Surrey Waste Local Plan
Examination

Matters Statement: Matter 4 Spatial Strategy (Policies 9, 10, 11a, 11b and 12)

23 August 2019
**Issue: Whether the spatial strategy and distribution of waste management provisions are soundly based?**

63. Is the proposed spatial strategy for the planned provision for new capacity justified and consistent with national planning policy and guidance, including in relation to the focus on towns and urban areas, the use of previously developed land, and impacts on the environment and amenity? Is the identified spatial hierarchy for the location of future waste management provision justified, clear and readily understandable? Do the policies of the plan, including Policies 2, 9 and 10, clearly support the delivery of the spatial strategy and the locational hierarchy?

**Council’s Response:**

63.1 Yes, the proposed spatial strategy is justified and consistent with national planning policy and guidance.

63.2 Section 4.1 of the SWLP Part 1 identifies the key components of the spatial strategy.

63.3 The safeguarding of existing capacity is consistent with National Planning Policy for Waste\(^1\) which expects existing sites to be accounted for when planning for the need for additional capacity. This is due to the fact that existing sites play a significant and important role in managing waste and that the identification of new sites may be difficult.

63.4 The focus on towns and urban areas, the use of previously developed land, and impacts on the environment and amenity is justified and consistent with national policy, in particular that set out in Sections 4.0 and 5.0 of National Planning Policy for Waste.

63.5 The Report on *Delivering the Spatial Strategy (SWLP 12)* includes specific sections (3.1.2, 3.2.2, 3.3.2) which explain how the key policies which deliver the spatial strategy (Policies 8 (Improvement or Extension of Existing Facilities), 10 ((Areas suitable for the development of waste management facilities), 11a (Strategic Waste

\(^1\) Section 3, NPPW
Site Allocations) and 11b (Allocation of a Site for a Household Waste Materials Recycling Facility) are consistent with national planning policy.

63.6 Figure 5 clearly shows the broad categories of land and general preference in considering locations which are acceptable for new waste management facilities. This is in line with national planning policy on Green Belt\(^2\) and, while policies are included in the plan which are intended to implement this, it is recognised that modifications are needed to Policies 9 and 10\(^3\) to ensure consistency with national policy. Also see the response to Q. 67.

63.7 Policies 2\(^4\) (Recycling and Recovery (other than inert C, D & E and soil recycling facilities)) and 9 (Green Belt) are considered to clearly support the delivery of the spatial strategy and the locational hierarchy.

63.8 To ensure that Policy 10 clearly supports the delivery of the spatial strategy and the locational hierarchy the Council proposes the following modification:

| Policy 10 – Areas suitable for development of waste management facilities |
| Planning permission will be granted for the development of facilities (excluding permanent deposit) at the following locations: |
| 1) Sites allocated under Policy 11a – Strategic Waste Site Allocations, not in the Green Belt or |
| ii) On land identified as an ‘Industrial Land Area of Search’ as shown in the policies maps. |
| iii) On any other land identified for employment uses or industrial and storage purposes by district and borough councils. |
| iv) On land considered to be previously developed\(^60\) and/or redundant agricultural and forestry buildings and their curtilages. |
| v) On land that is otherwise suitable for waste development when assessed against other policies in the Plan. |

Planning permission will be granted for a Household Waste Materials Recycling Facility on land allocated under Policy 11b – Allocation of a Site for a Household Waste Materials Recycling Facility, if it is shown that the need cannot be met at any

\(^2\) NPPF, Section 13 Protecting the Green Belt

\(^3\) The modifications to Policy 9 are set out in response to Q. 68 and the modifications to Policy 10 is set out in response to Q. 71 (part of Matter 5).

\(^4\) Modifications to Policy 2 are proposed in response to Q.46 (part of Matter 3).
of the locations described in i) to iv) above and the proposal is consistent with other policies of the Plan including Policy 9 concerning Green Belt. Planning permission will be granted for the development of facilities (excluding permanent deposit) on land allocated under Policy 11a that is within the Green Belt, if it is shown that the need cannot be met at any of the locations described in i) to iv) above and the proposal is consistent with other policies of the Plan including Policy 9 concerning Green Belt.

64. Does the proposed distribution reflect a robust analysis of waste management needs, including for specific waste streams? What sources of data have been used for this analysis? How reliable and up-to-date are these sources? Does the evidence demonstrate that options for strategic approaches to locating facilities have been considered?

