PLANNING STATEMENT - HIGH TEMPERATURE TREATMENT FACILITY FOR MEDICAL WASTE, STOPGATE LANE, SIMONSWOOD

Stopgate Lane, Simonswood

Culzean W2E Limited

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Document History:

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1.0	30/11/2021	DY	CW2E	Draft for applicant review
1.1	06/12/2021	DY	CW2E	Updated draft
1.2	13/12/2021	DY	CW2E	Application submission version

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1 Introduction

1.1 Overview of Application

1.1.1 This application is for the operation of a High Temperature Treatment Facility for management of Medical Waste at Stopgate Lane, Simonswood. The plant will be a specialist facility for the management of medical waste.

1.1.2 The title of the application is as follows:

"Demolition of Existing Building and Erection of Purpose Built Building (and Ancillary Structures) to House High Temperature Treatment Facility for the Management of Medical Waste."

1.2 Applicant and Agent

1.2.1 The applicant is Culzean W2E Limited of Chadwick House, Warrington Road, Birchwood, Warrington, WA3 6AE.

1.2.2 Oaktree Environmental Ltd has been engaged to act as consultants for Culzean W2E Limited and to assist in the preparation of this planning application. Contact details for Oaktree Environmental are as follows:

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2 Site and Application Proposals

2.1 Site Location

2.1.1 The application site is located at Stopgate Lane, Simonswood, within an existing industrial estate, which contains a number of existing industrial processes, including waste recycling facilities and other industrial processes.

2.1.2 The site is located within an industrial estate and therefore suitable for this type of development. There are a number of existing waste and other industrial operations in the vicinity with several large scale structures. The existing site is permitted for waste management related use. As such, the proposals are in keeping with the location, both in terms of scale and proposed processes.

2.1.3 The site is accessed via Stopate Lane, via an existing purpose built access point.

2.1.4 Reference should be made to Drawing No. 2776-008-01 and 2776-008-02 for the general location of the site and indicative red-line planning application boundary. All references to 'the site' in this statement shall mean this area. A site layout plan is also provided (2776-008-04).

2.2 Site Planning History

2.2.1 The following summarises the site's planning history, based on available information on the West Lancashire Borough Council (WLBC) and Lancashire County Council (LCC) planning public access websites:

Application No. LCC/2020/0007

County Matter - Change of use from storage of shipping containers to storage of reclaimed material mounds as an extension of the existing waste transfer station. Permission granted 5 March 2020

2.3 Application Proposals

2.3.1 The proposals are for a high temperature treatment facility for management of medical wastes. This will include acceptance of up to 3,650 tonnes/annum of hazardous wastes for treatment, which will form the majority of wastes accepted, in addition to smaller quantities of non-hazardous waste with wastes predominantly arising from medical sites.

2.3.2 Reference should be made to drawing nos. 2776-008-04 and 2776-008-06 for details of the proposed layout and elevations. The proposals will include the construction of a purpose built building, 28m by 40m in length and width and 10.635m in height to the ridge. This will be located as shown on the site layout plan. The proposals also include the demolition of an existing ageing building on-site, to make way for the footprint of the new development/building.

2.3.3 The building will house the main thermal processing equipment, including the pyrolyser and fuel storage and feed system. Ancillary plant will be included external to the building, including heat exchanger, pollution control plant, exhaust flue and flare, as shown on the layout plan. This flue is required to dilute and disperse residual emissions from the process, following abatement. The flue will fairly modest in height, being 14m in elevation. The height of the flue has been determined/verified as sufficient by a detailed modelling assessment. Reference should be made to the Environmental Statement (document ref: 2776-005-B) which contains the modelling assessment. Heat from the process will be used to dry wood within a container, also located externally to the building, maximising the sustainability of the process.

2.3.4 The site will include the following principal infrastructure, as shown on the Site Layout Plan:

- Pyrolysis unit and associated ancillary plant;
- Pollution control plant;
- Waste reception area;
- Wood drying container;

- Bin wash area; and,
- Bin store.

2.3.5 The exact specification of plant and equipment to be installed within the building along with the internal configuration is outside the scope of the planning application and will be agreed with the regulator as part of the permitting process. However, this has been provided for information purposes as part of this application.

2.3.6 Wheeled Bins (1100 litre and 240/700 litre capacity) are to be delivered to site by articulated lorry (double stacked) for processing. For traceability and identification of wastes, all bins will have a unique Community Power (CP) Barcode/QR Code Tag.

2.3.7 The bins are to be scanned in (where barcodes are present), with barcodes attached to those that do not have them. The different waste types (by European Waste Catalogue (EWC) code) will be weighed, with these weights being set against the bins identity (barcode). Following this, they will be stored in “like type” areas (again by EWC code, ensuring clear separation).

