

Local Members' Interest	
Mr. M Worthington	Churnet Valley

PLANNING COMMITTEE – 2 November 2017

WASTE COUNTY MATTER

District: Application No. Staffordshire Moorlands: [SM.17/02/1138 W](#)

Date Received as valid: 4 July 2017

Date Revised/Further Details Received: 4 April 2017 (Application Form); 10 April 2017 (Environmental Statement); 11 April 2017 (Fee); 25 May 2017 (Revised General Layout Plan, missing LVIA documents, Elevations, Revised Red Line Plan / Application Boundary and Routing of HGVs around wider site); 12 June 2017 (Revised Red Line Plan); 4 July 2017 (Additional Fee); 11 October 2017 (Landscape Mitigation Planting Plan); 13 October 2017 (Supplementary Information on Waste Wood Source, Surface Water Drainage and Landscaping); 23 October 2017 (Additional drainage information and revised traffic movements and throughput)

John Pointon and Sons' application for renewable energy facility to provide electricity and heat to existing industrial operations at the wider John Pointon and Sons' site, including regrading of existing embankments at John Pointon and Sons site, Bones Lane, Cheddleton, Leek.

Background/Introduction

1. [John Pointon and Sons Limited](#) is one of very few animal rendering operations in the UK, and also the largest single site rendering and recycling company uniquely operating both Category 1 (high risk animal by-products) and Category 3 (low risk animal by-products otherwise fit for human consumption) processing facilities from the same site. The Cheddleton site has been occupied by a rendering facility for over 80 years and the facility was relocated here from a Leek town centre location by the Local Authority. The primary activity at the plant is the extraction of tallow and meat and bone meal from animal by-products and food waste and production of pet food and supplier of raw materials to the Oleochemical industry. Approximately half a million tonnes of animal by-products and food waste is collected every year from UK mainland destinations including from Port Authorities, Customs and Excise and Local Authorities and processed at the Cheddleton site. The operations are undertaken within enclosed buildings and under Environmental Permits issued by the Environment Agency. A Site Liaison Group meets quarterly with members including local residents, Parish Councillors, Environment Agency Officers, District Councillors, and Staffordshire County Council Trading Standards – Animal Health.
2. Energy requirements for the rendering process are provided by 4 gas fired (formerly tallow fired) boilers which are connected to four flues in a common stack 28 metres

high. Also the main process odours for the rendering operations pass through 2 thermal oxidisers and are discharged via two flues from a 28 metre high stack. With a view to minimising the environmental impact of their meat and bone meal rendering operations, to safeguard future employment at the plant and associated supply industries and to minimise costs, the Company is proposing a waste wood fired Combined Heat and Power (CHP) Plant at the Cheddleton site to generate heat, in the form of steam, and electricity, to displace the fossil fuels being consumed on the site each year.

3. An Energy Resource Centre consisting of a bio-diesel production plant (using tallow from the rendering operations) on the current application site was granted planning permission in May 2010 by Staffordshire Moorlands District Council ([SMD/2008/0936](#)) to support the operations at the wider Pointon's site. This however was not implemented and an Anaerobic Digestion (AD) facility (using meat and bone meal and food waste from the rendering operations as the fuel source) was approved in September 2010 as a replacement to the bio-diesel production plant ([SMD/2010/0411](#)). The AD facility however was not considered a viable efficient option as heat rather than electricity generation is required for the wider rendering operations and so this facility was also never implemented.
4. As the fuel source for the proposed Combined Heat and Power (CHP) Plant is waste wood (not originating from the Pointon's site), this is classed as a waste operation and the application for uses of land for energy from waste incineration and other waste incineration are a '[county matter](#)' which should be dealt with by the County Council as the Waste Planning Authority.

Site and Surroundings

5. The Pointons site lies approximately 1.5 kilometres south of Cheddleton and 6 kilometres south of Leek. Access is gained via Bones Lane, a private access which connects to the A520 to the west. The wider surroundings are predominantly in agricultural use, with housing and a sports facility (provided by John Pointons & Sons Limited as part of the permission [SMD/2008/0936](#)) to the west.
6. The application site is located in the eastern part of the established Pointon's industrial operations on a hillside, approximately 3.2 hectares in extent comprising a cleared man-made terrace of land (2.05 hectares in area) and a long access road to and from the A520 through the rendering site utilising the site's entrance and weighbridge and wheel cleaning facilities (1.15 hectares in area). The main rendering facility is at a higher level to the southwest and the water treatment plant for the wider site is at a higher level to the south. (Refer to Plan 1 – Site Location).
7. Three terraces were formed in advance of the construction of the Energy Resource Centre, consented under [SMD/2008/0936](#), which descend a north-easterly facing slope to the east/northeast of the existing main industrial plant for the rendering operations. The land slopes downwards from the southwest (235 metres Above Ordnance Datum (AOD)) to the northeast (192 metres AOD) and the three terraces are separated by steep engineered slopes with gradients of approximately 1:1.5 to 1:1.8 each achieving a level change of approximately 4 - 5 metres.
8. The application site lies on the middle terrace at an elevation of approximately 209.5 metres AOD, and comprises compacted subsoil surfaces, part bounded by remnant

stone walls. An industrial warehouse, used as a store for pet food and equipment, occupies the northern (lowest) terrace with surrounding ground levels at approximately 204.5 metres AOD, with the warehouse roof height extending to approximately 219 metres AOD. The southern (highest) terrace lies at approximately 216.5 metres AOD and is undeveloped land /open compacted subsoil surfaces currently used as a lorry park.

9. An access road defines the southern boundary of the highest terrace and also the eastern boundary of the terraces including the application site. A Public Right of Way (Cheddleton 39) follows the natural slope of the hillside (approximately 1:13 gradient) to the east of the access road, separated from agricultural land by a stone wall.
10. The closest residential properties to the wider Pointon's site boundary are located to the immediate west at the site access Bones Lane. The closest residential receptors to the proposed Renewable Energy Facility are Felt House Farm and Woodlands Hall Cottage, located approximately 250 metres to the northeast.
11. Churnet Valley SSSI is a distance of 1.1 kilometres east/southeast of the site and an Ancient woodland is 495 metres east/southeast of the site. Caldon Canal Site of Biological Importance (SBI) is approximately 665 metres northeast and there are a further 5 SBI's within 1.2 kilometres and 1.6 kilometres from the site, and also 3 Biodiversity Alert Sites 265 metres, 300 metres and 1.6 kilometres from the site. Ashcombe Park, a Grade II* Listed Building is located 410 metres to the north of the site at its closest point. A hotel is located 55 metres southwest of the main Pointon's site entrance off the A520. There are no schools or hospitals or other such sensitive receptors within 500 metres of the site.

Summary of Proposals

12. Planning permission is sought for the construction of a purpose built Renewable Energy Facility (REF) which would comprise of a biomass Combined Heat and Power (CHP) plant, with a thermal input capacity of 44MWth and an electrical generating capacity of 6.5MWe, and associated infrastructure in the eastern part of the established Pointon's industrial operations.
13. The footprint of the development would lie on a north-west to southeast axis and would comprise two buildings referred to as the turbine hall and the fuel hall, and several ancillary structures such as silos, skips and adiabatic condensers adjacent to the sides of the buildings which are required to operate the plant in accordance with regulatory requirements. (Refer to Plan 2 – Site Layout).
14. A three biomass boiler system configuration is proposed which would provide an energy generation package which allows the full thermal (steam) demand for the rendering business to be met while at the same time generating sufficient on-site electricity to meet the electricity requirements of the established business. On completion of the development it is envisaged that 3 of the 4 existing gas fired steam producing boilers for the rendering operations would be utilised as standby boilers.
15. The development would reduce greenhouse gas emissions by approximately 25,000 tonnes of CO₂ equivalent per annum by producing energy from renewable fuels rather than gas. Whilst there are no plans currently, there is however also potential in the future for any electricity generated, when not required for the existing operations,

to be transferred to the National Grid.