Council’s Response:

Does the proposed distribution reflect a robust analysis of waste management needs, including for specific waste streams?

64.1 The Site Identification and Evaluation Report (SWLP 9) sets out how sites proposed for allocation were identified. The criteria used are set out in Section 3 and are informed by the NPPW (Appendix B). From the long list of 208 potential sites, only 6 sites were identified as suitable for allocation in the SWLP but this is considered sufficient based on the estimate of additional requirements for facilities as set out in Section 1 (which is based on the Waste Needs Assessment (SWLP 8)). These sites are well distributed across the county (SWLP Part 1, Figure 1). Had the site selection process revealed more sites that were suitable for allocation, or if the sites identified had all been clustered in one area within the county, further sub-county level analysis of waste arisings would have been required, but this was not the case.

What sources of data have been used for this analysis?

64.2 The Waste Needs Assessment (SWLP 8) does not include analysis of waste arisings at a sub-county level to inform the Spatial Strategy for the Plan. It was considered that there was no need to conduct analysis of waste arisings at a sub-county level, owing to the nature of the data but also due to the relatively well connected nature of the county’s transport network.
How reliable and up-to-date are these sources?

64.3 Waste management needs were robustly assessed. The Waste Needs Assessment (SWLP 8) uses multiple data sources, which are set out in the document (Table 9, Table 11 and Table 13). Data was sourced from government departments or bodies (MHCLG, Environment Agency) and from Surrey County Council (the Council) itself. Data used is considered to be robust and the best available. The approaches taken are consistent with relevant paragraphs of the Chapter on Waste within Planning Practice Guidance. Also see responses to related questions in Matter 2.

Does the evidence demonstrate that options for strategic approaches to locating facilities have been considered?

64.4 Different options for strategic approaches to locating facilities were considered as explained in the response to Q.11 (Matter 1).

65. How does the spatial strategy and the proposed distribution of waste management facilities address the proximity principle and are strategic movements of waste justified? How have the transport implications for the proposed distribution of proposed allocated sites and ILAS been assessed? Is the distribution justified in this regard?

Council’s Response:

How does the spatial strategy and the proposed distribution of waste management facilities address the proximity principle and are strategic movements of waste justified?

65.1 As explained in paragraph 4.1.1.1, the Spatial Strategy is informed by a number of building blocks, one of which relates to the need to take into account the fact that there are no major distinct sources of waste but instead a more dispersed pattern of arisings and another concerns transport and connectivity. These matters are addressed by anticipating a mix of locations which are well connected to waste arisings via the excellent road network in Surrey. This approach takes account of the proximity principle which is intended to reduce impacts caused by the movement of waste. In particular the Spatial Strategy states:

“Sustainable transport options in Surrey are limited, however, through the delivery of new or improved waste management facilities a network of sustainable facilities is
encouraged. This should include sites which are well-connected to sources of waste, such as main centres of population and employment by road or rail.

By encouraging a network of waste management facilities which are well-connected to sources of waste movements of vehicles, especially heavy goods vehicles (HGVs), the county council is seeking to avoid significant adverse impacts from vehicles on residents.

Areas which are likely to offer opportunities for waste development in accordance with this Spatial Strategy include urban areas and towns located close to the boundary with London, and the large towns of Guildford, Woking, Reigate/Redhill and Farnham”.

65.2 Strategic movements of waste are justified by the fact that the management of waste routinely involves the transport of waste across administrative boundaries to the most appropriate facility for management. This is explained in paragraph 4.1.1.1 which includes the following:

“The Plan accepts that it is not practicable to deal only with waste produced in Surrey and that cross-boundary waste movements, including from London, are necessary to support the viable and efficient operation of waste management facilities.”

65.3 This is consistent with Section 4 of National Planning Policy for waste that includes the following (with emphasis added):

“In preparing their plans, waste planning authorities should:...plan for the disposal of waste and the recovery of mixed municipal waste in line with the proximity principle, recognising that new facilities will need to serve catchment areas large enough to secure the economic viability of the plant;”

65.4 The strategic movement of waste is accepted as a matter which requires cross boundary co-operation between waste planning authorities and this is generally recognised in the Memorandum of Understanding between the Waste Planning Authorities of the South East of England (SWPS-02) and more specifically within SoCG prepared with Hampshire County Council (SOCG-06), West Sussex County Council (including the South Downs National Park Authority) (SOCG-05), East Sussex County Council (including the South Downs National Park Authority and Brighton & Hove City Council) (SOCG-04), Kent County Council (SOCG-03), Suffolk County Council (SOCG-08) and North London Boroughs (SOCG-02).
65.5 The London Plan plans for the management of waste on the basis of net self-sufficiency and in doing so also recognises that there will be strategic movements of waste between London and other areas.

