## BELBROUGHTON and FAIRFIELD PARISH COUNCIL
## (BROMSGROVE DISTRICT)

**John Farrell**
**Clerk**
**e mail: belbroughtonpc@live.co.uk**
**tel: 01299 270722**

**Millers Cottage**
**Pinkham**
**Cleobury Mortimer**
**Kidderminster**
**Worcs. DY14 8QE**

**Worcestershire County Council**
**County Hall**
**Spetchley Road**
**Worcester WR5 2NP**

**5th July 2016**
Your Reference 13/000027/CM

**For the attention of Mr. Steven Aldridge, Principal Planner**

Dear Mr. Aldridge,

**Application Ref: 13/000027/CM Grid Ref: (E) 395286, (N) 276078**

Applicant: Veolia Environmental Services Ltd

Proposal: Construction and operation of an Incinerator Bottom Ash (IBA) Recycling Facility accepting 120,000 tonnes per annum along with ancillary / welfare facilities and operation of mobile equipment on site.

Location: Veolia, Sandy Lane, Wildmoor, Bromsgrove, B610QT

Thank you for your letter dated the 27th of April 2016 enclosing a complete copy of the applicant's documentary information.

Belbroughton and Fairfield Parish Council believes that across a range of matters this planning application is 'inappropriate development' and that the applicant has not demonstrated the 'very special circumstances' required by both national and local planning policy to justify locating this type of development on the Sandy Lane site.

**1. LOCATION – EXISTING SITE RESTORATION AGREEMENT**

It is unclear whether the application is for a temporary consent until the restoration of the site, or whether it is for a permanent facility. Reference is made within both the April 2013 and the March 2016 Veolia Statements to the facility being temporary including a statement that the IBA recycling facility is proposed *"…for a temporary period and would not prevent the future restoration of the site."*

However, reference is also made to the proposal providing a *"significant benefit compared to the approved restoration…"* which, together with other statements strongly indicate that a permanent consent is being sought.

Indeed, the covering letter with the application (dated 16 March 2016) states that "*…Veolia has indicated that it is willing to give up the rights to infill this area and to implement, in accordance with a scheme to be agreed with Worcestershire County Council…*". The area being referred to is the Eastern Quarry for which Veolia already have an extant permission to landfill. They seem to be indicating that they would be willing not to land fill this quarry if the application for the IBA Plant was approved – a trade off. This is contrary to planning legislation which requires that each application should be considered on its own merits.

Within Part 9, Paragraph 81 of the National Planning Policy Framework (NPPF), reference is made that local planning authorities should *'plan positively to enhance the beneficial use of the Green Belt*' and *'to retain and enhance landscapes'*.

Paragraph 143 of the NPPF, which relates to Facilitating the sustainable use of minerals, states that – '*In preparing Local Plans, local planning authorities should - 'put in place policies to ensure worked land is reclaimed at the earliest opportunity*'. More so under Paragraph 144 the NPPF notes that when determining applications local planning authorities should provide for the *'restoration and aftercare at the earliest opportunity to be carried out to high environmental standards'.*

Worcestershire County Council, requires the restoration of the site as a result of planning permission 107110/DC5060/5 (B2000/0015) for the Western Quarry sand pit, which under a Review of the Old Mineral Planning Permission (ROMP) issued a determination of new conditions for the quarry. We understand that the review of the minerals permission (ROMP) for this site was scheduled to start in March 2015.

Reference is also made by the applicant to the adjacent Veolia landfill site permission 407292 (B91/1136), which was granted on appeal 12th November 1993. However, it is understood that landfill on this adjacent site ceased on the 4th of July 2015, and capping of the site was finished in August 2015.

When completed the additional temporary permission for the wood chipping and windrow composting facility (407646 B/2006/0088) would be revoked and the site cleared, notwithstanding the fact that it is understood that this consent has now expired with the renewal application still yet to be determined.

