

**WASTE DEVELOPMENT PLAN DOCUMENT (DPD)
PREFERRED OPTIONS - KEY CONSULTATION
RESPONSE THEMES AND COUNTY COUNCIL
REJOINDERS**

February 2008



WASTE DPD PREFERRED OPTIONS CONSULTATION – SITE RESPONSES

Minerals and Waste Core Strategy (MWCS) Preferred Options.

The current priority within the Buckinghamshire Minerals and Waste Local Development Framework (MWLDF) is to finalise the Minerals and Waste Core Strategy (MWCS) Preferred Options. This report sets out the County Council's vision, objectives and spatial strategy for minerals and waste matters in Buckinghamshire; and also identifies the strategic allocations for waste management. Formal consultation on the MWCS takes place between 29 February and 25 April 2008, in line with our revised Minerals & Waste Local Development Scheme (MWLDS) agreed with the Government Office.

The MWCS is supported by a Sustainability Appraisal, and detailed studies dealing with "Appropriate Assessment", air quality and traffic implications relating to the strategic allocations.

To assist respondents in their consideration of the MWCS *Preferred Options*, the Council has prepared the following "rejoinders" to representations made to earlier consultations, as follows:

- 1 A detailed Schedule of all of the responses made to the MWCS *Issues & Options* consultation (9 July to 31 August 2007), together with the Council's rejoinders, in line with the requirement of Regulation 27 (3) of the Town & Country Planning (Local Development) (England) Regulations 2004;
- 2 Additionally, and to assist the current consultation, a paper setting out the main concerns raised during the Waste DPD Preferred Options consultation (22 June to 3 August 2007) relating to those sites* which form strategic allocations or safeguardings in the MWCS Preferred Options - **the task of this paper**;
- 3 Additionally, and to assist the current consultation, a paper setting out the main concerns raised during the Minerals DPD Preferred Options consultation (17 September to 26 October 2007) relating to strategic minerals matters relevant to the MWCS Preferred Options.

* These are: Calvert Landfill Site; Wapseys Wood Landfill Site; Springfield Farm Landfill Site; Woodham Industrial Area; High Heavens, London Road, Amersham; College Road North, Aston Clinton; and off Osier Way, Buckingham.

CALVERT LANDFILL SITE

[Waste DPD Preferred Options, PAW1]

BCC comment following consultation/further assessment

The County Council has considered the responses relating to Calvert Landfill Site made during the Waste Development Plan Document Preferred Options consultation and sees no overriding reason for discounting this site from consideration as a potential allocation for a Strategic Waste Complex in the Minerals & Waste Core Strategy.

BCC current position

Maintain site for further consideration.

1 "Need for new road access to the west of the site linking to A41"

Agreed. The Waste Development Plan Document Preferred Options [hereafter "Waste DPD Preferred Options"] suggests - in the Area Statement for Calvert) that any new waste management complex situated on this site would require a new access road direct to the A41.

2 "Area Statement 'No settlements nearby' – there are 300 homes at Calvert Green, 30 at Calvert and nearby farms"

The Council accepts that this statement is not well-worded, nevertheless the Area Statement does refer to the "new community of Calvert Green". The Council has had regard to the amenity and environmental considerations of Calvert Green.

The Council has commissioned an Atmospheric Dispersion modelling study of potential Energy from Waste or Anaerobic Digestion plants at Calvert or Woodham. This study is similar to that undertaken for sites in South Buckinghamshire under "Appropriate Assessment".

This study will be published as part of the Evidence Base for the MWCS Preferred Options.

3 "Large site – any development will affect both Edgcott and Grendon"

The Council does not consider that the development of a recovery facility (or SWC) at the Calvert Landfill Site would cause any significant disbenefits for either Edgcott or Grendon (other than access - see below).

The Council has information on: for example, emissions from EfW plant (incineration with energy generation), relevant standards (Waste Incineration Directive), and from its studies undertaken for Appropriate Assessment. It has commissioned an Atmospheric Dispersion modelling study (see rejoinder above) for Calvert or Woodham. This work will inform on local implications.

There is also the possibility of locating recovery plant and co-located waste facilities at a point removed from Calvert Green.

4 "Additional traffic would affect all villages along the various local roads from ... the A41"

The Council does not consider that this will be significant, nevertheless it has commissioned a traffic study to look at potential traffic implications. This indicates that the majority of HGVs going to Calvert would approach via the A41 from the Aylesbury direction. The A41 is part of the County's strategic network and is therefore an appropriate route for waste traffic.

However after leaving A41 traffic seeking Calvert currently uses unclassified roads passing through Grendon Underwood and Edgcott. Although the possible increase in HGVs at the Calvert site that would result from Options likely to be proposed in the MWCS Preferred Options is relatively low, the Council takes the view that any new waste management complex situated on this site would require a new access direct to the A41.

5 "Other wildlife sites not attributed in Area Statement"

The Council agrees this comment. It has received useful additional information from Natural England (NE), BBONT, and its own Countryside Team. As a result, additional designated and local nature conservation sites have been added to the relevant Area Statements. In the case of Calvert, these are:

Local Wildlife Sites

- | | |
|--|----------|
| • Woodland between Lawn Hill & Dunsty Hill | Adjacent |
| • Decoypond Wood | Adjacent |
| • Grendon Underwood Meadows | 200m |
| • Romer Wood | 500m |
| • Greatsea Wood | 550m |

Biological Notification Sites

- | | |
|------------------------------|----------|
| • Scrub near Railway | Adjacent |
| • Lee Wood Poplar Plantation | 200m |
| • Track leading to Railway | 300m |

These sites have all formed part of the baseline information for the Sustainability Appraisal (SA) of the MWCS.

6 "Residents not knowledgeable about EfW – need to be better informed"

The Council accepts this comment. It has provided an overview of the EfW (Energy from Waste, or incineration with energy recovery) in the Waste DPD Preferred Options at (Appendix C of the consultation report).

In addition it has prepared a digest of Frequently Asked Questions (FAQs), including matters relating to waste technologies, which can be found on the Council's website.

WAPSEYS WOOD LANDFILL SITE

[Waste DPD Preferred Options, PAW2]

BCC comment following consultation/further assessment

The County Council has considered the responses relating to Wapseys Wood Landfill Site made during the Waste DPD Preferred Options consultation and sees no overriding reason for discounting this site from consideration as a potential allocation for a Strategic Waste Complex in the Minerals & Waste Core Strategy.

BCC current position

Maintain site for further consideration.

1 "Current planning consents require restoration to agricultural land by 2021 ..."

The Council agrees that this statement is correct. However this does not mean that the land is precluded from development.

