KEYPOINT SWINDON ENERGY, SWINDON
RENEWABLE ENERGY CENTRE

ENVIRONMENTAL STATEMENT | NON TECHNICAL SUMMARY

ROLTON KILBRIDE

MAY 2016 | K.0170_48

ROLTON KILBRIDE
POWERING THE FUTURE

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CONTENTS

PREFACE

This document forms the Non-Technical Summary (NTS) of the Environmental Statement (ES) that accompanies a planning application submitted by Rolton Kilbride (the Applicant) who is seeking to obtain planning permission for a proposed Renewable Energy Centre (REC) to generate power and heat for local commercial energy users located within the Keypoint Site, off Thornhill Road, Swindon (the Application Site).

The Application site is located within the administrative area of Swindon Borough Council (SBC). The REC is known as Keypoint Swindon Energy and referred to as the Proposed Development.

The ES comprises studies on each of the aspects of the environment identified as likely to be significantly affected by the Proposed Development, which are supported with technical appendices where appropriate. The ES is structured as follows:

- Volume 1: Comprises the written statement and graphic material in the form of figures, drawings and photomontages, which is the main volume of the ES
- Volume 2: Contains the Technical Appendices to the main volume of the ES

Additional documentation that will be submitted with the planning application includes:

- Planning Statement
- Design and Access Statement
- Application Forms
- Technical Drawings
- Statement of Community Involvement
- Environmental Statement

The ES and associated documents will be available for viewing during normal business hours at Swindon Borough Council Offices at the following location:

Swindon Borough Council
Civic Offices
Euclid Street
Swindon
SN1 2JH

The ES may be purchased in Volumes, the costs for which are set out below:

- Non-Technical Summary – Free of charge
- Volume 1: Main Volume and Figures - £150
- Volume 2: Technical Appendices - £150

Copies of all documents can be obtained on CD for £15. For copies of any of the above please contact Pegasus Group at the following address:

Pegasus Group
Pegasus House
Querns Business Centre
Whitworth Road
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Fax: 01285 642348

SITE CONTEXT PLAN

INTRODUCTION

Background

The Proposed Development includes two separate buildings; 1) a Renewable Energy Centre; and 2) an industrial warehouse building to include storage and offices.

The Renewable Energy Centre (REC) will employ an Advanced Conversion Technology (ACT) – a form of gasification process to generate power and heat from Refuse Derived Fuel (RDF) together with other pre-treated wastes. RDF is a product which is pre-treated then shredded, dehydrated and / or compressed from municipal solid waste and industrial and commercial waste and when heated to very high temperatures breaks down to provide a gas which is utilised in a boiler to create steam which drives a steam turbine to produce electricity and heat. It is a clean, modern and hi-tech approach to producing energy, with a proven track record.

The Proposed Development would generate up to 14.5 megawatts (MW) gross of electricity - the equivalent of powering over 26,000 homes on a continual basis. The plant is capable of accepting 150,000 tonnes of waste per annum which would otherwise go to landfill.

The Applicant and EIA Project Team

Rolton Kilbride is a privately owned developer of Renewable Energy Centres. Rolton Kilbride is also working with a set of highly specialised technology partners and advisers who have extensive experience in the field of energy generation, gasification and the use of modern environmental technology.

The ES has been co-ordinated and managed by Pegasus Group. The consultants who have contributed to the preparation of the ES are as follows:

- Air Quality – ESG
- Landscape and Visual – Pegasus Group
- Traffic and Transport – PFA Consulting
- Hydrology and Flood Risk – PFA Consulting
- Hydrogeology and Ground Conditions – Curtins
- Noise – ESG
- Ecology and Nature Conservation – Avian Ecology
- Archaeology and Cultural Heritage – Cotswold Archaeology
- Socio Economics – Pegasus Group

EIA Process

The Town and Country Planning (Environmental Impact Assessment) Regulations 2011 require that a proposed development which falls within the description of a 'Schedule 2 Development' within the meaning of the Regulations, will require an Environmental Impact Assessment (EIA) where the development is likely to have significant effects on the environment by virtue of such factors as its nature, size or location (Regulation 2).

Under the EIA Regulations Scoping is not a mandatory requirement, however, requesting a Scoping Opinion from the local authority can be helpful. Obtaining a Scoping Opinion enables consultation over the content and extent of matters to be included within the ES from all key statutory and non statutory bodies. The Scoping should identify key environmental issues, appropriate surveys and methodologies, potential mitigation and areas of further assessment.

The aim of the Scoping process is to identify key environmental issues at an early stage, to determine which elements of the Proposed Development are likely to cause significant environmental effects and to identify issues that can be 'scoped out' of the assessments.

The Applicant submitted a Scoping Request to SBC in February 2016. The Scoping Request set out the proposed methodology for each of the key environmental issues and requested comments from SBC and other Statutory Consultees on the suitability of the Proposed Development, the proposed methodology and the likely significant effects of the construction and operational phases of the Proposed Development.

A Scoping Opinion confirming the issues to be covered in the EIA was provided by SBC in March 2016.

Under the EIA Regulations, proposals which fall within the scope of Schedule 2 development, an EIA is discretionary. This EIA has been produced however, in recognition of the strategic significance of the development and the expected local interest in the proposals. The EIA and this ES have been undertaken and prepared with due regard to the criteria of Schedule 4 of the Regulations. The ES includes an assessment of the predicted effects of the proposed development, focussing, as required by the EIA Regulations, on those effects that have the potential to be significant. The content of the ES, as well as the overall approach to the EIA, has also been designed to reflect other requirements of the EIA Regulations as well as widely recognised good practice in EIA.

CONSULTATION & SCHEME BENEFITS

Public Consultation

Public consultation was a fundamental and integral process of the planning application. A well thought out strategy to engage with local stakeholders was carefully delivered from the outset and comprised a press release; residents and press briefings; residents group meetings; a leaflet drop and invitation to two public exhibitions where members of the design team, as well as technology providers, air quality, noise, landscape and transport consultants were on hand to answer any queries.

The Applicant has consulted a number of statutory consultees during the course of the Environmental Impact Assessment Scoping procedure who are aware of the proposals and have provided formal advice.

The Applicant has also engaged in a pre-application consultation process with SBC prior to the submission of the planning application. The advice received was broadly supportive of the proposals in principle, including guidance setting out the planning policy context that an application would be judged against and an indication of the documentation necessary to support an application.

The full details of the public consultation strategy and feedback from the events are included within the Statement of Community Involvement which is a separate report submitted with the planning application documentation.

Scheme Benefits

The benefits of the REC include:

- Proven technology with outstanding operational and environmental performance and very low emissions;
- Conversion of non-recyclable, non-hazardous waste into renewable energy, displacing landfill and fossil fuels;
- Reducing greenhouse gas emissions;
- Job creation across a variety of skills and levels of expertise with employment opportunities for local people;
- Transforming an allocated vacant plot within an existing industrial site and enhancing with landscape planting;
- Production of lower cost renewable energy potentially for local businesses with connections to local energy users via underground cable;
- Clear progression in the transition to a low-carbon economy with grid carbon offset; and
- Compliance with Government policy and the Industrial Emissions Directive (IED) to provide sustainable renewable energy production close to use.

SITE CONTEXT AND LOCATION

Site Context

The Application Site is located within the Keypoint Site, off Thornhill Road, Swindon. Thornhill Road is located just off the A420 at Gablecross roundabout which fronts the A419 leading to the M4 motorway. The proposed location of the development is shown in the Site Context Plan.

The site is a vacant plot measuring approximately 3.17ha and is allocated in the Local Plan under Policy EC2 for employment use and Sui Generis.

The Application Site is surrounded by various forms of development. The Site once formed part of the South Marston Aerodrome, which is now the base for Honda UK. The Honda plant and testing track is located to the North. To the east are the SDC and TDG warehouses which form part of the Keypoint site and the Oxford University for the Bodleian book storage facility. A rail terminal is located just north of the TDG Building. Immediately south of a wooded tree belt adjacent to the sites southern boundary lies the Western Main Line railway which connects Swindon with Bristol and London Paddington. Beyond the railway line is the Madison Hotel (now vacant) and a retail park. To the site's western boundary are two fields consisting of grass and a mix of semi-mature and mature trees, beyond the fields is the A419 dual carriage way.