The Process

16. All delivery, shredding and processing of the wood waste would be undertaken within the fuel hall in the eastern part of the Renewable Energy Facility. The fuel would be fed into the three boilers in the turbine hall by conveyors from the adjacent fuel hall, which would then heat thermal oil. The combustion process would use moving grate technology to drive an Organic Rankine Cycle (ORC) turbine for electricity generation, and to produce heat for use by the wider site. The equipment to be used within the plant would be of proven design used extensively throughout Europe. A CHP plant of similar design located in Sheffield is currently in the commissioning phase (refer to [decision notice 12/00752/FUL](#), and Environmental Permit [EPR/CP3936CA](#)).

The Turbine Hall

17. The turbine hall would be approximately 47 metres wide (north-west to south-east) by 83 metres long (south-west to north-east) with a roofline at 20.5 metres Above Ground Level (AGL) (extending to 227.5 metres AOD) and a Finished Floor Level (FFL) of 207 metres AOD. The plant would incorporate equipment to ensure compliance of combustion emissions with the limits and emission standards set by the [Industrial Emissions Directive](#). The exhaust gas would be passed to three emissions stacks at the north-western end of the turbine hall which would rise to a height of up to 35 metres AGL, i.e. 14.5 metres higher than the turbine hall roofline (approximately 242 metres AOD). Note that following the review of results of preliminary air quality modelling the stack heights have been increased to 35 metres.

The Fuel Hall

18. The fuel hall which would lie to the east of the turbine hall would be approximately 47 metres wide (north-west to south-east) by 76 metres long (south-west to north-east) with a roofline at between 15.5 and 10.0 metres AGL (extending to 222 metres AOD) with FFL of between 207 metres AOD in the west and 212 metres AOD in the east adjacent to the existing track due to the change in slope.

Design

19. The proposed buildings would share many of the same characteristics as the existing more recent elements of the wider industrial plant site, including the adjacent warehouse building, in terms of style, massing and colour (muted dark and light green metal sheet cladding to blend in with the surrounding green infrastructure). The main body of the buildings would be faced in Leaf Green (RAL 6002) and Dark Green (RAL 6003) metal sheet cladding with grey louvre ventilation panels and opaque polycarbonate windows approximately 5 metres below the roofline. The facades of each building would also contain roller shutter doors which would remain closed during evening / night-time periods when no HGV deliveries are occurring. The modular, regular appearance of the buildings is indicative of the industrial architecture of the wider site. (Refer to Plan 3 - Elevations).
20. The three emission stacks on the turbine hall would be grey in colour. The tops of the new stacks would be at a lower elevation (242 metres AOD) than the tops of the

existing stacks at the main rendering plant site (estimated to be approximately 250-255 metres AOD). The stack heights would also be 4 metres less than the previously consented chimney for the electricity generation engines associated with the Anaerobic Digestion facility ([SMD/2010/0411](#)).

21. All external lighting would be restricted to down lighting in vehicle and pedestrian circulation areas.

Waste Wood

22. Approximately 90,000 tonnes per annum (tpa) of recycled and recovered waste wood would be delivered to the plant for use as fuel for power generation. The waste wood would comprise of blended grade A, B and C wood (where A category wood is clean, and B category wood is painted, glued or varnished; and C Category includes Category A and B materials plus fencing products, flat pack furniture made from board products and DIY materials). The waste wood would be sourced from within a 50 mile radius of the site from contracted suppliers e.g. well-established waste management companies such as local skip companies, and Material Recycling Facility (MRF) operators; and other major handlers of waste wood or producers of waste wood companies such as furniture, kitchen and board manufacturers; storage operators; demolition contractors; sawmills; and construction companies. Quality and consistency of fuel and permitted waste types to ensure the fuel meets the specification dictated for the facility's boilers would be controlled through the Environmental Permit issued by the Environment Agency. D grade wood wastes, which includes heavily painted wood wastes or wood that has been treated with preservatives such as copper chrome arsenates (known as CCA wood and includes telegraph poles, and railway sleepers) would not be permitted to be delivered to the facility.

Vehicle Movements

23. All material / fuel for the facility would be imported by road, utilising the existing site access and weighbridge, and would be similar Heavy Good Vehicles (HGVs) to those servicing the rendering plant. A maximum of 25 loads of waste wood would be delivered per day (50 vehicle movements) and 1 load of ash would be removed from the site per week to a licenced waste management facility. The number of existing daily HGVs associated with the wider rendering operations is on average 130 loads / 260 movements per day. There are no vehicle restrictions or routing agreements associated with delivery of animal by-products and food waste to the Pointons site.
24. A one-way system would be employed to and from the proposed facility; vehicles would approach the site from the existing access road to the south and east of the application site and would turn west along the northern boundary and then reverse to deliver the fuel to the fuel hall. Upon leaving the building vehicles would turn left/west along the northern boundary of the facility and leave using a newly constructed access track to the north-west of the turbine hall.

Regrading of existing embankments

25. The new buildings would be located on the middle terrace (currently at an elevation of approximately 209.5 metres AOD), which would be re-graded to achieve formation levels of 207 metres AOD in the north-west of the site sloping up to 212 metres AOD

in the south-east. Use of the available space across the slope would be optimised by extending the middle terrace to the south and by using retaining structures on the slopes between the application site and the terraces to the north and south. The existing track and Public Right of Way (PRoW) would be regraded to achieve the 212 metres AOD level required to provide vehicular access to the development from the east.

Associated infrastructure

26. The transformer and metering equipment for the electricity generated by the proposed facility would be located inside the building. The steam generated by the process would be piped below ground to provide a resource for the existing industrial plant processes. Other utilities (electricity, telecoms, mains water and sewerage) would be installed beneath new hard standing areas where necessary within the development area with connections to services within the existing industrial plant area. Surface water run off from the site is currently collected and treated in the water treatment plant for the site and surface water run off from the development site would also be channelled using piped drainage systems to an underground retaining tank from where the water would be pumped to the water treatment plant prior to discharge in accordance with the discharge consent regulated by the Environment Agency.

Hours of Operation

27. During operation the facility would generate electricity and steam 24 hours a day 7 days a week. Vehicle movements however would be restricted to between 7am and 7pm Monday to Friday and 7am to 2pm on Saturdays. No deliveries would take place on a Sunday, Bank or Public Holiday.

Construction Phase

28. Construction of the facility and external areas is anticipated to take approximately 12 - 18 months. Works would involve clearance of any remaining vegetation prior to the start of the bird nesting season, earthworks and construction of retaining walls, construction of the fuel hall and turbine hall including the use of cranes where necessary, utility connections to the existing site and external hard surfacing to allow vehicle circulation.

Landscaping

29. Planting as part of the consented Energy Resource Centre has already been implemented around the wider site and in particular along the haul road and to the north of the warehouse on the lower northern terrace. Additional landscape mitigation planting is proposed on the regraded slopes around the proposed Renewable Energy Facility to provide a higher level of visual screening on the approach to the site from the north and south along the Public Right of Way. Regraded slopes would be seeded with a Conservation Grass mix and two belts of woodland screen planting each 6 – 10 metres wide with irregular edges are proposed to the south. The applicant has also indicated a willingness to submit a comprehensive landscape management plan for the entire operations within their land ownership.

