

# Strategic Planning Committee

12 July 2021

## Dorset Council response to consultation on proposed energy recovery facility at Eco Sustainable Solutions, Parley.

### For Decision

**Portfolio Holder:** Cllr D Walsh, Planning

**Local Councillor(s):** Cllrs Rod Adkins, Julie Robinson, Ray Bryan, Barry Goringe & Andrew Parry

**Executive Director:** J Sellgren, Executive Director of Place

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**Report Status:** Public

### Recommendation:

That Dorset Council responds to Bournemouth, Christchurch and Poole (BCP) Council regarding the planning application consultation on the proposed development of an energy recovery facility, with reconfiguration of the site, at Eco Sustainable Solutions, Parley, as per the response attached at Appendix 3 to this report, which concludes that:

‘The Bournemouth, Christchurch, Poole and Dorset Waste Plan identifies a clear need for non-hazardous waste management capacity. The application provides for 60,000tpa of residual waste management capacity, making a contribution towards this need. The proposal is on a site allocated in the Waste Plan and generally in principle therefore can be considered acceptable.

However, the Waste Plan makes clear that the proposals on the allocated site will only be acceptable if it can be demonstrated that there will be no adverse effects on the integrity of European sites. The application as it stands does not provide sufficient information with regards to possible effects on European sites and therefore does not fully accord with the allocation and other policies in the Waste Plan.

The detail of the application is also considered insufficient with regards to landscape impacts and aerodrome safeguarding.

As a result, Dorset Council is not satisfied that the Environmental Impact Assessment and Habitats Regulations Assessment carried out for the proposed development provides robust evidence that all impacts, including impacts on Dorset's environment and interests, have been identified and can and will be appropriately mitigated. Therefore Dorset Council objects to the detail of the proposed development, recommends that further information is sought as outlined in this response and asks Bournemouth, Christchurch and Poole Council to ensure that further robust assessment is undertaken, and consulted on, to ensure impacts are properly understood and appropriately mitigated. Dorset Council considers that as it stands it is not possible to determine that the proposal is in accordance with the adopted Bournemouth, Christchurch, Poole and Dorset Waste Plan.'

#### **Reason for Recommendation:**

- a) Following assessment of application documents, Dorset Council is not satisfied that the Environmental Statement submitted with the planning application provides robust evidence that all relevant impacts have been identified, and can be satisfactorily mitigated. Dorset Council considers that the applicant needs to carry out further assessment to properly identify and mitigate impacts.

#### **1. Executive Summary**

This report considers Bournemouth, Christchurch & Poole (BCP) Council's consultation on the proposed development of an energy recovery facility and reconfiguration of the site at Eco Sustainable Solutions, Parley, north of Bournemouth. Dorset Council was consulted on the application (reference 8/21/0207/FUL) as an adjoining authority and has been given until 13/07/21 to respond. The report identifies the key issues associated with the proposed development, including those potentially affecting Dorset, and sets out further information received from specialist consultees within Dorset Council. It recommends that Dorset Council objects on the grounds that the Environmental Impact Assessment has not adequately addressed all likely impacts, and does not set out satisfactory mitigation based on robust evidence.

A draft officer response has been sent to BCP Council, pending endorsement by the Strategic Planning Committee.

#### **2. Financial Implications**

As a response to a planning consultation in a neighbouring authority, there are no direct financial implications associated with this decision. However, should there be unmitigated or poorly mitigated impacts from development of the site which affects Dorset, this could have financial implications for Dorset Council.

### **3. Well-being and Health Implications**

No well-being or health matters directly related to this report and its recommendations have been identified.

### **4. Climate implications**

No climate change related implications directly related to this report and its recommendations have been identified.

### **5. Other Implications**

Dorset Council seeks to ensure, through its response to this consultation, that should BCP Council ultimately give permission for this site, then development will occur in a sustainable manner.<sup>1</sup>

### **6. Risk Assessment**

Having considered the risks associated with this decision, the level of risk has been identified as:

Current Risk: Low

Residual Risk: Low

### **7. Equalities Impact Assessment**

An Equalities Impact Assessment is not a material consideration in considering this application.

### **8. Appendices**

Appendix 1 – Site location and constraints, taken from Inset 7 of the Bournemouth, Christchurch, Poole and Dorset Waste Plan (2019)

Appendix 2 – Proposed site masterplan

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<sup>1</sup> **Footnote:** Issues relating to financial, legal, environmental, economic and equalities implications have been considered and any information relevant to the decision is included within the report.

## **9. Background Papers**

Bournemouth, Christchurch, Poole and Dorset Waste Plan 2019

## **10. Background**

- 10.1 The site is an existing waste management facility located at Chapel Lane, Parley to the north of Bournemouth Airport. It lies within the Bournemouth, Christchurch and Poole administrative boundary, 430m east of the Dorset Council administrative boundary and the Parish of West Parley. Ferndown South is 725m to the north-west of the site and St Leonards and St Ives is 1.5km to the north. At its south-eastern boundary the site adjoins Hurn Common SSSI and at its south-western boundary the site adjoins Parley Common SSSI, both of which are designated as part of the Dorset Heaths SAC and Dorset Heathlands SPA. The site is located within the South-East Dorset Green Belt.
- 10.2 The site has an extensive planning history and provides a range of waste recycling and treatment functions for managing green, wood, food, soils and inert wastes. Planning permission 8/14/0515 was granted by Dorset County Council in August 2016 for the ‘proposed reconfiguration of existing and consented development; introduction of new plant and processes; increase in permitted throughput; partial widening of access road; provision of a permissive path; new landscaping and associated matters.’ The maximum permitted throughput of waste for the site is currently 266,000tpa.
- 10.3 The site is allocated in the Bournemouth, Christchurch, Poole and Dorset Waste Plan (‘the Waste Plan’). The Waste Plan was prepared by Dorset County Council on behalf of Dorset County Council, Borough of Poole and Bournemouth Borough Council and was adopted in December 2019 by both Dorset Council and Bournemouth, Christchurch and Poole Council. The minerals and waste planning team of Dorset Council offer planning policy advice to BCP Council on the adopted Plan.
- 10.4 The site is allocated through Policy 3, Inset 7 of the Waste Plan. The allocated uses are stated as: ‘Opportunities for intensification and redevelopment of the site including the management of non-hazardous waste. Waste management facilities, including incineration, that would lead to adverse effects upon the integrity of European Sites will not be acceptable.’

10.5 Appendix 1 of this report is Inset 7 of the Waste Plan – which includes a plan showing the site and constraints.

## **11. Proposed Development**

11.1 The proposal is for the construction of an energy recovery facility (ERF) situated within the north-western portion of Eco Sustainable Solutions' existing site at Chapel Lane, Parley. The proposed facility would manage 60,000 tonnes per annum of non-hazardous waste, which would be subject to pre-processing within the ERF building. From this, 50,000 tonnes would be subject to thermal combustion, providing combined heat and power with an anticipated generating capacity of 11.5 megawatts thermal and 3.4 megawatts electrical. The power would be used on site and through the local distribution network and the heat would be used on site with options being explored for use by surrounding businesses. The ERF will produce ash residues.

11.2 The proposal also comprises changes to the existing configuration of the site, including relocation of green waste composting, reduction in scale and relocation of the consented anaerobic digestion facility and demolition of offices and green waste reception building and construction of replacement administration building, car parking and landscaping.