In addition, Wapseys Wood is some 146 hectares in extent and the development of a "Strategic Waste Complex" would only require a relatively small proportion of this (say, around 15 hectares). This would logically be upon the stable (not tipped) part of the site, because to try to locate major plant upon the landfilled area would require extremely expensive construction techniques.

The remainder of this very large site could therefore still be restored by 2012 in accordance with the relevant planning condition. There would be opportunities for mitigation and greater biodiversity.

2 "Protection of the Green Belt is a planning priority in PPS10 ..."

The County Council supports the general presumption against inappropriate development within the Green Belt set out in national policy (PPG2, *Green Belts*)

"The general policies controlling development in the countryside apply with equal force in Green Belts but there is, in addition, a general presumption against inappropriate development within them. Such development should not be approved, except in very special circumstances" (PPG2, para 3.1).

It has always been allowed that "very special circumstances" are possible .. "it is for the applicant to show why permission should be granted" (PPG2, para. 3.2).

The relevant national waste policy PPS10 (*Planning for Sustainable Waste Management*, July 2005) also requires planning authorities to prepare and deliver planning strategies that, amongst other objectives, maintain the overall protection of green belts. In this context "protection" will normally be the preservation of "openness". This is an important point because some forms of waste management, (for example, windrow composting) might not be "inappropriate development".

However large, "permanent" waste facility(ies) certainly would be "inappropriate development". The Council accepts this.

- Nevertheless, PPS10 also indicates that planning authorities should " ... recognise the particular locational needs of some types of waste

management facilities when defining detailed green belt boundaries and, in determining planning applications, that these locational needs, together with the wider environmental and economic benefits of sustainable waste management, are material considerations that should be given significant weight in determining whether proposals should be given planning permission ..." (PPS10, Key Planning Objectives, page 6).

- The Regional Spatial Strategy (RSS) indicates that "waste management facilities should not be precluded from the Green Belt" (RPG9 Policy W17).
- The Council's adopted minerals & waste local plan (BM&WLP, June 2006, Policy 27) allows that "proximity" and the availability of alternative sites outside the Green Belt can be relevant considerations.

Normal Green Belt policy would continue to apply (ie "very special circumstances" would need to be demonstrated for waste development which affects the "openness" of the Green Belt).

With regard to the site characteristics of Wapseys Wood it is a fact that the site is an active landfill and is not a "greenfield site". The site appraisal underpinning the Preferred Options has had to be consistent with national and regional policy. It should be noted that RSS says that priority should be given to "safeguarding and expanding suitable sites with an existing waste management use and good transport connections" (RPG9 Policy W17).

Finally, it is relevant that only a relatively small proportion of these very large sites would be needed for a "Strategic Waste Complex" (say 15 hectares - 10% of Wapseys Wood or 23% of Springfield Farm), and therefore that the majority can be restored and make a continuing contribution to "openness". Although it is not a Green Belt purpose per se, restoration will allow for landscaping and biodiversity mitigations that will enhance the future contribution of the sites to the Green Belt.

3 "Misleading to consider proposal as relating to an existing landfill site, it will have been restored by the time the proposed facilities are due on stream."

Official regional planning guidance (RPG9 Policy W17) says that, in identifying locations for waste management facilities, priority should be given to safeguarding and expanding suitable sites with an existing waste management use and good transport connections. The Council considers that Wapseys Wood is just such a site.

All of the landfill sites in the County have restoration conditions upon them, and it is clearly not the Government's intention that such sites should be precluded from further waste development.

The future need which is most certain in timing relates to the development of a recovery facility to manage Buckinghamshire's residual municipal solid waste, and this would need to be operational from 2013. If Wapseys Wood were to be the location for the facility then construction would certainly have to commence before 2012.

If the site was developed for, say, a recovery facility for residual commercial waste then it is true that this would most likely be after 2012. Nevertheless, as stated above, restoration of the landfill area would not preclude a planning consent being given for an SWC on part of the area.

- 4 "A large area of woodland across the M40 from Wapseys Wood has been cleared for the the construction of an MSA. This increases the imperative to restore Wapseys Wood to agricultural land in order to maintain the countryside balance in this locality."

The Council does not accept this point. There is no direct linkage between these respective developments. The reasons for the identification of Wapseys Wood for future waste management facilities has been set out above.

However, a recovery facility, in itself, would only need a small proportion of this very large site. This would remain the case even with co-location of other waste facilities to form a "Strategic Waste Complex" (say, around 15 hectares). The remainder of the site could be restored as conditioned.

- 5 Additional visual impact of new electricity power lines from EfW plant

The Council takes the view that this is a matter best considered at the detailed planning application stage (ie when the technology, scale and configuration is known), if such an application is forthcoming. For the present the Council notes that the owners of Wapseys Wood consider that a connection to the grid can be made. It therefore considers that this consideration does not preclude the site being taken forward as an allocation.

- 6 "The site is accessible by road only so that the preferred options of rail or canal for bulk movement are not available."

It is unfortunately true that the majority of sites that have come through the appraisal process are accessible by road. The exception is the landfill site at Calvert, which has a rail link. Calvert is likely to be proposed as an SWC in the MWCS Preferred Options.

The Council presently safeguards a site at Richings Park, Iver as a possible multi-modal freight transfer facility (rail/canal/road). A consultant study has shown this to be the only such transfer possibility in Buckinghamshire. This site is likely to be "carried forward" into the MWCS.

However it is difficult to realise the apparent advantages of a rail connection because:

- Bucks is a small county, and the most viable movements by rail are over longer distances;
- There is no mechanism available to deliver Rail Transfer Facilities for Commercial and Industrial Wastes, which are likely to remain delivered direct by road for the foreseeable future;
- Transfer of all Bucks' residual Municipal Solid Waste (MSW) (ie put simply, household waste remaining after recyclable material have been taken out) to rail, or even all of that arising in southern Bucks, is not possible. Significant road transfer would still be required.

The Council therefore considers that greater sustainability is more likely to be achieved by proximity of facilities to arisings.

7 "The landfill capacity will be full before 2012 so that all incinerator ash and other processing residues will require removal from the site. This would equate to 6000 outgoing truck movements for a 400,000 tonne pa incinerator."

Should an incinerator be developed at any of the locations identified by the Council for potential SWC facilities, the likelihood is that the bottom ash will be sent elsewhere for processing into construction materials.

It would not be a good use of these materials to simply landfill them - because it would be contrary to husbanding of void space and primary minerals.

8 "Road access to the site is from the A40 only ... implications for Gerrards Cross ... "

The Council considers that the site has good transport connections, and the Highway Authority has no objections to waste development. The Council has commissioned a traffic implications study (for which the Highways Agency has been involved in designing the work).

The traffic implications study suggests that if a Strategic Waste Complex was to be developed at the site, the percentage change in HGV traffic would be low.