The Applicant's Case

30. The proposed development aims to reduce reliance of fossil fuels as a means of energy generation and reduce greenhouse gas emissions with significant CO₂ savings. The facility design is purpose built to meet the current energy demands of the wider rendering operations at the Cheddleton site.
31. In terms of environmental protection, the development has been designed to be sensitive to the surrounding environment and landscape mitigation is proposed for the wider site.
32. The operation of the facility would require an Environmental Permit that would ensure an acceptable level of enforceable controls in terms of fuel source and quality. Grades A, B & C recycled/recovered wood fuel comprises the primary fuel for the proposed biomass fired CHP plant. This waste wood fuel would be the only fuel consumed during normal operation of the plant. When the plant is however shut down for maintenance or abnormal operation, gas would be used.
33. All waste wood fuel for the facility would be subject to completion of long term (10 year) commercial fuel supply agreements with suppliers fully aware of the requirements, and the consequences of delivering loads that do not meet the specification of the facility. The fuel is subject to minimum requirements on input (in particular in respect of calorific value and moisture content) to ensure compliance with the boiler manufacturer's specification and to reduce the scope for variation in quality of the wood fuel. The delivered fuel would be sampled in accordance with the "Fuel Measurement and Sampling" (FMS) requirements published by OFGEM and these samples would be independently tested by a suitably accredited laboratory, again in accordance with OFGEM's FMS procedures, to determine and confirm the make-up and characteristics of the fuel (calorific value, the levels and type of any contaminants, biogenic content etc.) and to ensure that only the consented biomass fuels are consumed on the site. This specification, along with effective fuel store management procedures would ensure the homogeneity of the fuel from sourcing through to the grate on the combustion chamber.
34. The Environmental Permit would also regulate the operations placing strict controls on stack emissions, as well as a statutory requirement for continuous 24/7 monitoring. The Permit would also regulate other operational aspects of the plant including the management and use of water resources on site and the storage and use of thermal oils, lubricants and any chemicals used in the process. The Permit would be subject to regular inspection and enforcement by the Environment Agency to ensure the installation is operated in an appropriate manner.
35. It is a requirement; under both the Waste Incineration Directive (WID) and the Industrial Emissions Directive (IED) that the plant is operated and controlled at all times to prevent the formation or re-formation of dioxins in the exhaust flue gasses. This is controlled, under the Environment Agency Licenses to operate, by ensuring that the boiler design is capable of maintaining combustion that generates exhaust gas temperatures in excess of 850 degrees Celsius for at least 3 seconds prior to entry into the exhaust gas exit stack. This particular plant is actually designed with a furnace temperature in excess of 1,000 degrees Celsius.

36. The process to achieve these temperatures and flow rates is demonstrated in advance of the plant being granted a license to operate by the Environment Agency by the use of Computational Fluid Dynamics (CFD) modelling. In operation this is achieved by meticulously monitored Continuous Emissions Monitoring Systems (CEMS) that link into the plant control systems. The CFD modelling has to be analysed and approved by the Environment Agency as part of the licensing process and the results from the CEMS monitoring equipment are also reported to the Environment Agency each month. Any excursions beyond the consented emissions to land, air or water must also be reported to the Environment Agency.
37. To ensure that these furnace and exhaust gas temperatures are always maintained, the boilers are fitted with high capacity gas burners which are used during the start-up procedures to bring the furnace and exhaust gas temperatures up to in excess of 850 degrees Celsius prior to the introduction of the wood fuel onto the furnace grate.
38. The furnace and exhaust gas temperatures are continuously monitored and if it appears that the furnace or exhaust gas temperature may drop below the minimum set point (usually 875 degrees Celsius) then the gas fired burners are brought into operation to ensure the minimum temperatures are maintained. This is a safety and emissions compliance control and it would be very unusual for this to happen in normal operation.
39. When the plant is shut down for maintenance or abnormal operation, as the wood fuel supply is stopped and the remaining fuel on the grate is consumed the temperatures in the furnace and exhaust gas temperatures would start to drop, once again the gas fired burners would come into automatic operation as the temperatures approach the 875 degrees Celsius set point. Gas fired operation would continue to maintain the temperature until all wood fuel has been consumed and the furnace grate is cleared. After the grate is cleared the gas fired burners would slowly drop the furnace and exhaust gas temperature, in accordance with agreed and licensed parameters, to prevent thermal shock to the boiler and furnace plant.
40. In practice it is anticipated that the plant would operate for around 7,890 hours each year with two or three planned shutdown each year for maintenance etc. Gas would only be used in the circumstances described above and would represent only a very minor proportion of the thermal input for the plant.

Relevant Planning History

41. The Cheddleton site has been occupied by a rendering facility for over 80 years as a result of the local authority re-locating the facility from Leek town centre. All planning permissions for the site have been issued by Staffordshire Moorlands District Council as the relevant determining authority.

Adjacent Land

42. [SMD/2002/0974](#) [Old ref = 02/00598/FUL] granted on 18/11/2002 Erection of material reception building, odour abatement unit, offices, two amenity buildings, security lodge, two weighbridges and car parking and access road.
43. [SMD/2005/0179](#) granted on 31 March 2005 for Change of use from agriculture to game bird rearing.

Application Site

44. [SMD/2008/0936](#) [Old ref = 08/01715/FUL_MJ]. granted on 29 May 2010 for Development of energy resource centre consisting of bio-diesel production plant and silos, renewable energy power regeneration unit, 30m chimney and silos and associated equipment, meal and packaged food stores, plant and vehicle maintenance facilities and associated access, turning and parking areas and landscaping and surface water attenuation area; and 2) development of community recreational facilities including provision of football and other playing pitches and changing rooms and associated access off Felthouse Lane, car parking and landscaping; and new access road off Cheadle Road to link with the eastern end of Felthouse Lane to main factory site including stopping up of part of western end of Felthouse Lane to prevent vehicular access to main factory site; and 3) renovation and conversion of former farmhouse to police and first responder base. *Note the energy resource centre has not been implemented.*
45. [SMD/2010/0411](#) [Old ref = 10/00343/FMAJEI] granted on 6 September 2010 for the development of an anaerobic digestion facility in place of a bio-diesel production plant included in planning permission 08/01715/FUL_MJ (for an energy resource centre) including a 39m chimney for the electricity generation engines in place of the 30m chimney previously proposed. Note the Anaerobic Digestion facility has not been implemented.

Environmental Impact Assessment (EIA)

Screening Opinion: NO **Environmental Statement:** YES

46. The Environmental Statement (ES) considered: Air Quality; Ecology; Flood Risk; Landscape and Visual Impact; and Noise. The findings of the ES (and the environmental information subsequently received) are summarised in [Appendix 1](#).

Findings of Consultations

Internal

47. The Environment and Countryside Unit (ECU) – proposals for landscape and visual mitigation were originally requested. It is considered that the concept proposals submitted have the potential to achieve some mitigation. A condition is recommended requiring further detail regarding soils, de-compaction, amelioration and seeding and planting techniques. It is also advised to submit detailed planting mixes based on the conceptual proposals that are native species tolerant of the ground conditions, including ‘nurse’ species which can be thinned later. The Landscape Management Plan for both the application site and other areas of land in the applicant’s ownership is welcomed and a condition is recommended for the submission of these details within 6 months of any approval. The Management Plan should include where appropriate additional planting to supplement and reinforce areas of planting to deliver landscape and biodiversity enhancement. In respect of ecology, conditions are recommended requiring development to take place in accordance with the Extended Phase 1 Habitat Survey Report (s 5.2.2 – 5.2.8). Pre-commencement conditions are also recommended for a protected species survey and also a breeding bird survey if commencement is inside the bird breeding season.