11.3 The proposal would increase the site's total annual throughput from 266,000 tpa to 341,000 tpa comprising 60,000 tpa for the proposed ERF and an additional 15,000 tpa of green waste and wood waste. It is understood that planning permission for a bio-energy facility (8/11/0268 and 8/13/0404) will be relinquished as part of the proposal.

11.4 Appendix 2 of this report is a plan showing the application boundary and proposed development.

## **12. Key Issues**

12.1 In preparing to respond to BCP Council, advice on selected topics has been sought from internal (Dorset Council) specialist consultees and is included in the proposed response. In addition, some of the responses from BCP Council's other consultees are available on BCP Council's website. The proposed response of Dorset Council to this application as attached at Appendix 3 of this report focusses firstly on how the proposal sits with the allocation of the site in the Waste Plan and secondly on the key issues as they are perceived to affect Dorset. The proposed

response has been sent in draft to BCP Council, pending endorsement by the Strategic Planning Committee.

12.2 The key issues set out fully in the proposed response are summarised below.

- a) Acceptability in principle of the proposal – the minerals and waste team have considered the principle of the application with regards to the adopted Waste Plan. The response outlines that the proposal is generally in principle in accordance with Policy 3 and the allocated use for the site, as identified in Inset 7 of the Waste Plan. This is due to the Waste Plan identifying a need for facilities to manage non-hazardous waste that should be met through four allocated sites, of which Inset 7 is one.
- b) Detail regarding potential adverse impacts - there are a series of development considerations for Inset 7 regarding various potential impacts that must be fully addressed in order for the proposal to accord with Policy 3 of the Waste Plan. The proposal must also accord with all relevant policies of the Waste Plan, which are listed on pages 2-3 of the proposed response. It is not considered that the proposal provides sufficiently robust information and therefore it is not possible to determine whether the proposal is fully in accordance with the Bournemouth, Christchurch, Poole and Dorset Waste Plan. In particular, the response identifies the following key issues/potential impacts:
  - a. Ecological, including impacts on sites of international, national and local nature conservation importance and protected species - it is not considered that sufficient information has been provided through the application to demonstrate that emissions from the proposed development will not impact on features of the European designated sites. Further assessment must be undertaken to allow BCP Council to properly assess potential impacts and proposed mitigation. Inset 7 of the Waste Plan clearly states under the allocated uses for the site that 'Waste management facilities, including incineration, that would lead to adverse effects upon the integrity of European Sites will not be acceptable.' Dorset Council's Natural Environment Manager's comments on the proposal are included in the proposed response.
  - b. Aerodrome safeguarding – the response highlights that it will be necessary for BCP Council to fully address the objection of Bournemouth Airport to ensure that the proposal would not result in adverse impacts in relation to aerodrome safeguarding.
  - c. Landscape and visual - it is not considered that sufficient information has been provided through the application to demonstrate that there would not be an adverse landscape and visual impact, including on the Green Belt. Further assessment must be undertaken to allow BCP Council to properly assess potential impacts and proposed mitigation. Dorset Council's landscape

officer's comments on the proposal are summarised in the proposed response and also appended in full to the response.

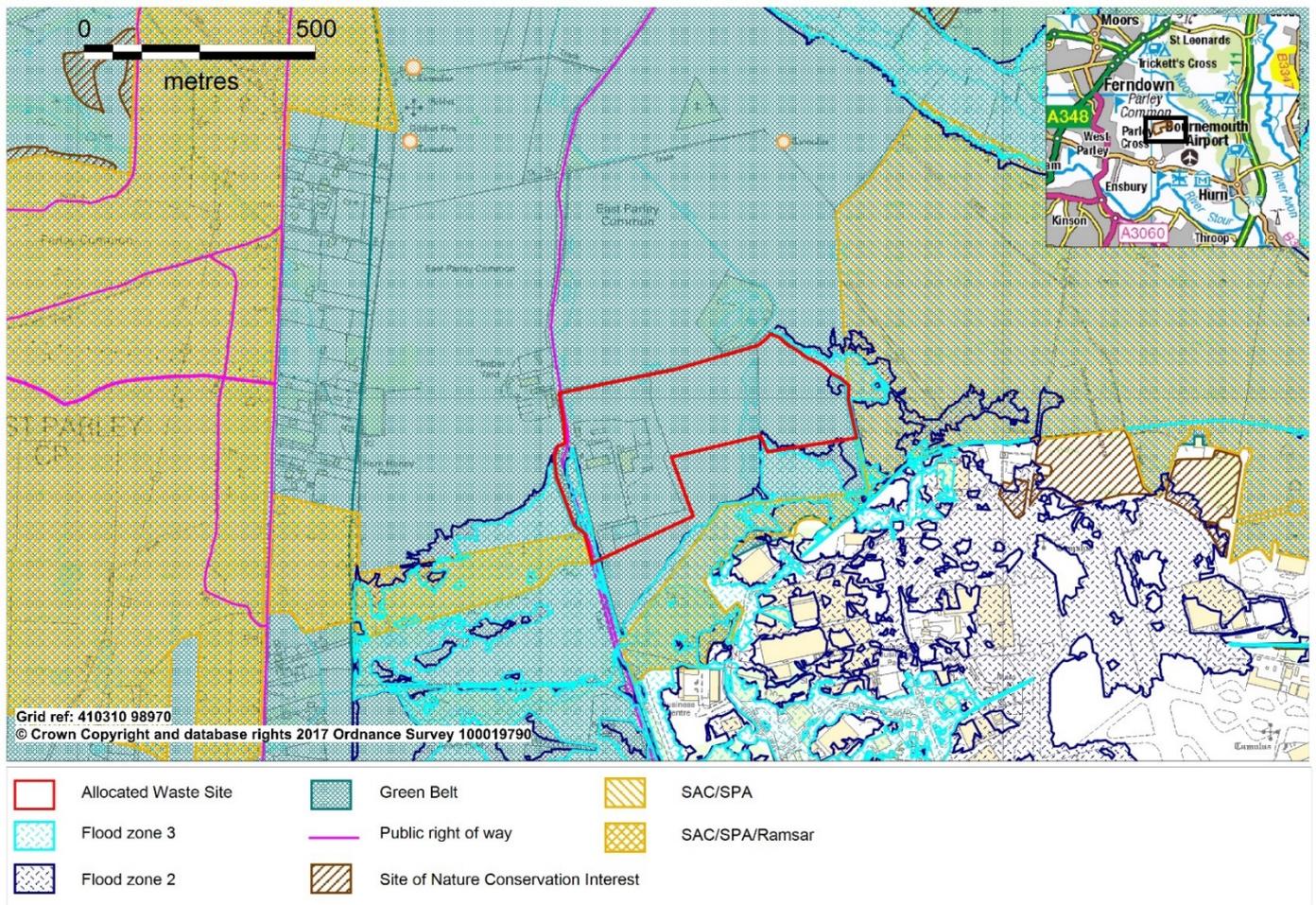
- d. Amenity – the response highlights the need for an odour management plan. With regards to air quality and noise, Dorset Council's Environmental Health Officer advises that they are content with BCP Council's approach to reviewing the submitted assessments and able to provide support on this if required.
- e. Transport – the response highlights that it will be necessary for BCP Council to ensure compliance with Policy 12 'Transport and Access' of the Waste Plan and to ensure mitigation to address congestion in the area is considered. Dorset Council's transport policy manager's informative comments are included in the proposed response.
- f. Flooding, groundwater and soil – the response notes that these matters have been addressed in the Environmental Statement and states that whilst Dorset Council doesn't have any specific comments on these matters BCP Council should be satisfied that they have been fully addressed, including in line with the Environment Agency's response to the application.