2.3.8 At the point of collection from a waste producing site (hospital, medical centre etc), securely locked bins (1100 litres + 240/700 litre capacity) will be checked for a relevant CP issued barcode/ QR code. As and where required (lost damaged tags), new CP barcode/ QR code tags will be applied by the driver/operator. A bin without a CP issued barcode/QR code tag applied cannot be collected/removed from waste producing site. This barcode / QR code will stay with the bin/waste until the waste contained within has been duly processed, and the bin disinfected and made ready for re-distribution. Until collection from the production of waste site, the barcode/QR code tag is of no relevance. At the point of collection, and reading, the Barcode / QR code becomes “live”.

2.3.9 At the point of reading the barcode and prior to loading onto the transportation vehicle, the type of waste along with location of pickup will be recorded. This

information will be sent directly to the waste processing site at Simonswood for verification and record keeping.

2.3.10 Multiple waste types may be collected from the same or multiple sites in one vehicle "Milk round" style.

2.3.11 Bins will be locked by the operator/driver if not already so, prior to collecting and loading onto the transportation vehicle, when collecting from the waste production site.

2.3.12 At no point will differing waste types be put within the same bin. The bins will be unloaded from the transporting vehicle directly into the building on the site. At no point will unprocessed bins go "outside" of the building. Only disinfected bins will be moved or stored outside of the building, but within the fenced compound of the site.

2.3.13 Upon delivery of the bins to the work site (Simonswood), the bins will be weighed. Prior to arriving, the bins barcodes, contents, and originating location will have been transferred to the work site.

2.3.14 Once weighed, the differing waste types by bin will be moved to its dedicated internal storage area, prior to processing by pyrolysis. The bin's barcode will be read and recorded again at the dedicated storage location to confirm it's location within the facility. Bins will be stored with "like type" bins. (Yellow with Yellow, Orange with Orange etc).

2.3.15 The pyrolysis unit will thermally destruct the medical waste. The empty bin will be taken directly to the bin wash point. Once complete, the bin will be scanned as clean, and then stored ready for return to the medical sites they have originated from.

2.3.16 Waste heat from the process will be used to dry wood, which will be brought onto site by a local business. This will maximise the sustainability of the operation.

2.3.17 The development will generate up to 12 full time jobs.

2.3.18 It is anticipated that up to 12 Heavy Goods vehicle (HGV) trips (24 movements) will be generated by the development each day and up to 12 car trips (24 movements) each day associated with site staff. Additionally, one tractor trip (2 movements) will be generated each week, for the delivery and removal of wood for drying.

2.3.19 The process will be operated on a continual basis, 24 hours per day, 7 days per week, except for periods of maintenance/shut down. The site will be open for the limited number of HGV movements for the delivery and export of materials between the hours of 06:00 and 20:00.

2.3.20 Clean surface water drainage from the roof will discharge to the existing drainage system on site. It is anticipated that rainwater harvesting will be included to capture water for use in the bin washing operation. Effluents and waste water from the process will be collected in below ground holding tank(s) to be removed from site periodically for appropriate disposal at a suitably permitted facility. The main effluent from the process is expected to include disinfectant and water from the bin washing process.

2.3.21 The site will require an Environmental Permit (EP) to operate. This will be a Schedule 13 permit, regulated by WLBC. Emissions from the process will be controlled and regulated under the EP.

2.4 Description of High Temperature Treatment Process

2.4.1 The precise details of the process/design are outside the scope of the planning application and will be required to be agreed with WLBC as part of the permitting process. However, the following provides basic technical information on the process to provide the reader with an understanding of the principles of the operation.

2.4.2 At the point of thermal (Pyrolysis) processing, the bins will be moved to the Pyrolysis unit, in the optimal order as calculated by the operations software. The Pyrolysis unit will thermally destruct the waste, initially at a temperature of 850°C.

2.4.3 The pyrolysis process includes the controlled heating of wastes in an oxygen free environment, which is undertaken within an initial chamber. Wastes are initially pyrolysed to produce syngas and char. The char is removed from the process by a filtration system. The syngas is then directed to a secondary chamber, where the gases are combusted at a minimum temperature of 1100C for at least two seconds. Due to the design of the chamber, the gases will be resident for approximately 7 seconds. The heat within the secondary chamber exhaust gases are routed past the main, primary chamber, with the heat being utilised to keep the primary chamber continuously heated.