It is possibly a relevant consideration the Wapseys Wood landfill presently accepts most of the municipal solid waste (MSW) arising within the South Buckinghamshire, Chiltern and Wycombe District Council areas for landfill.

The Council agrees that HGV routing would be necessary. This should form a condition on a planning consent. If the site were to be used for the recovery of municipal waste then there is the possibility of monitoring the routes taken by HGVs electronically (satellite tracking). If the site were to be used for the recovery of commercial & industrial waste then it is more likely that the direction HGVs took leaving the facility could be monitored using CCTV.

9 "Dedicated access from the M40 is not possible due to the proximity of J2 and J1."

The Council agrees that a dedicated access from the M40 would not be acceptable to the Highways Agency. It would not, in any event, be justified by the modest traffic levels accessing a SWC at Wapseys Wood.

10 "The site lies under the Heathrow flight path and could present a hazard."

The Council does not accept that this is the case. This representation was not made during the Waste DPD Preferred Options consultation by the airport operators (nor by the MOD in respect of Northolt). In fact, aircraft would be at a considerably greater height than a facility stack.

11 "Nearness to residences, Air Quality and danger to health"

"Air quality in the locality is already an issue due to the traffic levels on the M40. Emissions from an incinerator or other processing would be an unacceptable additional deterioration."

The Council has commissioned an Atmospheric Dispersion Modelling study to support its earlier Appropriate Assessment screening (Stage 1). Whilst the primary purpose of this work is to assess the implications of the presence of the Burnham Beeches SAC for the use of the two sites (Wapseys Wood and Springfield Farm), it has also allowed some comment to be made on the potential impact at human health receptors along the M40 corridor .

In order to determine the potential impact of the emissions, comparison has been made against the relevant nitrogen dioxide long term UK Air Quality Strategy (AQS) Objective. The AQS Objective is based on minimising the effect of pollutants on human health. Whilst there are other pollutants that would be emitted from an installation, only nitrogen dioxide assessment levels would be in danger of being breached.

In terms of the potential impact at human health receptors, this work indicates that neither EfW or AD facilities at Wapseys Wood are likely to lead to breaches of the AQS Objectives (ie the predicted concentration from the installation is lower than the Objective), at receptors along the M40 corridor. The Council therefore takes the view that the health effects of the emissions are acceptable.

With regard to other emissions, and specifically those from an incinerator with energy recovery (also called "Energy from Waste" or "EfW"), we have been advised that:

- An EfW plant can only operate with a permit from the Environment Agency (EA) under the Pollution Prevention and Control regulations. It must continuously monitor and report emissions from the plant and the EA has the power to close a plant if it breaches these. EA inspections are both scheduled and unannounced;
- The Health Protection Agency stated in a report in 2006 that the current levels of dioxin emissions from incineration are unlikely to increase the human body burden significantly, since incineration accounts for less than 1% of UK dioxin emissions. (HPA Response to the British Society for Ecological Medicine Report);
- Modern waste incineration contributes so little to dioxin emissions that it doesn't even figure in the Government's list of top 12 sources. (Report produced for DEFRA, for the UK's commitments under the Stockholm Convention [NETCEN 2006].);
- With regard to the very small particles emitted called PM₁₀ (of which PM_{2.5} is part), the National Atmospheric Emissions Inventory research (NAEI) in 2005 shows that traffic produces six times more PM_{2.5} particles than all waste management processes (not just incineration);
- Concerns about the health of people living near an EfW facility have also been addressed by the UK Committee on Carcinogenicity of Chemicals in Food, Consumer Products & the Environment. In its March 2000 report, it said: 'The Committee is reassured that any potential risk of cancer due to residency (for periods in excess of 10 years) near to municipal solid waste incinerators was exceedingly low and probably not measurable by the most modern epidemiological techniques. The Committee agreed that, at the present time, there was no need for any further epidemiological investigations of cancer incidence near municipal solid waste incinerators.' Since this

report, the EU Waste Incineration Directive has come into force and emissions have reduced still further. The Committee's findings have been backed up by more recent studies in Portugal in 2007 by Lisbon University Institute of Preventive Medicine;

- There are 17 thermal treatment plants in the UK, three of them in Hampshire. They provide data on emissions which are strictly monitored by the Environment Agency (EA). This information is public and can be viewed on their website. The data show that the plants are safe and well within the requirements.

Recent research for the government (Enviros 2003) showed that all waste processes are responsible for some emissions, but that none poses a threat to human health or the environment. Energy from waste plants are more strictly regulated than most other processes, including coal-fired and gas-fired power plants. They are fitted with extensive systems for controlling emissions, and for cleaning those emissions which cannot be avoided. Modern energy from waste plants meet all the stringent environmental criteria laid down by the UK Government and the EU. They are considered by the UK Dept of Health to be environmentally safe, and to pose virtually no risk to health. The Royal Commission on Environmental Protection (RCEP) says that EfW offers a long-term, secure and environmentally acceptable Best Practical Environmental Option (BPEO) for treating municipal waste.

The Environment Agency (EA) will only authorise the plant to operate when it has been demonstrated that it can comply with strict new emissions limits set in the EC Waste Incineration Directive. The EA has the power to shut down any facilities (not just EfW) that fail to meet the appropriate standards.

We are naturally seeking the views of the PCT and health authorities upon these conclusions.

12 "Site prone to Flooding. This would be exacerbated by further development of the site."

The Council does not consider that this precludes consideration of the site. Mitigation is certainly possible. The site is not within a river floodplain as shown on the Environment Agency's Flood Zone Maps. This has been confirmed by the Agency (letter 30 July 2007). Therefore the Council takes the view that the site could be developed.

Whilst the site is outside the floodplain, development in this category (ie over 1 hectare) can generate significant volumes of surface water and so a Flood Risk Assessment (FRA) to assess the impact of detailed proposals will need to be undertaken to support any planning application.

13 "Contour levels have been raised significantly under the most recent landfill consents. Any proposal to reopen pits and further raise the levels to accommodate incinerator ash or other proces waste would be completely unacceptable, both aesthetically and in respect of drainage and leacheate control."

The development of a Strategic Waste Complex (SWC) at Wapseys Wood will not require the opening of the landfill. This will be the case even if a recovery facility took the form of an incinerator with energy generation.

Should an incinerator be developed at any of the locations identified for potential SWC facilities, the likelihood is that the bottom ash will be sent elsewhere for processing into construction materials. It would not be a good use of these materials to simply landfill them - because it would be contrary to the objectives of husbanding voidspace and primary minerals.

Detailed proposals will fall to be considered at the time a planning application is made.

The present contours are intended to ensure run-off of surface water.

14 "Potential pollution damage to Burnham Beeches SAC. And also to Stoke Common SSSI and the Church Wood RSPB reserve at Hedgerley."

