

## 13.0 ANNEXES AND APPENDICES

**(Note: The majority of objections relating to individual sites shown on the Proposals Maps and Insert Plans at Annex 1 are dealt with in Section 5 of this report, which considers, amongst other things, objections to the preferred areas in Schedules 1 and 2).**

### 13.1 General Objections to Various Sites in Annex 1 (Proposals Maps and Insert Plans)

#### Objection

340/84 Mr B Smith - Environment Agency  
340/86 Mr B Smith - Environment Agency (EA)

#### Counter Objection

344/P1 C Pearson

#### Summary of Objections

- 13.1.1 (a) The WPAs should have regard to the EA's existing Policy and Practice for the Protection of Groundwater for any proposed site located in an aquifer.
- (b) There is a presumption against permitting a new composting process within 250m of dwellings / work places
- (c) The deletion of preferred areas for waste management particularly in the Swindon and Salisbury areas will put more emphasis on Compton Bassett and increase lorry movements in the Calne area.

#### Inspector’s Reasoning and Conclusions

- 13.1.2 I am satisfied that the EA’s concern regarding the need to have regard to its Policy and Practice for the Protection of Groundwater has been met in the RDDP. The supplementary text to Policy 6, at Paragraph 6.3.12 of the RDDP, requires regard to be paid to this document and the various Site Profiles in Annex 1 refer to the location of aquifers. I consider that no further modification is necessary in response to this objection.
- 13.1.3 I deal with the need for a bioaerosol buffer zone at sites considered to have potential for composting at Section 5 of this report. At Sites S1 and Site L7, the deletion of composting as a potential use in the RDDP removes the need to refer to a 250m bio-aerosol buffer zone. In relation to Site S2, I recommend at section 5.9 that reference be made to the EA’s normal requirement for a 250m buffer zone at composting sites in the Site Profile in Annex 1. I note that the Site Profiles of all other sites considered to have potential for composting use have a note relating to the EA’s requirement. I therefore conclude that no further modification is necessary in relation to this objection.
- 13.1.4 With regard to the proposed deletion of preferred areas for waste management in the Proposed Changes, I deal with the impact of deleting a particular site when considering objections and counter objections relating to that site in Section 5 of this report. In that section, I indicate that I have considerable sympathy with the submission that the loss of sites identified as preferred areas for waste management could add to pressure to continue transporting waste across the County to existing waste management facilities such as those near Calne. However, in most instances there are alternative locations to the preferred area in question, which give scope for the provision of new waste management facilities. I note that although the WPAs appear to have adopted a somewhat inconsistent attitude in response to objections from the owners of land identified as preferred areas for waste management, this is explained to a large extent by the different degrees of need and availability of preferred areas across the Plan area. I am satisfied that the deletion of the sites in question will not impose an unacceptable burden on

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#### Objection Coding

XXX/XX A N Other = Respondent No./Objection No. Name  
RX = objection to Revised Deposit Draft W = Withdrawn

CW = Conditional Withdrawal

- 13.1 -

the Calne area, particularly when bearing in mind that the Plan provides opportunities for the provision of new waste management facilities in locations outside preferred areas. I conclude that the Plan should not be modified in response to this counter objection.

**RECOMMENDATION**

**13.1.5 Other than my recommendation relating to the Site Profile of Site S2, which I make at Paragraph 5.9.5 of this report, I recommend that no modification be made to Annex 1 in response to these objections.**

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**13.2 Annex 1 - Site S4 (Compton Bassett Waste Management Facility)**

**Objection**

70/13 Mrs D Lewis

**Summary of Objection**

13.2.1 The Waste Local Plan has failed to identify whether the existing Materials Recovery Facility at Compton Bassett will have a strategic role in the WLP.

**Inspector’s Reasoning and Conclusions**

13.2.2 In response to the FDDP, Mrs Lewis objected to Annex 1 on the grounds that the WLP had failed to identify whether the existing Materials Recovery Facility (MRF) at Compton Bassett would have a strategic role in the WLP. I deal with a similar objection in relation to Policy 3 at Section 5.6 of this report and note that details have been included in the RDDP to clarify the situation. I am satisfied that these changes are adequate and that no further modifications are necessary to Annex 1 in response to this objection.

**RECOMMENDATION**

**13.2.3 I recommend that no modification be made to Annex 1 in response to this objection.**

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**13.3 Annex 1 - Site S5 (Westbury Landfill Site, Westbury)**

**Objection**

46/17 Ms S Ziessen

**Summary of Objection**

13.3.1 There should be no incineration at the site.

**Inspector’s Reasoning and Conclusions**

13.3.2 In response to the FDDP, it was submitted that the potential uses at the site should not include incineration. As references to EfW being a potential use at Site S5 were deleted in the RDDP, it seems to me that this objection has been met and that no further modification is necessary.

