect employment opportunities and supply chain benefits.

Direct employment opportunities

The proposed development will secure between 6 and 12 FTE's. These jobs will range widely in terms of skills, experience and remuneration and there is no reason why positions cannot be secured by the local workforce currently residing in the vicinity of the site.

Job opportunities will include drivers, telehandlers, machinery operatives, weighbridge operators, pickers and fitters.

Indirect employment opportunities

The construction of the building will provide employment opportunities for builders, ground workers, scaffolders, metal workers and joiners.

Supply chain benefits

The supply chain benefits include local skip hire firms, recycling businesses, local engineering firms.

WASTE MANAGEMENT STATEMENT

Wastes created during the construction phase will be segregated and stored on site for onward re-use and recycle.

Groundworks will include the removal of an existing area of hardstanding – this is primarily concrete which will be crush and screened on site and re-used on site for building and engineering purposed. Therefore, wherever possible, wastes shall be re-used and recycled on site. As one of the Countries leading recycling companies Valencia will seek to treat construction waste as high up the waste hierarchy as practicable and only dispose to landfill where there are no suitable recycling or recovering outlets.

The premise of the facilities is to intercept the commercial and industrial waste that is heading for landfill and extracting recyclable materials which would then be removed from site for recycling/re-use/recovery by third parties elsewhere. Any domestic/putrescible waste by would by-pass the facility to landfill as per current arrangements.

The proposed development could attract a third-party construction, demolition and excavation waste. This material will be segregated into recyclables and soils/rubble that can be used as engineering materials and daily cover on the landfill. Any putrescible waste will again bypass the facility and be directly landfilled.

The plant/equipment will extract recyclables and inert materials. A combination of Shredder, Long-Part Separator (removes long items from the process), Incline Magnet (removes ferrous metals), Combi Screen (removes fines), Eddy Separator (removes non-ferrous metals and Picking lines (to remove wood and plastics) will typically sort the inputs into composition (% by weight) of:

- Hardcore 30% - to be used on site for engineering, daily cover and capping
- Fines 15% - to be landfilled or recovered as an RDF elsewhere
- Wood 10% - to be recycled
- Metals 5% - to be recycled
- Plastics 5% - to be recycled
- Residue 10% - to be landfilled
- Lights 25% - to be landfilled or recovered

Context

Pilsworth Landfill was previously owned and operated by Viridor Waste Management Ltd.

In April 2022, Viridor divested its landfilling operations, assets, and landfill staff to a third party (as an entire entity) under the new name of Valencia Waste Management Ltd ('Valencia').

Valencia operates a number of landfills throughout the country ranging from Dunbar, East Lothian, Scotland to Lean Quarry, Liskeard, Cornwall.

Valencia is looking to roll out a series of facilities that maximises the recycling opportunities for waste heading to its operational landfills. On certain sites Valencia will be able to utilise existing buildings but other sites will require new build facilities.

The premise of the facilities is to intercept the commercial and industrial waste that is heading for landfill and extracting recyclable materials which would then be removed from site for recycling/re-use/recovery by third parties elsewhere. Any domestic/putrescible waste by would by-pass the facility to landfill as per current arrangements. The proposed development could attract a third-party construction/demolition/excavation waste. This material will be segregated into recyclables and soils/rubble that can be used as engineering materials and daily cover on the landfill. Any putrescible waste will again bypass the facility and be directly landfilled.

1 Introduction

1.1 Synopsis

This statement supports a planning application the development of the Material Recycling Facility at Pilsworth Landfill. The landfill is consented to operate until 2028 however a further application will be submitted to extend this further in due course.

The purpose of the facility is to intercept and extract recyclable materials from the commercial and industrial waste that is heading for landfill, which would then be removed from site for recycling/re-use/recovery by third parties elsewhere. Any domestic/putrescible waste would by-pass the facility to landfill as per current arrangements. The proposed development could also attract third-party construction/demolition/excavation waste and much of this material will be segregated into recyclables and soils/rubble that can be used as engineering materials and daily cover on the landfill. Any putrescible waste within this waste stream will again bypass the facility and be directly landfilled.

Previous applications have included proposals similar to this application (approved under Bury MBC planning ref: 47617) which would have been closely associated with the existing landfilling operations - but was not constructed.