The Council does not agree. An Atmospheric Dispersion Modelling study has been undertaken to inform the original Appropriate Assessment screening report (Stage 1).

This concludes that the presence of the SAC does not preclude any of the potential development scenarios for Energy from Waste (or incineration with energy generation) or Anaerobic Digestion facilities being progressed at the Wapseys Wood site.

This overall conclusion has been endorsed by Natural England (NE).

No objection has been made by NE in respect of Stoke Common SSSI, nor by RSPB in respect of Hedgerley.

15 "Red kites are nesting on the site and in the neighbouring woodlands ... Further development of the site and associated pollution would put these birds at risk."

The Council has no evidence that red kites are nesting on this site. The presence of the red kite was not identified in responses made by the Countryside Initiatives Team, nor by BBONT. This representation was not made by the RSPB.

This would be a consideration at planning application stage. It would be amenable to mitigation, given that the majority of the site can be restored consistent with biodiversity interests.

16 "BCC claim to have considered a wide range of sites (WPDP para 1.9). But at the options review stage it was decided to focus on existing large landfills (para 5.4). These choices were further limited by designating three sites including [Wapseys Wood], as potential Strategic Waste Complexes (paras 6.6/6.7). It is inconceivable that there are not other industrial sites that should be included for consideration."

The Waste DPD Preferred Options consultation report (Section 5) sets out the area/site search and appraisal process in some detail. This shows that the initial "long list" of areas/sites which could have potential for waste management use comprises some 191 sites. These included sites in waste management use, in industrial areas, and brownfield land. These classifications are consistent with national and regional policy. The derivation of a "short list" was a thorough process and did, indeed, include some industrial sites. However these were not suitable for Strategic Waste Complex development.

- 17 "Undue emphasis is placed on incineration as a solution, with more advanced technologies dismissed as unproven."

The Waste DPD Preferred Options consultation report was technology neutral (as indeed the MWCS will be), and actually contained a question mark against incineration with energy recovery (also called Energy from Waste) and Anaerobic Digestion at Wapseys Wood pending clarification of potential effects upon the Burnham Beeches SAC (now resolved).

However, the main point is that the Waste DPD Preferred Options do not preclude any of the "advanced technologies" from further consideration. It seems helpful, however, to indicate to stakeholders and consultees that these are less likely to be implemented because they are less likely to be funded. In this, the Council is simply indicating the general view of the industry and procuring bodies.

- 18 "Incineration can be a disincentive to increasing recycling by offering 'easy' disposal of waste and through contractual commitments to provide fixed tonnages of waste to the incinerator."

The Council does not accept that this needs to be the case.

A recovery facility will not necessarily be an incinerator (with energy recovery). However even if it were the two processes are complementary. We have a recycling-led joint waste strategy that seeks to recycle at least 45% by 2010/11 and go beyond this in the longer term. We recycle first, then we try to recover more from what is left over. Our policy is to encourage as much recycling as possible and only process the minimum left over. Also, by using an Energy from Waste technology, we use what cannot be recycled to produce energy. Other European countries see good results from having both recycling and thermal treatment. For example, in Denmark, they recycle 40%, burn 50% with the rest going to landfill. In Holland, 50% is recycled and 40% goes through an EfW plant so very little ends up in holes in the ground.

(EU Waste management strategy and the importance of biogenic waste. Centre for the Study of Institutions, Population and Environmental change (CIPEC) September 06)

- 19 "Additional lorry movements to take 30% bottom ash when landfill completed in 2012"

The Council assumes that this comment relates to an incineration (with energy recovery) - or EfW - facility.

The Council is aware of this consideration. It now seems likely that bottom ash would be reprocessed for aggregate applications rather than landfilled wherever a facility was located within the County. Therefore the availability of voidspace is not necessarily significant.

It would also be consistent with the concept of a Strategic Waste Complex if bottom ash from an EfW facility was to be reprocessed on site.

- 20 "The toxicity of chimney residues (fly ash) and of bottom ash remains a major public concern."

The Council assumes that this comment relates to an incineration (with energy recovery) - or EfW - facility.

The main solid residue is bottom ash, which accounts for about 30% by weight of the original waste and about 10% by volume. Bottom ash is an inorganic sterile material with the consistency of sandy gravel containing about 10% ferrous metals. It is not classified as hazardous.

The metals are separated by magnets for recycling. The remaining ash can then be disposed of to landfill or can be used in construction.

'Fly ash' is the term used for the material removed during the gas cleaning processes. It consists of small quantities of fine particles trapped in the gas stream and, the largest proportion, the reagents such as lime or activated carbon and salts which were used to clean the gases. Fly ash and air pollution control residues represent 2-4% by weight of the input waste. This material is treated as hazardous waste, and landfilled in separate specialised secure landfills. The main hazardous property associated with fly ash is its alkaline nature, resulting from the use of lime to clean the gases which are emitted.

Fly ash is classified as hazardous because it is very alkaline, not because it is toxic. It can be used industrially to neutralise acid. Factories that produce acid in their manufacturing process have to dispose of it sometimes and fly ash can be used in this treatment process, reducing the hazard associated with both materials. There are some UK EfW plants which sell the ash to industry, thereby reducing the need to landfill it.

- 21 "If EfW is an unavoidable option then it might be better considered as a furnace driven power generation application rather than waste disposal. As such it would more appropriately located either:
- i) on an existing fossil fuel power station site, or
 - ii) on an industrial complex where the 'waste' heat can be used for local area heating or to drive another process."

There are no such locations within Buckinghamshire. There will be some local opportunities for the possible use of heat, although the Council expects that the co-located waste technologies upon a Strategic Waste Complex (SWC) will be a more significant user of heat in reprocessing activities.

22 "Property values"

PPS1 ("Delivering Sustainable Development") sets out the Government's objectives for the planning system. Prominent among these is that:

"Good planning is a positive and proactive process, operating in the public interest [BCC underlining] through a system of plan preparation and control over the development and use of land" (PPS1, para. 2) and that "Sustainable development is the core principle underpinning planning ... (PPS1, para. 3).

With regard to waste, PPS1 says that development plan policies should take account of "the management of waste in ways that protect the environment and human health, including producing less waste and using it as a resource wherever possible" (PPS1, para. 20).

The Council has had particular regard to these Objectives when preparing the Waste DPD Preferred Options consultation report. It will be similarly guided by public interest and sustainable development when drafting the MWCS Preferred Options.