2.4.4 Hourly, the pyrolysis unit will process on average, 400Kg of waste. A dedicated waste processing software programme will calculate which bins should be processed, and in which order, to facilitate 400kg of waste per hour.

2.4.5 Bins will be stored ready for processing for a maximum of 24 hours, unless collected on a Friday, or Saturday. In this case, legislations states that they can be stored for a maximum of 72 hours.

2.4.6 Exhaust gases arising from the process will be abated to meet the relevant emission limits, which are set out in the Industrial Emissions Directive (EU Directive 2010/75/EU). The abatement system will include the following components:

- Solids/dust removal with a trace heated cyclone prior to oxidiser. This is to reduce the soot loading on the thermal oxidiser and reduce volatile metals in the combusted gases;
- Selective Non-Catalytic Reduction for (nitrogen oxides) NO_x control;
- Gas cooling to approx. 220-250°C prior to gas cleaning/filtration to give optimal conditions for sodium bicarbonate reaction and metals and dioxins and furans adsorption onto the Powdered Activated Carbon (PAC).
- Ceramic filtration for particulate matter removal;
- Abatement of acid gases using sodium bicarbonate;
- Capture of Volatile metals using PAC; and,

- Dioxin and furan removal using PAC – this ends up in the gas cleaning residues.

2.4.7 Following abatement, the exhaust gasses are then routed into the exhaust stack, where they are released to atmosphere for further dilution and dispersion of residual emissions.

2.4.8 The produced ash/char will be removed on a weekly basis, and it is anticipated that this will be suitable for utilisation in the production of concrete blocks, subject to assessment of suitability via further analysis and testing. Pollution control residues will be disposed at suitably permitted facilities, as required.

2.5 Benefits of Proposal

2.5.1 The main benefits of the proposals can be summarised as follows:

- Provision of a facility to deal with local medical wastes which would otherwise have to be transported over longer distances, increasing sustainability of management of a local waste stream;
- Provision of a facility for the safe destruction of medical wastes, being the only viable treatment/disposal option for most of the waste streams the plant will accept;
- Reduction in road miles and associated emissions, since the waste would otherwise have to be transported further afield;
- Reduction in road miles for medical wates reduces associated risks with transportation of the hazardous waste stream
- Generation of 12 full time jobs, providing significant economic benefits;
- Economic benefits through the need for contractors and raw materials during the construction phase;
- Economic benefits for other businesses during operations through the need for contractors, raw materials and maintenance support during site operations;
- Removal of ageing building which is in state of disrepair from site; and,

- Recovery of value from waste through re-use of waste heat from thermal treatment process and potential for re-use of bottom ash for use in concrete block manufacturing; and,
- Use of heat from the process to dry wood products, maximising the sustainability of the operation.

3 Environmental Impact Assessment

3.1 Town and Country Planning (Environmental Impact Assessment) Regulations 2017

3.1.1 Given that the proposals include the disposal of hazardous wastes, they fall under Schedule 1 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017. As such, the proposals are Environmental Impact Assessment (EIA) development and an Environmental Statement (ES) has therefore been submitted as part of the application. Reference should be made to document ref: 2776-005-B for the ES. The ES has demonstrated that with appropriate mitigation place, no significant adverse impacts will result from operation of the plant.

4 Environmental Regulation

4.1 Overview

4.1.1 The operation of the facility will require an EP to be in place which will contain conditions to control emissions to air, land and water. As such, operations at the site will be strictly regulated and controlled.

4.2 Environmental Permit

4.2.1 A Schedule 13 EP will be required to be in place for the operations, which will be regulated on a continual basis by the WLBC, who will undertake regular compliance inspections to ensure the site operator is complying with stringent permit conditions so designed to protect air, land and water and human health/amenity. The site operator will implement an Environmental Management System (EMS) during the day to day running of the site in order to comply with the EP and protect the surrounding environment. An application for an EP will be submitted to WLBC.

5 Relevant Planning Policies

5.1 Overview

5.1.1 Relevant policies are included in both national and local planning policy documents. These influence the way in which applications for planning permission are determined. The following discusses the relevant policies applicable to the proposed development on both the national and local level.

5.2 National Policies

5.2.1 Relevant National Planning Policies

5.2.1.1 The following national planning policies are relevant to the proposals:

- National Planning Policy Framework (NPPF), Published July 2021;
- National Planning Policy for Waste, Published October 2014, (NPPW);
- Waste Strategy for England 2007; and,
- Waste Management Plan for England, Published December 2013.

5.2.2 National Planning Policy Framework

5.2.2.1 The original NPPF was published in 2012. An updated NPPF was published in July 2018, which replaced the previous NPPF. Further very minor updates to text were made in a further revision to the NPPF in February 2019 and most recently in July 2021.