The closest settlements are Stratton and St Margaret's which are located west of the A419 where the closest dwellings lie approximately 165m from the site. The village of South Marston is located approximately 700m to the north east.

Historical Uses of the Site

An Envirocheck report of the site shown that the earliest historical maps date from 1886 and show the site to consist of 2-3 fields separated by hedgerows and trees. Two small square/rectangular features (possibly ponds) which are later infilled, are shown along one of the field boundaries in the north of the site.

The earliest maps show the surrounding area to be largely agricultural with the buildings of Breach Farm located 100m to the north. The railway line is 20-30m from the southern site boundary with a road beyond. An airfield and sand drag (to stop aircraft overrunning the runway) is constructed next to the site in the 1960's which later becomes part of a large car factory development which exists to the present day. The surrounding area remains relatively unchanged until the late 1960's and early 1970's when the residential expansion occurs to the west of the site and the construction of the A419. By the 2000's a number of industrial units and associated infrastructure thought to be related to the nearby car factory have been built adjacent to the eastern site boundary including a road, railway line and electricity substation.

Images from google earth in 2002 reveal the site appears to have been subject to earthwork filling. At this time much of the site surface had little or no vegetation cover and appears slightly raised with numerous wheel ruts and track routes evident, leading from the road at the eastern boundary.

Ecological Considerations

The Application Site comprises a single body of land with no distinct boundaries. The northern third of the plot has been dug over and is currently ephemeral / short perennial vegetation and the remainder is dominated by tall ruderal vegetation with patches of poor semi-improved grassland and a few larger strips of grassland.

The Application Site is bordered on three sides by young broadleaved woodland / dense scrub with occasional mature trees, together with a section of semi-improved grassland to the southwest. The remaining (north eastern) side borders a road with an earth bank along the margin which is sparsely vegetated and a length of dry ditch (most likely dug out to create the adjacent earth bank) runs parallel with this for some distance.

There are no statutory designated sites located within at least 2.3km of the Application Site. The nearest non statutory designated site comprises a small tributary of the River Cole, situated c. 340m north.

A single statutory site lies within 1km of the proposed cable route; Stanton Park Local Nature Reserve (LNR), situated c. 460m northeast. This site supports wildflower hay meadows, parkland and woodland, together with a lake..

Landscape and Heritage Considerations

The Application Site is not subject to any statutory or non-statutory landscape designations and no designated heritage assets are recorded within the Application Site.

The northern edge of the North Wessex Area of Outstanding Natural Beauty (NWD AONB) lies approximately 4km to the south of the application site at its closest point. The nearest Registered Park and Garden, the Grade II Queens Park, lies approximately 3.6km to the south west of the application site, surrounded by the built form of Swindon.

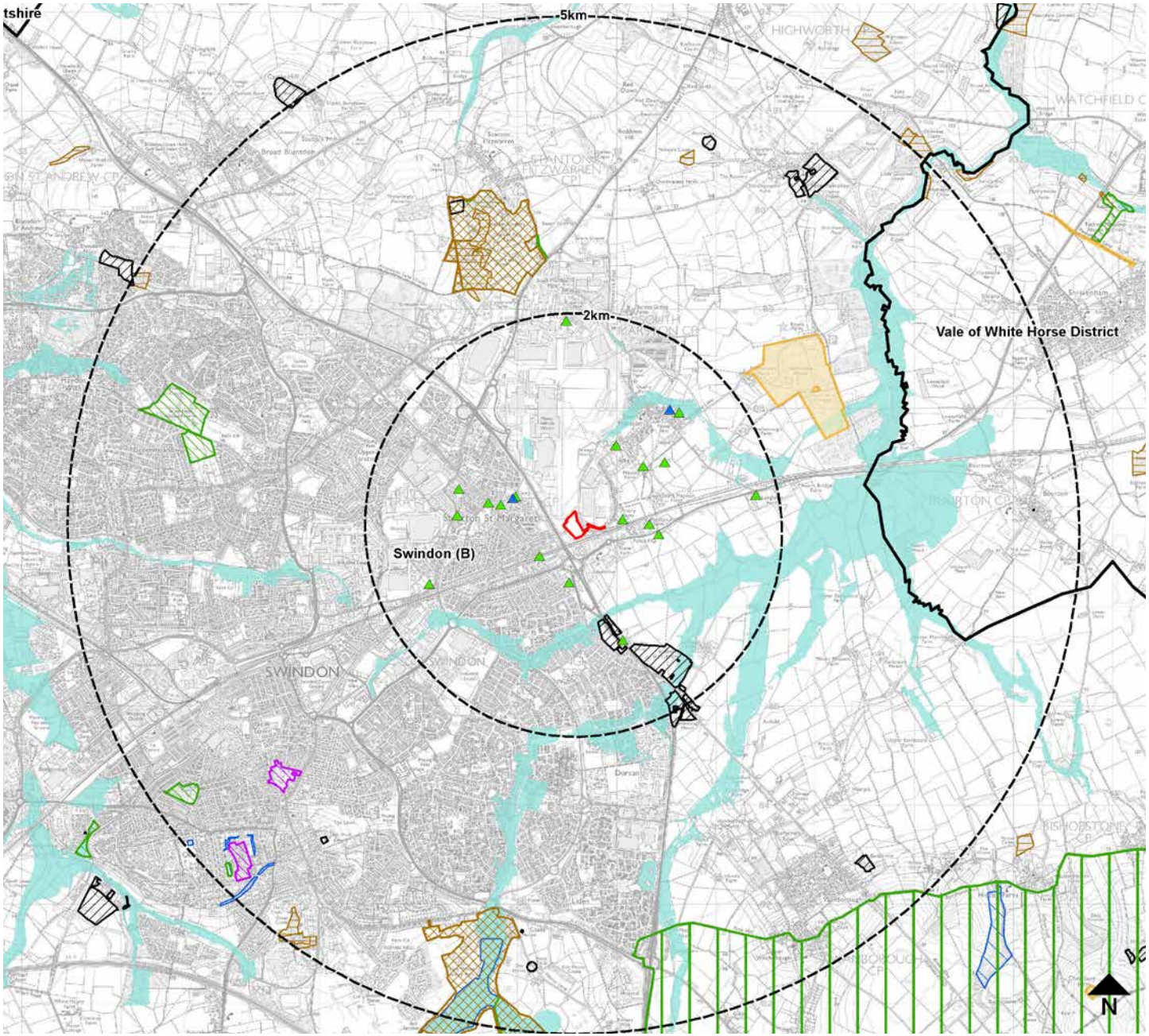
The nearest Grade I Listed Buildings are the Church of St Margaret in Stratton approximately 560m to the north west, and the Church of St Mary Magdalen in South Marston which is approx. 1.4k to the north east. There are a number of Grade II Listed Buildings within Stratton and South Marston, as well as at various individual farmsteads in the surrounding area. The nearest Scheduled Monument is the site of a Roman Town, West of Wanborough House, which is approximately 850m to the south east of the Application Site.

Existing Flood Risk

The Environment Agency's Flood Map shows the site lies entirely within Flood Zone 1, which indicates the land assessed as having less than 1 in 1,000 annual probability of river or sea flooding (<0.1%). The Strategic Flood Risk Assessment contains no records of historic flooding from watercourses in the vicinity of the application site.

The Environment Agency's Risk of Flooding from Surface Water Map shows the majority of the site lies in an area with a 'very low' risk of surface water flooding. Areas of higher risk are associated with the private road and railway sidings along the north and north east boundaries of the site and the low lying areas to the north west of the site.

The Environmental Constraints and nearby Designations are shown on the contraints plan on page 11.



DESIGNATION & CONSTRAINTS PLAN

ALTERNATIVES, SITE SELECTION & FEASIBILITY

Consideration of Alternatives

Schedule 4, part 1, paragraph 2 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2011 requires that *"an outline of the main alternatives studied by the applicant and an indication of the main reasons for this choice, taking into account the environmental effects"* are included within the ES.

Other Legal and General Assurance Society Limited managed sites were considered early in the feasibility process, however, the principal reason for the selection of the site was its location within an allocated site in an industrial area with good access to the primary route network and in close proximity to energy intensive industrial customers.

The design of the Proposed Development has been informed by an iterative process with alternative layouts and elevations considered throughout the process. The layout options for the REC element of the site prior to the final option taken forward demonstrate constraints and opportunities associated with the location and orientation of the REC and industrial / warehouse building, vehicular movement and access as well as landscaping proposals.