Research undertaken by Cluttons examined trends in houseprices and inward investment in relation to a (then) proposed Energy Recovery Facility at Newhaven. In the course of this study the researchers:

" ... looked at empirical evidence from actual residential and commercial property transactions in three locations in Hampshire (Chineham, Marchwood and Portsmouth), where similar ERF developments have recently been completed. From the available evidence from these locations, we are of the opinion that there has been no noticeable or lasting adverse affect on the property markets in those locations due to the presence of the ERFs. In all three locations values have continued to rise in line with other areas in their local markets. In addition, in all three cases there has been substantial investment / development in both the residential and commercial sectors in the areas around the ERFs in the periods following grant of planning consent and construction. This has continued once the ERFs have become operational" (*Energy Recovery Facility, North Quay, Newhaven - Assessment of Potential Impacts on Investment and Property Values: Study of Three Energy Recovery Facilities in Hampshire, Cluttons*).

The Council therefore takes the view that there is no substantive evidence that EfW plants have an adverse impact on the ability of an area to attract inward investment, the image and perception of an area as a business location or property values.

SPRINGFIELD FARM LANDFILL SITE

[Waste DPD Preferred Options, PAW3]

BCC comment following consultation/further assessment

The County Council has considered the responses relating to Springfield Farm Landfill Site made during the Waste DPD Preferred Options consultation and sees no overriding reason for discounting this site from consideration as a potential safeguarded site for a Strategic Waste Complex in the Minerals & Waste Core Strategy.

BCC current position

Maintain site for further consideration. Proposed for safeguarding against possible need for a reserve Strategic Waste Complex (SWC) site.

1 "Nearness to residences – only 500M from closest houses. Schools close by"

This response seems to relate to anticipated pollution from an EfW (incineration with energy recovery) facility.

The Council is bound to take account of the Government view that "research carried out to date shows no credible evidence of adverse health outcomes for those living near incinerators" (Waste Strategy 2007, Chapter 5, paragraph 22).

Please see also the Council's rejoinder at Wapseys Wood (12) above. This discusses relevant work that the Council has commissioned (Air Dispersion Modelling), together with conclusions arising from other sources.

The Council takes the view that the health effects of the emissions are acceptable.

Recent research for the government (Enviros 2003) showed that all waste processes are responsible for some emissions, but that none poses a threat to human health or the environment. Energy from waste plants are more strictly regulated than most other processes, including coal-fired and gas-fired power plants. They are fitted with extensive systems for controlling emissions, and for cleaning those emissions which cannot be avoided. Modern energy from waste plants meet all the stringent environmental criteria laid down by the UK Government and the EU. They are considered by the UK Dept of Health to be environmentally safe, and to pose virtually no risk to health. The Royal Commission on Environmental Protection (RCEP) says that EfW offers a long-term, secure and environmentally acceptable Best Practical Environmental Option (BPEO) for treating municipal waste.

The Environment Agency (EA) will only authorise the plant to operate when it has been demonstrated that it can comply with strict new emissions limits set in the EC Waste Incineration Directive. The EA has the power to shut down any facilities (not just EfW) that fail to meet the appropriate standards.

We are naturally seeking the views of the PCT and health authorities upon these conclusions.

2 "Visual impact"

The Council understands residents' concerns about possible visual impact, and again, seems to be addressed to an EfW (incineration with energy recovery) facility and the necessary stack.

It should be said that a recovery facility, if found acceptable and necessary at Springfield Farm, would not necessarily take the form of an incinerator (with energy recovery); for example it could be Anaerobic Digestion (AD) or Mechanical Biological Treatment (MBT) both of which could have a far lower stack.

Nevertheless the Council agrees that consideration of a stack up to 75m (as likely for an incinerator) is an important factor in assessing visual impact. However, there would be an effect upon the landscape wherever such a facility is to be built. Clearly much can be achieved through quality of design.

3 "Concerns about additional traffic going through Beaconsfield Old Town"

One of the purposes of proposing Strategic Waste Complexes is to reduce lorry movements through co-location of related waste management activities. Therefore the aggregate of waste movements is reduced, consistent with good planning (and national/regional policy). We have estimates which suggest that very modest additions to existing loadings are likely to result from further waste development at Springfield Farm.

We have also consulted with the Highway Authority, and they do not see traffic implication/access difficulties arising from the proposals. Against this overall background, the Council does not accept that there would be unacceptable traffic implications for Beaconsfield Old Town.

The number of lorries accessing a recovery facility at Springfield Farm would be relatively small. In addition, the daily lorry movement (for all uses on the site) is controlled to 380 - one way - and the consultation document has not proposed any extension to this.

The Council accepts that rigorous routing arrangements would need to be put in place as a condition attached to any planning permission, and that these would need to be monitored (and enforced, if necessary).

There is a major Traffic Assessment exercise underway which will address these general issues, taking into account the general future growth in traffic. This results of this modelling will be published, and will inform the MWCS Preferred Options consultation report.

4 "Burnham Beeches SAC"

An Atmospheric Dispersion Modelling study has been undertaken to inform the original Appropriate Assessment screening report (Stage 1).

This concludes that the presence of the SAC does not preclude any of the potential development scenarios for Energy from Waste (or incineration with energy generation) or Anaerobic Digestion facilities being progressed at the Springfield Farm site.

This overall conclusion has been endorsed by Natural England.

5 "Health concerns – air quality"

The Waste DPD Preferred Options consultation report is "technology neutral" between the various forms of recovery. Nevertheless Energy from Waste (EfW) is likely to be a possibility at Springfield Farm in the MWCS Preferred Options (although the site is likely to be a "reserve"), and the Council understands that local people are concerned about emissions and public health. This is also true of residents around any of the sites where EfW is a possibility.

Government advice is that "research carried out to date shows no credible evidence of adverse health outcomes for those living near incinerators" (*Waste Strategy 2007*, Chapter 5, paragraph 22).

The Council has commissioned a study of the implications upon air quality in the area. These are not simple matters, and require a dispersion model based upon expected inputs and plant performance. This work became available in December 2007, and has informed the content of the MWCS Preferred Options consultation report.

Please see rejoinder (1) above, and Wapseys Wood (11)

6 "Property values"

Please see rejoinder made to Wapseys Wood (22) above.

7 "As Wapseys Wood is a larger site and further away from housing, it would be preferable to Springfield Farm"

The Council agrees that Wapseys Wood is the larger site (at 146 hectares, compared to Springfield Farm at 66 hectares).

The Council considers that there are a number of reasons why Wapseys Wood may be seen as a preferable location to Springfield Farm for the development of an SWC, and these will be fully set out in the forthcoming Minerals & Waste Core Strategy (MWCS). Therefore Wapseys Wood is likely to be a "preferred area" in the MWCS, whilst Springfield Farm is likely to be a (contingent) "safeguarded area".

WOODHAM INDUSTRIAL AREA

[Waste DPD Preferred Options, SAW1]

BCC comment following consultation/further assessment

The County Council has considered the responses relating to Woodham Industrial Area made during the Waste DPD Preferred Options consultation and sees no overriding reason for discounting this site from consideration as a potential safeguarded site for a Strategic Waste Complex in the Minerals & Waste Core Strategy.