### **13 Conclusion**

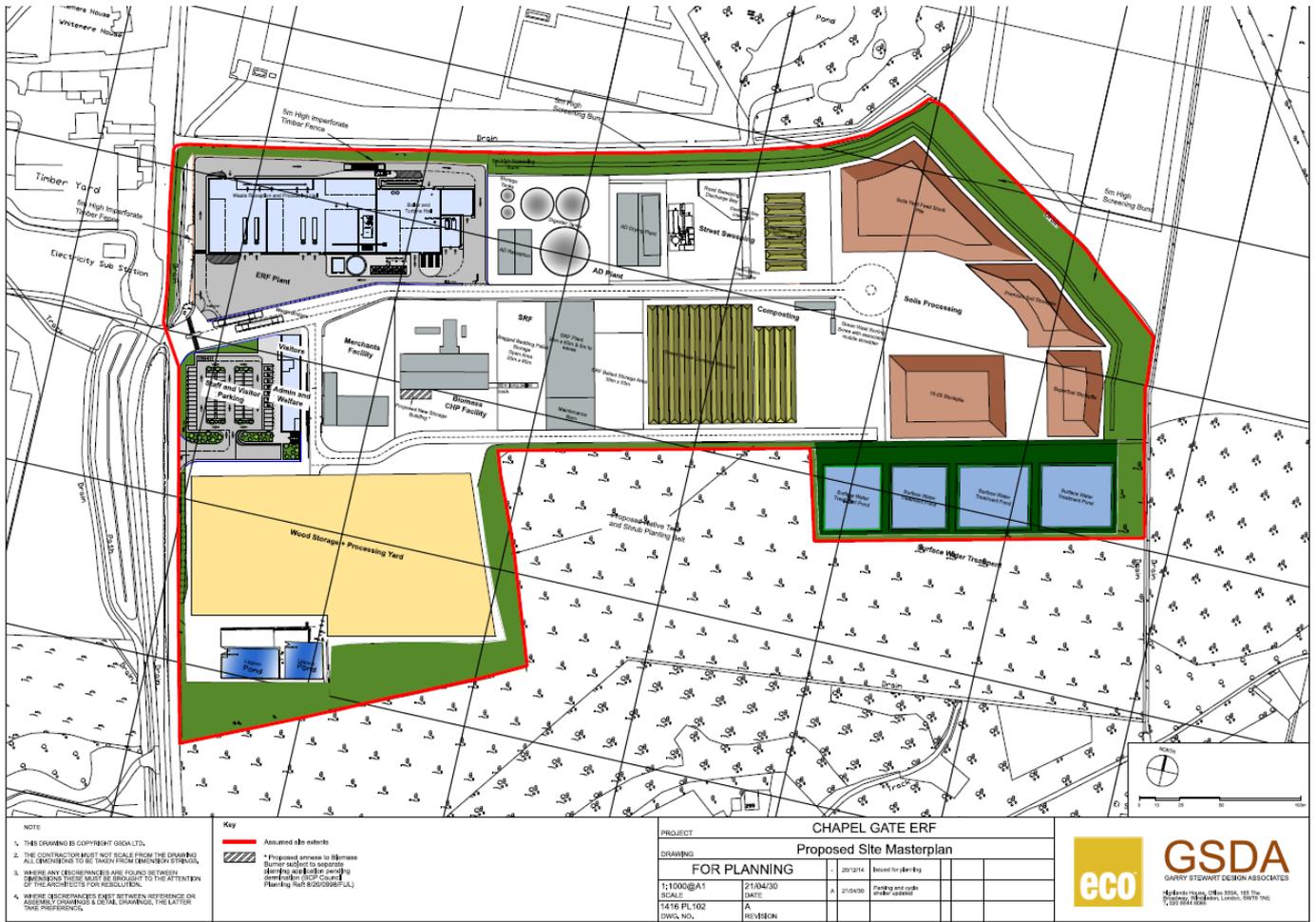
In conclusion, following assessment of the application documents, it is not considered that the Environmental Statement submitted with the planning application provides robust evidence that all relevant impacts have been identified and can be satisfactorily mitigated. It is therefore considered that the applicant needs to carry out further assessment to properly identify and mitigate impacts. It is recommended that Dorset Council objects to the application on the grounds that the Environmental Impact Assessment has not adequately addressed all likely impacts, and does not set out satisfactory mitigation based on robust evidence. It is recommended that the response attached at Appendix 3 is submitted to Bournemouth, Christchurch and Poole Council.



**Appendix 1: Site location and constraints, from Inset 7 of the Bournemouth, Christchurch, Poole and Dorset Waste Plan (Eco Sustainable Solutions, Parley)**



# Appendix 2: Proposed Site Masterplan



## **Appendix 3 – Proposed Dorset Council response**

Dear Sophie

**Application 8/21/0207/FUL: Proposed development comprising the installation of a low carbon Energy Recovery Facility for the generation of electricity and heat through a low-emission thermal process using residual waste; including a new administration building and associated car parking area; associated reconfiguration of existing and permitted uses; an increase in permitted waste throughput; landscaping and associated works.**

### **Introduction**

Thank you for consulting Dorset Council on the above application.

This response was endorsed by Dorset Council's Strategic Planning Committee, on xx June 2021.

The response considers the acceptability in principle of the proposed development in relation to the Bournemouth, Christchurch, Poole and Dorset Waste Plan ('the Waste Plan'), which was adopted in December 2019. The Waste Plan forms part of the development plan for the application site. The Waste Plan was prepared by Dorset Council on behalf of Bournemouth, Christchurch and Poole Council, and Dorset Council therefore provides advice on the local waste planning policy context. The response considers the application against the Waste Plan's strategic policies and provides some commentary in relation to its development management policies.

The response also provides comments from Dorset Council as neighbouring authority to the application site.

### **The site**

The site is an existing waste management facility located at Chapel Lane, Parley to the north of Bournemouth Airport. It lies 430m east of the Dorset Council administrative boundary and the Parish of West Parley. Ferndown South is 725m to the north-west of the site and St Leonards and St Ives is 1.5km to the north. At its south-eastern boundary the site adjoins Hurn Common SSSI and at its south-western boundary the site adjoins Parley Common SSSI, both of which are designated as part of the Dorset Heaths SAC and Dorset Heathlands SPA. The site is located within the South-East Dorset Green Belt.

The site has an extensive planning history and provides a range of waste recycling and treatment functions for managing green, wood, food, soils and inert wastes. Planning permission 8/14/0515 was granted by Dorset County Council in August 2016 for the 'proposed reconfiguration of existing and consented development; introduction of new plant and processes; increase in permitted throughput; partial widening of access road; provision of a permissive path; new landscaping and associated matters.' The maximum permitted throughput of waste for the site is currently 266,000tpa.