5.2.2.2 Similarly to the original NPPF, the revised NPPF identifies the three overarching dimensions to achieving sustainable development, including economic, social and environmental objectives, all to be delivered through the preparation and implementation of plans and the policies in the framework.

5.2.2.3 The revised NPPF placed increased emphasis on the importance of supporting business growth and improved productivity and therefore the significant number of

jobs being created by the proposals accords with the economic aspirations of the revised NPPF.

5.2.2.4 The following sections of the NPPF are considered relevant to the consideration of the proposed development:

- Section 2 – Achieving sustainable development;
- Section 6 - Building a strong, competitive economy;
- Section 9 – Promoting Sustainable Transport;
- Section 14 – Meeting the challenge of climate change, flooding and coastal change; and,
- Section 15 – Conserving and enhancing the natural environment.

Section 2 – Achieving Sustainable Development

5.2.2.5 The NPPF states that in achieving sustainable development, the planning system has three overarching objectives, including economic, social and environmental goals, which are to be delivered through preparation and implementation of plans and the application of policies within the NPPF. The NPPF includes a presumption in favour of sustainable development. For decision taking, this means approving development proposals that accord with an up to date development plan without delay. As is demonstrated in the following sections, the proposals are fully compliant with relevant local planning policies, and therefore accord with Section 2 of the NPPF relating to sustainable development.

NPPF Section 6 – Building a Strong, Competitive Economy

5.2.2.6 Section 6 of the NPPF outlines that significant weight should be placed on the need to support economic growth and productivity. The proposals include the creation of 12 full time jobs, whilst providing other significant economic benefits through the need to purchase/hire plant and machinery and raw materials and utilise services from contractors/maintenance companies during the construction process and operation

of the plant itself. Therefore, the proposals fully accord with the aims of the NPPF in this regard.

NPPF Section 9 – Promoting Sustainable Transport

5.2.2.7 Reference should be made to the ES for the Traffic and Transport EIA. This has demonstrated that the proposals will not have any material impact on the highway and further concludes that the site is located on a well-established industrial estate which offers satisfactory levels of accessibility to the site via walking, cycling and public transport facilities. These findings demonstrate that prospective staff will not be wholly reliant on the private car to travel for to work.

5.2.2.8 As such, the proposals accord with the transport provisions of the NPPF.

NPPF Section 14 – Meeting the Challenge of Climate Change, Flooding and Coastal Change

5.2.2.9 Paragraph 148 of the NPPF directs that the planning system should, amongst other things, help to shape places in ways that contribute to radical reductions in greenhouse gas emissions and encourage the reuse of existing resources. The proposals will reduce the amount of road miles, and associated carbon emissions, that would otherwise be generated transporting wastes further afield to an alternative specialist facility. Solar panels will be installed on-site and rainwater will be harvested and re-used on site for the process.

NPPF Section 15 – Conserving and Enhancing the Natural Environment

5.2.2.10 The proposals are located within an existing industrial site. Therefore, there is not expected to be any flora or fauna of conservation interest within the site. However, a full Ecological Impact Assessment (EcIA) has been undertaken in support of the proposals. Reference should be made to the ES which contains this assessment. This has demonstrated. This has included mitigation and compensation measures are in order to reduce potential impacts to insignificant levels. Furthermore,

recommendations for ecological enhancements have been provided, which could improve the habitats locally following the development, resulting in a minor positive outcome. This is therefore compliant with West Lancashire Council's local planning policies. The report concludes that provided the measures within the report are followed, it is considered that the proposed development will be compliant with all relevant legislation and planning policy and ecological receptors will not be significantly negatively impacted.

5.2.2.11 There are no statutory ecological receptors in close proximity to the site, including no Special Areas of Conservation (SAC), Special Protection Areas (SPAs) or Ramsar sites within 10km of the site. The nearest Site of Special Scientific Interest (SSSI) is Ravenhead Brickworks SSSI, approximately 8,600m to the East-North-East. Given the significant distance between the site and these receptors, there will be no significant impacts on statutory receptors. There are a series of Local Wildife Sites within 2km of the site. However, as demonstrated by the ecology and air quality chapters of the ES, no significant adverse impacts will occur on these sites as a result of aerial emissions.

5.2.2.12 Paragraph 188 of the NPPF states that the focus of planning policies and decisions should be on whether proposed development is an acceptable use of land, rather than the control of processes or emissions (where these are subject to separate pollution control regimes). It goes on to state that planning decisions should assume that these regimes will operate effectively. In the case of the proposed development, potential environmental impacts from operations on-site will be controlled under an EP, to be issued and regulated by WLBC. In accordance with the NPPF, this control should not be duplicated under the planning regime.