An informative relating to Public Footpath No. 39 Cheddleton is recommended.

48. Highways Development Control (on behalf of the Highways Authority) – no objections.
49. Staffordshire County Council's Noise Engineer – no comments received.
50. Planning Regulation Team – no comments received.
51. Flood Risk Management Team (on behalf of the Lead Local Flood Authority) has no objection subject to a condition requiring further details of the sustainable drainage system to be approved.

External

52. The following consultees have no objections: Environment Agency; Natural England; Staffordshire Police Crime Prevention Design Advisor; Historic England; Public Health England.
53. The Environment Agency has explained, in respect of Environmental Permitting, that an application to vary the existing bespoke permit to include the new activities would need to be made to them for technical review and determination. *Note an Environmental Permit has been submitted in parallel to this Planning Application.*
54. Staffordshire Police Crime Prevention Design Advisor commented that no crime, disorder or anti-social behaviour implications have been identified or are likely to arise from the proposed installation of a renewable energy facility at this location nor have any issues of security been identified that would warrant pertinent security advice to be offered appertaining to the installation.
55. The following consultees have not responded: Staffordshire Moorlands District Council Environmental Health; Health and Safety Executive; Campaign for the Protection of Rural England (CPRE); Staffordshire Wildlife Trust; Staffordshire Fire and Rescue Service – Fire Safety Officer; Severn Trent Water.

District/Parish Council

56. Staffordshire Moorlands District Council – no response received.
57. Cheddleton Parish Council – no objections.
58. Consall Parish Council (adjacent Parish Council) – no response received.

Publicity and Representations

59. Site notice: YES Press notice: YES
60. 111 residents (within 250 metres of the site) were notified by letter and 1 representation has been received which raises concerns about excessive light pollution. It is commented that good lighting practice has already been recognised by an award from the Commission for Dark Skies re the Pointon's sports facility. It is

requested that downward facing, and shielded external lighting should be specified for the new facility. *Note: Paragraph 21 above in respect of design confirms this will be undertaken.*

The development plan policies and proposals relevant to this decision

61. The relevant development plans include the [Staffordshire and Stoke-on-Trent Waste Local Plan](#) and the [Staffordshire Moorlands District Local Plan](#). The other material considerations include European and National Policy on waste, on energy, on air quality policy together with the National Planning Policy Framework and Planning Practice Guidance. The relevant development plan. The relevant development plan policies and other material considerations are listed in [Appendix 2](#).

Observations

62. This is an application for a Renewable Energy Facility to provide electricity and heat to existing industrial operations at the wider John Pointon and Sons' site, including regrading of existing embankments.
63. Having given careful consideration to the application, environmental and other information, including the environmental information subsequently received, the consultation responses and the representation received, the relevant development plan policies and the other material considerations, all referred to above, the key issues are considered to be:
- Planning Policy considerations
 - Green Belt considerations
 - Design and landscape mitigation
 - Site specific environmental considerations: air quality, traffic and flood risk

Planning Policy considerations

64. The principle of energy generation (comprising a bio-diesel production plant and an Anaerobic Digestion facility) in support of the operations at the wider Pointons site has already been established by the granting of two planning permissions in 2010 by Staffordshire Moorlands District Council at this specific location (permissions [SMD/2008/0936](#) and [SMD/2010/0411](#)). It is nevertheless important to consider the proposed Renewable Energy Facility against development plan policies, and any other material considerations, since the 2010 decisions.

Energy planning policy considerations

65. The [UK Renewable Energy Strategy](#) (published by the Department for Energy and Climate Change in 2009) states that the Government's goal is to ensure that 15% of energy is generated from renewable sources by 2020. The Strategy indicates that: the planning system must enable renewable development in appropriate places, at the right time and in a way that gives business the confidence to invest; the generation of renewable energy from waste biomass could provide a significant contribution to renewable energy targets and could also significantly reduce the total amount of waste that is landfilled in the UK; and, the benefits identified and impacts associated with renewable energy include climate change benefits and environmental impacts; security of supply, business benefits; impact on jobs; impact

on economy; impact on energy prices and bills and impact on energy markets.

66. The [National Policy Statements for Energy Infrastructure](#) (NPS) published in July 2011 sets out national policy for the energy infrastructure. . The National Planning Policy Framework (NPPF) specifically references the NPS for [Renewable Energy Infrastructure](#) (EN-3). Paragraph 1.1.1 states that ‘Electricity generation from renewable sources of energy is an important element in the Government’s development of a low-carbon economy’. Paragraph 2.4.2 makes the following statement ‘Proposals for renewable energy infrastructure should demonstrate good design in respect of landscape and visual amenity, and in the design of the project to mitigate impacts such as noise and effects on ecology’. Paragraph 2.5.2 also confirms that ‘the recovery of energy from the combustion of waste, where in accordance with the waste hierarchy, will play an increasingly important role in meeting the UK’s energy needs. Where the waste burned is deemed renewable, this can also contribute to meeting the UK’s renewable energy targets’.
67. The UK Bioenergy Strategy for England ([UK Bioenergy Strategy](#)) published in 2012 sets out the Government’s approach to achieving sustainable, low-carbon bioenergy deployment by defining a framework of principles that will govern future policies. Paragraph 1.4 states that ‘bioenergy is one of the most versatile forms of low carbon and renewable energy as it can contribute towards energy generation across the energy spectrum of electricity, heat and transport.... biomass can also provide a continuous and constant flow of energy with less variability than some renewable energy sources’. Paragraph 1.7 also states that ‘if waste is used as a feedstock for bioenergy, quantities of waste being sent to landfill can be reduced.....’.

Waste Planning Policy considerations

68. In March 2014 the Government introduced the [Planning Practice Guidance](#) and published the [National Planning Policy for Waste](#) in October 2014, which set out detailed waste planning policies and guidance and should be read in conjunction with the [National Planning Policy Framework](#) introduced in 2012. The [Staffordshire and Stoke on Trent Joint Waste Local Plan](#) was also adopted in 2013. These documents promote the principles of sustainable waste management, and also recognise waste as a resource and offer guidance on the provision of waste management facilities that are *the right type, in the right place and at the right time*.
69. Paragraph 5.23 of the [Staffordshire and Stoke-on-Trent Joint Waste Local Plan](#) indicates that ‘energy from waste and waste derived fuels has an important role to play alongside recycling and composting in a system of integrated sustainable waste management’. Policy 1.5 states energy recovery proposals should demonstrate that they:
- are consistent and comply with the requirements of Policy 4 (Sustainable design and protection and improvement of environmental quality);
 - will not undermine the provision of waste management facilities operating further up the waste hierarchy (the waste to be treated cannot practically be suitable for reuse, recycling or processing to recover materials);
 - are in close proximity to the source of waste in order to obtain reliable and regular supply of feedstock and minimise transport emissions;

- maximise energy recovery, either by combined heat and power (CHP) or electricity generation, or be CHP ready, with a realistic prospect of a market for the energy in the area; and,
- meet the locational approach set out in Policy 2 (Targets and broad locations for waste management facilities).

70. *Conclusion:* The proposed development would bring an innovative, renewable and clean technology to the site and enable the substitution of fossil fuels in an established industrial process on an industrial site. Valuable use would be made of the wood fuel which would otherwise be treated as a waste material and may be sent to landfill. The Renewable Energy Facility is designed to meet the current energy demands of the wider rendering site operations and it is therefore reasonable to conclude that in general terms the facility is the right type, in the right place at the right time. However it is also important to have regard to the site specific considerations discussed below.