A series of basic architectural massing techniques were undertaken to help understand how the buildings would best relate to one another and the character of the surrounding area. Due to the split use of the site with the industrial warehouse to the south east and REC located infront, this allowed the warehouse to sit at a relative height to the neighbouring industrial units whilst the energy plant stepped up behind.

Following the basic massing exercise the functional and operational requirements of the building were explored. By creating a single central energy plant unit that is served by the ancillary buildings located to the peripheral edges this allowed for vehicular circulation around the building to all facades.

A series of elevation option alternatives were explored and considered throughout the iterative design process before the design was finalised. The precursor to the current elevations were presented on the display boards at the public exhibition events for residents of Stratton St. Margaret on 11th March 2016 and residents of South Marston on 3rd March 2016 (see separate Statement of Community Involvement report). The design team responded to comments and suggestions from residents to use a colour palette which would blend further into the background. The colour palette of the cladding to the main buildings were altered to a neutral grey-green colour and represented in bands becoming increasingly pale towards the top of the building. The introduction of the banding has helped to reduce the perceived massing of the building.

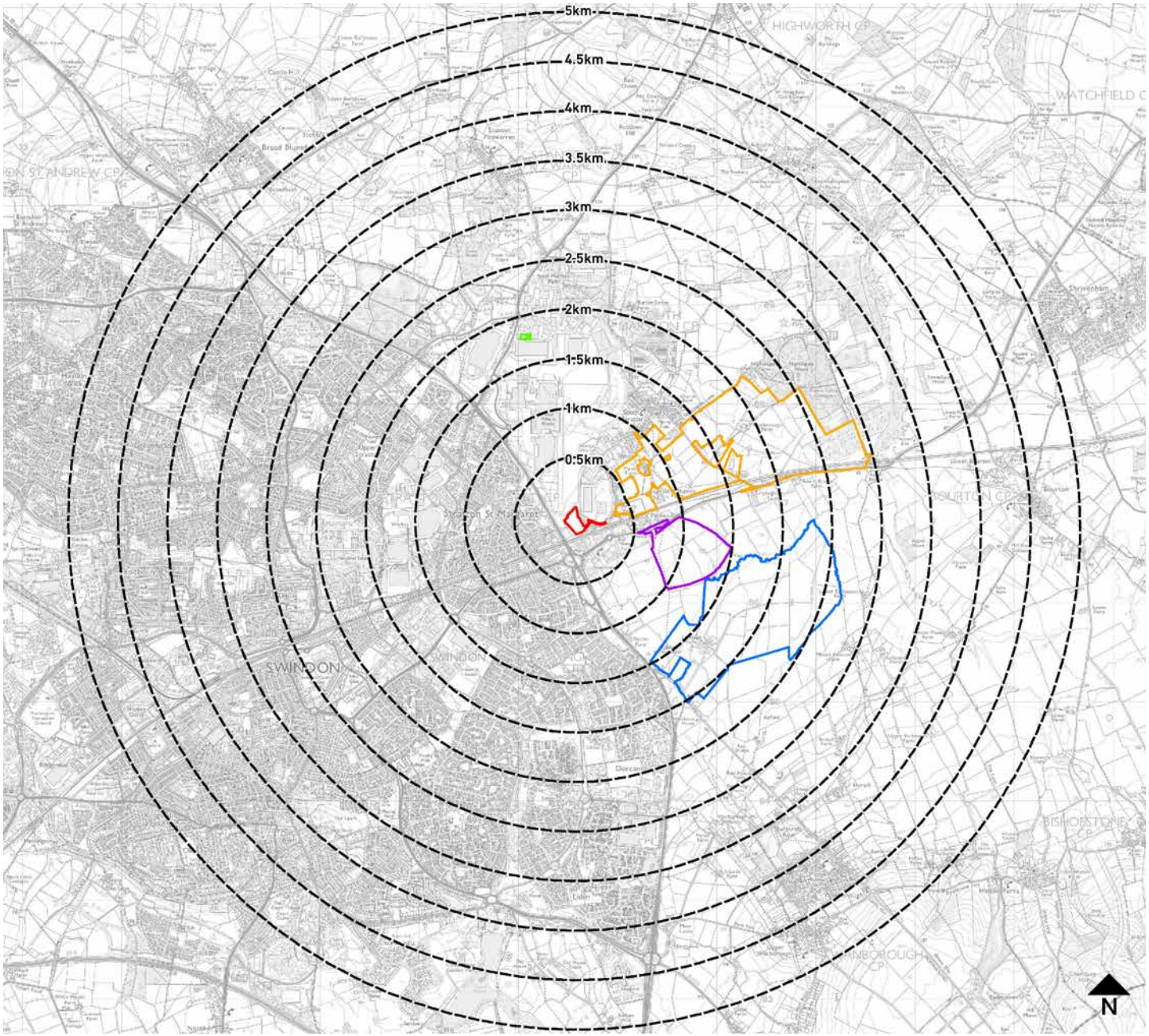
Site Identification and Feasibility

The Keypoint Swindon site was identified to provide the opportunity for power to be supplied to any interested local businesses as well as the opportunity to supply heat in the form of steam and / or hot water if required; and in view of the need for new waste infrastructure within Swindon Borough Council area with the plant saving approximately 150,000 tonnes of waste going to landfill annually.

The site at Keypoint Swindon was chosen having established:

- Its availability and its size which was suitable for up to a 150,000 tonnes facility;
- Its proximity to energy intensive industrial consumers. It is intended that the proposal will be able to offer low cost secure energy to one or more neighbouring businesses, assisting in securing the future of those companies and their employees;
- Its access adjacent to the existing industrial estate which immediately joins the primary route network without the need to go through residential areas.

No other viable site alternatives that met all three criteria were identified



CUMULATIVE SCHEMES PLAN

Consented Development & Cumulative Considerations

Schedule 4, part 1, paragraph 4 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2011 requires that a description of the likely significant effects of the development on the environment should cover cumulative effects.

The main aim of a cumulative assessment is to assess the additional impact of the development proposed on the baseline of projects that are either already operational, have planning permission or which are in the planning system.

During the pre-application process SBC identified four sites to be included within the cumulative assessment. The cumulative sites lie within a 3km radius of the Proposed Development and are listed as follows and their locations in relation to the site is shown on the Cumulative Sites Plan:

- Biomethane Demonstration Facility – S/LDO/16/0046
- Eastern Villages South (The Hub) – S/RES/15/1522
- Lotmead Site – S/OUT/15/0753
- Northern Eastern Villages – S/OUT/13/1555

PROPOSED DEVELOPMENT

The Proposed Development includes two separate buildings; 1) a Renewable Energy Centre (REC) powered by an Advanced Conversion Technology (ACT) (gasification) plant to generate power and heat; and 2) an industrial / warehousing building to include storage and offices.

The REC is capable of accepting approximately 150,000 tonnes per annum of Refuse Derived Fuel (RDF) (a waste product that following pre-treatment is shredded, dehydrated and/ or compressed) as well as an element of residual commercial and industrial waste (CIW) together with an element of construction and demolition (C&D) and potentially municipal solid waste (MSW) i.e. residual waste where all the practicable recycling has been completed. The Facility will not accept hazardous or hazardous clinical waste.

The electricity produced from this facility will have a capacity of 14.5MW/hr gross of electricity. The gasification technology employed at Keypoint Swindon Energy Centre will involve a two-stage system, which initially gasifies the waste to produce synthetic gas. This gas is then transferred to a second stage where it is combusted in a high efficiency boiler to produce steam which drives a steam turbine to produce electricity. The process allows for efficient control of emissions and improved performance generally as an energy solution. Gasification is classed as an Advanced Conversion Technology (ACT) as the biomass element of waste qualifies for Contract for Difference (CFD). CFDs provide long-term price stabilisation for low carbon plants, allowing investment to come forward at a lower cost of capital and therefore at a lower cost to consumers but enables advanced renewable technology to be developed.