1.2 Planning History

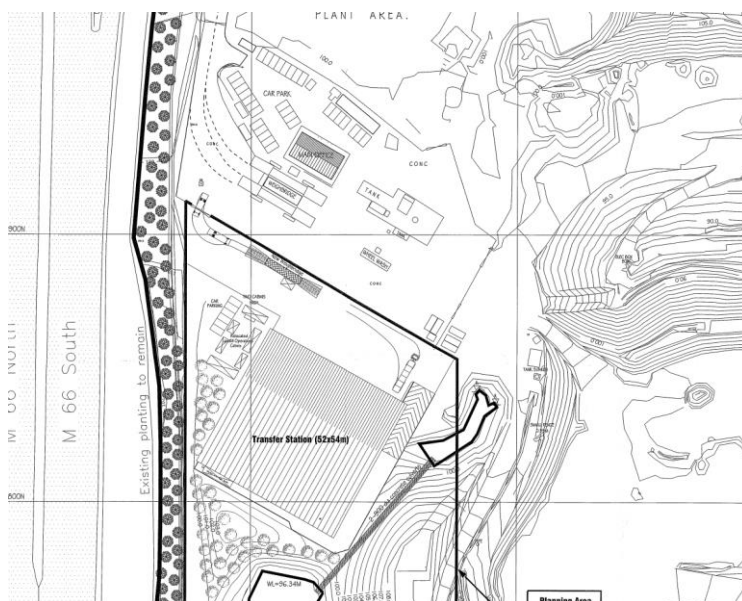
The planning history of the site is important as it identifies the extant consent for landfilling at the site and also establishes that a similar development to the one proposed in this instance has already been approved:

54563 – 25/01/12 – Scrap metal and aggregate/soils recycling facility – updated 14/02/12
54012 – 09/08/11 – Waste Reception, Transfer, Recycling and Pre Treatment facility – updated 25/08/11
45528 – 01/03/06 – Extraction of Sand and Gravel from extension area prior to creation of approved landscape buffer zone including in part backfilling and restoration with controlled waste
47617 – 21/05/07 – Waste Reception, Transfer Recycling and pre-treatment facility
49899 – 19/06/08 – Retention of existing modular type building that is used as an Environmental Education Centre
51132 – 13/05/2009 – Green waste reception and shredding facility for a period of 27 months

53453 – 09/05/12 Vertical and lateral extension, re-phasing and enhanced restoration and ecological scheme within the consented site boundary – implemented
59691 – 08/08/16 Erection of leachate storage tanks and associated works – not yet implemented
62626 – Non-material amendment following grant of planning permission 59691 for change to the layout of the proposed leachate tanks and a reduction in the height of the proposed tanks – not yet implemented

Two of the above-mentioned planning applications are particularly relevant to this applicant. Firstly, the extant consent for landfilling ref: 53453 which allows landfilling to continue at the site until 2028. An application will be submitted in due course to seek an extension to landfilling operations.

Secondly, the planning approval ref: **47617** for a 'Waste Reception, Transfer Recycling and pre-treatment facility' which was proposed on land to the south of the offices/weighbridge, as shown on the plan below.



The development now proposed will perform a similar function to this approved scheme but the location has been moved to north of the office/weighbridges.

1.4 The Planning Application

This application is submitted for full planning permission – full details of the proposed development is covered in Section 3.0 of this report.

2 The Site and its Surroundings

2.1 The Application Site

Pilsworth South Landfill lies wholly within the Borough of Bury to the east of Junction 3 of the M66. Bury town centre lies 2.5km to the north west, whilst Heywood, in the neighbouring Borough of Rochdale lies about 3km to the north east.



2.2 The Surroundings

The proposed development lies within the existing redline planning boundary of the Pilsworth South site, which covers approximately 72.6 hectares. It is proposed to extend the existing landfill boundary to the south, and to east up to the Rochdale MBC boundary.

The site lies within the setting of various industrial estates and retail parks. The M66 passes in a north-south direction immediately adjacent to the western boundary of the site. Pilsworth Road runs across the northern boundary and separates the site from Pilsworth North, a former landfill and quarry which is currently undergoing restoration. Moss Hall Road, a local B-road, runs along the eastern site boundary whilst Brightley Brook (designated as a main river) follows a course running parallel to the southern boundary at a distance of approximately 100m. A belt of undulating agricultural land

used for stock grazing lies to the east and south of the site and to the south there are a number of reservoirs currently used for fishing and recreation.

2.3 Designations

The site lies within the north Manchester Green Belt

2.4 Site Access

Access into the site will remain unaltered.