BCC current position

Maintain site for further consideration, with potential for large- or small-scale recovery processes.

"Some conservation sites/concerns omitted from the Area Statement:

Ham Home-cum-Hamgreen Woods SSS1 - impact

BNS 71E01 Ham Farm ponds should be added to negative sustainability factors to be addressed in planning applications.

Add "protected species" as "negative sustainability factors to be addressed in planning applications."

The Council agrees.

"The site is located in the vicinity of gas mains operating at high pressure".

Local authorities have a statutory duty to consider applications for development in the vicinity of high pressure (above 7 bar) pipelines and to advise the developer on whether the development should be allowed on safety grounds on rules provided by the HSE.

The relevant pipeline passes adjacent to the south-eastern boundary to the site. The operator of the gas transmission system has not indicated that the site should be discounted from further consideration.

The Council has considered the the "Gas Transmission Underground Pipelines" Guidance and associated activity risk tabulation provided by the operator. It concludes that there is no reason to discount the site from further consideration.

"Road access on to A41 ..."

"6 private houses and their gardens: Creighton Road"

The Council agrees that an improved access to the site from the A41 is likely to be needed if Woodham were to accommodate major waste development.

One possibility would be to use the alignment of the disused railway which runs along the western boundary of the site, with access taken from a roundabout on A41.

This would allow a more satisfactory relationship to the houses in Creighton Road than the present access to the site.

"Problems from the old landfill area, which is giving problems"

"Limited scale waste management facilities may well enable the issue (unsatisfactory former landfill area) to be addressed with limited impact on residential amenity. The site could therefore have potential for small-scale uses ..."

This area has an old landfill on the northern part of the site, associated with the former Woodham Brickworks. This site was operated under the Control of Pollution Act 1974 (ie before the Waste Management Regulations 1994) and so does not benefit from a Waste Management Licence. The site formerly accepted household and C&I waste and was not engineered or properly capped to today's standards.

The former landfill remains in an unsatisfactory state and is considered to need recapping and reprofiling.

It may be possible to achieve this objective in association with additional waste development.

"Site lies within Flood Zone 1, the low risk zone for planning purposes. However since it is greater than 1 ha, a flood risk assessment will be required"

Agreed.

"Potential loss of employment"

The Council is aware of some 14 companies operating from the Woodham area. One company deals with the transport of hazardous materials, and another with haulage. It is therefore possible that there could be synergies with some of the existing companies at Woodham.

It is likely that the site could accommodate waste development without impacting upon existing employment. This has been identified in the MWCS Area Statement as a matter for consideration should a planning application be made.

"Visual screening"

The Council accepts that there would need to be careful consideration of screening waste development in the design of site landscaping. Nevertheless it is likely to be difficult to screen large plant, for example an EfW facility. Therefore there should be a high standard of design as a key ameliorative factor.

This is a consideration that would also apply to other potential recovery sites.

"EfW discharges into the atmosphere"

The Plan is "technology neutral" between the various forms of recovery. Nevertheless EfW is a "reserve" possibility at Woodham, and the Council understands that local people are concerned about emissions and public health. This is also true of residents around any of the sites where EfW is a possibility.

Government advice is that "research carried out to date shows no credible evidence of adverse health outcomes for those living near incinerators" (*Waste Strategy 2007*, Chapter 5, paragraph 22).

The Council has commissioned a study of the implications upon air quality in the area. These are not simple matters, and require a dispersion model based upon expected

inputs and plant performance. This work became available in December 2007, and has informed the content of the MWCS Preferred Options consultation report.

"Safeguarding proposals increase the degree of uncertainty"

The Council accepts that its safeguarding proposals, particularly those related to major energy-recovery facilities, should be proportionate. It will therefore propose fewer sites in its forthcoming Minerals & Waste Core Strategy (MWCS). Nevertheless, it would be imprudent not to allow for some contingency in case "preferred areas" could not - for some unforeseen reason - prove incapable of implementation.

"There is no existing landfill capacity on the site, so any end products from EfW and MBT would need to be taken off the site for disposal (the nearest site being Calvert)"

The Council agrees that this would be the case.

If the recovery technology was to be Energy from Waste (EfW) [incineration with energy generation], the main "end product" would be "bottom ash".

However, although this material can be landfilled it is now more common for the bottom ash to be processed into construction materials. This can be done on-site or sent elsewhere for processing.

This is likely to be the case, should an incinerator be developed at any of the locations identified by the Council for potential SWC facilities.

It would not be a good use of these materials to simply landfill them - because it would be contrary to husbanding of voidspace and primary minerals.

"The site should not be considered for development if expansion at Calvert, and the associated road link, are being pursued"

This comment is noted. When the MWCS Preferred Options are published, it is likely that Woodham will be a reserve site for the eventuality that a facility could not be developed at Calvert. The Council would not, therefore, be proposing both sites for major waste development.

"It is not clear why this site is capable of small scale EfW, AD and MBT ..."

This was initially a view of the Council's Consultant when the initial site appraisals were undertaken, based upon a concern for visual intrusion.

However, the Council considers that there would, in visual terms, be relatively little difference in building mass (for example between a plant of around 100,000 tpa and one handling 210,000 tpa) whether the recovery technology was to be EfW, AD or MBT.

COLLEGE ROAD NORTH, ASTON CLINTON

[Waste DPD Preferred Options, PAW4]

BCC comment following consultation/further assessment

The County Council has considered the responses relating to College Road, Aston Clinton made during the Waste DPD Preferred Options consultation and now regards the site as unsuitable for thermal treatment because of potential conflicts with operations at RAF Halton.

However the Council sees no overriding reason for discounting this site from consideration as a potential allocation for a Waste Transfer Facility in the Minerals & Waste Core Strategy.

BCC current position

No longer considered suitable for strategic facilities because unsuitable for thermal processes. Maintain site for further consideration for a Waste Transfer Station (WTS).

Planning application for Household Waste Recycling Centre (HWRC) is imminent.

Other(non-recovery) waste uses may be considered in the Waste DPD submission draft

1 "Danger to aircraft, chimney in line with main runway at RAF Halton"

The Council assumes that this comment relates to an incineration (with energy recovery) - or EfW - facility.

The Council agrees this concern following representations from the Ministry of Defence (MOD), Defence Estates in response to the Waste DPD Preferred Options consultation.

The MOD Defence Estates has recently confirmed (January 2008) its earlier objection that the College Road North site is unsuitable for the development of an Energy from Waste facility (EfW) because the necessary flue stack would create an unacceptable hazard to aircraft using the northern approach to and from runway 20 at RAF Halton.