### **The proposal**

The proposal is for the construction of an energy recovery facility (ERF) situated within the north-western portion of Eco Sustainable Solutions' existing site at Chapel Lane, Parley. The proposed

facility would manage 60,000 tonnes per annum of non-hazardous waste, which would be subject to pre-processing within the ERF building. From this, 50,000 tonnes would be subject to thermal combustion, providing combined heat and power with an anticipated generating capacity of 11.5 megawatts thermal and 3.4 megawatts electrical. The power would be used on site and through the local distribution network and the heat would be used on site with options being explored for use by surrounding businesses. The ERF will produce ash residues.

The proposal also comprises changes to the existing configuration of the site, including relocation of green waste composting, reduction in scale and relocation of the consented anaerobic digestion facility and demolition of offices and green waste reception building and construction of replacement administration building, car parking and landscaping.

The proposal would increase the site's total annual throughput from 266,000 tpa to 341,000 tpa comprising 60,000 tpa for the proposed ERF and an additional 15,000 tpa of green waste and wood waste. It is understood that planning permission for a bio-energy facility (8/11/0268 and 8/13/0404) will be relinquished as part of the proposal.

### **Waste planning policy advice and the principle of the development**

The relevant policies of the adopted Bournemouth, Christchurch, Poole and Dorset Waste Plan (2019) are considered to be:

#### Strategic policies

- Policy 1 – Sustainable waste management
- Policy 2 – Integrated waste management facilities
- Policy 3 – Sites allocated for waste management development
- Policy 5 – Facilities to enable the recycling of waste
- Policy 6 – Recovery facilities

#### Development management policies

- Policy 12 – Transport and access
- Policy 13 – Amenity and quality of life
- Policy 14 – Landscape and design quality
- Policy 15 – Sustainable construction and operation of facilities
- Policy 16 – Natural resources
- Policy 17 – Flood risk
- Policy 18 – Biodiversity and geological interest
- Policy 20 – Airfield safeguarding areas
- Policy 21 – South East Dorset Green Belt

#### The allocated site

The Waste Plan assessed the need for capacity to manage non-hazardous waste arisings, based on expected growth in arisings and permitted capacity at facilities in Bournemouth, Christchurch, Poole and Dorset. The Plan identifies that during the Plan period there is a shortfall in capacity for managing non-hazardous residual waste - that is waste from kerbside collections, household recycling centres and the commercial and industrial waste stream that is left after materials for recycling and composting have been removed. Appropriate facilities are needed to manage this waste, whilst ensuring that value is obtained through the recovery of energy in the form of heat and power, wherever practical. The Waste Plan makes provision for residual waste treatment facilities to manage waste derived throughout the Plan area.

To meet the need for residual waste treatment capacity, the Plan allocates four sites through Policy 3 – ‘Sites allocated for waste management development’ (Insets 7 to 10). Each of the sites are existing waste management facilities where potential exists for intensification or redevelopment. Together they provide up to 385,000tpa of treatment capacity, exceeding the identified needs for the Plan area and providing flexibility in what type and capacity of facility could be brought forward. Insets 7 to 10 were allocated following a full review of potential alternative sites.

The application site is allocated by Policy 3, Inset 7 for intensification and redevelopment, including facilities for the management of non-hazardous waste. The site is referred to in Policy 3 as Inset 7 – Eco Sustainable Solutions, Chapel Lane, Parley. Policy 3 states that proposals within the allocated sites will be permitted where they are in accordance with the allocated uses set out in Insets 1-12, and where it is demonstrated that they meet criteria a-d. Inset 7 provides further detail on the allocated site, including proposed uses and a list of development considerations that must be addressed through any application.

Inset 7 states that there is scope to redevelop and intensify waste management uses on this site and increase capacity to manage larger quantities of waste. As part of the preparation of the Waste Plan, the site was assessed for its potential to manage c.160,000tpa of residual waste. This is on top of the existing permitted uses, excluding the permitted solid recovered fuel (SRF) facility (8/14/0515) which it was assumed would not be developed. It is noted in Inset 7 that the proposed uses are likely to replace permitted, undeveloped uses.

The application proposes an ERF that would manage 60,000tpa of non-hazardous waste. This is in principle in accordance with the allocated uses for Inset 7, as required by Policy 3.

It should be noted that under the allocated uses of Inset 7, it is stated that ‘waste management facilities, including incineration, that would lead to adverse effects upon the integrity of European Sites will not be acceptable.’ The level of detail available at the Plan making stage did not enable Likely Significant Effects to be ruled out for technologies involving incineration. As a result there was some uncertainty over the amount of capacity and type of technology that could be successfully provided on the allocated sites. Such assessment should be done at the planning application stage and it is noted that feasibility work undertaken by the applicant has indicated that a smaller plant size is more appropriate in this location.

During the preparation of the Waste Plan, it was acknowledged that a facility managing a smaller quantity of waste than was considered through the Plan may be necessary when taking into account detailed assessment regarding potential impacts on European sites and aerodrome safeguarding. Although the proposal would not provide the 160,000tpa of capacity for residual waste stated in the Waste Plan, it is considered to accord with Policy 3 in principle because Policy 3 allows for the allocated site to provide up to c.160,000tpa, subject to there being no adverse effects upon the integrity of European sites.

The proposal provides for the management of non-hazardous waste on an allocated site and contributes to an identified need for capacity to manage residual waste. However, the detail of the proposal would need to clearly demonstrate that there would not be adverse effects on the integrity of European sites in order to fully comply with the allocation in the development plan.

The development of the ERF should also meet the requirements of Policy 6 – ‘Recovery facilities’, the criteria of which are referred to in the relevant sections below. Criterion a of Policy 6 requires demonstration that the proposal supports the spatial strategy. As discussed above, as

the proposal provides capacity for the management of non-hazardous waste on an allocated site, this criterion is considered to be met.

Policy 3 requires proposals to comply with the relevant policies of the Waste Plan and that the relevant Development Considerations have been addressed. There are 12 development considerations set out in the Waste Plan that relate to Inset 7. In order for the proposal to fully accord with Policy 3, BCP Council should be satisfied that each of these development considerations has been addressed. Policy 3 further requires that possible effects from proposals would not adversely affect the integrity of European sites. With specific reference to Inset 7, the application site, Policy 3 requires that applications should include studies that demonstrate that emissions from development will not impact on the features (species and habitats including lichens and bryophytes) of the nearby European sites. The detail provided in relation to these matters is key to determining the overall acceptability of the application.

### Sustainable waste management and integrated facilities

Policy 1 – ‘Sustainable waste management’ requires facilities to demonstrate how they will support the delivery of the waste hierarchy, how they contribute to the county being self-sufficient in waste management and requires proposals to adhere to the proximity principle. The application provides for a recovery facility for residual waste providing both heat and power. Residual waste cannot be managed at a higher level of the hierarchy and this facility provides capacity at a higher level than landfill. The information provided indicates that any recyclable material would be screened from the waste before it goes into the ERF and exported off site for recycling, thereby ensuring this fraction is diverted from the recovery process (and therefore moved up the waste hierarchy). Criterion b of Policy 6 – Recovery facilities requires that waste that is already being managed higher up the waste hierarchy is not displaced. It is considered from the information provided that this criterion is satisfied.

By providing a facility for non-hazardous waste on an allocated site, the application provides capacity for managing waste arising from within Bournemouth, Christchurch, Poole and Dorset. In terms of the principle of proximity, waste should be recovered as close as possible to where it is produced. In general terms, Chapel Lane is well located for a strategic facility to serve the Plan area (Bournemouth, Christchurch, Poole and Dorset), being situated in south east Dorset.