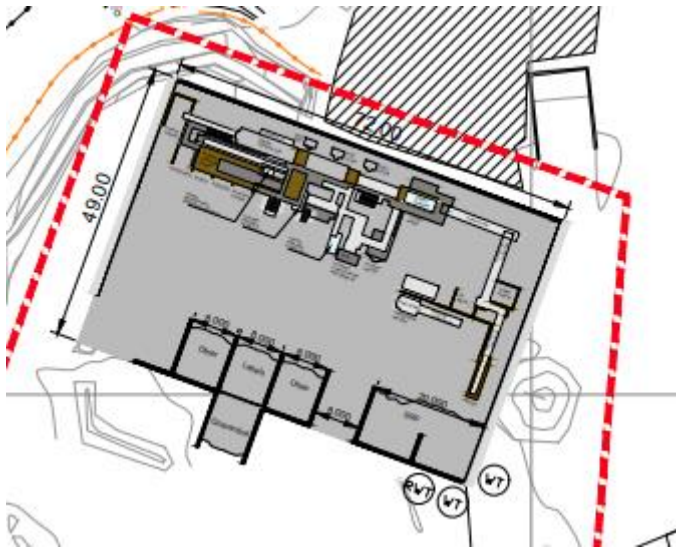
2.5 Identified Receptors

Pilsworth South is surrounded by a small number of sporadic residential receptors. The nearest residential property to the landfill operations is Jackson Fold some 60m to the north of the existing landfill boundary on the opposite side of Pilsworth Road. The Three Arrows Inn and a set of three cottages (The Boskins/Whippletree Cottage/Coal Pits Farm) lie 235m and 400m east of the proposed landfill boundary respectively. Four dwellings known as Pilsworth Cottages abut the Pilsworth South Landscape Buffer Zone (LBZ) some 320m south of the consented landfill boundary. Further south of the site, and beyond the deeply incised valley of Brightley Brook, there are a number of scattered dwellings; all of these are over 500m from the Landscape Buffer Zone. A group of dwellings known as Hollins Estate lies further afield over 600m from the proposed development site on the opposite side of the M66.

3 The Proposed Development

3.1 Design and Layout

The drawings of the proposed development and its location on site are shown on the attached plans. The building will measure 52m by 39m with an eaves height of approximately 9m and a ridge height of circa 12.5m. The building will be steel portal frame on breeze block with internal breeze-block push walls.



Full plans and Elevation drawings are also enclosed.

No fencing or lighting is currently proposed however it is considered that these could be dealt with by subsequent details pursuant conditions if they are deemed necessary in the future.

The plant/equipment will extract recyclables and inert materials. A combination of Shredder, Long-Part Separator (removes long items from the process), Incline Magnet (removes ferrous metals), Combi Screen (removes fines), Eddy Separator (removes non-ferrous metals and Picking lines (to remove wood and plastics) will typically sort the inputs into composition (% by weight) of:

- Hardcore 30% - to be used on site for engineering, daily cover and/or capping
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- Plastics 5% - to be recycled
- Residue 10% - to be landfilled
- Lights 25% - to be landfilled or recovered

The process is likely to employ upto 6 FTE's.

3.2 Access

The MRF will be accessed via the existing road junction utilising the existing weighbridges and offices

3.3 Post Operation

The proposed developments will be removed from the site during the restoration of the landfill.

4 Policy Context

4.1 The Development Plan

This section sets out the local and national planning policies as well as material considerations which are relevant, both to the application site, and the type of development proposed. Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with the provisions of the Development Plan unless material considerations indicate otherwise.

The development plan for the application, the site and surrounding area comprises:

- The Bury Unitary Development Plan (UDP) 1997

The following table provides an appraisal of the development plan policies relevant to the site and the development proposals:

Policy	Commentary	Residual Impacts
Objective 6: To encourage waste minimisation, recycling and alternative methods of waste disposal.	The proposed development is looking to bring waste that would otherwise be landfilled (and indeed is destined to be landfilled) further up the waste hierarchy thus fully supporting the principles attached to the waste hierarchy. As a proportion of the waste will still be landfilled or used for landfill engineer and daily cover the proposed development also fully supports the proximity principle and is ideally co-located at the landfill.	None
MW3/2 - Waste Recycling and Bulk Reduction The Council will, without prejudice to other policies and proposals of the UDP, give favourable consideration to proposals which facilitate the economic recycling and reclamation of waste	The proposed development would utilise the existing contracts for commercial wastes but will also attract local construction, demolition, excavation wastes – thus catering for the needs of the local area.	None

materials and the bulk reduction of waste.		
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The table above demonstrates that the proposed development in this location conforms to the development plan.