The proposed REC is made up of the following principal elements:

- **A main building** – this will house the majority of the process plant and will have a number of silos to the rear and a flue stack to the west of the building, all waste material will be unloaded inside the building. At its highest point, the main body of the building will be 24m high and 87.96m long x 72.7m wide with a floor area of 5,725m2. The flue stack contains a walk around platform for continual air quality monitoring access and consists of a metal framework. The flue stack will have a height of 52m and a diameter of 2.8m;
- **Waste Reception Bunker (located in main building)** - Wastes are deposited into an 8m deep waste bunker within the building, with a capacity of 820m3 where shredding and separating takes place to prepare the fuel for the gasification process, and any ferrous material is taken out which will be removed for recycling;
- **Prepared Fuel Storage Bunker** – the prepared fuel will be deposited in storage bunker within the building (which has 4 days of waste storage thus complying with fire regulations and stopping build-up of heat from waste gasses), which has a capacity of c6,000m3.
- **Turbine Room** – this will be a smaller separate building 15.6m high, with a base of 30m x 15m. A short section of pipe line will connect the main building and the turbine generator building;

KEY

- SITE LOCATION (3.17HA)
- PROPOSED BUILT FORM
- PROPOSED VEGETATION

LAYOUT PLAN

- **Air cooled condenser fans** – have a height of 23.4m with a footprint of 39.62m x 15.76m;
- **Bottom Ash bunker** – the bottom ash is stored in a bunker measuring 10m x 12m x 5m with a capacity of 600m3. This material is inert and can be reused as an aggregate or used for an engineering material in landfill. It complies with current European legislation;
- **Fly Ash Silo** – the fly ash silo framework stores the residue from the flue gas cleaning system and measures 10.5m x 5.15m and 19.5m high. The ash is removed in a safe manner by attaching an umbilical hose to a tanker and can be either reused /recovered or disposed of at licensed landfills. The handling, storage, treatment and reuse/disposal of this material is highly regulated;
- **Fire Water Tank** - a fire water tank would be included next to the south of REC building. The tank has a 17m diameter and a height of 6.75m with a 1 million litre capacity;
- **Pump Room** – the pump house is next to the fire water tank and has a height of 3.2m with a footprint of 6.09m x 4.59m; and
- **Technical / Control room and Workshop** – will be located within the east side of the main building.

In addition, the external site areas will include:

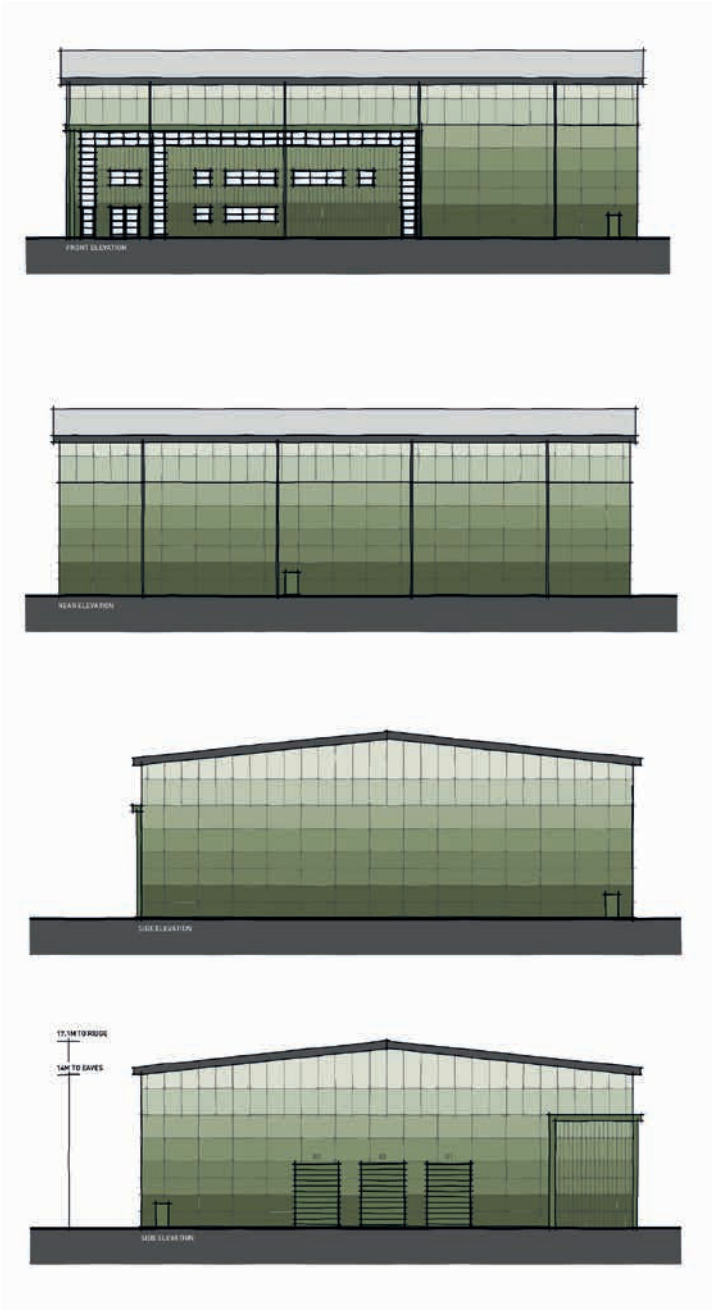
- Two weighbridges (both in and out); with an office measuring 4.85m x 3m x 2.95m high;
- Site entrance and circulation roads;
- 18 car parking spaces plus 2 disabled bays;
- Provision for 14 cycling spaces; and
- Landscaping and Sustainable Urban Drainage Systems (SuDS).

SIDE ELEVATION FRONT ELEVATION

The industrial warehouse building has a height of 17.1m to ridge, width of 44.70m and length of 51.96m. The building footprint measures 2,322m2 and the floor area measures 2,671m2. Surrounding the industrial warehouse building are 17 car parking spaces plus 2 disabled spaces. There will be a minimum of 12 secure cycling spaces.
To the south of the industrial warehouse unit is an HGV turning area and an office. There will be a 2m high paladin boundary fence as well as security and lighting.

SIDE ELEVATION

REAR ELEVATION



WAREHOUSE ELEVATION

Process Description

The plant employs a two stage system that first gasifies (heats) the waste to produce a synthetic gas which is then transferred to a second stage where it is oxidised. Changing the waste to a gas fuel, means the combustion environment can be finely controlled, dioxins thoroughly destroyed and Nitrogen Oxides (NOx) emissions minimised which can achieve emissions levels that are compliant with the Industrial Emissions Directive (IED) (Directive 2010/75/EU of the European Parliament and the Council on industrial emissions).

The key stages of the process are as follows:

- Waste Reception Hall
- Fuel bunker and transport system;
- Thermal conversion;
- Heat recovery steam generator
- Energy utilisation system;
- Flue gas cleaning system; and
- Control and monitoring system.

Operating Hours

The REC will operate continuously; 24 hours a day, 7 days per week. Operational staff would be required to operate the Plant on a 3 shift pattern (each of 8 hours). During weekdays the facility will be open for deliveries between the hours of 0700 and 1900 and between the hours of 0700 and 1400 on Saturdays. There will be no waste received on Sundays. It is expected that HGVs importing and exporting materials from the site will do so evenly throughout the 12 hour period and there is unlikely to be a peak in movements associated with these operations.

Grid Connection

The Applicant has held discussions with Scottish and Southern Energy (SSE) (the responsible DNO) who have advised that there is sufficient capacity at Stratton substation, the proposed connection point for the REC's export located just north of Kingsdown Road (B4141).

The proposed grid connection will be laid within the highway, footway or verge areas along Ermin Street and Kingsdown Road. The cable route corridor from the site to the grid connection point has been assessed and included within the relevant chapters of the ES. The cable route lies within close proximity to the site and will be underground and will not be routed through the village of South Marston.

TYPICAL PLANT AND PROCESS EQUIPMENT OF A RENEWABLE ENERGY CENTRE

Design Approach

Many industrial sites are designed with a typical 'form follows function' approach. From the outset it was deemed important that the external appearance of the plant should be appropriate for the area.

In terms of architectural detailing and materials, both follow a similar palette, albeit simplified for the smaller industrial warehouse unit and consist of mainly a coloured cladding system.

Due to the energy plant building being a large mass, it was important to use a cladding system that would achieve the functional needs, as well as aesthetic ones too. A simple palette of materials was proposed consisting of a neutral grey-green colour and represented in bands becoming increasingly pale towards the top of the building. The aim of the introduction of the banding is to reduce the perceived massing of the building. The stack will be faced in a muted grey metal which will sit and almost blend into the typical overcast skyline of the UK. External equipment will be faced in a grey coated metal to blend into the colour palette of the main plant.

