

Bournemouth, Dorset and Poole Waste Plan Examination June 2018

HEARING REFERENCE Comment ID PSD-WP211

Statement by M R Hirsh MRICS MRTPI of Intelligent Land on behalf of Ankers and Rawlings.

Land at Woolsbridge Industrial Estate:

Policy 3 and Inset 1 as detailed in Appendix 3;

Together with Issues from the letter by Inspector Nick Palmer:

Matter 3 -Forecasts and need for new facilities

Policy 3 -Sites allocated for waste management development

Questions 43, 44 and 45

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Foreword

This statement is submitted against the background of an ongoing discussion with the Dorset County Waste Planning Team and latterly East Dorset District Council's Policy Team over agreeing a statement of Common Ground (SOCG). A copy of the latest draft version of the SOCG is provided in Appendix 3. The aim is to provide a completed SOCG to the hearing timetable.

1.0 Introduction.

1.1 This statement supplements that previously submitted on behalf of Ankers and Rawlings (A&R), who own the subject land, by providing additional new information.

1.2 The representation already made by way of objection to the Waste Plan is in respect of the extent of the allocation at Inset 1 Appendix 3 (and the plan map) only extending to the south area of the land allocated as Policy VTSW6 in the Christchurch and East Dorset Local Plan Part 1 -Core Strategy. This position, it is submitted, is unsound.

1.3 This statement also comments specifically on questions 43, 44 and 45 as set out by Inspector Nick Palmer in his pre-Examination letter.

1.4 Questions 44 and 45 appear to relate, in part, to the counter-representations made by East Dorset District Council opposing the principle of a waste allocation on this land. [By implication there is an issue about the duty to co-operate as plainly it is unfortunate for two authorities to be in disagreement].

2.0 The Extent of the Allocation and Question 43

Building under construction and infrastructure works at Woolsbridge.

2.1 The available area of search for the land identified in the Waste Plan has already shrunk by 0.414 of a hectare. Paragraph 1.6 of the submission made on behalf of A&R referred to a reserved matters approval for a new unit in the north part of the proposed allocation (East Dorset District Council Ref: 3/17/1988.RM). The building is now under construction and a site plan showing the location is provided at Appendix 1.

2.2 At Appendix 2 is an email from Scott Rawlings of Ankers and Rawlings dated the 24 May 2018. It provides that Company's commitment to continued construction including the new road junction to Ringwood Road by early 2019. A&R are seeking prospective users of all types of industrial, commercial and related *sui generis* uses. If the market for waste occupiers is uncertain in the short to medium term it is foreseeable that the allocation, as it appears in the Waste Plan, may become further eroded. A&R are not philanthropic which is the point being made in part in the email of the 24 May 2018.

2.3 The draft plan position of the County Council lacks justification because the evidence firmly points to a wider allocation to ensure deliverability and the County officers' reservations have essentially been overtaken by the details submitted in the context of the major applications referred to in the previously submitted statement.

Suggested alterations to the text and plan and to meet question 43 (Please also see Appendix 3)

2.4 Revised wording is provided in a draft Statement of Common Ground (SOCG) in relation to Policy 3 and Appendix 3 Inset 1 of the Waste Plan at Appendix 3 to this statement. This draft SOCG reflects informal first views of the County as well as a revised A&R position. 2.5 Under the heading referring to local waste management facilities, it is submitted that the description of Inset 1 is revised to identify it as: <u>An area of search at</u> Woolsbridge Industrial Estate, Three-Legged Cross.

2.6 After the listing of the 6 inset sites for local waste management facilities in Policy 3 a further heading is suggested to meet the Inspector's concerns, in relation to Question 43, to deal with the lack of clarity over a non-local facility for bulky waste.

2.7 At Appendix 3 of this statement the most recent suggested revised wording for Inset 1 of Appendix 3 of the Plan is set out in full.

3.0 Further information countering the Objection by East Dorset District Council relating to the loss of employment land and submissions in relation to the questions 44 and 45 raised by the Inspector in relation to land within the current administrative boundaries of East Dorset District Council.

3.1 There are two further short points to make about the position of East Dorset District Council.

3.2 Since the submission on behalf of A&R was made in relation to the draft Waste Plan, it has been confirmed that the Dorset County and East Dorset District Councils will shortly merge with the other rural councils of Dorset to become one large unitary authority. This will involve East Dorset being prized apart from the Borough of Christchurch. There will also be an urban unitary comprising Poole, Bournemouth and Christchurch Borough Councils.

3.3 In the context of revising the Core Strategy, East Dorset District Council has completed the Council's 'call for sites' and are about to publish the findings, presumably in the form of 'issues and options consultation' (Regulation 18) notwithstanding the above merger. It is plain, that the Core Strategy (April 2014) is rapidly becoming out of date and EDDC along with other authorities involved in the merger are to varying degrees all engaged in similar processes. East Dorset, therefore, has a marvellous window of opportunity, if there is concern about the lack of available land for industrial and commercial purposes, to propose a further increase in this land use. This could readily take account of any concern that there may be about land needed for waste purposes and also reflect the increased need for employment land associated with the forecast increases in population. The whole

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point about the planning system is that it needs to be positive and embrace change pro-actively. 'To make fresh provision for planning the development and use of land...'¹ and it has always been thus.