Greater Manchester Waste Development Plan

The Greater Manchester Joint Waste Development Plan Document (the 'Waste Plan') formally became part of Development Plan. The waste plan was prepared jointly between the ten Greater Manchester authorities, and it identifies how Greater Manchester will deliver the spatial vision for waste development to 2027.

The overall aim of the Waste Plan is to provide a sound spatial planning framework to deliver sustainable waste management in Greater Manchester consistent with national planning policies and the Waste Strategy for England 2007. The purpose is to provide sufficient opportunities for new waste management facilities to come forward within Greater Manchester. In this regard the relevant policies of the Waste Plan include:

Objective 2: To promote the movement of waste up the waste hierarchy, assuming minimisation at source, increasing reuse, recycling and recovery, whilst recognising there may still be a need for additional landfill capacity for residual wastes.

Objective 8: To reduce waste movements and, where waste needs to be moved, to promote the sustainable movement of waste across the sub-region.

Policy 6 - Inert residual waste disposal

This policy states that applications for inert residual waste disposal will be permitted where the applicant can demonstrate that: (i) the proposal meets the requirements of the Waste Plan, relevant Core Strategy and other relevant national and local planning policy, including the requirement to move waste up the hierarchy; and (ii) the proposal contributes to the Waste Plan aim and objectives.

4.2

National Policy

National Planning Policy Framework

The latest version of the National Planning Policy Framework (NPPF) was published on 20 July 2021 and it sets out the government's planning policies for England and how these should be applied in, inter alia, the determination of planning applications. The NPPF is therefore a material consideration in all planning decisions. In this instance the NPPF should be read in conjunction with the government's planning policy for waste (see below).

Key to the NPPF is paragraph 8 which states that:

'Achieving sustainable development means that the planning system has 3 overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives):

- ***an economic objective*** – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure
- ***a social objective*** – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and
- ***an environmental objective*** – to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy'.

At the heart of the Framework is a presumption in favour of sustainable development.

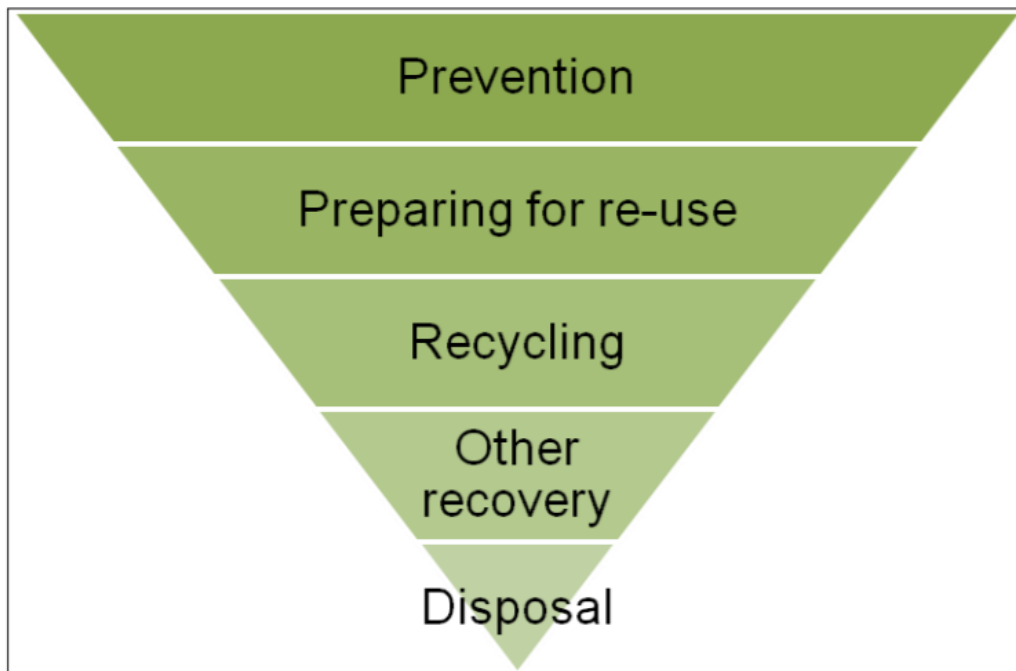
The proposed development is seeking to provide infrastructure to promote sustainable waste management. The facility will help to minimise waste by removing recyclable materials from waste streams heading to landfill. Recycling materials saves energy, cuts carbon emissions and reduces reliance on the use of finite resources. The scheme makes the economy less linear and more circular and sustainable.

Further reference is made to the NPPF below with reference to Green Belt policy.

1) National Planning Policy for Waste (NPPW)

The NPPW was published on 16 October 2014 and sets out the government's ambition to work towards a more sustainable and efficient approach to resource use and management.