Green Belt considerations

71. The application site is situated on a hill side, and comprises a cleared man-made terrace of land between operational units within the Pointon's site. The site is however within the North Staffordshire Green Belt and it is therefore necessary to assess the proposed development against the [National Planning Policy Framework \(Section 9\)](#), the [National Planning Policy for Waste](#) and the relevant Local Plan policies (the [Staffordshire and Stoke on Trent Waste Local Plan](#) Policy 4.2 (viii) and the [Staffordshire Moorlands District Local Plan](#) Policies SS6a and R1) which all seek to protect the Green Belt from inappropriate development and to preserve its openness.
72. Paragraph 89 of the [National Planning Policy Framework](#) states that 'new buildings should be regarded as inappropriate in the Green Belt unless they fall within one of the listed exceptions'. One of the exceptions is: 'limited infilling or the partial or complete redevelopment of previously developed sites (brownfield land), whether redundant or in continuing use (excluding temporary buildings), which would not have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development'. Paragraph 91 states that 'When located in the Green Belt, elements of many renewable energy projects will compromise inappropriate development. In such cases developers will need to demonstrate very special circumstances if projects are to proceed. Such very special circumstances may include the wider environmental benefits associated with increased production of energy from renewable sources'.
73. When Staffordshire Moorlands District Council determined [SMD/2008/0936](#) for the Energy Resource Centre, it concluded that the very special circumstances included the delivery of renewable energy on the site the fuel for which would be derived as a by-product of the factory immediately adjacent to the site; a significant reduction in vehicle movements on the local highway network; provision of an improved junction with the Cheadle Road; re-alignment of the access road away from residential properties; creation of new jobs; provision of community facilities and cessation of use of the Staffordshire Farmers site and its laying out as woodland. It was not considered that the development would give rise to significant concerns relating to

contamination, air quality, protected species, loss of trees, flood risk, nor would the proposal give rise to highway safety concerns or a loss of neighbouring amenity.

74. In this case, it is again considered that the proposed Renewable Energy Facility would constitute inappropriate development in the Green Belt and should therefore not be approved except in very special circumstances. However, it is considered that very special circumstances do exist in this case for the reasons explained below:
- The Renewable Energy Facility would replace the permitted Energy Resource Centre and Anaerobic Digestion facility;
 - The facility would maximise the use of waste as a resource and would comprise of a biomass Combined Heat and Power (CHP) plant, with a thermal input capacity of 44MWth and an electrical generating capacity of 6.5MWe, thereby making a contribution to the targets for energy generation from 'renewable' sources which accords with government policy; in addition to meeting the existing energy demand of the existing rendering operations at the site; which accords with [Staffordshire and Stoke on Trent Waste Local Plan](#) policy 1.5
 - The scale of the proposed buildings is indicative of existing industrial units on the Pointon's site, in terms of style, massing and colour so as to minimise any visual intrusion which accords with [Staffordshire and Stoke on Trent Waste Local Plan](#) policies 4.1 and 4.2.
75. When considering inappropriate development in Green Belt land, it is necessary to have regard to the [Town and Country Planning \(Consultation\) \(England\) Direction 2009](#). The Direction requires the Waste Planning Authority to consult the Secretary of State for Communities and Local Government on inappropriate developments in the Green Belt, where it intends to approve a building or buildings where the floor space to be created by the development is 1,000 square metres or more or the site area is 1 hectare or more; or any other development which, by reason of its scale or nature or location, would have a significant impact on the openness of the Green Belt.
76. In this case, the two buildings for the proposed biomass Combined Heat and Power facility would have a combined floor space in excess of the 1,000 square metres (7,473 square metres) and the site area is 2.05 hectares (excluding the access road); and, by reason of scale or nature or location would have a significant impact on the openness of the Green Belt. Given the recommendation below is to approve the development it would be necessary to refer the decision to the Secretary of State for Communities and Local Government c/o the National Planning Casework Unit before planning permission can be issued.
77. *Conclusion:* Having regard to policies and guidance referred to above, it is reasonable to conclude that the proposals do constitute inappropriate development in the Green Belt, and that 'very special circumstances' exist that outweigh the harm to the openness of the Green Belt. However, before planning permission can be issued it would be necessary to refer this case to the Secretary of State c/o the National Planning Casework Unit.

Design and landscape mitigation

78. The documents submitted in support of the application considered the effects of the

proposal on landscape and visual amenity. The [National Planning Policy Framework](#) (section 11), [Staffordshire Moorlands District Local Plan](#) (policies SS6c and DC3) and [Staffordshire and Stoke on Trent Waste Local Plan](#) (policy 4.2) all seek to protect and / or enhance the landscape and visual amenity and ensure that development is informed by, or sympathetic to, the character and qualities of its surroundings, its location, scale and design. National Waste Policy and NPPF promotes high quality design and the Waste Local Plan (policy 3.1) promotes the general requirements for new and enhanced facilities, and with particular regard to this application aims to ensure that new waste management facilities are:

- Fully contained within well designed purpose built or appropriately modified existing buildings or enclosed structures appropriate to the technology or process;
- Compatible with nearby uses, and appropriate in scale and character to their surroundings giving careful consideration to any cumulative effects that may arise (Refer to 'Policy 4: Sustainable design and protection and improvement of environmental quality'); and,
- Complement existing or planned activities or form part of an integrated waste management facility and demonstrate an overall enhancement of the site.

79. The previous consented Energy Resource Centre approved the construction of a bio-diesel production plant with buildings 14 metres to the ridgeline, 10 metres to the eaves and a 30 metre high chimney. Also the previous consented Anaerobic Digestion (AD) facility included a 39 metre high chimney for the tallow fuelled electricity generation engines, a 23.2 metre stack for the AD plant's CHP engines, and two anaerobic digestion tanks of 20.3 metres in height. In comparison the proposed Renewable Energy Facility is larger in scale: the Turbine Hall has a roofline 20.5 metres Above Ground Level (AGL) and a Fuel Hall with a roofline between 15.5 metres and 10 metres AGL, and the three stacks are 35 metres AGL. The facility is however purpose built to meet the energy demands of the wider rendering plant; the air quality modelling has dictated the height of the stacks at 35 metres, which incidentally are 4 metres lower than the consented chimney for the Anaerobic Digestion proposal; and the turbine hall, whilst being 6.5 metres higher than the consented Energy Resource Centre is designed to accommodate the infrastructure inside.

80. The Landscape and Visual Impact Assessment accompanying the application concludes that there would be no significant visual effect in terms of the strategic visual amenity of the Green Belt and wider effect on the Peak District National Park. The proposed facility would be similar to the existing industrial plant and stacks and given the proximity of the two areas and taking account of the higher elevation of the existing industrial plant and the existing warehouse on the lower northern terrace, the views of the site may include an extended industrial component, however the overall impact is unlikely to be increased. Whilst the proposed development would have no change or slight adverse change from the majority of visual receptors, it however would result in a very localised significant adverse effect on views from a section of Footpath Cheddleton 39 which passes adjacent to the site and which would also involve views of regrading works to the access track on which the Public Right of Way is located. The degree to which this effect would result in 'unacceptable visual harm' (Waste Local Plan Policy 4.2) should be considered in the context of the

current appearance of the application site, the previous consented uses for the application site, the industrial architecture on the wider site and any proposed mitigation.