5.2.3 National Planning Policy for Waste

5.2.3.1 NPPW states that in preparing local plans, waste planning authorities should ensure that planned provision of new waste capacity is based upon a proper analysis of up-to-date and best information, work jointly with other authorities to collect and share information on waste arisings and ensure that the need for waste management

facilities is considered alongside other spatial planning concerns. Local plans should identify sufficient opportunities to meet the local need for new facilities for the management of specific waste streams. As such, suitable sites and areas should be identified for new facilities and these should be assessed against set criteria.

5.2.3.2 In development control terms, the determination of planning applications should be subject to specific assessment, principally in line with policies contained in up-to-date local plans. These should consider issues such as amenity and design and implementing the planning strategy in the local plan, but should not concern issues that are within the remit of the pollution control authorities. The policy document refers to the Waste Hierarchy, which sets out the preferences for managing waste. The proposed development is compliant with the waste hierarchy, the proposals being the only suitable treatment option for the waste stream concerned. The proposals are also considered to meet the general requirements set out in terms of the locational criteria in Appendix B of the NPPW.

5.2.3.3 NPPW directs that when determining waste planning applications, planning authorities should concern themselves with implementing the planning strategy in the Local Plan and not with the control of processes which are a matter for the pollution control authorities and that they should work on the assumption that the relevant pollution control regime will be properly applied and enforced. In this instance, operations at the site will be regulated under the provisions of an EP and there should be no duplication of permitting controls as part of the planning process.

5.2.4 Waste Management Plan for England (2021)

5.2.2 The Waste Management Plan (WMP) for England, adopted in January 2021, promotes the sustainable management of waste, and movement of waste up the hierarchy and describes incentives in place for sustainable waste management practices.

5.2.3 In terms of hazardous waste, the WMP states that hazardous waste management practices and new infrastructure must meet existing regulatory requirements, including the Hazardous Waste (England and Wales) Regulations 2005 and the

Environmental Permitting (England and Wales) Regulations 2016 in order to help secure environmental sound management of hazardous waste. The proposals accord with the WMP, being the only viable option for most of the waste streams that will be accepted.

5.3 Local Policies

5.3.1 Local Planning Policy

5.3.1.1 In terms of the development plans for the consideration of waste-related planning applications at the site, the following policy documents are relevant:

- West Lancashire Local Plan: 2012 - 2027, Adopted October 2013; and,
- Lancashire Minerals and Waste Development Framework Core Strategy, Adopted February 2009; and,
- Lancashire Minerals and Waste Development Framework: Site Allocation and Development Management Policies, Adopted September 2013.

5.3.2 West Lancashire Local Plan (WLLP)

5.3.2.1 The following policies contained in the WLLP are considered relevant to the proposed development:

Policy SP1 – A Sustainable Development Framework for West Lancashire

5.3.2.2 This policy states that the council will take a positive approach that reflects the presumption in favour of sustainable development contained within the NPPF and that applications which accord with policies within the local plan will be approved, unless material considerations indicate otherwise. As is demonstrated within this planning statement, the proposals are fully compliant with the local plan and there are no other material considerations which provide any grounds for refusal of the application.

Policy GN3 – Criteria for Sustainable Development

5.3.2.3 This policy sets out the sustainability criteria against which development will be assessed, including design and setting, accessibility and transport, flood risk, landscaping and the natural environment and other environmental considerations.

5.3.2.4 The proposals are located within an existing industrial estate with a number of large scale buildings in the vicinity, which are used as part of waste and industrial operations. The proposed development is relatively small scale in nature in the context of the location. The external flue at 14m is relatively modest in height and not likely to generate any significant landscape and visual impacts. As discussed below, The proposals will accord with the provisions of Policy EN1. The site will include appropriate site security arrangements, such as security fencing, Closed Circuit Television (CCTV) as illustrated on the Site Layout Plan.

5.3.2.5 Reference should be made to the Traffic and Transport EIA chapter of the ES, which has been supported by a Transport Statement (TS). This has demonstrated that the proposals will accord with the Accessibility and Transport provisions of this planning policy.

5.3.2.6 As demonstrated by the ES, the proposals will not generate increased flood risk elsewhere, nor be at risk of flooding itself. The proposals are located within Flood Zone 1 and will incorporate sustainable drainage systems, as demonstrated within the ES. Solar panels will be installed on site, in addition to electric vehicle charging points

5.3.2.7 Biodiversity improvement measures will be integrated into the development, as demonstrated within the EcIA which forms part of the accompanying ES.