Appendix A of the NPPW sets out the principles of the waste hierarchy. The waste hierarchy provides a sequential preference as to how waste should be prevented and treated.



The various stages of the hierarchy are:

1. **Prevention:** The most effective environmental solution is often to reduce the generation of waste, including the re-use of products.
2. **Preparing for re-use:** Products that have become waste can be checked, cleaned or repaired so that they can be re-used
3. **Recycling:** Waste materials can be reprocessed into products, materials, or substances.
4. **Other recovery:** Waste can serve a useful purpose by replacing other materials that would otherwise have been used.
5. **Disposal:** The least desirable solution where none of the above options is appropriate.

Clearly the higher up the hierarchy the greater the preference.

Also, two key planks of the NPPW are to:

'delivery of sustainable development and resource efficiency, including provision of modern infrastructure, local employment opportunities and wider climate change benefits, by driving waste management up the waste hierarchy

and by

'helping to secure the re-use, recovery or disposal of waste without endangering human health and without harming the environment'.

The NPPW also states that:

'When determining waste planning applications, waste planning authorities should: only expect applicants to demonstrate the quantitative or market need for new or enhanced

waste management facilities where proposals are not consistent with an up-to-date Local Plan'.

The proposed development will look to extract recyclable material out of waste streams heading for disposal and making them available for recycling thus pushing waste inputs up the waste hierarchy and providing a more sustainable waste treatment option.

4.3 Other material considerations (Policy)

The following section provides a snap-shot of current Government policy and strategy on waste, recycling and the cyclical benefits of recycling. It also demonstrates that there is a groundswell of policies that fully support the principle of the proposed development.

Circular Economy Package policy statement - published 30 July 2020

The UK is committed to moving towards a more circular economy which will see us keeping resources in use as long as possible, extracting maximum value from them, minimising waste and promoting resource efficiency. The Circular Economy Package (CEP) introduces a revised legislative framework, identifying steps for the reduction of waste and establishing an ambitious and credible long-term path for waste management and recycling.

25 Year Environment Plan

This 25 Year Environment Plan sets out government action to help the natural world regain and retain good health.

The ambitious proposals will tackle the growing problems (such as) waste. Its that that:

'Our 25-year goals By adopting this Plan we will achieve: (inter alia)

5. Using resources from nature more sustainably and efficiently.

In addition, we will manage pressures on the environment by: (inter alia)

8. Minimising waste.'

Chapter 4: Increasing resource efficiency and reducing pollution and waste

1. Maximising resource efficiency and minimising environmental impacts at end of life.

iv. Improving management of residual waste

We want to make sure that materials ending up in the residual waste stream are managed so that their full value as a resource is maximised and the impact on the environment of treating them is minimised.

It also states that:

We will:

- *Make sure that resources are used more efficiently and kept in use for longer to minimise waste and reduce its environmental impacts by promoting reuse, remanufacturing and recycling.*

- *Work towards eliminating all avoidable waste by 2050 and all avoidable plastic waste by end of 2042*

Sustainable growth can go hand in hand with less waste and a smarter use of resources. We know that well-designed and delivered regulation, taxes and charges contribute to cleaner growth: the landfill tax has been instrumental in reducing the amount of waste dumped in the ground by 44% since 2000. The aggregates levy has hugely incentivised use of recycled aggregate'

The Clean Growth Strategy 'Leading the way to a low carbon future'

This states that *'Clean growth means growing our national income while cutting greenhouse gas emissions¹. Achieving clean growth, while ensuring an affordable energy supply for businesses and consumers, is at the heart of the UK's Industrial Strategy'*.

With regard to waste it states that *'.....Innovative techniques are also needed to reduce the impact of landfills at the end of their use'*.

Resources and waste strategy for England 'OUR WASTE, OUR RESOURCES: A STRATEGY FOR ENGLAND' 2018

This strategy sets out how the UK will preserve material resources by minimising waste, promoting resource efficiency and moving towards a circular economy in England.

This strategy sets out how UK plans to double resource productivity and eliminate avoidable waste of all kinds (including plastic waste) by 2050.

Our strategy sets out how the UK will (inter alia):

- *preserve our stock of material resources by minimising waste, promoting resource efficiency and moving towards a circular economy*
- *minimise the damage caused to our natural environment by reducing and managing waste safely and carefully*

The strategy aims to improve recycling rates by ensuring a consistent set of dry recyclable materials is collected from all households and businesses. It highlights that recycling makes the material content of products that can no longer be repaired or reused available to be used in new products. It spares the environment the carbon impacts of extracting and processing virgin materials, and of managing wastes through energy recovery or landfill.