81. The modular, regular appearance of the proposed buildings is indicative of the industrial architecture of the wider site, and the colour (muted dark and light green metal sheet cladding) is proposed to blend in with the surrounding green infrastructure and match existing buildings.
82. It has previously been concluded by Staffordshire Moorlands District Council, in consideration of the two previous energy facility applications, that despite the size of the proposed Energy Resource Centre, and the Anaerobic Digestion facility, the specific siting and the nature of the proposed developments are such that the benefits outweigh the modest environmental impacts which are, in any event, either within accepted standards or can be mitigated further.
83. A scheme of landscape and visual mitigation consisting of a perimeter screen bund with planting alongside the south eastern site boundary to mitigate the views from the Public Right of Way, and other perimeter tree / woodland planting was proposed as part of the consented Energy Resource Centre, which was later revised by the proposed Anaerobic Digestion facility. Some planting as part of the consented Energy Resource Centre has already been implemented around the wider site and in particular along the haul road and to the north of the warehouse on the lower northern terrace.
84. Due to the design of the proposed Renewable Energy Facility (Turbine Hall and Fuel Hall) there are constraints to the level of mitigation that can be achieved for users of the Public Right of Way given the limited available space within the application site and no feasible use of off-site locations due to the adjacent access track which forms the eastern boundary. Landscape mitigation planting is however proposed on the regraded slopes around the proposed facility to provide a higher level of visual screening on the approach to the site from the north and south along the Public Right of Way. Regarded slopes would be seeded with a Conservation Grass mix and two belts of woodland screen planting each 6 – 10 metres wide with irregular edges are proposed to the south. The applicant has also indicated a willingness to submit a comprehensive landscape management plan for land within the Company's ownership.
85. The County Council Environmental Advice Team have confirmed that the submitted concept proposals have potential to achieve some mitigation and could develop into an area of woodland planting capable of filtering and screening views of southwest elevations. A condition is recommended requiring further detail regarding soils, de-compaction, amelioration and seeding and planting techniques. It is also advised to submit detailed planting mixes based on the conceptual proposals that are native species tolerant of the ground conditions, including 'nurse' species which can be thinned later. It is commented however that the scheme remains deficient in that it offers no mitigation between the facility and the Public Right of Way leaving this open to views from receptors to the east and there is no option of reducing the height of the buildings which would be of landscape benefit. The applicant's offer of a Landscape Management Plan for both the application site and also land in the applicant's ownership is however welcomed and a condition is recommended for the submission of these details within 5 months of any approval and that the

Management Plan should include where appropriate additional planting to supplement and reinforce areas of planting to deliver landscape and biodiversity enhancement. Pre-commencement conditions are also recommended in respect of ecology in respect of protected species survey and breeding bird survey and also a condition for the development to take place in accordance with the Extended Phase 1 Habitat Survey.

86. The representation received raised concerns of light pollution. All external lighting however would be restricted to down lighting in vehicle and pedestrian circulation areas, as is the practice on the main industrial plant. This can be required by condition.
87. *Conclusion:* Having regard to the policies, guidance, other material considerations and consultation responses, and the representation referred to above, it is reasonable to conclude that, subject to the recommended conditions, the Combined Heat and Power Renewable Energy Facility would not give rise to any unacceptable adverse landscape or visual impact.

Site specific environmental considerations: air quality, traffic and flood risk

88. [Paragraph 123 of the NPPF](#) requires that local planning authorities make decisions that:
- *“avoid noise from giving rise to significant adverse impacts on health and quality of life as a result of new development”;*
 - *“mitigate and reduce to a minimum other adverse impacts on health and quality of life arising from noise from new development, including through the use of conditions”;* and,
 - *“recognise that development will often create some noise and existing businesses wanting to develop in continuance of their business should not have unreasonable restrictions put on them because of changes in nearby land uses since they were established.”*
89. The [Staffordshire and Stoke on Trent Waste Local Plan policy 4.2](#) and the [National Planning Policy for Waste](#) explain that consideration should be given to the likely impact on the local environment and on amenity including air emissions including noise and odour.
90. Planning Practice Guidance on [Noise and Air quality](#) explains that the planning system controls the development and use of land in the public interest. The guidance also explains that these matters are covered by other regulatory regimes and waste planning authorities should assume that these regimes will operate effectively.
91. The noise impact assessment submitted as part of the application concludes that noise levels for the operation of the facility are likely to be a low impact at residential dwellings in the vicinity of the site.
92. The plant will be covered by the waste incineration elements (Annex VI) of the Industrial Emissions Directive (referred to as the IED) and as such the plant will need to incorporate equipment to ensure compliance of combustion emissions with the

limits and emission standards set by the IED. The air quality assessment submitted as part of the application considered various stack height options for the proposed development and concluded that a stack height of 35 metres was the most appropriate. Public Health England have confirmed that an analysis of the modelled stack emissions has concluded that there is no significant impact with regard to human health as a result of the proposals and they have no significant concerns regarding risk to health of the local population providing that the applicant takes all appropriate measures to prevent or control environmental emissions, in accordance with industry best practice.

93. The Environment Agency raised no objections and it is important to note that the Environmental Permit issued by the Environment Agency would regulate the operations at the facility, placing strict controls on emissions and quality of fuel source and quality as well as a statutory requirement for continuous 24/7 monitoring.
94. Having regard to the debate at the October Planning Committee meeting regarding a biomass development. It is important to be clear that the fuel for the facility is waste wood as described in paragraph 22 above, and any other fuel or waste materials were not applied for and would raise environmental and amenity issues which would need consideration afresh and therefore the subject of a planning application.
95. In respect of traffic impacts Government guidance (the [National Planning Policy Framework](#) paragraphs 32 and 144 and the [National Planning Policy for Waste](#)) and local plan policies (the [Staffordshire and Stoke on Trent Waste Local Plan](#) policy 4.2) aim to protect the local highway network and the safety of residents. Highways Development Control has no objections to the proposal. Traffic limits and hours of delivery can however be restricted by condition to protect local amenity.
96. In respect of surface water drainage, the Flood Risk Management Team received additional information and as a result has no objection, subject to a condition requiring further details of the sustainable drainage system to be approved.
97. An existing Site Liaison Group meets quarterly with members including local residents, Parish Councillors, Environment Agency Officers, District Councillors, and Staffordshire County Council Trading Standards – Animal Health. This was set up in relation to the District Council permissions and rendering operations. The applicant has confirmed that this group would be expanded to include County Councillors and County Council Officers in relation to permitted operation of the Renewable Energy Facility.
98. *Conclusion:* Having regard to the policies, guidance, other material considerations and consultee responses, referred to above, it is reasonable to conclude that, subject to the imposition of the recommended conditions the proposed development would not give rise to any unacceptable adverse impact on air quality, or noise impacts, flood risk, or any unacceptable adverse impacts on the highway network or in terms of highway safety.

Overall Conclusion

99. Overall, as an exercise of judgement, taking the relevant development plan policies as a whole and having given consideration to the application, the supporting and environmental information, the consultation responses, the representation and the

other material considerations, all referred to above, it is reasonable to conclude that the proposed development is acceptable and should be permitted subject to planning conditions.

RECOMMENDATION

As the proposal is inappropriate development on land in the North Staffordshire Green Belt the recommendation is....

.....to consult the Secretary of State for Communities and Local Government (c/o the National Planning Casework Unit) to advise that having regard to the matters referred to in the report, the County Council is **MINDED TO PERMIT** the proposed development, subject to planning conditions (the heads of terms are listed below).

The planning conditions to include the following:

Definition of Permission

1. To define the permission with reference to approved documents and plans;
2. To define the commencement of the development;
3. To limit the use of the site to the uses hereby permitted;

Cessation of Operations

4. To require a site clearance scheme in the event that the use of the site should cease;
5. To define cessation;
6. To require a Restoration and Aftercare Scheme should the use cease
7. To define the expiry of the permission should the use cease.