**How have the transport implications for the proposed distribution of proposed allocated sites and ILAS been assessed? Is the distribution justified in this regard?**

65.6 In line with the NPPF (Para 102) and NPPW (Appendix 2), transport was considered from the earliest possible stage of site identification and evaluation. Proximity to the SRN was included as a sieve in the *Site Identification and Evaluation Report (SWLP 9)*.

65.7 The suitability of each site identified for waste related development was further assessed as part of the *Transport Study (SWLP 19)* undertaken to support the Plan. The *Transport Study (SWLP 19)* found that all allocated sites are suitable for some form of waste related development and key development considerations were included in *SWLP Part 2*.

65.8 There was no concern raised in the *Transport Study (SWLP 19)* regarding the transport implications of the distribution of the sites proposed for allocation. Also see the response to Q. 134 (Matter 7).

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66. Does the SWLP include sufficient information on the location criteria for site identification? Does it meet European reporting requirements for waste management plans to show existing and proposed waste management sites on a geographical map, and/or include sufficiently precise locational criteria for identifying such sites? (PPG ID: 28-039-20141016)

**Council’s Response:**

66.1 **Does the SWLP include sufficient information on the location criteria for site identification?**

66.2 Yes. The *Spatial Strategy (SWLP Part 1, section 4)* indicates the preferred types of land for waste related development. The Policies, when taken together, ensure that waste related development is steered towards suitable locations in accordance with the Spatial Strategy (specifically, Policies 9-12, 14 and 15).

**Does it meet European reporting requirements for waste management plan?**

66.3 See response to question 18.
Policy 9 - Green Belt

67. Is the spatial strategy consistent with national planning policy in respect of development within the Green Belt? To be effective, should the spatial strategy clearly indicate that allocated sites within the Green Belt would not be preferred to other suitable sites outside the Green Belt that may come forward in the future? For effectiveness, should the interrelationship between the Spatial Strategy, Policy 2, Policy 9 and Policy 10 be clearly explained within the Plan?

Council’s Response:

Is the spatial strategy consistent with national planning policy in respect of development within the Green Belt?

67.1 Yes. The spatial strategy (SWLP Part 1) clearly reflects national planning policy in respect of development within the Green Belt. Paragraph 4.1.1.1 sets out the ‘key building blocks’ which underpin the spatial strategy and one of these (see the fifth indent) relates specifically to Green Belt and states “the Plan allows for ‘inappropriate’ development within the Green Belt where very special circumstances (VSC) can be demonstrated for the proposal in question”. The text of the third paragraph of the Spatial Strategy (SWLP Part 1) then notes the general types of land which are prioritised for development subject to this land not being within the Green Belt. Without restating the text of national planning policy, it is considered that this adequately reflects the protection of Green Belt land from development provided for by national planning policy.

To be effective, should the spatial strategy clearly indicate that allocated sites within the Green Belt would not be preferred to other suitable sites outside the Green Belt that may come forward in the future?

67.2 It is considered that the provision of additional specificity regarding the suitability of locations for waste management, including that regarding Green Belt, is not required.

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Areas potentially suitable for waste management development include sites and areas identified for employment uses, industrial and storage purposes, redundant agricultural and forestry buildings and their curtilages. Waste management development is prioritised on previously developed land, sites identified for employment uses, and redundant agricultural and forestry buildings and their curtilages and/or land not in the Green Belt.
within the Spatial Strategy (SWLP Part 1). This is because the Spatial Strategy is intended to be an overarching statement setting out the Council’s broad expectations in terms of the suitability of locations for waste management. It is the purpose of the policies of the Plan to implement this strategy by being more specific about the suitability of different types of location for waste management. Ultimately this leads to policy that identifies specific allocations of land which have been assessed as suitable for development albeit subject to certain caveats. Figure 5 is intended to provide a broad interpretation of the Spatial Strategy’s preferences for development in different types of location and this clearly shows that (with emphasis added) “Sites and areas outside of the Green Belt, including allocated waste sites, existing waste sites, Industrial Land Areas of Search (ILAS) and other suitable sites” are preferred over other types of land.