Analysis – The proposed development will meet the criteria of what is considered sustainable development as set out in the NPPF and therefore there is a presumption in favour of the development. The facility will also meet the requirements of driving waste up Waste Hierarchy by maximise recycling, recovery and re-use opportunities and making disposal a last resort. This also adheres to the government's 25 year Environment Plan and Waste Strategy. It is clear that supportive policy considerations should be given significant weight when considering the merits of this proposed development.

5 Green Belt Policy

The application site lies with the North Manchester Green Belt and therefore careful consideration is required as to whether the proposed development is deemed acceptable in Green Belt policy terms.

One key characteristic of Green Belt is its permanence and this is reflected both in physical terms and policy terms. Firstly, the purposes of the Green Belt have remain unchanged since its inception. In 1995 Development Plan OL1 - GREEN BELT stated that:

'The Council will maintain a Green Belt, ensuring that it fulfils the following strategic purposes:

- *to check the unrestricted sprawl of large built-up areas;*
- *to prevent neighbouring towns from merging into one another;*
- *to assist in safeguarding the countryside from further encroachment;*
- *to preserve the setting and special character of historic towns;*
- *to assist in urban regeneration, by encouraging the recycling of derelict and other urban land'.*

And its clear that despite its age the UDP policy on Green Belt hasn't changed as the 2021 NPPF in paragraph 138 states that Green Belt serves 5 purposes:

- (a) to check the unrestricted sprawl of large built-up areas;*
- (b) to prevent neighbouring towns merging into one another;*
- (c) to assist in safeguarding the countryside from encroachment;*
- (d) to preserve the setting and special character of historic towns; and*
- (e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.*

To this end it is clear that the strategic aims of Green Belt remain unaltered.

It is also clear that the presumption against development in the Green Belt remains unaltered since its inception. The policy position on the green belt remained largely unchanged when the National Planning Policy Framework (NPPF) was revised in July 2018 and again in 2021 It says local planning authorities should regard the

construction of new buildings as inappropriate in the green belt, with a few specific exceptions. Beyond that, it states that "inappropriate development is, by definition, harmful to the green belt and should not be approved except in very special circumstances".

The NPPF confirms what that means in practice: "When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the green belt. 'Very special circumstances' will not exist unless the potential harm to the green belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations."

Where the potential harm is "clearly outweighed by other considerations" this can justify inappropriate development in the Green Belt (Para 144 NPPF) and represent "very special circumstances". There is no definite list for what will constitute very special circumstances, but the threshold can be high and will turn on the facts and circumstances of the individual application.

'Stricter test' than para 83/136 re: exceptional circumstances – see R (Luton BC) v Central Bedfordshire Council [2015] EWCA Civ 537, para 54, Sales LJ; • All factors which tell in favour of the grant can go to making up 'vsc', which may or may not suffice. It is not necessary to go through the process of considering whether a factor is or is not a very special circumstance: R (Lee Valley Regional Park Authority) v. Broxbourne BC [2015] EWHC 185 (Admin); SSCLG v. Redhill Aerodrome Ltd [2014] EWCA Civ 1386.

Its also clear that inappropriate development should not be located in Green Belt if there are suitable non-Green Belt locations available.

NPPW states in paragraph 6 that:

Green Belts have special protection in respect to development. In preparing Local Plans, waste planning authorities, including by working collaboratively with other planning authorities, should first look for suitable sites and areas outside the Green Belt for waste management facilities that, if located in the Green Belt, would be inappropriate development. Local planning authorities should recognise the particular locational needs of some types of waste management facilities when preparing their Local Plan.

Whilst the abovementioned paragraph primarily relates to plan-making, as opposed to development management decisions, it is clear that any waste development should be cognisant to opportunities for located waste development outside Green Belt sequentially in advance of locating facilities which Green Belt locations.

Response

All of the above demonstrates that the permanence of Green Belt also includes its own policies and that Green Policy has barely altered since PPG2 - which was published in 1995. The previous application (47617 dated 21/05/2007) for a virtually identical 'Waste reception, Transfer, Recycling and Pre-treatment facility' was approved with a virtually identical Green Belt policy background and the application was granted for the following reason(s):

'Permission should be granted having regard to the policies and proposals listed and the reason(s) for granting permissions can be summarised as follows:-

Although the application involves inappropriate development in the Green Belt, it includes a satisfactory case for 'very special circumstances' to justify the development. The visual impact of this temporary development would be mitigated sufficiently by existing and additional screen planting and through the design of the building. Given its temporary status, the development would not prevent the restoration of the site to informal recreational uses for the benefit of the wider community in accordance with the approved scheme. There are no other material considerations that outweigh this finding'.