¹ Town and Country Planning Act 1947 Introduction in 'Chapter 51' - 6 August 1947

Appendix 1



Email text from Scott Rawlings to Mike Hirsh dated 24 May 2018

Mike

As the Company Director I confirm that:

- We have now commenced works at Woolsbridge for the first commercial property on the south extension of the estate for Selwood Plant Hire and this should be ready for occupation October 2018
- 2. We are committed to the construction of the new access junction into Site B, which is the next land parcel south of the Selwood Plant Hire site, starting September 2018.
- 3. We are committed to the construction of the new junction with Ringwood Road into Site A, the Oakfield Farm site, in September 2018 with the new road to join Old Barn Farm Road by early 2019.

Ankers and Rawlings has been meeting operators on a regular basis since the submission was made in relation to the waste plan continues to discuss the potential Woolsbridge Waste allocation with various Waste Operators and for a variety of waste uses including Waste Transfer, Waste Sorting/Recovery and Waste to Energy Plants all of which in some way are connected to each other. The common theme raised by all Waste Operators is the importance of having flexibility and a long-term approach to Waste uses, to be able to respond to the requirements of Government Policy and the changing nature of the Waste market over time. It is likely that any waste facility at Woolsbridge would need to offer/provide a diverse range of Waste options and therefore operators require a wide and non-restrictive approach to the Waste Allocations so that they can commit to the long term. Woolsbridge does offer the opportunity with the right joint support from Government and Business to provide a whole cycle solution to treat/recycle/reuse and even convert to power which could be used locally on the industrial estate.

Regards

Scott Rawlings BA (Hons) MRICS



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BOURNEMOUTH, DORSET & POOLE WASTE PLAN

Woolsbridge Industrial Estate, Three Legged Cross, Policy 3 - Inset Maps

DRAFT STATEMENT OF COMMON GROUND

Between

Dorset County & East Dorset Councils

and

Ankers & Rawlings (PSD-WP211)

This statement addresses the following areas of common ground:

Revised Text to Policy 3

Revised Text of the Appendix 3 – Inset Maps

Revised Text to Policy 3

The following sites are allocated for the development of local waste management facilities for the transfer and recycling of waste:

- Inset 1 <u>Area of search at</u> Woolsbridge Industrial Estate, Three Legged Cross
- Inset 2 Land south of Sunrise Business Park, Blandford
- Inset 3 -Land Area of search at Brickfields Business Park, Gillingham
- Inset 4 Land at Blackhill Road, Holton Heath Industrial Estate, Wareham
- Inset 5 Land east of Loudsmill, Dorchester
- Inset 6 Old Radio Station, Dorchester

The following site is also allocated for the development of a facility for the management of bulky waste:

Inset 1 – An area of search at Woolsbridge Industrial Estate, Three Legged Cross

The following existing permitted waste sites are allocated for their potential for intensification and re-development, including facilities for the management of non-hazardous waste:...

Revised Text of the Appendix 3 – Inset Maps

Inset 1 – Woolsbridge Industrial Estate, Three Legged Cross: The area of search comprises parcels of employment land that forms both the southern and eastern extensions to the existing Woolsbridge Industrial Estate. It is south-east of Three-Legged Cross. The land is currently a mix of previously developed land, vacant land awaiting development and fields with boundary trees and hedges.

The site is allocated for waste transfer and the treatment of bulky waste. Facilities may provide both a local and strategic facility. The most likely concept for a local facility is simply for preliminary sorting and bulking up of waste. A strategic facility will sort into different fractions to provide a variety of recyclable materials including fuels.

| Parish Council/Ward | Verwood and West Moors |
|---------------------|---|
| Site Area | Approximately 2 hectares is sought within the larger area, |
| | the east extension of the Woolsbridge Industrial Estate is 4.3 ha and the |
| | south extension is 5.6 ha. |
| Existing Land Use | Land awaiting development and green field |
| Proposed Uses | Approximately a hectare for local waste transfer |
| | Approximately a hectare for a strategic bulky waste plant |
| Access | Via the existing Industrial estate access and the new proposed access |
| | onto Ringwood Road at Oakfield Farm |
| Sensitive Receptors | Adjacent to Dorset Heathlands SAC/Dorset heathlands SPA and Ramsar |
| | Site; SNCI and flood zone 3. Existing employment buildings and dwellings on the north-west side of the Ringwood Road. |
| | |

Development considerations:

- 1. Appropriate Assessment in accordance with the Conservation of Habitats and Species Regulations 2017.
- 2. Assessment of flood risk having regard to part of the site being in flood zones 2 and 3.
- 3. Consideration of an appropriate buffer and mitigation in relation to the adjacent SNCI.
- 4. Landscape assessment for buildings in the east extension over ten metres in height.



Signed by:

| M R Hirsh on behalf of Ankers and Rawlings | Date |
|--|------|
| on Behalf of Dorset County Council. | Date |
| on Behalf of East Dorset District Council. | Date |