The warehouse will follow on from the design principles established on the energy plant. It will be faced in a lightweight architectural cladding panel which is a neutral grey-green colour and represented in bands becoming increasingly pale towards the top of the building

A tree and shrub planting belt was integrated on the eastern and western boundary to screen visible elements and enhance the visual environment.

CONSTRUCTION AND ENVIRONMENTAL MANAGEMENT

Construction Duration

Subject to the grant of planning permission, it is anticipated that the construction of the proposed REC would commence in 2017. Construction on site would last for 24 months, after which there would be a commissioning period. Furthermore, construction would normally take place during the hours of 0700 to 1800 (Monday to Friday) and 0800 to 1300 (Saturday). No construction would take place on Sundays or bank holidays.

Environmental Management Plans

A Construction Environmental Management Plan will be prepared and adopted and will include sections on: noise, vibration, air quality, water quality, surface quality (prevention of contamination of ground surface), site transportation and traffic management, visual intrusion and waste management. The appointed contractor will also be required to register with the Considerate Construction Scheme.

A Site Waste Management Plan will be prepared and all relevant contractors will be required to seek to minimise waste arising at source and, where such waste generation is unavoidable, to maximise its recycling and reuse potential. Recycling of materials will primarily take place off-site where noise and dust are more easily managed.

Consents

In addition to planning permission, other consents will be required to enable the Proposed Development to proceed. Of particular importance to this development is the need for an Environmental Permit from the Environment Agency that will control all operations associated with the plant based upon various risk assessments. Information presented in this ES will be used in the preparation of the Permit.

AIR QUALITY

Introduction

The potential effects of the proposed REC on local air quality have been assessed following discussions with Swindon Borough Council. The assessment considered the potential effects human health, ecology and amenity arising from the construction and operation of the plant.

The operational impacts of the Proposed Development on air quality, odour and bioaerosol conditions for local receptors and additional traffic have also been assessed. Air quality impacts have been assessed quantitatively using dispersion modelling. Bioaerosol impacts have been assessed qualitatively based upon the levels expected to be generated and the likelihood of their being emitted from the REC.

Baseline Conditions

Background air quality information for the area around the Application site is available from a range of sources including the DEFRA air quality archive, Swindon Borough Council and other recent planning applications. These data were examined to determine representative, yet precautionary, values for the existing background concentrations of the pollutants of interest. It was recognised that background concentrations for the specific locations of interest were not available and as such conservative estimates for the general area were applied.

In addition to this data baseline monitoring was undertaken at locations agreed with SBC. The monitoring is being undertaken at fifteen locations and is intended to run for a period of six months commencing in January 2016. The aim of this data collection is to confirm the conservative nature of the background pollutant concentrations in the air quality assessment.

Likely Significant Effects

In terms of emissions from the facility's stack, the assessment has demonstrated that these will result in an insignificant change in concentrations at all local sensitive receptor locations for all pollutants. They are considered insignificant in terms of their ambient effect on human health and protected nature conservation sites and pose no threat to the attainment of applicable environmental standards.

The effect of dust arising from construction activities is considered to be Low falling to Negligible with the implementation of designed in mitigation measures. The impact of additional traffic resulting from the construction activities and subsequent operation of the proposed plant is estimated to be Neutral.

The effects of odours and bioaerosols were considered to be Slight and Insignificant respectively at most of the close residential locations falling to Negligible and Insignificant at all residential locations when designed in mitigation measures were considered.

The additional contribution of pollutants from two further proposed developments in the area is not considered to have any effect in the conclusions of this assessment.

It is not considered that releases from the proposed plant pose a threat to human health or amenity based on accepted environmental standards.

Mitigation and Enhancement

The construction works have the potential to create dust. During construction it will therefore be necessary to apply a package of mitigation measures to minimise dust emission. These control measures are industry standards for construction and are well proven. With these measures in place, it is expected that any residual effects will be 'not significant'. However, the guidance recognises that, even with a rigorous dust management plan in place, it is not possible to guarantee that the dust mitigation measures will be effective all of the time, for instance under adverse weather conditions. The local community may therefore experience occasional, short-term dust annoyance. The scale of this would not normally be considered sufficient to change the conclusion that the effects will be 'not significant'.

The plant will operate using pollution abatement measures which must meet the industry sector best available techniques and perform to the expected levels. These are techniques with a history of reliably meeting performance requirements to ensure compliance with set regulatory emission limits. It is expected that with mitigation measures already designed into the proposal it will effectively control releases to air such that the significance of effects is reduced to Negligible for all activities considered. It is not considered that any further mitigation measures will be necessary.

Conclusion

The assessment concludes that with the designed in mitigation measures in place the significance of the effect of releases to air on local air quality is Negligible for all of the effects considered. It is not considered that releases from the proposed plant pose any threat to human health, protected nature conservation sites or amenity based on accepted environmental benchmarks.

LANDSCAPE AND VISUAL

Introduction

The landscape and visual impact assessment has assessed the likely effects of the Proposed Development on landscape character, landscape features and elements within and in the immediate vicinity of the Proposed Development, and on local visual amenity. The assessment has been undertaken with regard to best practice and the Guidelines for Landscape and Visual Impact Assessment, 3rd Edition (2013), as published by the Institute of Environmental Management & Assessment (IEMA) and the Landscape Institute.

Baseline Conditions

The Application Site is not subject to any statutory or non-statutory landscape designation. The northern edge of the North Wessex Area of Outstanding Natural Beauty (NWD AONB) lies approximately 4km to the south of the Application Site at its closest. The Application Site lies within the Midvale Ridge National Character Area, and within the Settlement LCA of the Swindon Borough Landscape Character Assessment. The Mid Vale Ridge and Vale of the White Horse LCAs lie a short distance to the east and south-east.

The Application Site comprises a single body of land with no distinct boundaries. The northern third of the plot has been dug over and is currently ephemeral / short perennial vegetation and the remainder is dominated by tall ruderal vegetation with patches of poor semi-improved grassland and a few larger strips of grassland. The Application Site is bordered on three sides by young broadleaved woodland / dense scrub with occasional mature trees, together with a section of semi-improved grassland to the southwest. The remaining (north eastern) side borders a road with an earth bank along the margin which is sparsely vegetated.

The surrounding area is dominated by large or very large scale industrial development – the Honda manufacturing plant and South Marston Industrial estate to the north, two very large distribution centres (both associated with the Honda plant) and the recently constructed Bodleian Library storage facility to the north-east/east, with further industrial buildings and the settlement of South Marston further to the east. A number of large-scale retail facilities lie to the south. The A420 and the Paddington to South-Wales mainline railway lie to the south of the Application Site, and the A419 dual carriageway to the west. The edge of the main urban area of Swindon (Stratton St Margaret) lies to the west of the A419. The area to the north, east and south-east beyond the urban/industrial edge is predominantly managed farmland

The topography of the Application Site slopes very gently from approximately 103m AOD at the southern corner to approximately 102m AOD towards the north-western boundary, before sloping more steeply down to 100-101m AOD on the very north-western edge of the Application Site. A shallow bund, approximately 1m above the surrounding ground level, borders the road on the north-eastern boundary. A public footpath follows the south-west and south-east boundaries of the Application Site.

Likely Significant Effects

The assessment has only identified two significant effects arising from the Proposed Development, those being the effect on visual amenity as experienced from the footpath which passes close to the south-west and south-east boundaries of the Application Site. Although significant, the context provided by the surrounding industrial landscape means that these effects are not considered to be materially unacceptable.

