

Clerk to the Council:

MELLING PARISH COUNCIL C/O Maghull Town Hall Hall Lane Maghull L31 7BB

Mr Jonathan Haine
Planning Officer
The Development Management Group,
PO Box 100
County Hall
Preston
PR1 0LD
Email: devcon@lancashire.gov.uk

25 April 2022

Dear Mr Haine,

I am writing on behalf of Melling Parish Council to strongly object to planning application: LCC 2022/0003 Waste Incinerator at land on Stopgate lane, Simonswood Industrial Park, due to several harms arising, as set out below.

The Site

The Site (extract of location plan below) is located in an existing industrial estate within a rural part of West Lancashire (see extract from Googlemap streetview looking south from Stopgate Lane).



Green Belt

The site is in protected Green Belt, which is a nationally significant planning designation. It serves the purpose of keeping land permanently open and fulfils key Green Belt functions.

The national planning and development plan policies set out that land in Green Belt should be protected from inappropriate development. Although some mineral extraction and engineering works may be considered appropriate, the Parish Council considers the





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incinerator proposal to be inappropriate and the altered landform would serve to reduce the spatial and visual components of Green Belt and lead to harm.

Furthermore, the proposed change of use would increase the level of activity of HGV vehicles servicing the site. This would harm openness to a great extent. A worrying precedent would be created if this application is approved.

High grade agricultural land

The land involved in the application is assessed as both grade 1 and grade 2 Best and Most Versatile Land. In the Parish Council's view high grade farmland should be retained for future generations and this is also set out in national and local planning policy.

Ecology

The Parish Council is concerned about the flora and fauna associated with the site including bats, and rare farm bird populations meaning it would be difficult for the development to achieve the required Biodiversity Net Gain at the 10% required by the Environment Act 2021.

SSSI Impact Risk Zone

The nearest statutory designated site has been identified to be approximately 8km away in a north-

easterly direction and is known as Ravenhead Brickworks SSSI. The site is located in the impact zone of the nearby SSSI and the effects arising from construction and operation would be harmful to this important environmental designation. There is no mention of the SSSI in the planning statement.

Noise

There is concern that the proposed development will lead to noise pollution when considering the Environmental Noise assessment Figure 6.2 – Noise modelling of noise associated with the proposed operations

Air Quality

The parish council is concerned when considering the Environment Statement Part V1.2 Part 6Appendix III: Liverpool Wind Roses in the Modelling Assessment of the about the effects of the construction and operation of the development on the local air quality and that at a distance for the people who live in Melling and to wildlife in proximity to the site. It is understood that there are other receptors in addition to the nearest dwelling house including the road and wildlife, including the fact the site is within the SSSI Impact Zone.

Odour Assessment

The parish council is concerned about the odour effects from the development to people at proximity and those located at a distance, particularly for the people who live in Melling to the west of the site.





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Health and safety

It is noted the sites is within the consultation distance of at least one major hazard and/or pipeline and that the HSE must be consulted on any development of the site.

Waste use

The PC notes that the area proposed for this development is not currently permitted for waste management operations.

Landscape Character and Visual Amenity

Melling Parish Council considers the area is presented as more urban than it is in reality. The site has a flat topography with a hedgerow at the boundary, a spectacular isolated field tree and trees and woodland at the boundary to the south near the railway. See an extract from Googlemaps of the site view looking south from Stopgate Lane, above. Our rural landscapes should be protected for the benefit of all in the future. The Parish Council is concerned that this matter was scoped out of the Environmental Statement.

Contrary to national and local planning policies

When deciding on the merits of the application it is important to consider the development plan policies. In this case the relevant planning policy is:

Lancashire County Council - Local Planning for Minerals and Waste Core Strategy and Development Plan - Managing Waste and Natural Resources. The Parish Council considers the application to be unsustainable and therefore contrary to Policy.

West Lancashire Local Plan 2012-2027 Development Plan Document (DPD) in particular Policy GN3 Criteria for Sustainable Development, Policy EC1 The Economy and Employment Land - Other Significant Employment Sites - Allocated Waste Sites and Policy EN1 Low Carbon Development and Development Infrastructure. Melling Parish Council considers the application to be harmful to future productivity of the land for agriculture, particularly as it is such high grade land, and other economic activity.

A material consideration is the National Planning Policy Framework and Planning Practice Guidance. There are a number of policy areas to be considered: Section 8: Promoting health and safe communities; Section 12: Achieving Well Designed Places; Section 13: Protecting Green Belt Land; and Section 15: Conserving the natural environment.

The Parish Council considers that the proposed change of use will lead to poorer health, will reduce the quality of place.

The Parish Council also considers the proposal to be contrary to Planning Practice Guide concerning: air quality, hazardous substances, healthy and safe communities, land affected by contamination, land stability and waste.



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Local opposition

There is considerable local opposition with West Lancashire Borough Council strongly objects to the proposed development on the grounds of noise, and highway concerns among others. Like the people of Melling, Simonswood Parish Council very strongly objecting on the grounds of smells, noise, air quality and HGV's on this site. It is considered the local roads are not fit for purpose. An open meeting is requested by the PC. Bickerstaffe PC raise similar concerns about road safety, impact from the incinerator on people's health and environmental quality, carbon emissions and Green Belt harms.

Summary

For the reasons set out above the Parish Council considers the harms arising to Green Belt and other material considerations to outweigh the claimed benefits.

Yours sincerely

Melling Parish Council