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Our ref: UT/2006/000217/CS-
06/EW1-L01
Your ref:
Date: 08 October 2014

Dear Sir

BIRMINGHAM DEVELOPMENT PLAN – EXAMINATION

HEARING STATEMENT

MATTER J: EMPLOYMENT AND WASTE PROVISION (BDP POLICIES TP15, TP17-19 & TP25)

Please find below the Environment Agency's responses to the questions raised for discussion by the Inspector in relation to Matter J.

Question 8) Should policy TP15's requirements for the location of waste facilities with respect to residential development be relaxed in the case of energy-from-waste schemes?

TP15 states '*New waste facilities will not normally be approved adjacent to existing housing and proposals for anaerobic digestion will not be approved within 250m of existing housing.*' The wording of this policy therefore suggests that the 250m buffer only applies to anaerobic digestion facilities, although it might be prudent to expand this to include other types of facilities such as open air waste facilities (e.g. composting sites, scrap yards). This is due to the difficulties in controlling fugitive emissions from these facilities which makes them more likely to cause amenity issues if located near to sensitive receptors.

The wording '*...New waste facilities will not normally be approved adjacent to existing housing...*' suggests this part of the policy applies to all waste facilities, including energy-from-waste (EfW) facilities.

EfW facilities are highly regulated. Well-operated facilities rarely cause amenity issues, nevertheless this policy would still be appropriate to EfW schemes as they typically

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accept mixed or putrescible waste which has the potential to represent a nuisance issue through odour, dust and vermin. This could impact on residential amenity if located adjacent to housing. Noise and vibration could also be an issue if not adequately mitigated against, potential sources of noise nuisance include vehicle maneuvering, loading and unloading; fans used to draw air into the boiler and up the stack; air cooled condenser units and steam release valves and pipework.

Vehicle movements from trucks transporting waste to EfW sites may also impact on residential areas and this would not fall under the control of an environmental permit. Deliveries of waste to facilities are normally linked to waste collection rounds and may peak at certain times.

EfW facilities also tend to require large buildings. The size of the building and the associated chimney stack mean that they represent a significant visual impact on their surroundings. This can also make them unsuited to residential areas (visual impact is not controlled under the environmental permit, but the permit may require a minimum stack height in order to ensure adequate dispersal of gasses emitted to the atmosphere).

Question 9) Should Policy TP15 seek to prevent waste facilities from locating next to other types of development, such as schools?

TP15 considers the potential impact on residential developments and seeks to direct waste management development away from such receptors. However the policy could consider conflicting land-uses more broadly as certain types of waste facilities may also be incompatible with other land uses - this would give greater certainty to prospective developers as to where future waste management facilities could be appropriately located.

Schools and hospitals may be sensitive to amenity impact, and waste facilities may also have a detrimental effect on sites of heritage and nature conservation, protected species and habitats in addition to recreation. Waste facilities can be acceptably accommodated alongside similar land uses. Open-air composting, and landfill sites tend to be better suited to rural locations where they can be sited away from sensitive receptors.

Question 10) Should policy TP15 be more ambitious in its requirements for the design of waste facilities, including provision of green infrastructure?

TP15 states '*Careful consideration should be given to the need to minimise environmental and visual impact*'. We consider that the policy could be more aspirational in promoting high quality design in line with PPS10 as stated in our response to the Pre-Submission Consultation (referenced UT/2006/000217/CS-03/PO1-L01 03 March 2014).

We promote the use of SuDS such as green walls as a method of incorporating green infrastructure into waste developments in order to provide attractive screening from active frontages. We recommend this could be particularly useful in areas where wider regeneration is sought, for example Tysley Energy Park.

Yours faithfully

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