2 "Traffic – poor haul route, only last 500M is dual carriageway. All of the traffic will have to go through Aylesbury and villages to the south"

[This representation was addressed to the suitability of the Aston Clinton site for a waste recovery facility ie an incinerator with energy recovery - however it is addressed here as the considerations may also relate to a Waste Transfer Facility].

The Council does not accept that the site is unsuitable in terms of transport. On the contrary, we say that the site is well located, being adjacent to the A41 Aston Clinton bypass and a junction offering access.

Similar arguments on transport and access were made at the time of the Minerals and Waste Local Plan Inquiry (April 2005), as indeed were comments on vehicles passing through Aston Clinton and Weston Turville villages. The independent Inquiry Inspector found that the site at College Road North was suitable for a

Household Waste Recycling Centre (HWRC) - a "bring site" with visiting vehicles coming from a fairly wide area.

Turning a possible Waste Transfer Station (WTS), this would be needed to accommodate possible movements of "residual waste" (waste left after recycling) from the north of the County to a recovery facility in the south.

The Council does not expect that adding additional movements due to a WTS will add significantly to these movements (we estimate about xxx on the A41). The major movement will be from the Aylesbury direction and will use the A41. The site is well located in relation to Aylesbury and the growth locations. The Highways Authority has identified no problems with the proposed development (given agreed improvements to the A41 bypass junction and the related part of College Road North).

3 "Air pollution and health concerns – schools and nursery nearby. Fumes will be trapped in the vale"

The Council assumes that this comment relates to an incineration (with energy recovery) - or EfW - facility.

The Council no longer proposes an EfW facility at College Road North, Aston Clinton.

4 "Bearbrook constantly floods surrounding fields"

The matter of potential flooding was discussed at the BM&WLP Inquiry, and the Inspector recommended that the College Road North site be safeguarded for an HWRC.

Because the site is larger than 1 hectare in size, a Flood Risk Assessment (FRA) will need to be undertaken.

5 "16 miles to the nearest landfill site"

The Council assumes that this comment relates to an incineration (with energy recovery) - or EfW - facility.

The Council no longer proposes an EfW facility at College Road North, Aston Clinton. The disposal of, for example, incinerator bottom ash from the site is no longer a factor.

6 "Visually intrusive – setting of AONB and Scheduled Ancient Monument at Vatches Farm. Impossible to screen"

The Council assumes that this comment relates to an incineration (with energy recovery) - or EfW - facility.

The Council no longer proposes an EfW facility at College Road North, Aston Clinton. There will therefore be no need for a stack. Although a waste transfer facility will take the form of a large building (some 15 metres high) the Council considers that visual intrusion can be significantly mitigated through on-site and high quality plant design.

It may also be a relevant consideration that Aylesbury Vale District Council in its Aylesbury Allocated Sites DPD (July 2007) has proposed an employment allocation

of some 15-20 hectares at College Road North.

7 "Badgers and Great Crested Newts on site"

These species have not been identified to the Council by any of the conservation respondents. The Council therefore concludes that there are no protected species within the site.

8 "Site too small for proposed plant"

The Council assumes that this comment relates to an energy recovery facility. The Council no longer proposes such a facility at College Road North, Aston Clinton.

The forthcoming MWCS Preferred Options are likely to propose a Waste Transfer Station at the site (additional to the HWRC, for which an application has now been made). The site is large enough for these uses.

9 "House prices"

The Council assumes that this comment relates to an incineration (with energy recovery) - or EfW - facility.

However it no longer proposes a recovery facility at College Road North, Aston Clinton.

Nevertheless, the Council therefore takes the view that there is no substantive evidence that EfW plants have an adverse impact on the ability of an area to attract inward investment, the image and perception of an area as a business location or property values (see Wapseys Wood [22]).

10 "Effect on Hertfordshire residents who are downwind"

The Council no longer proposes an EfW facility at College Road North, Aston Clinton. There will therefore not be incineration emissions to the atmosphere. A WTS building will be a sealed structure with negative air pressure which will act to confine dust etc.

BUCKINGHAM

[Waste DPD Preferred Options, ASW1 & ASW2]

BCC comment following consultation/further assessment

The County Council has considered the responses relating to the Areas of Search at Buckingham made during the Waste DPD Preferred Options consultation and sees no overriding reason precluding identification of a site for consideration as a potential allocation for a Waste Transfer Facility in the Minerals & Waste Core Strategy.

BCC current position

The Council has now identified a site off Osier Way site for further consideration for a Waste Transfer Station (WTS).

The provision of a Household Waste Recycling Centre (HWRC) is likely to be proposed in the WDPD submission draft.

1 "Development in this category (ie over 1 hectare) can generate significant volumes of surface water"

The site is located in Flood Zone 1 which is land outside the floodplain as shown on the Environment Agency's Flood Zone Maps.

A site in excess of 1 hectare will require a Flood Risk Assessment to be undertaken.

2 "Possible impact on the A43 and A5"

The WTS is not intended to serve areas to the north of the county, and will not have any significant impact upon these (trunk) roads. The predominant movement would be the carriage of local residual waste to a recovery facility located within southern Buckinghamshire.

3 "There are two Local Wildlife Sites within 500 metres of the Area"

The Council welcomes this information and has added the LWSs to the relevant Area Statement.

4 "Concern about traffic and access"

The Council has sought the views of the Highways Authority - a location accessed from Osier way (within the Waste DPD Preferred Options ASW2) was seen as preferable to a location within ASW1 (access off the Tesco roundabout).

The Council therefore considers that access to a Waste Transfer Station at this location would be satisfactory. It has commissioned an initial Transport Assessment and the number of additional HGVs resulting from a WTS at the site off Osier Way, if required, would be low.

- 5 "Land blighted until 2026 with safeguarding policy ... ASW1 too large & not a suitable location ... ASW2 too large, location adjacent to the business park would be more suitable - there is existing access off the A421 at the 'Focus' roundabout".

At the time of the Waste DPD consultation the Council indicated that it would "undertake the necessary further studies to identify specific sites as soon as it is able to do so. It will then cease the safeguarding of the remainder of the ASWs" (Waste DPD Preferred Options consultation report, paragraph 6.15). It therefore had no wish to blight these large areas.

The Council has now undertaken this work and has identified a site off Osier Way (within the former ASW2). This site will be a preferred area within the forthcoming Minerals & Waste Core Strategy.

It is located adjacent to the business park and will be accessed from the A421 at the 'Focus' roundabout.

A waste transfer station would need to be operational by the opening date of the facility(ies) it is intended to serve, say by 2013.

The Council therefore no longer proposes to safeguard the area comprising ASW1 ("Buckingham South East") proposed in the Waste DPD Preferred Options.

- 6 "... affects Grade 1 registered Stowe Landscape Park"

The Council does not accept that a WTS off Osier Way, associated with the extension to the Buckingham Industrial Park, would affect Stowe Park.