Given the above, understandably, there is a strong expectation in our local community that both of these sites will be fully restored and reclaimed back to the Green Belt and agricultural uses as required by the original planning permissions.

**This application seeks to negate the existing Western Quarry restoration agreement and place an industrial plant within the designated Green Belt and landscape protection area contrary to the NPPF and Policy WCS5 of the Worcestershire Waste Core Strategy (WWCS) relating to Landfill and Disposal.**

## 2. PROTECTION OF THE GREEN BELT

The application seeks to construct and operate an industrial plant which handles the burnt residues from waste incineration of household and other forms of waste. This process is by definition a **secondary recovery process**.

The NPPF seeks to help achieve, and presumes in favour of sustainable development, which *"should be seen as a golden thread running through both plan-making and decision taking"* (Paragraph 14). It goes on to require that applications for planning permission must be determined in accordance with the development plan (which includes the Local Plan) unless material considerations indicate otherwise. It also sets out what makes a proposed plan or development unsustainable.

The Wildmoor area, within the Green Belt of northern Worcestershire, has a long history of mineral extraction sites, some of which have been landfilled, and continues to receive pressure for unsuitable and unsustainable types of development. It is therefore essential that any decisions concerning development within our Green Belt should be made with a special emphasis on their sustainability and environmental benefits.

The proposed site, which was previously used for mineral extraction, is also within a landscape protection area of the Green Belt in Northern Worcestershire and cannot be considered as brownfield land.

In Section 9 of the NPPF it is stated that 'the essential characteristics of Green Belts are their openness and permanence', with the Green Belt stated as serving five purposes, one of which is 'to assist in safeguarding the countryside from encroachment'.

The proposal includes the construction of a large steel framed building (41m x 26m). The NPPF makes clear that the construction of new buildings within the Green Belt is being inappropriate, with the six exceptions noted. **None of the listed six exceptions include the construction of a new industrial building with surrounding concrete storage areas and a leachate lagoon.**

Additionally, this application is not permitted under Policy DS2 items a) to h) of Bromsgrove District Council's Local Plan (BDCLP), and Policy BDP4 of the emerging Bromsgrove District Plan (BDP) which reflects the ethos noted within the NPPF above.

As stated above, this proposed Incinerated Bottom Ash plant is a secondary recovery process. Paragraph 90 of the NPPF refers to other forms of development that are not inappropriate in the Green Belt. **Five types of development are listed and none of the five include the applicant's proposals for a factory facility to handle incinerated bottom ash as a secondary recovery process.**

**Through each of the above items within Section 9 of the NPPF this application falls outside the suitable criteria listed for possible development and should therefore be considered as 'inappropriate development'.**

Indeed, the applicants within their submission acknowledge that the development does not fall within the listed exceptions and as such requires 'very special circumstances', again thus alluding to the fact that the application is for a permanent facility and not a temporary one.

Within Paragraph 6.20.7 of the applicants April 2013 Statement reference is made to the fact that certain other forms of development are not inappropriate where they preserve the openness of the Green Belt, including mineral extraction.

Although this statement is in line with the NPPF (Paragraph 90), the applicant's reference to *"whilst the proposed development is not mineral extraction it does have many of the same requirements and characteristics of this type of development"* **is extremely disingenuous and certainly does not equate to very special circumstances.**

Such an operation does not need to take place within the Green Belt and landscape protection area, whilst the construction of large steel framed buildings are not a normal repercussion of mineral extraction.

**This application does not seek to improve the Green Belt, it seeks to exploit it and is not sustainable. This type of proposed development, as a result of its operation and function, will bring unnecessary harm to the Green Belt. The applicants have been unable to demonstrate 'very special circumstances' why this development should take place on this Green Belt site.**

**The proposal does not comply with either the NPPF or local planning policy contained within Policy DS2 of the BDCLP and Policy BDP4 of the emerging BDP as being appropriate development within the Green Belt.**

## 3. ALTERNATIVE SITE ASSESSMENT

Worcestershire's Waste Core Strategy (WWCS) was published in November 2012 and recognizes and embodies the policies contained in the Waste Management Plan for England published earlier that year and later amended in 2013.