**For effectiveness, should the interrelationship between the Spatial Strategy, Policy 2, Policy 9 and Policy 10 be clearly explained within the Plan?**

67.3 As stated above, the Spatial Strategy (SWLP Part 1) underpins all the policies in the Plan and it would not be consistent to single out how its position on Green Belt is articulated in specific policies. If this additional explanation were required then, to be consistent, it would be necessary to explain how the other elements of the Spatial Strategy are articulated in policies which would mitigate against the Plan being a succinct document. In this regard, the NPPF\(^6\) notes that Plans should be ‘succinct’ and PPG\(^7\) notes they should be ‘focused’ and ‘concise’. Ultimately, when assessing waste development, it is necessary for decision makers to consider the Plan, and, in particular the wording of policies, in its entirety. This is explained in the introduction to the Plan at paragraph 1.1.1.5 that states: “When determining applications all relevant policies of the development plan, as well as national policy, will be taken into account.”

\(^6\) Paragraph 15

\(^7\) Paragraph: 002 Reference ID: 61-002-20190315 Revision date: 15 03 2019
68. Is Policy 9 consistent with other adopted and emerging development plans within the area covered by the SWLP? Is the location of proposed allocations within the Green Belt justified? Does the evidence demonstrate an inability to identify sufficient, suitable, opportunities for waste management facilities on land outside the Green Belt?

Council’s Response:

Is Policy 9 consistent with other adopted and emerging development plans within the area covered by the SWLP?

68.1 Policy 9 has been included in the SWLP to provide a local interpretation of national planning policy concerning development in Green Belt. It is intended to firstly set out the general circumstances which would need to apply for waste management development to be allowed within the Green Belt and then provide additional information on the types of matters, relating specifically to waste management, which it is considered might justify development within the Green Belt. Provided that the wording of the Policy is consistent with national planning policy then it follows that it must be consistent with that in other adopted development plans within the area as, to have been found sound, these plans must be consistent with national planning policy.

68.2 Notwithstanding the above, it is noted that Spelthorne BC raised a concern that Policy 9 is not consistent with the NPPF and, on further reflection, the Council considers that to be consistent with national planning policy, Policy 9 requires modification and the proposed text of this modification is provided below. No other district and borough councils have made representations concerning Policy 9:

<table>
<thead>
<tr>
<th>Policy 9 – Green Belt</th>
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<tbody>
<tr>
<td>Planning permission will not be granted for inappropriate waste management development in the Green Belt unless it is shown that very special circumstances exist, considerations associated with the proposal, either on their own or in combination, amount to the existence of very special circumstances which clearly outweigh the harm caused to the Green Belt by reason of inappropriateness and any other harm resulting from the proposal is clearly outweighed by other considerations associated with the proposal, either on their own or in combination.</td>
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<tr>
<td>The following factors may contribute to constitute ‘other considerations’ very special circumstances’:</td>
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<tr>
<td>i) The lack of suitable non-Green Belt sites.</td>
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<td>ii) The need to find locations well related to the source of waste arisings.</td>
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<td>iii) The characteristics of the waste development including scale and type of facility.</td>
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**Matter 4: Spatial Strategy (Questions 63 – 70)**

iv) The wider environmental and economic benefits of sustainable waste management, including the need for a range of sites as well as increased production of energy from renewable sources.

v) The site is allocated in a development plan identified as suitable for waste management use, development under Policy 11.

vi) The wider environmental benefits associated with increased production of energy from renewable sources.

68.3 In order to provide additional explanation the supporting text at paragraph 5.3.1.5 is proposed to be amended as follows:

| 5.3.1.5 | **Policy 9 includes other considerations which need to be weighed when determining whether very special circumstances exist which include further reasons are the wider social and environmental benefits associated with sustainable waste management, including the need for a range of sites.** |

68.4 Key areas of agreement, and disagreement, between the Council and the district and borough councils in Surrey are set out in a Statement of Common Ground (SOCG-01). Paragraph 5.29 of this document sets out the agreed position on locating waste management facilities within the Green Belt.

Is the location of proposed allocations within the Green Belt justified?