Fuel / Waste Types, Quantity and Vehicle Loads

8. To limit the fuel to recycled and recovered waste wood within the category Construction, Demolition and Excavation waste which would comprise of blended grade A, B and C waste wood (where category A wood is clean, and category B wood is painted, glued or varnished; and category C includes Category A and B materials plus fencing products, flat pack furniture made from board products and DIY materials).
9. To limit the tonnage of waste wood to 90,000 tonnes per annum;
10. To limit deliveries of wood waste to 25 loads per day

Non-Conforming Waste

11. To require the removal of non-conforming wastes;

Site preparation, clearance and construction phase

12. To limit site preparation, site clearance and construction operations to:

- 07.00 to 19.00 Monday to Fridays; and,
- 07.00 to 14.00 on Saturdays;

No such operations / activities to take place on Sundays, Public or Bank Holidays;

13. To require all vehicles, plant and machinery associated with site preparation, site clearance and construction to be operated with engine covers closed, with effective silencers, maintained in accordance with the manufacturer's recommendations and fitted with non-audible reversing/warning safety systems.

14. To require protected species surveys prior to carrying out site preparation, site clearance and construction and such operations / activities to take place outside the bird breeding season unless preceded by a survey in accordance with the recommendations in the Phase 1 Habitat Survey Report.

General Environmental Protection

15. To limit the import of waste, export of ash or shredding, grinding and separation of waste wood to:

- 07.00 to 19.00 Monday to Fridays; and,
- 07.00 to 14.00 on Saturdays;

No such operations / activities to take place on Sundays, Public or Bank Holidays;

16. To require details of the external finishes of the buildings to be submitted for approval.

17. To require the buildings, structures and hard-surfaces to be maintained in good condition and fit for purpose

18. To require details of surface water drainage based on sustainable drainage principles to be submitted for approval.

19. To require no handling, storage or processing of wood waste other than in the fuel hall and no external storage of ash other than in the enclosed ash skips.

20. To require the storage of oils, fuels or chemicals on an impervious base and within bunds / tanks.

21. To require Public Right of Way to be kept open and safe for users at all times

22. To control external floodlighting

23. To define the site access
24. To require the use of quick close roller shutter doors at all times when operations are being carried out within the buildings
25. To require loads of wood waste or ash to be sheeted or otherwise contained
26. To require the existing wheel cleaning facilities to be used as necessary to prevent mud or other deleterious materials being deposited on the public highway.

Landscaping and Ecology

27. To require a detailed Landscape Mitigation Planting Scheme
28. To require a Landscape Management Plan for the wider site

Record Keeping and Knowledge of the Permission

29. To require record keeping of the quantity, source and type of waste wood used to fuel the boilers; vehicle movements
30. To require a copy of the permission and all associated documents to be available to the person person/s responsible for the operations on site;

Informatives

1. **The Environment Agency** advised as follows:

The site is subject to an Environmental Permit issued by them and a modification to the Environmental Permit may be required as a result of this permission.

2. **The Environmental Advice Team (Rights of Way)** advised as follows:

It is important that users of the Footpath Cheddleton 39, which runs adjacent to the proposed development sites, are still able to exercise their public rights safely and that the path is reinstated if any damage to the surface occurs as a result of the proposed development. The surface of the footpath must be kept in a state of repair such that the public right to use it can be exercised safely and at all times. Heavy vehicular use can cause the way to become unsuitable for use and in some instances dangerous. Some attention needs to be drawn to this and that surface works may be required.

Any planning permission given does not construe the right to divert, extinguish or obstruct any part of the public path. If the path does need diverting as part of these proposals the developer would need to apply to Staffordshire County Council under section 257 of the Town and Country Planning Act 1990 to divert the footpath to allow the development to commence. The County Council will need to be formally consulted on the proposal to divert this footpath. The applicants should be reminded that the granting of planning permission does not constitute authority for interference

with the right of way or its closure or diversion. For further information the applicant should be advised to read section 7 of DEFRA's Rights of Way Circular (1/09).

3. Site liaison:

The operator to be encouraged to expand the existing Site Liaison Group which meets quarterly to include County Councillors and SCC Planning Officers regarding the operation of the Renewable Energy Facility.

Case Officer: Julie Castree-Denton
tel: (01785) 277293
email: planning@staffordshire.gov.uk

A list of background papers for this report is available on request and for public inspection at the offices of Staffordshire County Council, 1 Staffordshire Place, Stafford during normal office hours Monday to Thursday (8.30 am – 5.00 pm); Friday (8.30 am – 4.30 pm).

Appendix 1: Summary of the findings of the Environmental Statement

Section 1 Introduction

This Section of the Environmental Statement (ES) provides an introduction to the submission; the applicant and the development proposal.

Section 2 Site Location and Context

This section of the ES provides a general description of the application site; its surroundings, including baseline landscape character, ecology baseline conditions, background sound levels and baseline air quality and observations of the Floor Risk Assessment.

Section 3 Proposed Development

This section describes the proposed scheme, including the site layout, building and stack dimensions, vehicular access, hours of operation and construction timeframe.

Section 4 Design Statement

This section describes how the nature and extent and operational requirements of all energy consumption on the wider Pointon's site has been identified and how the CHP (Combined Heat and Power) energy generation facility has been designed to maximise the renewable thermal and electricity energy generation required. The different design iterations are described and analysis confirms that all of the steam demands from the three main steam boilers at the rendering facility could be displaced by the same grade and temperature of steam being generated as part of the CHP process.

Section 5 Environmental Considerations

This section considers the following topic areas in terms of impact and is supported where necessary by mitigation measures:

- **Landscape and Visual Impact**

This describes the visual assessment undertaken for three stages of activity (construction, Year 1 and Year 15 of operation) in relation to the baseline situation which comprises the terraced slope, an in the context of the adjacent existing industrial plant site to the west/south west and the existing industrial warehouse to the north. The summary identifies the visual impacts of the proposed scheme and focuses on significant effects.

It concludes that the proposed development is likely to be similar or less than that of the existing industrial plant and stacks taking account of the higher elevation of the existing plant site and close proximity of the two areas and while views of the site may include an extended industrial component the overall visual impact is unlikely to be increased. The effect on the visual amenity of the PROW adjacent to the Application Site would however be great.

The proposed development would have No Change or Slight Adverse Change from the majority of visual receptors, however would result in a very localised Significant

adverse effect on views from a section of Footpath Cheddleton 30 which passes adjacent to the site and which would also involve views of regrading works to the access track on which the Public Right of Way is located. No additional mitigation is proposed due to the constraints associated with limited available space within the Application Site and no feasible use of off-site locations.

- Ecology

This details the ecological assessment undertaken and the potential impacts and effects arising from activities relating to the construction and operational phases of the proposed development on habitats and fauna. It is considered that there would be no likely important adverse effects from the proposed development on fauna, flora, habitats and designated wildlife sites. The habitats at the Site are of Negligible – Low ecological importance. No further surveys are required. Recommendations include vegetation removal outside the bird breeding season (March – September); removal of spoil heaps and dry stone wall before the hibernation period for Great Crested Newts and/or inactive period for Reptiles (October – February inclusive). If protected species are found to be present within the Site during construction of the proposed development, then appropriate surveys, mitigation and compensation measures should be devised and implemented prior to any construction work taking place.