In relation to the proposed development, Veolia Environmental Services Ltd submitted their Alternative Site Assessment (dated April 2013) as part of the original submission. This includes 1) Appendix A – long list of sites identified, 2) Appendix B detailed site criteria and scoring and 3) Appendix C short listed sites.

**It is considered to be extremely negligent that this review has not been updated as part of the additional submitted information in 2016, as more than 3 years have passed since the original survey and analysis was undertaken.**

**Although it is accepted that any such analysis is taken at a point in time, it is contended that this information is extremely out of date and does not appropriately reflect the current situation. New sites may now be available, infrastructure changed and planning policy / approach taken within a number of the planning authorities updated.**

Notwithstanding the above, at the outset the applicants state within Paragraph 1.1.1 of their 'Alternative Site Assessment that, *"A site within the West Midlands would ensure that the material does not have to travel too great a distance from its source".*

The applicants go on to state, within Paragraph 1.1.2, that '*Both the Staffordshire ERF and the Shropshire EfW are conditioned under their Planning Obligations to transport their IBA to a facility located within a maximum of 60 mile radius from them, which also forms another reason to locate the facility within the West Midlands'*.

This 60 mile radius was considered by the Inspector in the Shropshire appeal where he stated '*reasonable endeavours to transport IBA to a reprocessing/recycling facility within 60 miles of the appeal site and reporting on IBA transported to a secondary aggregate facility". The Inspector continued to state 'Furthermore, neither the establishment of a liaison group of local neighbours, nor requiring reasonable endeavours to transport IBA to a reprocessing/recycling facility within 60 miles of the appeal site, would be necessary to overcome planning objections to the proposed development or to make it acceptable in planning terms. These obligations do not meet the test set out in CIL Regulation 122, and therefore I am unable to take them into account in determining this appeal'.*

Therefore the 60 mile criteria as set out in Appendix A - 'Alternative Site Assessment' item 2.2.3 v. is not a specific requirement and should not have been considered necessary in the alternative site assessment. It is an arbitrary distance.

The WWCS (Annex A: Areas of Search) identifies a range of sites (58 in total) within the geographical hierarchy, as potentially appropriate sites to all developers for waste management facilities. These locations were assessed against basic criteria relating to policy framework, compatible land uses, infrastructure, constraints and transport links. The sites were noted as being able to accommodate a range of scales and sizes of facilities.

The applicants have conducted their own independent search for a suitable site, which whilst including some of those listed within Annex A not all are reviewed. This is a basic flaw in their assessment.

In addition, it does not appear that the applicant has liaised directly with the County Council during this process, or indeed any of the other local authorities in which they have undertaken a site search.

**For this type of operation it is fundamental that the applicants should work in partnership with Authorities to determine a suitable location and site.**

In doing so the applicants have ignored the objectives of Worcestershire's Waste Core Strategy objectives WO2, WO3, WO4 and WO8 and the Spatial Strategy set out in Figure 13: Geographic Hierarchy (GH).

The applicant's Appendix A - 'Alternative Site Assessment' – Stage 1 assessment- lists a total of 139 sites. A total of 59 sites are located in Staffordshire and the West Midland areas. Sites 69 to 93 (33 sites) are located in Worcestershire GH Level 1, sites 94 to 102 (8 sites) are located in GH Level 2, sites 103 to 113 (10 sites) are located in GH Level 3, whilst sites 114 & 115 are located in GH Level 4. The remaining 23 sites (sites 116 to 139) are considered across other areas.

The reasons given by the applicants for discounting 138 of the sites which are included with the WWCS are due to size, unsuitability, availability and incompatibility. With 35 of the 41 sites listed within GH Levels 1 & 2 referred to as 'incompatible for their purpose' with no full rationale / justification provided.