LONDON ROAD, AMERSHAM

[Waste DPD Preferred Options, PAW5]

BCC comment following consultation/further assessment

The County Council has considered the responses relating to London Road, Amersham made during the Waste DPD Preferred Options consultation and sees no overriding reason for discounting this site from consideration as a potential allocation for a Waste Transfer Station in the Minerals & Waste Core Strategy.

BCC current position

The site is already safeguarded for this purpose in the adopted Buckinghamshire Minerals & Waste Local Plan (June 2006). Therefore the principle of a WTS at this location is already established.

Other(non-recovery) waste uses may be considered in the Waste DPD submission draft

1 "Current noise levels from the HWRC & noise levels likely from WTS"

The Council accepts that it will be important to protect adjacent residential development from adverse impact upon environment and amenity. Noise will be one such factor. A Waste Transfer Station, if developed, would be an enclosed facility. The number of additional HGV movements resulting from the facility would be low.

2 "Traffic hazard - junction of Cokes Lane & A413 London Road East" "Traffic generation on the A413 - more cars & HGVs"

The Council has sought the views of the Highways Authority - a location accessed from the existing site entrance on the A413 is seen as acceptable. It has commissioned an initial Transport Assessment and the traffic implications of a WTS at London Road would be low.

3 "The full implications of (WTS) development on the Chilterns AONB ... buildings ...may have detrimental impacts on the landscape ...Need for new buildings?"

The Council accepts that a WTS, if developed, would require a new building and this is likely to be large (some 15 metres high). It should therefore be to a high standard of design. However the Council does not accept that there would be visual intrusion because there are limited views into the site from adjacent areas.

5 "River Misbourne"

The Council accepts that appropriate measures must be provided to ensure the River Misbourne is protected from contamination. However it takes the view that the local watercourse is unlikely to be a receptor for contamination from groundwater.

These matters would fall to be considered at the time that a planning application is made (for example, the relative elevation of the watercourse to that of the groundwater). However mitigation, even if needed, is expected to be possible.

In addition, a Flood Risk Assessment will be required.

5 "Ecological Designations"

The Council agrees that the Area Statement does not take into account all sites designated for their nature conservation interest. It has therefore added the following:

- BNS 99X04 'A413 verge near Amersham' is adjacent
- BNS 99X05 'Golf Course Bank, Little Chalfont' is less than 500 metres to the east

These additions will be taken into account in preparing the Sustainability Appraisal for the MWCS.

HIGH HEAVENS

[Waste DPD Preferred Options, PAW6]

BCC comment following consultation/further assessment

The County Council has considered the responses relating to High Heavens made during the Waste DPD Preferred Options consultation and sees no overriding reason for discounting this site from consideration as a potential allocation for a Waste Transfer Facility in the Minerals & Waste Core Strategy.

BCC current position

The site is already safeguarded for this purpose in the adopted Buckinghamshire Minerals & Waste Local Plan (June 2006). Therefore the principle of a WTS at this location is already established.

Other(non-recovery) waste uses may be considered in the WDPD submission draft

- 1 "The full implications of (WTS) development on the Chilterns AONB ... buildings ...may have detrimental impacts on the landscape ...Need for new buildings?"

The Council accepts that a WTS, if developed, would require a new building and this is likely to be large (some 15 metres high). It should therefore be to a high standard of design. However the Council does not accept that there would be visual intrusion because there are limited views into the site from adjacent areas.

- 2 "Ecological Designations"

The Council agrees that the Area Statement does not take into account all sites designated for their nature conservation interest. It has therefore added the following:

- BNS 89K01 'Hillgreen and Hollygreen Woods' is adjacent
- BNS 88J07 'Nuttings Wood' is adjacent

- BNS 88J02 'High Heavens Meadow' less than 250m to east
- BNS 88J08 'Linzees Firs' less than 250m to east
- BNS 88P06 'High Heavens Wood' less than 500m to east

These additions will be taken into account in preparing the Sustainability Appraisal for the MWCS.

3 "Flood Risk"

The site is not within a river floodplain. However the site is in excess of one hectare in extent and so a Flood Risk Assessment (FRA) will need to be undertaken.

4 "M40 Junction 4"

The Council has sought the views of the Highways Authority - a location accessed from the existing site entrance is seen as acceptable. It has commissioned an initial Transport Assessment and the traffic implications of a WTS at High Heavens would be low.

RICHINGS PARK

[Waste DPD Preferred Options, SAW5]

BCC comment following consultation/further assessment

The County Council has considered the responses relating to High Heavens made during the Waste DPD Preferred Options consultation and sees no overriding reason for discounting this site from consideration as a potential allocation for a Multi-Modal Waste Transfer Station in the Minerals & Waste Core Strategy.

BCC current position

The site is already safeguarded for this purpose in the adopted Buckinghamshire Minerals & Waste Local Plan (June 2006). Therefore the principle of a Multi Modal Waste Transfer Facility at this location is already established.

- 1 "Add wagons to existing trains or originate new trains from appropriate places on the rail network in Bucks in order to make full use of the rail system and reduce the amount of road traffic."

The Council does not consider that this is likely to prove possible or viable. The most realistic prospect for the movement of waste by rail will be from a dedicated Transfer Facility.

- 2 "Some nature designations missing ..."

The Council accepts this is so, and welcomes the information. It has therefore added the following to the relevant Area Statement:

- Biological Notification Site (BNS) 250m to the east of the site;
- BNS opposite Iver Station (08F04) less than 500m to east
- BNS Grand Union Canal, Slough branch (08F03) less than 500m to east

- 3 "This 10 ha site is located close to the M4 Junction 5 and would be a concern to the HA, especially if the traffic would be using the motorway junction"

The Council intends to undertake a robust evaluation, as requested, of the potential traffic implications arising if the site was developed as a MMWTF (Multi-Modal Waste Transfer Facility). This will be published as part of the Evidence Base supporting the MWCS.

The early indication is that the percentage change in HGV traffic at the site would be very low.

- 4 "Incursion into Green Belt & contrary to aims of Colne Valley Park"

The Council does not agree that these factors should preclude the site from further consideration. These matters were considered at the LPI of the adopted minerals & waste local plan (the BM&WLP) and were the Inspector agreed with the Council (and safeguarding the site for such a use).

5 "Not Brownfield land"

The site is a former sand and gravel working which has since been restored. Nevertheless the BM&WLP Inquiry Inspector recommended that the site should be safeguarded for a MMWTF.

6 "New access road - waste brought to site by road & existing traffic problems"

Again these matters were considered at the LPI, the Council commissioned a consultant study on access to the site. This concluded that there were a number of possibilities for constructing a new access into the site - these would also have the effect of reducing existing traffic problems in the area. Two of these, accessing the site from the south, were particularly favoured.