Policy 2 – ‘Integrated waste management’ gives support to facilities which incorporate different types of waste management activities at the same location, unless there would be an unacceptable cumulative impact on the local area. Criterion c of Policy 3 also requires the proposal to demonstrate there would not be an unacceptable cumulative impact. It is considered that this matter should in particular take into account any cumulative impact with regards to the access route, the nearby residential properties and the landscape.

### Recovery of energy and production of residues

Policy 6 – ‘Recovery facilities’, criterion d, requires that where energy is produced, combined heat and power is provided. It is stated that the electricity generated will be used to fulfil the electricity requirements of the site with the remainder directed to the local distribution network. It is also stated that heat will be recovered with several heat outputs achievable, which will be used on site and can be exported to neighbouring businesses along Chapel Lane and the Aviation Business Park. This provision of combined heat and power is welcomed as a benefit of the proposal and

accords with criterion d of Policy 6. However, it is recommended that further commitment to the full usage of heat is fully considered and secured if possible.

The application states that the ERF will produce two separate ash streams: incinerator bottom ash (IBA) and air pollution control residue (APCr). Policy 6 of the Waste Plan requires that these residues are managed in accordance with the waste hierarchy and the proximity principle. The applicant's objective to supply the IBA to a suitable recovery facility for use as aggregate is in line with the waste hierarchy however no detail is provided on where such a facility might be and therefore whether this could be achieved. No detail is provided on the likelihood of the APC residue being accepted by an effluent treatment contractor although it is accepted that this residue is a much smaller quantity than the IBA.

#### Loss of capacity for other waste streams

Inset 7 of the Waste Plan (development consideration 5) requires that there should be no net loss of capacity for waste streams that would affect the Waste Plan's spatial strategy.

It is noted that permission for the undeveloped bio-energy facility would be relinquished as part of this proposal. The bio-energy proposal is approved to manage 30,000tpa of wood waste. In preparing the Waste Plan's forecasts for wood waste capacity, this facility was not taken into account and so its 'loss' does not affect the Plan's strategy for this waste stream. It is noted from Table 2 of the planning statement that the proposal enables an increase in the total capacity of the site for managing wood waste to 50,000tpa. Although there is no specific need for wood management capacity identified in the Waste Plan, this small increase is welcomed given that the diversion of this type of waste from landfill and energy recovery assists in moving waste up the waste hierarchy.

It is noted also that the proposal provides for an increase in capacity to manage green waste. The Waste Plan identified a small shortfall in the capacity available to manage green waste in the Plan area. This provision will therefore contribute to meeting an identified shortfall.

The provision of additional capacity for both wood waste and green waste is in line with the allocated use of Inset 7, since it comprises an intensification of existing uses. This element of the proposal should meet criteria a-d of Policy 5 – 'Facilities to enable the recycling of waste'. Given the increase in capacity, it is considered that criterion a of Policy 5 is met. The site provides for the recycling of wood and green waste, thereby enabling it to be diverted from landfill and energy recovery wherever possible. This meets the requirements of criterion b of Policy 5. Criterion c of Policy 5 requires operations to be undertaken within an enclosed building unless there would be no benefit from this and the proposed operations would be compatible with neighbouring uses. It appears that there is no change proposed to the way in which wood and green waste is managed, although the green waste composting area will be relocated. Consideration should be given to any amenity impacts or advantages that would arise from this relocation in order to address criterion c. Criterion d relates to effects on European sites, which is discussed below.

The proposal outlines a reduction in scale of the consented anaerobic digestion plant, which manages food waste, which appears to result in a loss of 10,000tpa of capacity for this waste stream. The Waste Plan identifies a small shortfall in existing capacity for this waste stream and the provision of localised recovery facilities are encouraged through Policy 6. Whilst this loss does not assist with the shortfall identified, it is considered to be small scale and it is not considered to affect the Waste Plan's overall strategy in relation to this waste stream.

In conclusion, it is considered that the proposal satisfies development consideration 5 (Inset 7) of the Waste Plan.

### **Dorset Council's response regarding the potential impacts of the proposal**

BCP Council should be satisfied that each of the 12 development considerations for Inset 7 set out in the Waste Plan are addressed and that the submitted Environmental Statement is satisfactory in identifying and mitigating against adverse environmental impacts. The remainder of this response considers key topic areas relevant to the application, with reference to relevant policies from the Waste Plan and the relevant development considerations for the allocated site.

#### Ecology

Whilst Policy 3 allocates the site for the intensification and redevelopment of the site, including management of non-hazardous waste, it states (criterion d) that possible effects that might arise from the development should not adversely affect the integrity of European and Ramsar sites either alone or in combination with other plans or projects. This is supported by Policy 18 'Biodiversity and geological interest'. Inset 7 development consideration 1 further states that the applicant must provide sufficient information to enable the waste planning authority to carry out screening and, if necessary, appropriate assessment in accordance with the Conservation Regulations 2017.

Dorset Council's natural environment team leader comments as follows:

*'I have spoken to Jez Martin at BCP who is co-ordinating their ecological response along with Steve Dring. I have also spoken to John Stobart at Natural England who is covering for Nick Squirrell while he is away. The complex nature of this application in terms of impacts on the adjacent designated heathlands means that all are of the opinion that it is not possible to make a conclusive application response at this time. I am also aware that BCP intend to seek specialist advice from WSP (retained under their framework contract to provide HRA advice to the authority) on the air quality/nutrient deposition issues and my recommendation is that we wait until this advice, alongside advice from Natural England, has been provided.'*

*The applicant has been requested (by NE) to produce further information on deposition of nutrients to inform the Habitats Regulations Assessment and therefore demonstrate that emissions from the development will not impact on features (species and habitats including lichens and bryophytes) of the European sites. Although mitigation has been proposed it will not be possible to assess the appropriateness of this mitigation until the further information has been provided.'*

It is considered therefore that the application does not currently fully address Inset 7 development consideration 1 of the Waste Plan, as insufficient information is provided. The detail of the proposal is not considered sufficient to satisfy Policy 3 (d), Policy 6 (f) and Policy 18. Note that although the site is allocated, Inset 7 of the Waste Plan states under the allocated uses that waste management facilities, including incineration, that would lead to adverse effects of European sites will not be acceptable. Dorset Council is not satisfied that the Environmental Impact Assessment carried out on the proposed development provides robust evidence that all ecological impacts, have been identified and can and will be appropriately mitigated. It is critical

that this information is provided in order that the application can be properly assessed and in order that BCP Council can consider whether adverse effects on the European sites would occur.

### Aerodrome safeguarding

Waste Plan Inset 7 development considerations 3 and 11 highlight the need for applications at this site to address aerodrome safeguarding. This is reinforced by the requirements of Policy 20. Whilst Dorset Council cannot comment on whether or not this has been satisfactorily addressed, they refer to the objection of Bournemouth Airport, which highlights additional areas of work required from a safeguarding perspective. It would appear that further work is required to satisfy the requirements of Policy 20 and development considerations 3 and 11 and BCP should be satisfied that these have been met in order for the proposal to accord fully with Policy 20 and Policy 3 of the Waste Plan.