**The applicant's Appendix B - 'Detailed Site Criteria and Scoring' is a self-generated document which again ignores the objectives of the Spatial Portrait and Geographical Hierarchy. It is also very limited in its scoring procedure compared with the key physical site requirements generated, providing a very basic scoring system of 1 to 3, the equivalent of yes, maybe and no with no appropriate weighting provided given to the different criterion.**

A fundamental part of such an assessment is to obtain the local Authorities' agreement with regards to the scoring criteria, appropriate weighting and approach should be agreed with the Authority.

It is contended that the detailed scoring within the applicants Site Assessment Appendix C – 'Stage 4 Short List Site Analysis' is questionable, with several scores produced as a result of incorrect marking.
For example, for Site No. 6 (WORCB05) the 'local authority site allocation' should score 1 not 2, whilst the 'compatibility of existing land use' should score 1 and not 3, as it is now within the final weeks of a restoration programme. The 'proximity to sensitive receptors' should score 1 and not 2 due to the distance from the Beechcroft Nursery, whilst the 'proximity to cultural heritage and archaeological designations' does not recognize the nearby very special glacial feature, an SSSI underlying the Chadwich quarry area resulting from the last ice age. This should score 1 and not 2. The 'flood risk' score should be 2 as opposed to 3. Overall this site, on the applicant's own criteria, should score 35 and not 40 as stated.

Notwithstanding the above, the proposed Incinerated Bottom Ash (IBA) plant is a secondary recovery process, and as such is defined as 'Other Recovery' facilities within the WWCS (Paragraph 2.73 & 2.74). The location of such a plant should be more closely related to the source of its production in accordance with the 'proximity principle' and in accordance with WWCS Policy 4 and its explanatory text, which requires that such facilities will be directed to sites within Level 1 of the Geographic Hierarchy, or if in Level 2 'applicants should demonstrate why this is the highest appropriate level for the proposed development'.

Overall within WWCS, the Spatial Strategy regarding 'Other recovery' facilities states, "*To recognize their scale and role 'other recovery' facilities will only be enabled in Level 1 and 2 of the Geographic Hierarchy".*

WWCS Policy WCS6 'Compatible Land Uses (Table 7), for 'Other Recovery Enclosed Facilities' notes Greenfield land as 'not a compatible land use'.

The applicant's 'Alternative Site Assessment' concludes that from 139 sites there is no alternative site suitable other than the one located in the Green Belt, which is also located within in Level 5 of the Geographic Hierarchy of the Waste Core Strategy.

Within Paragraph 2.22.26 of the Planning Application Support Statement the applicant's state '*The lack of preferable alternative sites is considered to amount to a Very Special Circumstance'*.

**The 'Alternative Site Assessment' makes no attempt to recognize or work with the policies of the Waste Core Strategy, it not up to date and is inherently flawed and is based on the fact that the selected site is owned by the applicants.**

**The proposal is therefore contrary to Policies WCS4 and WCS6 of the WWCS which seek appropriate locations for such proposals.**

## 4. PROPOSED TRANSPORTATION BY ROAD

Within the applicant's 'Alternative Site Assessment', Paragraph 1.1.1, states that *"Veolia is currently in the process of constructing the Staffordshire Energy Recovery Facility (ERF)[1] and Shropshire Energy from Waste Facility (EfW)[2] (both now completed), which will combined generate approximately 78,000 tonnes of Incinerated Bottom Ash material(IBA)'* and that *"Veolia in Partnership with Ballast Phoenix Ltd (BPL) wish to construct and operate an IBA Recycling Facility to re-process the IBA generated by the two facilities".*

Out of the 120,000 tonnes per annum in total of bottom ash to be handled at the proposed Wildmoor site, the applicants intend to import the majority (65%) of the IBA material rather than handle it at a location nearer its source. This will result in an additional 70 HGV movements per day (as stated by the applicants). This importation and exportation of IBA is considered to be unnecessary and against the Policy WWCS8 and its explanatory text, which states that all developments *"…should aim to minimize the impact of the development by reducing the need to transport waste…".*