Mitigation and Enhancement

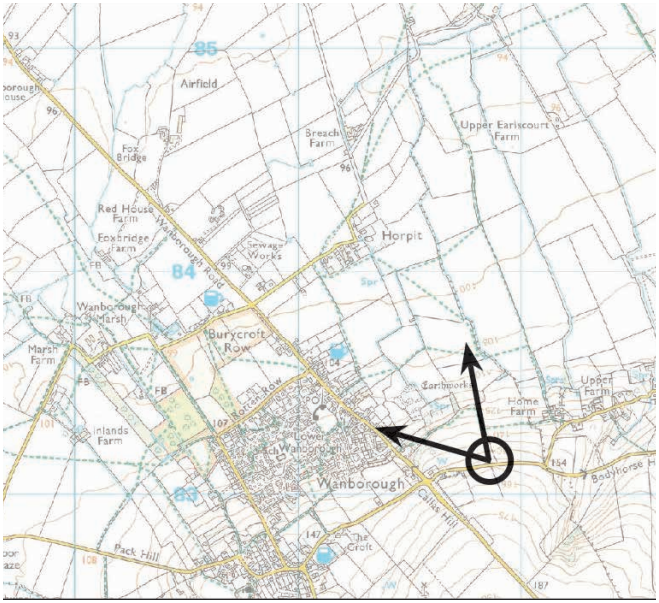
Mitigation measures (such as minimising the height of the stack and the main building, and the use of cladding of variable colours and shades so as to minimise the perceived massing of the buildings) have been incorporated into the design of the Proposed Developed as part of the iterative design process. The measures are therefore an integral part of the development and no further additional mitigation is considered necessary from a landscape and visual perspective.

Conclusion

The Application Site lies outside of any statutory or local/non-statutory landscape designations. The Application Site comprises a development site already allocated for warehousing or distribution development, set within the context of other very large-scale industrial developments, notably the Honda plant to the north of the Application Site and associated distribution centres to the north-east.

The Proposed Development would result in the construction of two large industrial buildings, together with a 52m tall stack. These would not be out of character with the Application Site or its surroundings.

The nature of the Proposed Development, together with the context provided by the land uses surrounding the Application Site, would mean that the Proposed Development is considered to be appropriate to the setting and landscape character of the site. The Proposed Development would not result in any significant effects on local landscape features or elements, and would not have any significant effects on visual amenity as experienced from the vast majority of locations within the local area, including views from the AONB to the south.



PHOTOMONTAGE FROM VIEWPOINT 13 – MINOR ROAD (BODYHORSE HILL) BETWEEN WANBOROUGH AND HINTON PARVA, LOOKING NORTH-WEST

TRAFFIC AND TRANSPORTATION

Introduction

The traffic and transport assessment has considered the environmental impacts of traffic to include pedestrian amenity, highway safety and driver delay in the context of the relative change in traffic flows.

Baseline Conditions

With respect to the Application Site two areas have been identified within the study area as needing further investigation. These are Sainsbury's and St Margaret's Retail Park and the 'dwellings on the A420 east of the Gablecross roundabout. The sensitivity of these receptors was noted to be Low and Moderate respectively.

Four locations have been identified with respect to the Cable Route. These are Sainsbury's and St Margaret's Retail Park and the Europa Industrial Park which have a Low sensitivity. The residential dwellings on Ermin Street, Kingsdown Road and Kingsdown Secondary and St Catherine's Primary schools which have a Moderate sensitivity.

Baseline traffic flows have been collected and used as the basis of the environmental impact analysis. Analysis against these daily flows is considered reasonable in light of the fact that the trip profile of the site is likely to be distributed evenly over the course of the day.

Likely Significant Effects

Operational phase impacts have been determined with reference to the trip generation calculations contained within the Transport Assessment which accompanies the ES. The operational phase of the project is, at worst, categorised as Negligible.

Construction phase impacts could be generated from the arrival and departure of construction workers and associated HGV traffic and will not be more than the operational phase and is therefore also considered to be Negligible.

The construction of the cable route is, at worst, categorised as Minor to Moderate but given the temporary nature of this phase of the development this is considered acceptable.

Mitigation and Enhancement

Given the Application Site's current extant planning permission and the resulting impact of the Proposed Development, it is considered that the surrounding highway network is of a suitable standard and will not require further mitigation to accommodate the increased levels of traffic/HGV deliveries associated with the operational phase.

A Travel Plan will seek to minimise the number of car visits to the Application Site by staff and visitors. The site is well located for existing bus routes and has close proximity to urban areas which should encourage the staff to walk or cycle to work. Cycle racks will be provided on site.

It is proposed that a Construction Traffic Management Plan (CTMP) would be prepared and submitted to the Local Planning Authority prior to the commencement of on-site works. The purpose of the CTMP would be to ensure appropriate environmental management practices are followed during the construction of the project. The effects associated with the laying of the cable will be mitigated in the form of traffic management including signage.

Conclusion

The Proposed Development can be accommodated without any unacceptable detriment to the environmental effects of traffic. The inclusion of mitigation measures at both construction and operational phases reduces the effects and impacts of the development.

HYDROLOGY AND FLOOD RISK

Introduction

An assessment has been undertaken of the likely significant effects that the Proposed Development would have on the water environment. The effect of the Proposed Development on local flood risk and water quality of nearby watercourses has been assessed and mitigation measures proposed. The hydrology and flood risk assessment is supported by a detailed Flood Risk Assessment which has been submitted with the planning application documents.

Baseline Conditions

The Application Site is currently an undeveloped land covered by scrub and grassland.

The site is predominantly flat with a slight slope north towards the ditch on its northern boundary. The ditch on the site's northern boundary receives surface water runoff from the Application Site and adjacent highway areas. The Environment Agency's Flood Map shows the site lies entirely within Flood Zone 1, which indicates the land assessed as having less than 1 in 1,000 annual probability of river or sea flooding (<0.1%) and is the lowest rating used by the Environment Agency. The Strategic Flood Risk Assessment contains no records of historic flooding from watercourses in the vicinity of the application site.

Likely Significant Effects

The construction of the Proposed Development will temporarily disrupt the onsite surface water drainage network. Potentially polluting activities and accidental spillages and leakages may occur during the construction and operation of the Proposed Development which could have an effect on local water quality.

Mitigation and Enhancement

Good site management, adequate contingency planning and application of pollution prevention principles and best practice construction techniques will reduce the risk of a significant water pollution event occurring.

The surface water drainage system will incorporate stormwater storage and will be discharged at a reduced flow into an onsite ditch. The system will provide a degree of flood risk betterment during these storm events.

The surface water drainage system will incorporate specific measures to intercept oil and silt and other pollutants from the site and relevant plant will be designed to minimise pollution risk (e.g. bunded).

Conclusion

Adopting best practice construction site management and provision of a suitably designed surface water drainage system incorporating pollution control and stormwater storage minimises the effect of the Proposed Development on local flood risk and water quality in nearby watercourses.

HYDROGEOLOGY AND GROUND CONDITIONS

Introduction

A qualitative assessment of the effects of the Proposed Development arising from the ground conditions has been completed. The assessment has considered the extent and methods of foundation construction, the anticipated degree of disturbance of the ground, the final form of the development, and the relevant national and local policies for contaminated land assessment and management.

Baseline Conditions

The baseline ground conditions at the site have been assessed by a detailed Phase 1 desktop study and site walkover.

Likely Significant Effects

Prior to mitigation a number of likely significant effects have been identified relating to the risk of the effects of contaminated land on construction workers, end users and controlled waters.

Mitigation and Enhancement

The following mitigation measures have been recommended:

- Undertake a geo-environmental ground investigation prior to development to provide an assessment of the ground conditions on the application site with respect to geotechnical properties and any potential contamination in the underlying soils and or groundwater.
- Application of appropriate measures during the construction phase to protect construction workers and site neighbours from exposure to any contaminated material which may be encountered (e.g. dust control measures, appropriate Personal Protection Equipment).
- The stockpiling and testing of material displaying visual or olfactory evidence of contamination during the construction works. Based on the results of testing, the soils should be re-used, treated or disposed off-site.
- A 'clean' and inert 300mm thick cover layer should be placed over in-situ soils in areas of new landscaping. The cover soils should be validated prior to placement.
- Building slabs and membranes should be designed to mitigate the Characteristic Situation classification for the site, ground gas monitoring should be undertaken to classify the gas regime, as described within BS 8485 and C665.
- The concrete used within the development should be designed in accordance with the concrete classification for the site (assessed using BRE Special Digest 1).
- The local water supply company should be consulted regarding the pipe material and backfill specification of potable water supply pipes.
- Operation on sealed hard standing would ensure any oils/lubricants or wastes are not able to penetrate into the underlying natural ground and controlled waters; and
- Develop systems in line with the plants/facilities Environmental Permit to ensure all potential contamination issues associated with the operation of the facility would have been satisfactorily controlled.

Conclusion

Following the implementation of the recommended mitigation measures the residual effect of the Proposed Development with respect to all receptors is assessed to be Neutral/Not Significant as either ground contamination sources or transport pathways to receptors will have been removed and no significant effects on geology, soils and contamination are predicted during the operation of the plant, which would be subject to its own operational methodology and risk assessments.