68.5 Yes – this is explained in section 5.3.3 of the SWLP. Section 1.4.3 of the Plan shows that for targets relating to the diversion of waste from landfill are to be achieved then 156,000 tonnes of additional recovery capacity will need to be developed by 2030. While it is possible that this could be achieved on land outside of the Green Belt, it is considered that additional certainty will be provided by the allocation of previously developed land in the Green Belt.

68.6 Paragraph 5.3.3.3 of the SWLP explains this as follows: “While the development of waste uses on land identified for employment and storage purposes by LPAs is encouraged under Policy 10, it is recognised that, due to commercial and practical considerations and competition from other land uses, such land cannot be wholly relied on to deliver the required waste management capacity over the Plan period. The allocation of sites under Policy 11a increases the potential for development to come forward that will contribute to the objectively assessed needs for waste management capacity in Surrey.”

36% of Surrey is designated as Areas of Outstanding Natural Beauty (AONB) and 73% is designated Green Belt (All AONB lies within the Green Belt). Two sites (Land to the north east of Slyfield Industrial Estate and Land at Lambs Business Park) are allocated
in areas unlikely to be affected by policy on Green Belt and so, whilst these could be developed to provide sufficient capacity, it is considered that the SWLP needs to provide additional flexibility.

68.7 The fact that so much of Surrey is covered by Green Belt means that there is a long history of development of waste management facilities within the Green Belt. Of the existing waste management capacity (excluding voidspace created by mineral working) 79% is located on land within the Green Belt. This shows that it is possible to demonstrate that very special circumstances exist which allow inappropriate waste management development within the Green Belt in Surrey.

68.8 It should be noted that the earlier consultation draft of the SWLP (SWPS-25) that was published in October 2017 included additional allocations within the Green Belt (Policy 10). As described in paragraph 5.3.3.6, these allocations were removed following a revised assessment of waste management requirements (Waste Needs Assessment (SWLP8)) which showed a reduced waste recovery capacity gap. The allocations removed from the Plan were those which involved the development of land that had not been previously developed and so were less well aligned with the Plan’s Spatial Strategy (SWLP Part 1).

68.9 The assessment of the allocated sites against other suitability criteria (as set out in section 4 of the Site Identification and Evaluation Report (SWLP9), shows that, in principle, development of these sites could be achieved that would be consistent with all other aspects of the SWLP.

68.10 While the allocation of Trumps Farm is not on previously developed land it is justified on the basis that development of a Household Waste Materials Recycling Facility is required to ensure that the Joint Municipal Waste Management Strategy (SWPS-12) for Surrey is achieved. This is explained in paragraphs 5.3.4.1 to 5.3.4.11 of the SWLP.

68.11 It should be noted the approach to allocation of waste sites within the Green Belt is similar to that taken in Hertfordshire where over half of the county is within Green Belt (See Table 2 and paragraphs 4.62 to 4.68 of the adopted Hertfordshire Waste Core Strategy & Development Management Policies Development Plan Document (SWPS-20) and paragraphs 4.6 to 4.10 of the Waste Site Allocations 2011-2026 (SWPS-21).

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8 See also Matter 8 and the Council’s response para 145.3.
68.12 Further justification for the allocation of the sites is set out in responses to questions under Matter 5.

Does the evidence demonstrate an inability to identify sufficient, suitable, opportunities for waste management facilities on land outside the Green Belt?

68.13 Yes. Section 3.2 of the Site Identification and Evaluation Report (SWLP 9) shows that identification of sites involved an exhaustive process of site identification. Subsequently, sections 4.3 and 4.4 show that if only suitable sites were allocated which were not located in the Green Belt then it would only be possible to allocate one site which would not be sufficient to develop capacity to meet the projected requirements for future management of waste or provide flexibility.

68.14 This process shows that there is a lack of clear suitable opportunities for development outside of the Green Belt that could be included as allocations in the SWLP. This finding is consistent with the position in the current adopted Plan which includes 4 out of 5 allocations on land within the Green Belt and reflects the unusually low proportion of land outside of the Green Belt in Surrey as mentioned above. (73% of Surrey’s land area is Green Belt which is significantly greater than any other South East shire county).

69. Does the wording of Policy 9 make it sufficiently clear that, even for proposed allocations, to be considered acceptable, waste development in the Green Belt would need to demonstrate very special circumstances exist? To be consistent with national planning policy, should the policy refer to the factors identified as those that may contribute to ‘other considerations’? To be justified, should the policy clarify that those factors are indicative, with each proposal considered on its merits?