The proposed MRF, by its very essence, is located on site to receive wastes that would ordinarily be deposited at the site. Therefore, it is very much ancillary to the current activities on-site. Now whilst 'ancillary development' for existing development isn't necessary considered to be not inappropriate it is clear in this instance the MRF and the landfill are inextricably linked.

The linkage between the MRF and the landfill and the overwhelming need to locate the MRF immediately adjacent to landfill can be considered a very special circumstance that would help justify the development.

Other very special circumstances include:

- 1) Pilsworth Landfill is a key strategic waste facility and Greater Manchester residual waste would need to travel long distances if Pilsworth was not available – thus increasing the carbon impact of Greater Manchester's waste disposal.
- 2) Greater Manchester's waste would have to travel even further to find a suitable landfill with front-end recycling facilities which extracts recyclables from the residual waste stream.
- 3) The proposed development is temporary in nature and therefore does not impact on the permanence of the Green Belt. Prior to the cessation of landfilling the building/machinery will be removed and the land restored to a green-field site.

To this end there is sufficient justification for considering that very special circumstances prevail in this instance and that there have been no changes to Green Belt policy (material or otherwise) that would alter that conclusion when compared with the decision to approve a similar scheme in 2007.

6 Summary of Environmental Effects

Environmental Considerations

Appendix 2 of the NPPW provides the environmental considerations that should be applied to waste/recycling related developments.

a. protection of water quality and resources and flood risk management

The application site does not sit within floodplain. The building will be connected to the main drain and not cause flooding elsewhere. This is confirmed by the FRA included as part of planning application submission.

b. land instability/ground conditions

A Ground Investigation Report was submitted in support of the application and concludes that:

'Based on available information summarised in this report, the ground conditions beneath the site are considered to present an overall moderate/low risk to the future development. There are number of potential environmental and geotechnical constraints that need to be fully investigated and assessed once the final development proposals and layout are known. It is considered that some mitigation measures will be necessary given the subsurface geology at the site.'

It is suggested that the mitigation measures identified in the report can be secured by way of planning condition(s).

c. landscape and visual impacts

An LVA has been produced in support of this planning application. This Report concludes that:

'The magnitude of change on the landscape during construction was Low-(Medium) Adverse reducing to Low Adverse upon completion. The significance of effect on the low sensitivity of the landscape was Slight-(Moderate) Adverse during construction reducing to Slight Adverse upon completion. As it is temporary and would be removed once the landfill had reached the end of its working life, the character of the landscape would be improved once the landfill restoration has been undertaken.'

'The Site was assessed on the impact on visual amenity. It was determined that visual effects were minimal and that there were no moderate or major adverse significance of effects. Any views of the site were mostly screened by intervening vegetation or were of an existing industrial nature with little effect on the experience of the view.'

'The site was assessed on the effect on the openness of the Green Belt and was found to have a highly localised minor effect at the access to Pilsworth Landfill. The remaining area of Green Belt would not be affected due to intervening topography and vegetation limiting views across the landscape.'

'As the site remains well hidden, is contextual with its working landfill setting, and is temporary and reversible, it is considered that the proposed development complies with the policies identified in Chapter 3.'

d. nature conservation

A Preliminary Ecological Appraisal Report has been submitted in support of the planning application. This report concludes that:

'A desk-based study and a field study were conducted in order to identify habitats and determine the suitability for any 'protected and notable' species to occur on site. The site consists of a hard standing area used for heavy plant and machinery storage. There is no vegetation present. The area is not suitable to support Protected Species'.



The attached photo shows the location of the proposed MRF and confirms that there is no habitation within the application site. To this end there will be no impact on any features of nature conservation.

e. conserving the historic environment

The proposed development will sit on already despoiled land and therefore there will be no archaeological impacts. The site is not within a Conservation Area and the proposal will not affect the setting of any Listed Buildings.

f. traffic and access

The MRF would have a maximum capacity of 150,000tpa. The proposed development will not increase inputs to the site. However, the proposed development will now result in a number of vehicles leaving the site will recyclable material.