- Flood Risk

This details the Flood Risk Assessment undertaken. It is considered that there is a negligible risk of flooding occurring at the site and a low risk of any consequential impacts to adjoining land uses because of the re-grading of the existing landform required to develop the site. The existing surface waste management regime will be maintained and where necessary developed.

- Noise

Potential sound levels from the proposed scheme have been predicted at nearby noise sensitive locations. The detailed Noise Impact Assessment indicates that there is likely to be a low impact at residential dwellings in the vicinity of the site.

- Air Quality

Methodology is provided of the detailed Air Quality Assessment which considers the potential impacts of aerial emissions from the proposed operations on local receptors, including a stack emissions assessment. This concludes that the operation of the proposed Renewable Energy Facility is unlikely to cause significant adverse air quality impacts in the vicinity of the site; on the basis that a high standard of emissions management and control is maintained and the site is operated in accordance with Environmental Permitting requirements.

- Alternatives

This section confirms that no alternatives have been explored. It is stated that as the proposed development uses proven technology and is a logical compliment to the existing industrial operations at the wider John Pointon and Sons site.

- Cumulative Impact and Interaction Effects

The consented operations are part of the baseline for the proposed development and the proposed development is for the establishment of a renewable energy facility that will provide a sustainable source of heat and electricity to the established operations undertaken by the applicant company. The proposals envisage the retention and continued use of the existing plant site and ancillary features and the main sources of potential interaction effects have been identified as the air quality impact on landscape, ecology and human health; the appropriate siting of the plant in relation to landscape and ecological impacts; and, the appropriate siting of stacks and general site design to minimise the scope for impact in relation to noise, dust and landscape. This section concludes that many options have been considered to secure an appropriate balance between the various technical disciplines to minimise the scope of interaction effects.

Section 6 Summary and Conclusions

This section provides a conclusion to the ES. The applicant considers the proposals represent a sustainable and logical compliment to the existing industrial operations at the wider John Pointon and Sons operational site. The proposals will enable the replacement of fossil fuels with a more sustainable form of energy generation with minimal impact on surrounding environment.

In respect of Landscape and Visual Amenity a significant cumulative adverse effect is not considered likely. The localised significant effect on the visual amenity of Footpath Cheddleton 39 is not considered so great that the overall benefit to the application site cannot be accepted.

With regard to Ecology it is considered that there would be no likely important adverse effects from the proposed development on fauna, flora, habitats and designated wildlife sites. If protected species are found to be present within the Site during construction of the Proposed Development, then appropriate surveys, mitigation and compensation measures should be devised and implemented prior to any construction work taking place.

With regard to Noise the overall outcome of the assessment indicates that there is likely to be a low impact at residential dwellings in the vicinity of the site.

In respect of Air Quality overall the site is considered to be suitable for the proposed use. The facility will require an Environmental Permit to operate; this will entail provision of detailed risk assessments and management plans to the Environment Agency and control of potential aerial emissions to ensure the facility does not result in unacceptable pollution.

Appendices

- 1 Landscape and Visual Impact Assessment
- 2 Ecological Assessment
- 3 Noise Impact Assessment
- 4 Air Quality Impact Assessment
- 5 Flood Risk Assessment
- 6 Development Scheme

Appendix 2: The Development Plan policies and other material considerations relevant to this decision

The development plan policies

[Staffordshire and Stoke on Trent Joint Waste Local Plan](#) (2010 – 2026)

(adopted 22 March 2013):

- Policy 1: Waste as a resource
 - Policy 1.1 General principles
 - Policy 1.2 Make better use of waste associated with non-waste related development
 - Policy 1.5 Energy Recovery
 - Policy 1.6 Landfill or landraise

- Policy 2: Targets and broad locations for waste management facilities
 - Policy 2.1 Landfill diversion targets
 - Policy 2.2 Targets for new waste management facilities required by 2026 to manage municipal, commercial & industrial, and construction, demolition & excavation waste streams
 - Policy 2.3 Broad locations
 - Policy 2.5 The location of development in the vicinity of waste management facilities

- Policy 3: Criteria for the location of new and enhanced waste management facilities
 - Policy 3.1 General requirements for new and enhanced facilities

- Policy 4: Sustainable design and protection and improvement of environmental quality
 - Policy 4.1 Sustainable design
 - Policy 4.2 Protection of environmental quality

[The Staffordshire Moorlands District Local Plan \(up to 2026\)](#) (adopted 26 March 2014)

- Policy SS1 Development principles
- Policy SS1a Presumption in favour of sustainable development
- Policy SS6a Larger villages area strategy
- Policy SS6c Other rural areas area strategy
- Policy SD1 Sustainable use of resources
- Policy SD2 Renewable /low-carbon energy
- Policy SD4 Pollution and flood risk
- Policy E1 New employment development
- Policy DC1 Design considerations
- Policy DC2 Historic environment
- Policy DC3 Landscape and settlement setting
- Policy R1 Rural diversification

Other material considerations

[National Guidance](#)

The [National Planning Policy Framework](#) (the NPPF) (published on 27 March 2012).

- Section 1: Building a strong, competitive economy;
- Section 4: Transport;
- Section 7: Requiring good design;
- Section 8: Promoting healthy communities;
- Section 9: Protecting Green Belt Land
- Section 10: Meeting the challenge of climate change, flooding and coastal change; and,
- Section 11: Conserving and enhancing the natural environment.

[Planning Practice Guidance](#) (last updated 28 July 2017)

- [Waste](#);
- [Design](#);
- [Renewable and low carbon energy](#);
- [Noise](#);
- [Travel Plans, Transport assessments and statements](#)

Waste

[National Planning Policy for Waste](#) (16 October 2014):

- Section 1: Key Planning Objectives;
- Section 6: Identifying Suitable Sites and Areas – Green Belt;
- Section 7: Determining Planning Applications.

[The Waste \(England and Wales\) Regulations 2011](#)

Public Health England's (PHE) Position Statement on Municipal Solid Waste Incineration – [‘The Impact on Health of Emissions to Air from Municipal Waste Incinerators’](#) (September 2009)

[Environmental Permitting \(EP\) \(England and Wales\) Regulations 2016\)](#)

Energy

National Policy Statements for energy infrastructure:

- [Overarching National Policy Statement for Energy](#) (EN-1);
- [Renewable Energy Infrastructure](#) (EN-3).

[Energy White Paper 2003](#) (Our Energy Future – Creating a Low Carbon Economy)

[Energy White Paper 2007](#) (Meeting the Energy Challenge);

[Climate Change Act 2008](#)

[The UK Renewable Energy Strategy \(2009\)](#)

[The UK Low Carbon Transition Plan \(2009\)](#)

[The UK Low Carbon Industrial Strategy \(2009\)](#)

[UK Renewable Energy Roadmap](#) (DECC, July 2011, updated December 2012, updated January 2013 and November 2013);

[UK Bioenergy Strategy](#) (April 2012 published by Defra, Department for Transport, Department of Energy & Climate Change); and,

[‘Energy from Waste – A guide to the debate’](#) (published by Defra February 2014 (revised edition))

European Policy

National policy on waste is derived from European legislation, of which the most relevant to this application are:

[The Revised European Framework Directive on Waste](#) (2008/98/EC adopted by the European Council on 17 October 2008);

[The Waste Incineration Directive](#) (2000/76/ec)

[The Industrial Emissions Directive \(IED\) 2010/75/EU](#)

Local Guidance

[Planning for Landscape Change](#) (formerly Supplementary Planning Guidance to the Structure Plan referenced as a material consideration in Appendix 3 of the Joint Waste Local Plan)

Staffordshire County-wide Renewable / Low Carbon Energy Study (September 2010)