NOISE AND VIBRATION

Introduction

A noise assessment has been carried out for the Proposed Development. The assessment has taken account of potential effects during the construction and operation of the Proposed Development, upon surrounding residential receptors. It has considered factors such as pilling during construction and additional traffic movements once the site became operational.

Baseline Conditions

To establish the baseline conditions, the existing ambient and background sound levels were measured at two locations that lie approximately east and west of the Proposed Development. The locations were Watermead Road and Thornhill Road, Swindon and are known as 'receptors' in the Assessment.

The main noise sources that influenced the measurement of baseline conditions were, road traffic (A419 and local), rail traffic (Bristol to Paddington main line), air traffic, commercial and industrial activity, conversation, footfall and wildlife.

N

BASELINE MONITORING LOCATIONS PLAN

Likely Significant Effects

For the day and evening periods the significant effect of rotary piling on the two assessed receptors was between negligible and low. Due to the very nature of construction, noise above the existing baseline is likely to be generated. The level during these times may be audible at receptor locations but is unlikely to cause any disturbance or disturbance.

At night the picture is slightly different with the significant effect ranging from low to high dependent upon the actual time period assessed. A significant effect of medium and high at night could possibly cause sleep disturbance. Although the predicted effect only gives an indication not a statement of fact or what will occur.

The predicted operational noise at the receptors was generally low for an industrial development with transport movements on and off site contributing most to these levels. The significance effect was negligible for most time periods with a low effect on a couple of night-time periods when ambient levels had receded to their lowest levels.

To reduce the effect of the development to within acceptable levels a mitigation strategy for piling and night-time transport was devised for the Proposed Development.

Mitigation and Enhancement

To reduce the significant effect of piling on the receptors it is proposed that no piling is undertaken between 23:00 and 07:00 during the construction phase.

The Proposed Development will add sound energy to the acoustic environment during the construction and operational phases. The developer should ensure that the effect of both operations on the local receptors is reduced to a minimum and is negligible where possible. However, even if there is a negligible effect during operation this will not represent an enhancement of the acoustic environment.

Conclusion

The significant sound source during the construction phase of the development will be piling, it is recommended that only rotary piling is used where possible and that piling should not be undertaken at night. Should the usual noise mitigation strategies being employed during the construction phase and the recommendations are followed then the significant effect of the construction noise should be reduced to low. The highest levels of construction noise will be throughout the day when baseline conditions are at their highest. This should lead to minimal daytime disturbance. If piling is not undertaken at night, then night-time disruption should be minimal and there should be no sleep disturbance during this phase.

For an industrial process within a mainly industrial/commercial environment the Proposed Development emits fairly low levels of operational noise during normal conditions. In turn, the predicted levels of operational noise at the local receptors can be described as very low. Therefore it is concluded that the operational noise is only likely to be briefly at the Lowest Observed Adverse Effect Level (LOAEL) when baseline conditions are at their very lowest so the development is unlikely to cause disruption or cause sleep disturbance.

ECOLOGY AND NATURE CONSERVATION

Introduction

The ecological assessment compiles information from a desk study and Extended Phase I habitat survey, enabling the determination of the likely ecological effects of the Proposed Development.

The assessment establishes the likely presence of protected or notable species, identifies statutory designated sites for nature conservation in the vicinity of the Proposed Development and evaluates the overall conservation status of the Application Site. The potential effects on identified ecological receptors including designated sites and protected and notable species is assessed in line with current guidance, and appropriate mitigation and enhancement measures are described.

Baseline Conditions

An Extended Phase 1 habitat survey was undertaken on the Application Site in August 2015. The survey recorded habitats within the Application Site and aimed to establish the presence or potential presence of protected and notable species.

Statutory designated sites were identified within a 5km radius of the Application Site using the Multi Agency Geographic Information for the Countryside (MAGIC) website, along with the Joint Nature Conservation Committee (JNCC) and Natural England (NE) websites. WSBRC (Wiltshire and Swindon Biological Recoding Centre) provided records of protected and notable species, locally designated sites and habitats within a 2km radius of the site, extended to 5km for bats.

The Application Site supports areas of ephemeral/ short perennial vegetation and tall ruderal vegetation, with patches of poor semi-improved grassland. The site is bordered on three sides by woodland or scrub with occasional mature trees and on one side by a road and sparsely vegetated earth bank.

No evidence of protected or notable species was identified during the Phase 1 habitat survey. The habitats present had the potential to be used by nesting birds and foraging bats, together with reptiles and were considered of value for invertebrates. No reptiles were observed during presence/ absence reptile surveys.

Bat activity surveys recorded common pipistrelle, soprano pipistrelle, noctule, brown long-eared bat and Myotis species. Activity levels of all bat species were considered Low overall, with the exception of Low to Moderate levels of noctule activity at one of the monitoring stations during September, however this monitoring station was situated along the boundary of the Site, beside broadleaved woodland.

The overall importance of the Application Site habitats and to protected and notable species is assessed to be Low to Moderate, with the higher value features along the Site margins being retained as part of the Proposed Development.

Likely Significant Effects

No significant effects are anticipated on statutory or non-statutory designed sites or habitats. No significant effects are anticipated on protected species, including birds, bats, badger, dormouse, amphibians and reptiles and invertebrates.

Mitigation and Enhancement

Mitigation and enhancement measures will include the following:

- Mature trees along the boundaries of the Application Site will be retained and protected during works;
- Pollution prevention and control measures will be used during construction;
- Inclusion of lighting scheme that avoids light spill to habitats adjacent to the south of the Application Site;
- Installation of additional bird and bat boxes;
- A pre-construction badger survey;
- Reasonable Avoidance Measures (RAMs) will be implemented during construction to avoid any risk of accidental harm to individual amphibians or reptiles that may be present; and,
- A Pre-construction nesting bird survey to be undertaken if works commencing during the breeding bird season (generally acknowledged annually as 1st March to 31st August inclusive).

Conclusion

The Proposed Development will have no significant effects on Ecology or Nature Conservation either individually or in combination with other developments. Residual effects of the Proposed Development will be negligible and not significant in relation to all identified ecological receptors.

ARCHAEOLOGY AND CULTURAL HERITAGE

Introduction

The archaeology and cultural heritage assessment has considered the likely significant effects of the Proposed Development that has used a combination of desk based research and on site investigation.

Baseline Conditions

No designated heritage assets are situated within the Application Site. Wiltshire Council Historic Environment Record have a single entry for an 'outfarm' (an agricultural out building) within the north of the Site. A review of historic mapping has shown that this consisted of a single farm building and a pond. No remains were identified during the Site visit, and this area of the Site was subject to extensive landscaping/excavation during the development of the industrial units immediately north-east of the Site. No potential archaeological remains were identified by the geophysical survey. As such, no below-ground remains of the former farm building are considered to survive.

The Historic Environment Record also records the Site within the boundaries of the South Marston Aerodrome. A review of Ordnance Survey mapping and aerial photography has indicated that, whilst the Site fell within the boundary of the Aerodrome, the Site has never contained features relating to its operation. The site of the Aerodrome was subsequently redeveloped for Honda Manufacturing Limited and the runway which formerly abutted the Site has since been utilised as a test track. The Historic England volume 'Military Sites post-1500' provides guidance on how Historic England consider significance with regard to WW2 sites. In the cases of both 'factories' of the period and also 'airfields and aviation' a critical factor in the significance of a site is its degree of preservation – the more 'intact' the complex is the higher its likely significance. Very few structures from the WW2 complex appear to survive in the whole of the former Aerodrome area, and very limited heritage significance could be attached to it. The main surviving element, as noted, is parts of the runways; the development would not impact on any such areas.

A review of aerial photography of the Application Site identified that it has previously been subjected to extensive landscaping/excavation, which has impacted the northern half of the Site. This will have removed any possible archaeological remains within the whole of the northern half of the Site.

Despite the lack of recorded remains within the Application Site, and the extensive previous impacts within it, a geophysical survey of the site was carried out to confirm this evidence. The survey found no magnetic anomalies indicative of significant archaeological remains. Stronger magnetic variation provided further evidence of the groundworks and landscaping previously carried out within the Application Site.