Council’s Response:

Does the wording of Policy 9 make it sufficiently clear that, even for proposed allocations, to be considered acceptable, waste development in the Green Belt would need to demonstrate very special circumstances exist?

69.1 Yes. It is explicit within the policy that it applies to proposed allocations as there is mention that development on Green Belt land which is allocated by Policies 11a and 11b of the Plan (in line with proposed modification (see above)) could contribute to other ‘considerations’. Furthermore, paragraph 5.3.3.8 makes it clear that proposals for development on allocated sites must be consistent with Green Belt policy (both at a national and local level). The ‘Key Development Issues’ for each site included in Part 2 of the SWLP also confirm whether Green Belt matters need to be addressed.
To be consistent with national planning policy, should the policy refer to the factors identified as those that may contribute to ‘other considerations’? To be justified, should the policy clarify that those factors are indicative, with each proposal considered on its merits?

69.2 Yes. A related modification to the Policy is proposed – see above response to Q.68.

70. The evidence indicates that sites within the Green Belt allocated in the current Waste Local Plan, such as former Weylands STW, have faced issues with their proposed development, due in part to their location within the Green Belt. Given this, what confidence does the Council have that the proposed allocations are likely to be effective in delivering waste development?

Council’s Response:

70.1 When considering the consistency of proposals for waste development on any of the sites proposed for allocation with policy on Green Belt, it will be necessary to take into account how any harm caused to the Green Belt, and any other harm, might be outweighed by other considerations. Clearly, the nature and extent of harm will be dependent on the nature of the facility proposed.

70.2 Evidence prepared to support consultation on the Draft SWLP (‘What is happening on sites allocated in the current Waste Plan 2008’, November 2017) (SWPS-09) shows that in fact there have only been issues with the development of one of the proposed allocated sites within the Green Belt and this is Former Weylands sewage treatment works, Walton-on-Thames. This evidence also shows that sites allocated within the Green Belt in the adopted SWLP have been developed as follows:

- Charlton Lane, Shepperton – permission was granted for an Ecopark and construction is now near to completion.
- Oakleaf Farm - permission was granted for a Materials Recovery Facility and this is now operational.
- Former Wisley Airfield - permission was granted for an in-vessel composting facility but never implemented.
- Land at Earlswood Depot Redhill - permission was granted for a new material bulking facility and improvements to the Community Recycling Centre – both have built and are operational.
70.3 The issues faced with proposed development on land at Former Weylands sewage treatment works, Walton-on-Thames relate to a lack of information submitted with the planning application. In this case a proposal for a ‘Waste Recycling and Recovery Park’ was withdrawn before it was considered by the planning committee. The officer’s report had recommended refusal on the grounds that it was considered that very special circumstances did not exist because other considerations did not clearly outweigh the harm to Green Belt and openness and other potential environmental harm arising from air quality. The factors associated with this proposal which contributed to the level of potential harm were as follows:

- The developed area would be 10.74 hectares part of which was not within the area of allocated in the SWLP.
- The amount of waste managed would be 295,000 tonnes per annum (tpa) broken down into: 160,000tpa for the AD/autoclave, 65,000tpa for the MRF and 70,000tpa for the C&D.

70.4 Areas of concern which were not adequately addressed by the proposal were as follows:

- The Alternative Sites Assessment report that was intended to show that there were no other suitable sites which could accommodate this development was found to be insufficient; and,
- whether transport associated with the site would have a significant adverse impact or not on the Air Quality Management Areas within the borough (as the potential route to the site was not clear as no definitive information was provided on the source of waste arisings and the route lorries travelling to the site would take).

70.5 It is clear that none of the issues above present insuperable obstacles to the development a waste facility at this site. It should also be noted that matters considered to have been adequately addressed by the application included the following:

- the need for a new access
- visual impact
- amenity impacts (noise, dust and odour)
- restoration of land to the east
- impact on the footpath which runs along the northern boundary
- flood risk.
70.6 It was also noted that the NPPF\textsuperscript{9} states that other considerations which may outweigh harm include the wider environmental benefits associated with increased production of energy from renewable sources, such as that associated with energy from waste facilities.

70.7 This demonstrates that although issues were experienced with development of this site in the past there is no reason why these should mean that a suitable proposal could not come forward in future.

\textsuperscript{9}Para 147