5.3.2.8 The ES includes detailed assessment of potential air quality impacts, demonstrating that the proposals will not have any significant adverse impact on air quality, either as a result of residual emissions from the process, or from vehicle exhaust emissions. Operations at the site will be regulated under a Schedule 13 Permit, controlling emissions to air, land and water.

Policy EC1 – The Economy and Employment Land

5.3.2.9 Policy EC1 states the aim to promote the development of 75ha of employment land across the borough. This policy includes the Simonswood Industrial Estate as a Significant Employment Site, stating that the council will permit industrial uses within this site. The proposals will generate a significant number of jobs and the nature of the proposals accord with the provisions of policy EC1.

Policy IF2 – Enhancing Sustainable Transport Use

5.3.2.10 Parking provision will comply with the relevant standards, as demonstrated within the ES. Sustainable transport used will be actively encouraged. Electric vehicle charging points will be installed on the site. Car sharing will be encouraged and provisions for cycle storage will be included within the site. Sustainable transport use has been fully considered within the transport statement which forms part of the ES.

Policy EN1 – Low Carbon Development and Energy Infrastructure

5.3.2.11 The proposals are not located within an area at high risk of flooding and will incorporate sustainable drainage systems, in line with policy GN3. Rainwater harvesting measures will be incorporated within the proposals. Heat from the process will be used for drying wood products, maximising the sustainability of the operation.

Policy EN2 – Preserving and Enhancing West Lancashire's Natural Environment

5.3.2.12 There are no SPAs, SACs or Ramsar sites within 10km of the site and the nearest SSSI is located approximately 9,600m to the East-North-East. As such, there is no potential for impact on such statutory sites, as demonstrated by the ES. Although, there are a number of local ecological sites within 2km of the proposed development, there will be no significant adverse impacts on such sites, as demonstrated by the ES. As demonstrated by the EcIA prepared as part of the ES, there will be no adverse impacts on flora or fauna of conservation interest. The proposals will not have any significant adverse impacts on landscape character or views and are entirely in keeping with the

industrial nature of the location, as demonstrated within the ES. Biodiversity improvement measures will be incorporated into the proposals, as demonstrated within the ES.

Policy EN4 – Preserving and Enhancing West Lancashire's Culture and Heritage Assets

5.3.2.13 There are no statutory heritage receptors in close proximity to the proposed site, the nearest asset including a Grade II* listed building, located approximately 1.5km to the West-North-West. Given the distance to the nearest heritage receptors and the heavily industrial context of the location, there will not be any significant adverse impacts on heritage assets, as is demonstrated within the ES.

5.3.3 Lancashire Minerals and Waste Development Framework: Core Strategy

Policy CS8 – Identifying Capacity for Managing Waste

5.3.3.1 This policy outlines how waste management needs will be met across the county of Lancashire. Of relevance to the proposals is that in addition to identifying a network of major waste management facility at strategic locations, the council aims to identify and prioritise other locations, including industrial sites, which would allow waste to be managed close to it's source and also aims to develop criteria for considering smaller scale waste facilities. Furthermore, the policy states that criteria will be developed for considering proposals for waste management facilities for hazardous waste, including the proposal's contribution to achieving net self-sufficiency. The proposals are small scale in nature and it is intended that waste will be obtained from the regional area, thereby meeting the aims of this policy. It should be note that thermal treatment within a specialist facility such as that proposed is the only suitable treatment option for the medical waste stream, which cannot be disposed/recovered by any other means. The applicant has advised that the waste will be sourced from regional NHS facilities, some of which currently transport their waste outside of the North West region for disposals. The location is suitable for this type of development, being industrial in nature and including other waste management and industrial facilities in the vicinity of the proposed site.

Policy CS9 – Achieving Sustainable Waste Management

5.3.3.2 This policy states that priority will be given to the location of larger waste facilities within facilities within existing or planned industrial or commercial areas and that criteria will be developed for the site identification process, and also for considering other proposals brought forward outside the plan-making process, to ensure that:

(i) Natural resources including water, air, soil and biodiversity are protected from contamination in the vicinity of waste facilities and opportunities are taken to enhance them.
(ii) Development will not adversely contribute to fluvial flood risks or surface water flooding.
(iii) The character and quality of Lancashire's landscapes and natural environment is protected from harm and enhanced.
(iv) Local distinctiveness and character is retained.
(v) Features and landscapes of historic and cultural importance are protected from harm and opportunities taken to enhance them.
(vi) Amenity, health, economic well-being and safety of population is protected.
(vii) Essential infrastructure and services to the public will be protected.