### Landscape

The site is located in the Green Belt and Inset 7 of the Waste Plan requires a high standard of design and landscaping for proposals on this site (development consideration 9) and a minimisation of landscape impacts (development consideration 3). Additionally, development consideration 7 of Inset 7 requires the 'development of a comprehensive landscape and ecological scheme for the site'. The proposal also needs to accord with Policy 14 – 'Landscape and design quality' and Policy 21 – 'South East Dorset Green Belt'.

Policy 21 is focussed on the consideration of whether the proposal constitutes inappropriate development and demonstration of very special circumstances in line with the NPPF, whilst development consideration 9 relates the Green Belt location to the high standards of design and landscaping expected. It should be noted that the allocation of the site in the Waste Plan followed a comprehensive review of alternatives and the need for a facility to manage non-hazardous residual waste is set out in the adopted Waste Plan. However, there is a clear expectation that any proposal on the site would offer a high quality design and comprehensive landscape mitigation package.

Dorset Council's landscape officer has reviewed the proposal and his detailed comments are attached to this letter (annex 1). It should be noted that he has concerns that the current proposal does not meet the requirements of the Waste Plan and NPPF in terms of landscape and Green Belt considerations. He considers the proposal to have a moderate adverse effect on the landscape character and moderate adverse visual impact on the amenity of the area within a 1km vicinity of the site. This is without taking into consideration the potential visual and landscape impact of any plume or emissions emitted, since the application does not appear to include information on potential plume visibility. There is concern regarding the effect of visible emissions on the quality of the landscape character and that the presence of emissions, even if these are not consistently present, has the potential to notably increase the landscape and visual effects of the development. Dorset Council recommends that further information is provided on plume visibility so that this can be properly assessed.

There is also concern that, given the scale of the proposed ERF, the landscape mitigation appears minor and focussed to within the red line boundary, relying on existing landscape features with little additional landscape enhancement or mitigation measures especially in the wider landscape. It is considered therefore that the application does not fully address Inset 7 development considerations 7 and 8 of the Waste Plan, which require a comprehensive

landscape and ecological scheme for the site and a high standard of landscape design in the Green Belt.

Waste Plan Policy 14 states that proposals should be compatible with their setting and conserve and/or enhance the character and quality of the landscape. Criterion c of Policy 14 requires proposals to avoid adverse impacts on the landscape, or if this is not practicable acceptable mitigation should be provided. The detail of the proposal is not considered sufficient to satisfy these elements of Policy 14.

The attached landscape officer comments also consider options presented in the Environmental Statement regarding decommissioning of the facility. Given that an option of restoration to a baseline condition is considered, Dorset Council recommends the submission of a plan showing the baseline condition in order to inform proposed site restoration, should this option be taken forward at a later date.

### Amenity

Policy 13 'Amenity and quality of life' of the Waste Plan states that proposals should demonstrate that any potential adverse impacts on amenity arising from the operation of the facility and any associated transport should be satisfactorily avoided or mitigated to an acceptable level.

Dorset Council's environmental health officer comments as follows:

*Environmental Protection have insufficient time to fully consider the documentation. We have however been in contact with BCP Council Environmental Health Team and we are happy with the way they are reviewing the assessments in terms of Air Quality and Noise impacts. We're able to provide any support the Officers require on the application and provision of information if required. We have also viewed the comments provided by the Environment Agency, which we would concur with and support.*

Waste Plan Inset 7 development consideration 6 highlights the need for suitable controls to minimise odour. It is noted that the existing odour management plan for the site would be updated to incorporate the proposed development. It is recommended that should permission be granted; the submission and approval of the updated odour management plan should be attached as a planning condition.

### Transport

The proposal should accord with Policy 12 – 'Transport and access' of the Waste Plan. The conclusions of the transport assessment appear to indicate that the proposal is in line with the criteria of Policy 12, however this will be a matter for BCP to determine.

The application states that previously approved upgrade works along Chapel Lane are to be undertaken, which is supported and should be secured. Inset 7 development consideration 4 suggests that mitigation to address congestion in the area would likely be from a contribution towards B3073 corridor improvements. It is not clear whether this is being addressed through the application.

Dorset Council's transport policy manager has provided the following informative comments which I hope are of assistance:

- *The BIG (Bournemouth International Growth) Programme through the Dorset Local Enterprise Partnership secured Government funding for improvements along sections of the B3073 — Chapel Gate rdbt improvements completed several years ago which included a cycleway/footway shared use link which links up to a Bridleway.*
- *B3073 at West Parley – housing development will include link roads on east and west sides of Parley Cross junction to relieve congestion on the junction. Parley Cross junction itself will be improved for cyclists and pedestrians.*
- *Transforming Cities Fund (TCF) - cycle links on B3073 to Ferndown and Wimborne and Bournemouth/Poole conurbation are being progressed.*
- *Longham Minis on A348 Ringwood Road/B3073 junction – improvements planned for cyclists and pedestrians. Junction is at or close to capacity during peak times but currently no plans to increase capacity. There are potential major housing sites in the Local Plan consultation which will impact on the Longham Minis junction, though high level Masterplan designs show links for peds and cyclists to bypass the junction.*
- *Regular bus services to Aviation Business Park from Bournemouth - not sure if any from Ferndown or Wimborne area.*
- *Proximity to Dorset Advisory HGV network – access to A338 is better since Blackwater junction improvements as part of the BIG Programme. B3073/A348 route to A31 – there are ongoing complaints about HGV traffic on this route, especially through Ferndown Town Centre and Longham Bridge, though the A348 Ringwood Road it is part of the advisory HGV network. Environment Statement 15 - Transport and Transport Assessment traffic forecasting suggests more HGVs will be travelling via the A338 Blackwater Junction compared with the B3073 Parley Cross route which would be preferable from a Dorset Council viewpoint.*

#### Other matters

Dorset Council notes that a flood risk assessment has been submitted in accordance with Inset 7 development consideration 9 and that the Environmental Statement includes assessment of potential groundwater impacts from contamination and oil storage in accordance with Inset 7 development consideration 10. We do not have any specific comments on these matters and note that the Environment Agency has responded to the application. BCP Council should be satisfied that the proposal meets the requirements of Waste Plan Policy 16 – ‘Natural Resources’ and Waste Plan Policy 17 – ‘Flood Risk’.

#### **Conclusion**

The Bournemouth, Christchurch, Poole and Dorset Waste Plan identifies a clear need for non-hazardous waste management capacity. The application provides for 60,000tpa of residual waste management capacity, making a contribution towards this need. The proposal is on a site allocated in the Waste Plan and generally in principle therefore can be considered acceptable.

However, the Waste Plan makes clear that the proposals on the allocated site will only be acceptable if it can be demonstrated that there will be no adverse effects on the integrity of European sites. The application as it stands does not provide sufficient information with regards to possible effects on European sites and therefore does not fully accord with the allocation and other policies in the Waste Plan.

The detail of the application is also considered insufficient with regards to landscape impacts and aerodrome safeguarding.

As a result, Dorset Council is not satisfied that the Environmental Impact Assessment and Habitats Regulations Assessment carried out for the proposed development provides robust evidence that all impacts, including impacts on Dorset's environment and interests, have been identified and can and will be appropriately mitigated. Therefore Dorset Council objects to the detail of the proposed development, recommends that further information is sought as outlined in this response and asks Bournemouth, Christchurch and Poole Council to ensure that further robust assessment is undertaken, and consulted on, to ensure impacts are properly understood and appropriately mitigated. Dorset Council considers that as it stands it is not possible to determine that the proposal is in accordance with the adopted Bournemouth, Christchurch, Poole and Dorset Waste Plan.