**RECOMMENDATION**

**13.3.3 I recommend that no modification be made to the Plan in response to this objection.**

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## 13.4 Annex 1 - Site S6 (NAAFI Depot, Amesbury)

### Objections

34/11 Mr J Mulvey, Amesbury Town Council  
281/20 Mrs A Lock – Corsham Civic Society

### Summary of Objections

- 13.4.1 (a) Spelling error -incorrect spelling of NAAFI.  
(b) The planning issues relating to Sites S6 and L8 are inconsistent.

### Inspector’s Reasoning and Conclusions

- 13.4.2 The acronym NAAFI was misspelt in the description of the existing use of Site S6 in the FDDP. However, this was subsequently corrected in the RDDP. Although the objection has not been withdrawn there is clearly no need to modify the Plan in relation to this matter
- 13.4.3 In response to the FDDP, it was submitted that there was some inconsistency in the planning issues raised in relation to sites S6 and L8. I deal with this matter at Section 5.13 of this report and conclude that the revised list of planning issues set out in the RDDP for the two sites overcomes that inconsistency.

### RECOMMENDATION

- 13.4.4 I recommend that no modification be made to the Plan in response to these objections.

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## 13.5 Appendix 4

### Objections

21/12 Ms J Hindley  
59/9-11 Ms J Ripley  
215/12 Mrs C G Carver Devizes and Marlborough Friends of the Earth  
217/6 Ms A G Stanton  
218/1 Mr A G H Batt  
218/2 Mr A G H Batt  
224/4 Mr P Matthews  
230/1 Ms S Singleton  
235/4,6 Ms M Willmot Salisbury Friends of the Earth  
250/2 Mrs R Buchheit  
281/21 Mrs A Lock Corsham Civic Society  
261/7 Ms R Collis  
262/1 Ms V Collis  
281/6 Mrs A Lock Corsham Civic Society  
340/30-32 Mr B Smith - Environment Agency  
368/7-9 Mrs J Heselwood  
375/11 Ms D Kilburn

### Summary of Objections

- 13.5.1 (a) The list of disadvantages of energy recovery should include the need for hazardous residue to be sent to landfill.  
(b) The transport effects of energy recovery should not be described as ‘local’.

- (c) It should be pointed out that energy recovery can undermine the incentive to recycle.
- (d) Incineration should not be described as a proven technology.
- (e) The definition of energy recovery should include anaerobic digestion.
- (f) A description of kerbside recycling of sorted waste for recycling/composting should be included in the section entitled 'Recycling'.
- (g) The Appendix is biased in favour of incineration, pays insufficient attention to recycling and should be rewritten.
- (h) The plan should give more support to incineration. New incinerators are much improved and supported by government policy. The performance of the Avonmouth gasification plant is impressive.
- (i) The layout of the Appendix does not make it clear that Combined Heat and Power and incineration/energy from waste are interlinked
- (j) The appendix should indicate that pyrolysis and gasification are technologies that are at the research and development stage. However, it should not indicate that such development could be sited close to urban areas.
- (k) The potential for incinerators to be placed ‘near urban centres’ is not an advantage.
- (l) The appendix appears to give greater weight to the disadvantages of incineration than other combustion technologies, in particular pyrolysis/gasification
- (m) When considering site requirements for different energy from waste technologies the appendix should compare like with like in terms of quantities of waste processed. The appendix considers development of a size that the Plan says will not be needed.
- (n) Reference should be made to the position of various technologies in the waste hierarchy.
- (o) The overall aim of plan is to divert waste away from landfill but it is then suggested that a disadvantage of recycling inert materials is that it will lead to 'a potential delay in mineral workings restoration by landfill'.
- (p) The disadvantages of HRCs include increased journeys by individuals, causing pollution, and lack of access for those without cars.
- (q) The Appendix does not contain a fair and objective view of waste management techniques and does not consider the effect of any of these techniques on climate change and greenhouse gasses.

### **Inspector’s Reasoning and Conclusions**

13.5.2 In response to the FDDP, a number of objectors submitted that the Appendix was unduly biased in favour of incineration. Some specific objections were met in the RDDP, yet the relevant objections were not withdrawn in many cases. These include adding references to the hazardous nature of residues from energy recovery facilities, the potential of energy recovery to divert waste that could otherwise be recycled, and deletion of the word ‘local’ to describe the transportation impacts of energy recovery development. A section has also been included in the Appendix setting out the advantages and disadvantages of the kerbside collection of recyclables, and the definition of energy recovery has been amended to include the bacterial treatment of waste. In my judgement these changes have overcome many of the objections and the apparent bias in favour of energy recovery that was given by the Appendix in the