5.3.3.3 It is demonstrated throughout the documents submitted as part of this planning application that the proposals accord with all the above criteria.

Policy NPPF1 – Presumption in Favour of Sustainable Development

5.3.3.4 This policy states that when considering development proposals the Council will take a positive approach that reflects the presumption in sustainable development contained in the NPPF. As has been demonstrated, the proposals are fully compliant with the NPPF in this regard and therefore compliant with policy NPPF1.

Policy DM2 – Development Management

5.3.3.5 This policy states that development for minerals or waste management operations will be supported where it can be demonstrated to the satisfaction of the mineral and waste planning authority, by the provision of appropriate information, that all material, social, economic or environmental impacts that would cause demonstrable harm can be eliminated or reduced to acceptable levels. In assessing proposals account will be taken of the proposal's setting, baseline environmental conditions and neighbouring land uses, together with the extent to which its impacts can be controlled in accordance with current best practice and recognised standards.

5.3.3.6 An ES has been submitted as part of this application, demonstrating that there will be no significant adverse residual social, economic or environmental impacts, thus demonstrating compliance with this planning policy.

DM4 – Energy from Waste

5.3.3.7 This policy states that all developments that include processes capable of recovering energy from waste will be required to include measures to capture any heat or electricity produced directly or as a byproduct of the waste treatment process and either use it on site or export it to the national grid or a local energy or heat consumer. The proposals include use of waste heat from the process to be used for drying wood products, thus maximising the sustainability of the operation.

WM1 – Capacity of Waste Management Facilities

5.3.3.8 This policy outlines waste management capacity required across the region based on waste arisings of various waste types. However, this does not make reference to medical/hazardous waste arisings and is therefore not considered relevant to the proposals.

WM2 – Large Scale Built Waste Management Facilities

5.3.3.9 Policy WM2 relates to large scale built waste management facilities around a capacity of 200,000 tonnes/annum, including for thermal treatment, stating that such development will be supported within the Simonswood Industrial Estate, subject to total capacity of all new waste management facilities developed during the plan period not exceeding need within the catchment area of West Lancashire. The need for the facility has been demonstrated within this planning statement, the facility providing the only viable disposal route for some of the wastes. The applicant has advised that waste will be obtained from regional sources, such as NHS sites, some of which are understood to currently transport the waste outside the North-West region for disposal. Whilst the proposals are not large scale, LCC have acknowledged within their pre-application response that it appears the proposals fall within the types of facilities considered suitable for the strategic locations with Appendix B of the Lancashire Minerals and Waste Development Framework: Site Allocation and Development Management Policies document.

6 Plant, Equipment and Infrastructure

6.1 Reference should be made to the site layout plan for details of plant and infrastructure to be installed on-site.

6.2 Any fuel or chemical storage tanks and containers which may be stored on site will be surrounded by a bund which is capable of containing a minimum of 110% of the volume of liquid stored in the tank. All pipework and associated infrastructure will be enclosed within the bund. A lock will be fitted to tank valves to prevent unauthorised operation. All valves and gauges on the bund will be constructed to prevent damage caused by frost. The tanks and containers will be clearly marked showing the product within and also their capacity.

7 Waste Types, Quantities and Handling Procedures

7.1 Waste Types

7.1.1 The site will have the capability to accept a range of medical wastes, which will include non-hazardous and hazardous waste types, as described previously in this statement. The receipt and acceptance of waste will be controlled and regulated under an EP and procedures will need to be agreed with the Local Authority as part of the permitting process.

7.2 Waste Quantities

7.2.1 The site will accept up to 4,000 tonnes of waste per annum. It is anticipated that the maximum quantity of waste stored on site at any one time will be 20 tonnes

7.3 Waste Processing and Handling Procedures

7.3.1 The handling and processing of wastes will be regulated and controlled under an EP and will need to be agreed with the Local authority as part of the permitting process. An EMS will be submitted to the Local Authority as part of the permit application, which will contain detailed procedures for waste storage and handling. The proposed internal layout will also need to be agreed with the Local Authority as part of the same process.

8 Environmental Considerations

8.1 Overview

8.1.1 The proposal has the potential to impart environmental impacts as a result of the activities undertaken. However, the development has been designed to control potential environmental impacts to an acceptable level.

8.2 Environmental Permit

8.2.1 A Schedule 13 EP is required to be in place for the operation, falling under regulation by the Local Authority. A permit application will be submitted to the Local Authority, subject to this application being successful. The EP will contain conditions for control of emissions to air, land and water and the site will be required to be operated in accordance with a detailed EMS, which will be a requirement within the EP for the site. This ensures that appropriate and comprehensive environmental control will be in place and the site fully regulated.