## **Annex 1: Landscape Response 11/06/2021**

**Proposal:** Proposed development comprising the installation of a low carbon Energy Recovery Facility for the generation of electricity and heat through a low-emission thermal process using residual waste; including a new administration building and associated car parking area; associated reconfiguration of existing and permitted uses; an increase in permitted waste throughput; landscaping and associated works.

**Application Number:** 8/21/0207/FUL

**Location:** Eco Composting Ltd Chapel Lane Christchurch BH23 6BG

### **By email**

Dear Sara Hardy,

Thank you for sending me the supporting documents for the proposed installation of a low carbon Energy Recovery Facility (ERF) on Chapel Lane Christchurch BH23 6BG.

After reading the supporting documents and carrying out a site visit. I have the following comments.

### **1. Landscape Character Type**

1.1. On a local level the application is within the River Terrace, Dorset Landscape Charter Type.

1.2. The River Terrace acts as a transition/physical buffer or barrier between the heathland and heath/farm/forest types and the river valley pastures. The medium scale landscape has a largely flat landform with a rural mixed farmland character. The field boundaries are often lined with low hedges or fencing, and woodland blocks and shelter belts form important landscape features and backdrops. Adjacent to the Bournemouth/Christchurch/Poole conurbation the area is heavily influenced by housing and other development such as mineral extraction, power lines, transport routes, solar farms and Bournemouth airport which all contribute to a neglected/ under managed feel in places. Away from this edge there are some quiet lanes and paths which act as important accessible recreational areas. There are a few scattered farmsteads, hamlets and important small village cores such as West Parley across the more rural parts of the terrace. There are important groups of interconnected trees, copses and tall mature hedgerows which frame horizons and vistas in places. Important remnant rural features are still evident and add to character such as roadside ditches, 'soft' highway edges and verges, old boundaries, and the use of locally distinctive building materials. The terrace landscape has historically been the location for large homes and parkland.

1.3. Key landscape character type characteristics:

- A wide and flat landform with deep alluvial and gravel soils.
- A buffer between the heathland landscapes and the valley pastures.

- Mixed agricultural land of arable and livestock with some marginal 'urban fringe' farming.
- Fields subdivided by low hedges and or fencing.
- Scattered farmsteads across the rural parts.
- Some quiet relatively isolated areas.
- Rivers have little impact on overall character.
- Woodland blocks and shelter belts are key features.
- Heavily influenced and impacted on by urban development including sand/gravel extraction, power lines and transport corridors and the South East Dorset conurbation.
- 1.4. Key Land management guidance notes:
  - Promote the use of the area as a multi-functional landscape resource in coordination with the Valley Pasture landscapes and in particular as an informal recreational resource.
  - Maintain and enhance remnant rural roadside features such as 'soft' verges and ditches.
  - Conserve, enhance and manage woodland, hedgerows, and the distinctive mixed shelter belts.
  - Strengthen the character of this area through existing and any future landscape management initiatives.
  - Create, conserve, and enhance open space areas as strategic open areas between important heathland and densely populated areas.
  - Control the impacts of housing and other development such as roads and other transport uses e.g. with sensitive site planning decisions based on an understanding of local character.
  - Strengthen the eroded character of this area for example by seeking to integrate new and existing development in a more sympathetic way e.g. by using new and existing woodland blocks and shelter belts to integrate development.

1.5. The overall management objective for the River Terrace Landscape Type should be to maintain and enhance the value of the area as a buffer, control and minimise the impact of development and transport infrastructure/use and the opportunities for large scale multi-functional landscape restoration and creation should be promoted and explored.

## 2. Green Belt

2.1. The ERF is in Parcel BA10 of the BCP and Dorset Council Strategic Green Belt Assessment which was published in December 2020. The assessment notes 'the parcel is open and contains a quarry, which is considered to be an 'appropriate use' in the Green Belt.' The parcel abuts the inset urban area at Bournemouth Airport, with built development at the Aviation Business Park and in the North-East Sector forming most of the boundary but is separated from Ferndown/West Parley by Parley Common. The parcel contains a quarry and is surrounded by large solar farms. Solar farms are classified as inappropriate development in a Green Belt, and therefore require demonstration of 'special circumstances' to be granted planning consent. As the solar farms have a limited life span of 25 years and a limited impact on openness consent was given.

2.2. Several woodland blocks and belts in the area break up the fields of solar panels and provide some visual containment around the edges of the parcel. Tree belts around the airport perimeter create separation between the inset area and the parcel. The heathland to the north of the airport and west of the parcel BA10 are a distinct, homogeneous, open, and an undeveloped landscape.

2.3. As part of the assessment the parcels contribution to the Green Belt is broken down into 5 purposes as in line with [para 134] of the National Planning Policy (NPPF). The third purpose – to assist in safeguarding the countryside from encroachment is described as having a strong rating with the rest as having a weak, equal or no contribution to the Green Belt. Purpose 3 explains the parcel is a significant distance from any urban areas, with heathland to the west, and within the southeastern part of the parcel, constituting countryside that is open, undeveloped and with a strong sense of distinction from urban areas. Tree cover forms a strong buffer between Aviation Business Park and the composting site off Chapel Lane, and the latter is not considered to constitute a significant urbanising influence.

2.4. With the proposed addition of a large ERF building on the location of the current composting site and with an associated stack the application needs to demonstrate it is following section 13. Of the NPPF - Protecting Green Belt Land. The NPPF [Para 133] explains ‘the government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.’

2.5. Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances [NPPF Para 143].

2.6. When located in the Green Belt, elements of many renewable energy projects will comprise inappropriate development. In such cases developers will need to demonstrate very special circumstances if projects are to proceed. Such very special circumstances may include the wider environmental benefits associated with increased production of energy from renewable sources [NPPF Para 147].

### **3. The Adopted Bournemouth, Christchurch, Poole and Dorset Waste Plan 2019**

3.1. The site is described in the Adopted Bournemouth, Christchurch, Poole and Dorset Waste Plan 2019 in Insert 7 as Eco Sustainable Solutions, Parley.

3.2. Policy 21 in the adopted plan– South East Dorset Green Belt explains:

3.3. Proposals for waste management facilities will only be permitted in the South East Dorset Green Belt where:

- They do not constitute inappropriate development; or The potential harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations to an extent that can demonstrate very special circumstances, including a need for the development that cannot be met by alternative suitable non-Green Belt sites; and
- The restoration of the site, where relevant, is appropriate to the inclusion of the land in the Green Belt and enhances the beneficial use of the Green Belt.

3.4. Paragraph 12.109 from the adopted waste plan explains; high standards of design, including landscape design, will be expected for any development within the Green Belt

#### **4. Landscape Character Impacts from the Proposed Development**

4.1. The level landform and medium scale of the River Terrace acts as a transition/physical buffer between a wide variety of other landscape character types. The flat level nature, woodland blocks and established field boundaries help create a visually enclosed environment.