This application has purely a commercial objective and is argued tenuously on the premise that the Wildmoor location is the best option for handling IBA from their Shropshire and Staffordshire plants. This goes against their reasoning in the submitted Alternative Site Assessment (Paragraph 1.1.2), where they identify that - *"a site within the West Midlands would best meet their source travel distances, 'thriving' market conditions and transport obligations".*

**The application is contrary to the NPPF, BDP Policy BDP1 and Policy WCS1 of the WWCS which seeks sustainable development.**

[1] The Staffordshire Four Ashes ERF is 28.79 miles from the Wildmoor site. (A.A. mileage calculator)
[2] The Shropshire Battlefield EfW is 54.4 miles from the Wildmoor site. (A.A. mileage calculator)

## 5. PRINCIPAL AQUIFIER & GROUND WATER SENSITIVITY

Worcestershire County Council's Scoping Opinion (item 6.3, first paragraph, page 6) states the following that *"The proposed development would be located in a highly sensitive location for groundwater as the proposed site lies on a principal aquifer, a ground water vulnerability zone and a Source Protection Zone for Severn Trent's public water supply borehole at Wildmoor which is located approximately 1km south of the proposed site."*

The Wildmoor pumping station provides a water supply for some 19,500 homes in Bromsgrove.

The applicant, within Section 9 Hydrogeology, Hydrology and Flood Risk of their application refers to 'Groundwater Vulnerability' and states:

*"9.5.28 'The application site is situated within Source Protection Zone (SPZ) 3 of the Wildmoor abstraction. SPZ3 is defined as the area around a source within which all groundwater recharge is presumed to be discharged at the source (in this instance the Wildmoor pumping station). Therefore, there is a confirmed pathway between the aquifer beneath the site and the Wildmoor pumping station.'*

*9.5.29 'The Wildmoor sandstone formation is considered to be highly vulnerable to pollution and is within a groundwater Nitrate Vulnerable Zone (NVZ) area.'*

*9.5.30 'The Wildmoor Sandstone aquifer is a regionally important drinking water resource. The lack of superficial deposit cover and the highly permeable nature of the aquifer mean that this resource is vulnerable to pollution. As a result, the sensitivity of this receptor is considered to be high."*

The applicant proposes to construct a 'lagoon' to collect all waste water from damping down the incinerated bottom ash (leachate liquid) plus any surface water runoff and to constantly reuse the polluted water to spray and damp down the stockpiles of waste ash. The incinerated bottom ash leachate contains a range of compounds and metals including aluminium, chloride, iron, antimony, chromium, copper, lead, mercury and selenium. The resulting leachate is a toxic mixture.

The collecting lagoon is said to be designed to have sufficient capacity to contain all the water / lechate in use and any surface or storm water that drains down onto the concrete aprons. Any runoff from the undeveloped quarry area is we believe excluded from this calculation and assumed to drain naturally into the sandy soil areas.

The applicant refers to the low risk of flooding, yet within the last fifteen years increasingly flooding has occurred locally. On the 28th of June 2012 a very heavy rain storm across northern Worcestershire caused many local roads to be turned into small rivers for several hours which resulted in extensive flooding to local houses and gardens as well as the A491. Flood water simply poured off the surrounding hillsides and tracked to the nearest water courses. W.C.C. has since laid a new 225 mm drain in Top Road from the A491 to the local water course to try to alleviate potential flooding problems in the area. We also understand that ongoing drainage mitigation works are being monitored uphill at the Chadwich Quarry site where extensive recurrent flooding has occurred.

All the above is evidence that the area is now subject to periodic flooding as our environment has become increasingly wetter. In March 2016, following a period of heavy rainfall, the base of the Western Quarry was flooded, please see illustration 1. This illustration shows surface water runoff coming from the adjacent land fill surfaces on the left hand side.