8.3 Environmental Statement

8.3.1 The proposals are EIA development. Therefore, an ES has been submitted as part of this application. As such, the potential for construction and operation effects has been considered in detail as part of this application. Potential impacts have been demonstrated to be negligible with appropriate mitigation built into the scheme as outlined within the ES.

8.4 Air Quality

8.4.1 Potential emissions to air from the operations on-site will be controlled under a Schedule 13 EP, regulated by the Local Authority. Therefore confidence is high that impacts on air quality will not be significant as a result of site operations. However, potential air quality impacts have been considered in detail within the ES prepared as part of this application, including a detailed dispersion modelling assessment of potential residual emissions from the stack serving the process. This has demonstrated

that the process will not generate any significant impacts. Vehicle exhaust emissions generated by the proposals will not generate any significant adverse impacts, as demonstrated by the ES.

8.5 Noise

8.5.1 The potential for noise impacts will arise from the operation of plant and machinery and movement of material around the site. However, the proposals are located within an existing industrial estate, with larger scale industrial activities in the vicinity. As is demonstrated within the ES potential noise impacts will not be significant during the construction or operational phase.

8.6 Surface and Groundwater

8.6.1 The Environment Agency's Flood Map indicates that the application site is located on land that is in an area with a low probability of flooding, the area being categorised as Flood Zone 1. However, a Geological, Hydrogeological and Hydrological Impacts Assessment has been undertaken as part of the ES. This demonstrates that the site will not increase flood risk elsewhere, nor will the site itself be at risk of flooding. Furthermore, there will be no discharges other than clean surface water.

8.7 Ecology

8.7.1 There will be no impacts on ecological resources. The proposals are located within an existing industrial estate using previously developed land Therefore, impacts on ecological resources will not be significant. However, a full EcIA supported by site survey has been completed as part of the ES, demonstrating that ecological impacts will not be significant.

8.8 Landscape and Visual Impact

8.8.1 The site is located within an existing industrial estate and the proposed building and ancillary structures, including flue, will not be significant in relation to exiting adjacent

large scale structures. As such, the proposals will have any significant impacts on landscape character or views.

8.9 Archaeology and Cultural Heritage

8.9.1 The proposals are to utilise an existing developed industrial site and therefore there will be no direct impact on archaeological resources. There are no statutory or non-statutory heritage assets within 1km of the site and given the context of the location, the proposals will not have any significant adverse impacts on the setting of heritage assets, as demonstrated by the ES.

8.10 Traffic and Transport

8.10.1 The transport statement included as part of the ES has demonstrated that the proposals will not have any material impact on the highways network and has concluded that there is no highway-related reason to withhold planning permission for the scheme.

9 Community Involvement

9.1 The general public has the opportunity to participate in the planning application process by making representations in response to publicity issued by the Local Planning Authority (LPA). However, in certain cases, many people are unaware of such opportunities to be involved and as such come into contact with the planning system when it is too late to have any bearing on decision making by the LPA. In this respect, people will tend to form negative views of the planning system, feeling that decisions are reached without taking due consideration of public opinion. The applicant company operates in an open manner and have been keen to provide an opportunity to present the proposals to interested parties and respond to any queries regarding the proposals.

9.2 The proposals are small scale in nature and the pre-application response from LCC did not include any requirement for community engagement, over and above the standard planning consultation process. During further email communications, LCC advised that they considered it would be advisable to contact Simonswood Parish Council to engage with them as part of pre-application liaison. As such, an email was sent to Simonswood Parish Council by the applicant on 27 November 2020 with an offer for an open online meeting to present and discuss the proposals. However, the applicant has confirmed that no subsequent response was received from the Parish Council to this offer. Evidence of submission of the meeting offer to the Parish Council is included within document ref: 2776-008-B (with personal information redacted).

9.3 Additionally, during the initial stage of pre-application discussions, the neighbouring planning authority (Knowsley Council) expressed an interest in a meeting being held between the applicant and members of the council (officers and councillors), in order to discuss the proposals and answer questions that council members may have had. As such, an invitation was issued by the applicant to the planning department at Knowsley Council on 16 November 2020 (as evidenced in document ref: 2776-008-C, with personal information redacted) and an online meeting was subsequently held with members of Knowlsey Council on 10th February 2021 and two representatives

from the applicant company, during which the proposals were discussed and questions answered. A list of attendees can be provided upon request. The applicant reported that questions had been answered satisfactorily in the meeting, but that some members had expressed that they would still be against the proposals as they did not want the facility adjacent to their area.