4.2. Paragraph 14.2.28 of the Landscape and Visual Impact Assessment for the application explains the proposal is 'for new development within the existing site where similar operations are already taking place.' I do not agree with this statement. The existing operations appear to cover a similar footprint of the proposed application, but the existing composting operations are open in the landscape with the compost processing area having a transient nature.

4.3. Further in paragraph 14.4.28 it explains 'the size of development required to house the proposed ERF is likely to be of a scale that would make it more apparent in the landscape, potentially affecting its character, appearance, and sense of openness. This means that undue consequences are likely to occur due to the presence of the proposed development that is contrary to Green Belt policy although Policy 21 allows for waste management facilities to be permitted that result in such harm if it can be demonstrated that very special circumstances exist'.

4.4. The proposal introduces new buildings into the landscape character and particularly the new ERF building and 38m stack which would be apparent in its own right above the tree line and visible to the north, east and west in areas sensitive to development such as Parley Common. This would result in a Moderate Adverse effect to the quality of the landscape character within the vicinity of the Site. Reducing in impact as the study area expands to 3km radius.

4.5. Despite the flat and sheltered nature of the River Terrace I am concerned it is a landscape which is being adversely affected by large scale developments not sympathetically designed in the landscape. The proposed ERF has the potential to further erode the quality of the River Terrace landscape character.

#### **5. Visual Impacts from the Proposed Development**

5.1. The impacts on Visual Amenity during the operational lifespan of the ERF are displayed in Table 14.4 in the Landscape and Visual Impact Assessment. After reviewing the table, the visual impacts for the ERF and stack are shown as Moderate Adverse within a 1km radius with the visual impacts decreasing as the study area broadens to 3km. As the landscape character of the River Terrace is relatively level in nature this conclusion is accepted.

5.2. The Moderate Adverse impacts in the 1km are a concern as this includes sensitive visual receptors such as Parley Common a public open access area in the Lowland Heath landscape character type. The Lowland Heath is a sensitive landscape with a key objective of mitigating against intrusive developments.

5.3. The 1km radius also is predominantly within the Green Belt. A nationally sensitive area with renewable energy projects comprising as inappropriate development [NPPF Para 147].

## **6. Landscape Proposals and Mitigation Measures**

6.1. As clarified earlier in [Para 4.2] of this response the adopted waste plan [Para 12.109] explains the proposal needs to demonstrate a high level of landscape design. The applications supporting Design and Access Statement has a brief description on the landscape proposal 'The majority of the existing waste recycling and recovery site comprises previously developed land with limited scope for new landscaping' [Para 5.1].

6.2. The proposal seems to rely on an existing 5metre high engineered screening bund to the north and east which are proposed to be planted with a mix of native species. The engineered screening bunds can help mitigate with visual impacts but can also create an adverse spatial impact on the openness of the Green Belt.

6.3. The Fence Layout and Pedestrian Routing plan DWG. NO. 1416 PL104 shows the site will have a hard-edge boundary in the form of a fence around the site including the 5metre high bunds. One of the proposed fences is for a 5m high imperforate timber fence. This fence has the potential to contribute to creating an adverse impact on the spatial openness of the Green Belt.

6.4. The proposed Landscaping / External Surfacing Materials Plan DWG. No. 1416 PL105 shows the main addition of the proposed landscape design is in the west framing the car park in front of the proposed Admin and Welfare building. There appears to be minimal landscape mitigation in the rest of the application due to space constraints. Referring to the Adopted Bournemouth, Christchurch, Poole and Dorset Waste Plan 2019 Insert 7 – Eco Sustainable Solutions, Parley. Point 2 asks:

- Development considerations for the 'Long-term restoration of surrounding heathland given the site's proximity to ecological designations.'
- Point 7 goes on to explain 'Development of a comprehensive landscape and ecological scheme for the site, with particular attention to mitigation enhancement opportunities for the eastern fields, that are very susceptible to development, and detailed design considerations to minimise visual impacts from any associated stack.'

6.5. Given the scale of the ERF development the landscape mitigation appears minor and focused in the red line boundary. I am concerned the proposal is relying predominantly on the existing landscape features and landscape character and adds little additional landscape enhancement or mitigation measures especially to the wider landscape. This does not address the adopted minerals and waste plan [Para 12.109] requirement for the need of a high-quality landscape design within the Green Belt.

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## **7. Stack Emissions and Plume**

7.1. After reviewing Section 14: Landscape and Visual Impact from the Environment statement I cannot find any reference of any potential visible emissions from the stack in the form of a plume.

7.2. From experience with reviewing other proposed Energy Recovery Facilities in Dorset I understand that a plume can vary in size and duration considerably depending on the moisture content within the waste which is being processed.

7.3. The Guidelines for Landscape and Visual Impact Assessment (GLVIA, third edition) recommend that EIA assessment should include a reasonable scenario of maximum effects, commonly known as the 'worst case scenario'. I am concerned about the effect of visible emissions on the quality of the landscape character and wider landscape character areas. In my opinion the presence of visible emissions, even if these are not consistently present, has the potential to notably increase the landscape and visual effects of the development.

7.4. I recommend further information is provide on potential plume visibility and the proposed photomontages are updated to include a plume (if present) in line with Type 4 photomontages (survey/scale verifiable) in accordance with the Landscape Institute Technical Guidance Note 06/19 on Visual Representation of Development Proposals.

## **8. Decommissioning and Restoration**

8.1. The NPPF [Para 133] explains the government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.

8.2. The applications supporting documents do not include a restoration plan. Section 4 of the supporting Environment statement explains options for decommissioning and shows 2 options:

- Option A: utilisation of the building for other industrial processes / activities; or
- Option B: restoration of the Site to a baseline condition. [Para 4.2.1]

8.3. Due to the location within the Green Belt I favour option B. This will give the ERF facility a limited life span and impact on the openness of the Green Belt. This limited lifespan should consider the potential timescale and impacts from the decommissioning process.

8.4. I would like further information provided demonstrating the current Site baseline condition. This information would be helpful if it was submitted as a plan. This information can then inform the proposed site restoration plan once operations have ceased.

## **9. Conclusion**

9.1. The proposal introduces new buildings into the landscape character and particularly the new ERF building and 38m stack which would be apparent in its own right above the tree line and visible to the north, east and west in areas sensitive to development such as Parley Common. This would result in a Moderate Adverse effect to the landscape character and a Moderate Adverse visual impact to the visual amenity of the area within the vicinity of the Site. Reducing in impact as the study area expands to 3km radius.

9.2. I have a major concern a possible plume could add an additional adverse impact to the quality of the landscape character and visual impacts associated with the 38m stack. In my opinion the presence of visible emissions, even if these are not consistently present, has the potential to notably increase the landscape and visual effects of the development.

9.3. The NPPF and Adopted Bournemouth, Christchurch, Poole and Dorset Waste Plan 2019 ask that developments in the Green Belt demonstrate very special circumstances and high standards of design, including landscape design, will be expected for any development within the Green Belt. As the majority of the existing waste recycling and recovery site comprises of previously developed land with limited scope for new landscaping. I have a major concern that the current proposal does not meet the NPPF or Adopted Waste Plans requirements for developments with a high standard of landscape design in the Green Belt.

9.4. I would like to request permission is not granted for the application until further information is submitted which addresses the concerns raised above in this response.

Kind regards,

**Aaron Carpenter BA (Hons) MA**  
**Landscape Officer**  
**Environment and Wellbeing**  
**Dorset Council**