Illustration 1. Water level at the base of the Western Quarry on the 9th of March 2016

The Parish Council **does not accept** the applicant's Flood Risk Assessment when it concludes in item 3.2 Fluvial Flooding, that - *'The flood risk posed to the development proposals from fluvial sources is therefore assessed to be negligible'.*

The closest adopted sewer is a combined sewer and pumping station located approximately 300m to the west of the site. Under wet conditions it is assumed that these existing drainage systems operate at full capacity.

Fiona McIntosh, Senior Water Management Officer of North Worcestershire Water Management has stated: *"Despite the apparent low risk of flooding at the site itself, it is important to note that the site is located on the watershed boundary between two catchments – the Fenn Brook, leading to the River Stour ; and the Elmbridge Brook, leading to the River Salwarpe. Both recently and historically severe flooding has been reported downstream on both water courses, and in particular the flooding through the village of Bournheath (which overlies the Elmbridge Brook) is known to suffer due to the under-capacity of the sewer network, which also takes leachate from the Veolia site. It is imperative that any changes to the site do not increase the risk of flooding elsewhere".*

As has been acknowledged this is a highly sensitive site for ground water, and with the unpredictable consequences of climate change there is a considerable risk in introducing a new large building enclosure, concrete aprons and a storage lagoon within this site.

Across the site the applicant's drawing Figure 9.3 indicates ground water levels between 140 and 144 metres AOD (recorded February 2011). The inside surface lining of the lagoon is shown at 148.50 metres AOD. Whilst this might imply a margin, with climate change, ground water levels could well surge higher during periods of excessive rain storms.

In the Flood Risk Assessment Appendix 9.1 SKM Enviros item 3.5.2. it is stated that: *'To address this problem (as well as pollution control concerns) the site operators have committed to undertaking monthly groundwater monitoring. If a significant long term rising groundwater trend was identified by this monitoring site operations would be ceased and the site cleared.'* The applicants have not defined 'groundwater trend' and have not included a risk assessment as to their timescale for such an operation, believing the risk to be too low for consideration.

**The application is contrary to the NPPF and local policy, including Policy WCS10 of WWCS which requires facilities to appropriately address drainage and flood risk.**

**6. DUST, NOISE AND SMELL**

Reference: Environment Agency - Risk Assessment 25th October 2013

**6.1 Dust.**

The Environment Agency (EA) stated that the probability of exposure to the release of particulate matter (dust) and micro-organisms (bioaerosols) in the air from the proposed plant would be high and that there is the potential for increased dust generation during prolonged dry periods e.g. summer months. To combat this the applicants would have to spray the surface stockpiles of ash to help reduce these dust emissions. In 2013 number of residents made a visit to the Ballast Phoenix Ltd., site at Tysley in Birmingham to witness for themselves what the implications for such an ash recovery process looked like. The movement of the IBA by a mechanical digger/shovel from the stockpiles up the ramp and into the separating machinery does allow for the release of dust particles to the air.

### 6.2 Smell

The raw IBA material has a PH of 11 and results in a strong alkaline odour large open stock piles of this material will have an adverse effect on the air quality, depending on wind direction to nearby residents and communities.

### 6.3 Noise and Vibration

This proposed operation is on an industrial scale. The applicants state that noise and vibration would be minimal. The residents in the nearby houses in the Madeley Road are less than 100 metres from this site. Fairfield Court and Fairfield village are some of the nearest receptors. Some 70 vehicles per day are proposed to be involved with the transportation of the bottom ash. As a result there will inevitably be considerable disturbance locally adjacent to this development.