The designated heritage assets (such as Listed Buildings) in the wider area were considered as to their sensitivity to development and potential development effects upon them. This assessment determines if the presence of the Proposed Development would have an impact on the 'setting' of these heritage assets. I.e. would someone looking at the heritage asset fail to understand its historical importance due to the proximity of the Proposed Development. The heritage assets near the Application Site included the Scheduled Monument of the Roman town west of Wanborough, which comprises buried archaeological remains adjacent to the A419 dual carriageway. Two churches were also assessed in detail (the Church of St Margaret and the Church of St Mary Magdalene), further Listed secular buildings, and the Stratton Conservation Area.

Likely Significant Effects

No adverse effects upon archaeological remains are identified at Construction Phase or Operational Phase. The baseline survey has clarified that much of the Application Site has been heavily effected upon by previous groundworks, and so no archaeological remains were identified by the geophysical survey.

No adverse effects upon the significance of designated heritage assets through change to their 'setting' were identified following the detailed settings assessment.

Mitigation and Enhancement

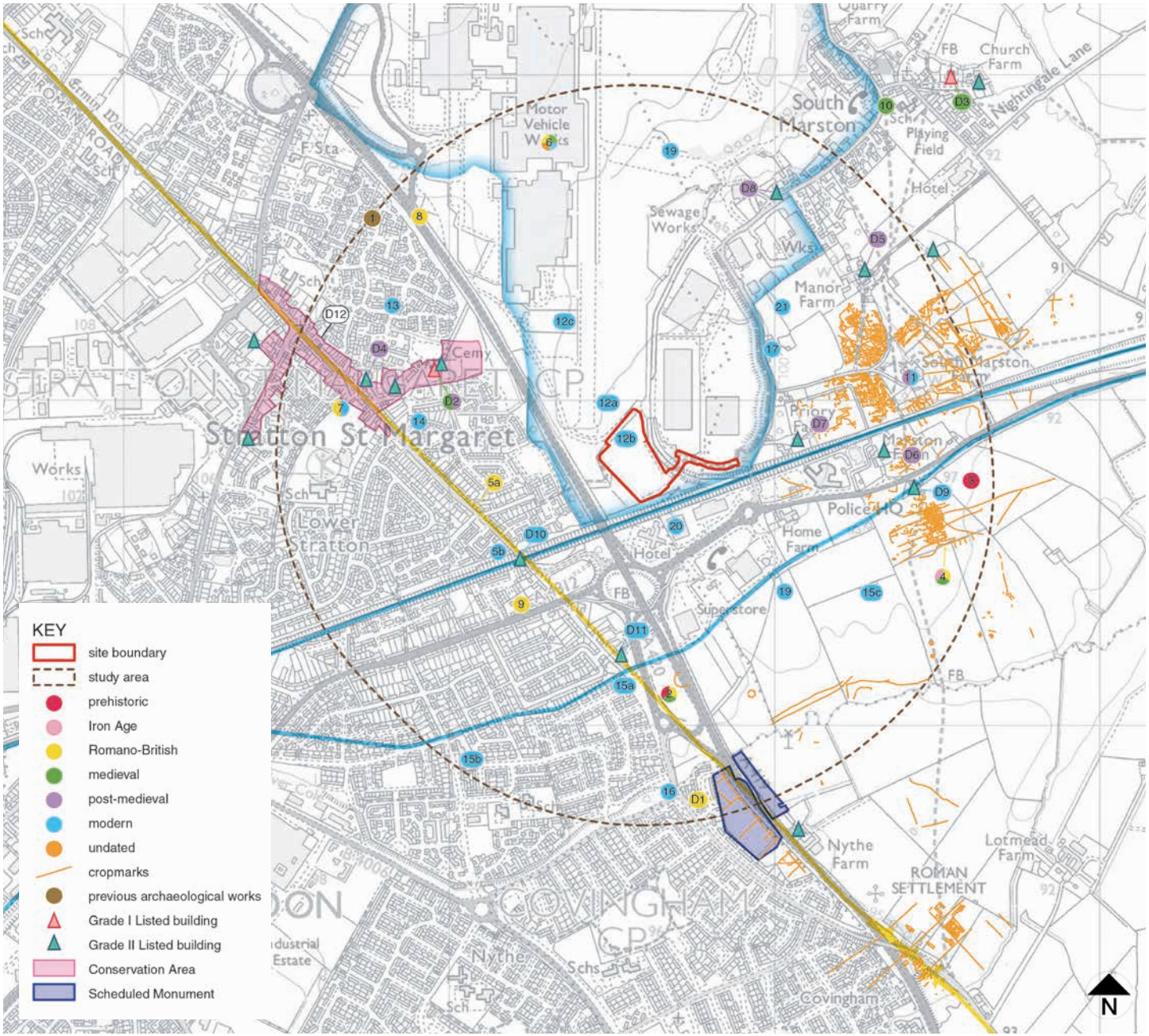
No further mitigation measures are proposed for the northern half of the site which has been subject to previous groundwork impacts. A programme of archaeological monitoring and recording during topsoil strip for the southern half of the site as part of a planning condition attached to any permission would be suitable regarding the southern half of the site.

As assessment and survey has not identified any potential heritage assets within the Application Site, this measure would be sufficient to manage any eventuality that remains do lie within the southern half which were not identified by the geophysical survey.

Conclusions

The development proposals would be in line with the objectives of the Wiltshire Core Strategy 2015 heritage policies.

The Proposed Development would not lead to harm to any Listed buildings, and would be consistent with the requirement of Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 which requires 'special regard to the desirability of preserving the building or its setting or any features of special architectural or historical interest which it possesses' nor would it harm the Stratton Conservation Area as the Proposed Development will be rarely seen from this Area.



HERITAGE ASSETS PLAN

SOCIO-ECONOMICS

Introduction

The socio-economic assessment considers effects of the Proposed Development during both the construction and operational phases. The analysis focuses on the provision of employment and the effect in terms of the economy within Swindon and St. Margaret and South Marston Ward.

There are a wide range of socio-economic issues that exist and which will be affected by the Proposed Development.

Baseline Conditions

Swindon is expected to experience population growth. It is expected to see the population age in accordance with national trends. The area currently experiences a little in the way of deprivation.

The area has a high level of employment and the majority of workers are employed in lower value occupations. The unemployed within the Ward that are seeking a job are looking for both lower and higher value employment. The level of qualifications is also low. Swindon experiences net out-commuting flows which reflect the negative pay differential that the area experiences.

Likely Significant Effects

The key socio-economic effects of the Proposed Development can be summarised as follows:

- Provision of circa 100 to 130 additional jobs during the construction phase in the construction sector;
- Provision of 20 jobs during the operational phase;
- The jobs will include elementary jobs during both the operational and construction phases which responds to the type of jobs being sought by the unemployed in the area currently;
- The provision of a different range of jobs locally which may meet the needs of some local residents;
- Investment in construction, operation and maintenance all of which will provide for indirect effects including generating work for local tradesmen;
- The increase of the local disposable income (for employees of the facility and tradesmen) which will have induced effects on local economy;
- The provision of lower priced sustainable energy for local businesses, reducing business costs which may be used to expand or enhance businesses (including new jobs and/or increased wages);
- Potential minimal increases in commuting flows.

Mitigation and Enhancement

There are no identified negative effects associated with the Proposed Development in socio-economic terms and so no mitigation has been identified.

Conclusion

Overall the Proposed Development is considered to provide for minor positive effects and will prevent around 150,000 tonnes of residual waste going to landfill, utilising is as a valuable resource.

SUMMARY

The technical chapters which have made up the Environmental statement and assess the REC at Keypoint Swindon Energy demonstrate that there are no overriding environmental constraints or planning policies which would preclude the development of the Application Site.

The Planning Statement which forms a separate part of the planning application demonstrates significant weight for both Planning Policy and Waste Policy which demonstrates the need for and benefits of the scheme. The Proposed Development is in accord with the relevant policies of the Development Plan and other material planning considerations including the principle of sustainable development.

The proposal has also been shown to be in compliance with national strategic level planning policies contained within the National Planning Policy Framework and the National Planning Policy for Waste, and guidance set out in the Waste Management Plan for England and both EN-1 and EN-3. These documents are significant material considerations in the planning process and indicate this proposal is acceptable.

The above considerations demonstrate that upon considering the significant benefits associated with the scheme against the relatively benign impacts, the proposal, on balance, falls well within the scope of acceptability as the benefits would indeed outweigh any limited harm.

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