The manufacturer specifies that, depending on likely inputs the recyclable content will be:

- 10% Wood
- 5% Glass
- 5% Plastic

Based on a typical month input of 15,000 tonnes per month would equates to the recycling of:

- 1500 tonnes of wood
- 750 tonnes of plastic
- 750 tonnes of glass

The material would be removed from site by 20t bulkers but assuming a load of 18.6t is removed per trip would equate to:

	2-way movements per month	2-way movements per week	2-way movements per day
Wood	80	18	4
Plastic	40	9	2
Glass	40	9	2
<u>Total</u>	160	36	8

Therefore, the proposed development will generate this than an additional 1 two-way movement per hour to the site.

g. air emissions, including dust

The recycling will take place within the confines of a building and therefore dust will be contained. However, a Dust Management Plan was submitted as part of the Environmental Permit application and it is repeated for the purpose of planning application.

h. odours

No putrescible waste will be processed through the facility and therefore no odours will be generated or released.

Putrescible waste will not be suitable for treatment at the MRF. Household waste and similar materials, with a high proportion of food waste or other putrescible material, will be identified at the pre-acceptance stage and will be directed to the landfill. Only wastes with a low putrescible content, such as construction and demolition wastes and some commercial and industrial wastes, will be directed to the MRF.

Waste will be unloaded inside the MRF building. The building is fitted with fast acting roller shutter doors which will, as far as possible, be kept closed except for allowing vehicle access and egress.

Waste will be dealt with on a first in first out basis and non inert waste will be turned round within 72 hours to minimise the risks of odour from aging waste and all bays will be emptied on a regular basis. Should any stockpile within the MRF generate a strong odour it will be prioritised for removal from site with an aim for it to be moved before the end of the working day.

Cleaning will be undertaken as necessary to prevent the build up of any waste residues.

i. vermin and birds

With the recycling taking place within the confines of a building it is highly unlikely that the facility will attract birds. Standard pest control measures will be used to control vermin.

j. noise

A Noise Impact Assessment has been produced in support of this planning application.

This concludes that the results of the noise assessment and detailed analysis have shown the following:

- a) Predicted noise levels from the operation of the MRF, HGV movement and mobile plant operation, show that the site rating noise level would be well below representative background sound levels and would therefore result in a **low impact** according to BS4142: 2014+A1:2019.
- b) The noise level from site would also be **well below appropriate design levels** within living rooms according to BS8233: 2014 for internal levels within sensitive rooms of dwellings assuming an open or closed window.
- c) The results of noise calculations (in accordance with BS5228-1: 2009+A1:2014) of the highest likely noise levels generated during the construction phase show that, during peak noise generated periods, noise levels are unlikely to exceed typical residual noise levels and would be well below threshold guidance levels at residential NSR and best practice would be applied to control and minimise noise.

The assessment concludes that the proposed operation of the MRF would generate noise levels well within relevant noise standards and guidelines at nearest sensitive receptors and therefore noise would be **not significant**.

This summary demonstrates the benign nature of the changes and no neighbouring properties will be affected by these minor changes.

7 Planning Balance and Conclusions

7.1 Introduction

Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that planning applications should be determined in accordance with the development plan - unless material considerations indicate otherwise.

Paragraph 38 of the NPPF also states that *'Local planning authorities should approach decisions on proposed development in a positive and creative way. They should use the full range of planning tools available, including brownfield registers and permission in principle, and work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area. Decision-makers at every level should seek to approve applications for sustainable development where possible'*.

7.2 Concluding Statement

When considering the planning balance for the proposed development there are four key issues:

- Is the application in accordance with the development plan?

The principle of the development is fully supported by development plan policy.

- Green Belt

The proposed development does not affect the purposes of Green Belt.

There is sufficient justification for considering that very special circumstances prevail in this instance and that there have been no changes to Green Belt policy (material or otherwise) that would alter that conclusion when compared with the decision to approval of a similar scheme in 2007.

- Does that application constitute sustainable development?

The proposed development is considered to be sustainable development as defined in the NPPF. The proposed development is of the right type, in the right place and will operate at the right time. The proposed development will improve waste/recycling infrastructure, minimise waste and help mitigate the impacts of climate change.

- Are there any material considerations that outweigh the development plan or the presumption in favour of sustainable development?

There are a plethora of waste, climate change and environmental government policies that support the proposal and there are no significant environment impacts likely to occur. The proposed development seeks to minimise the amount of waste and maximise

recycling opportunities whilst seeking to ensure that the landform is complete by 2030. The application site and the proposed building are visually well contained and do not cause any significant visual impact. The proposed increase in traffic will be marginal and there will be no impact on any features of ecological importance.

The supportive planning policy background and with no demonstrable harm likely to be accrued it is respectfully requested that the application is approved.