**Accordingly the application is contended to be contrary to the NPPF and local policy, including Policy WCS14 of WWCS which requires facilities to not have an adverse impact on amenity.**

## 7. CONCLUSIONS

### 7.1 Location and Existing Site Restoration

The Local Plan and the NPPF stress the significance and importance of restoration to ensure that previously worked mineral extraction sites are reclaimed at the earliest opportunity. The proposal is contrary to the NPPF and Policy WCS5 of the Worcestershire Waste Core Strategy (WWCS) relating to Landfill and Disposal.

### 7.2 Protection of the Green Belt and Landscape Protection Area

Bromsgrove District Council's Local Plan and the NPPF make clear that this application does not meet the criteria or the requirements for which sustainable development could be considered. Decisions concerning development within our Green Belt should be made with special emphasis on their sustainability and environmental suitability.

The proposed IBA plant and its operation will bring harm to the Green Belt and should be considered as ‘inappropriate development’. The application seeks to exploit this site which is located within both the Green Belt and a Landscape Protection Area. No ‘Very Special Circumstances’ have been provided, with the applicant claiming, via a flawed site assessment, that this is the only site available in the West Midlands.

**The proposal therefore does not comply with either the NPPF or local planning policy contained within Policy DS2 of the BDCLP and Policy BDP4 of the emerging BDP as being appropriate development within the Green Belt.**

### 7.3 Alternative site assessment

Incinerated bottom ash is a secondary recovery process which is defined as ‘other recovery’ facilities (WCS items 2.73 & 2.74), should be located as close to the source of its production as possible and will be enabled only in level 1 or level 2 of the geographic hierarchy.

The applicants have ignored the Objectives of the Spatial Portrait, the Spatial Strategy and the policy and objectives of the Waste Core Strategy. From 139 sites they conclude that only the Wildmoor site in Geographic hierarchy Level 5 meets their objectives. They also then compound their claim by stating that - ‘The lack of preferable alternative sites is considered to amount to Very Special Circumstances’. The alternative site assessment and its conclusion is flawed.

**The proposal is therefore contrary to Policies WCS4 and WCS6 of the WWCS which seek appropriate locations for such proposals.**

### 7.4 Principal Aquifer and Ground Water Sensitivity, Dust, Noise and Smell

The aquifer and the Wildmoor Pumping Station supply 19,500 homes within the Bromsgrove area and is a regionally important water Source Protection Zone (SPZ). The lack of superficial deposit cover and the highly permeable nature of the aquifer mean that the resource is vulnerable to pollution and is within a groundwater Nitrate Vulnerable Zone (NVZ) area.

If developed the site drainage would have to operate independently from the nearest local sewer and be self-contained with waste liquid being removed by tankers only. Similarly if there was a ground water rebound and the site flooded the entire site volume would have to removed by tankers. The applicants have not conducted a risk assessment as to the length of time that this would take.

The cumulative effect of such a proposed development in such a sensitive ground water area is highly questionable and should not be allowed.

**The application is not supported by either the Local Plan or the National Planning Policy Framework, particularly in regard to the protection of the Green Belt or the Worcestershire Waste Core Strategy (Policy WCS10).**
**With regards to dust, smell, noise and vibration, the proposals are contrary to the NPPF and local policy, including Policy WCS14 of WWCS which requires facilities to not have an adverse impact on the amenities of local residents.**

The above matters are our major objections and we would ask that this application be refused as contrary to national, county and district planning policy.

Yours faithfully,

Signed:
John Farrell
Clerk to Belbroughton and Fairfield Parish Council

References:


- Bromsgrove District Council – Local Plan
- The National Planning Policy Framework, March 2012, Department for Communities and Local Government
- Waste Management Plan for England, December 2013, Department for Environment Food and Rural Affairs
- Waste Core Strategy for Worcestershire, Adopted Waste Local Plan 2012 – 2027, published November 2012, Worcestershire County Council
- North Worcestershire Water Management
- The Planning Inspector's Report from the 'Battlefield Energy Recovery' Inquiry
- Environment Agency : Risk Assessment 25th October 2013
- The Automobile Association web site
- The Planning Application documents submitted by Veolia E.S. Ltd.