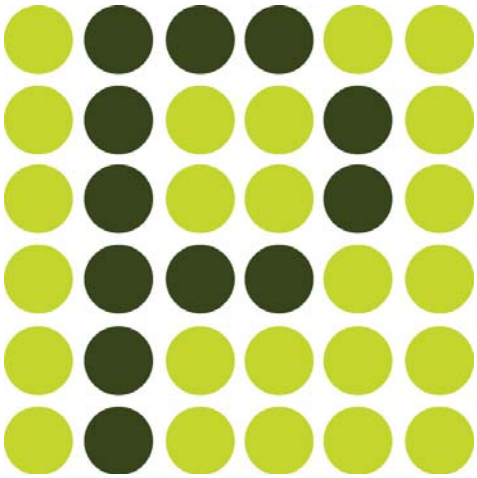
JOHN POINTON AND SONS LTD

CHEDDLETON INDUSTRIAL ESTATE

PLANNING APPLICATION
FOR A RENEWABLE ENERGY FACILITY TO PROVIDE ELECTRICITY AND HEAT TO EXISTING INDUSTRIAL OPERATIONS AT THE WIDER JOHN POINTON'S AND SONS SITE INCLUDING RE GRADING OF EXISTING EMBANKMENTS

PlANNING STATEMENT



PREPARED BY:
DAVID L WALKER LIMITED

April 2017

JOHN POINTON & SONS LIMITED

BONES LANE, CHEDDLETON

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SUPPORTING PLANNING STATEMENT INCORPORATING DESIGN AND ACCESS STATEMENT AND SUSTAINABILITY STATEMENT

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PREFACE

(i) This Supporting Planning Statement accompanies the planning application submitted by John Pointon & Sons Limited for the erection of a renewable energy facility to provide electricity and heat to existing industrial operations including re- grading of existing embankments at the wider John Pointon's And Sons site at Cheddleton, Staffordshire. The statement is provided in accordance with the requirements of the Staffordshire County Council Planning Application Criteria.

(ii) This Supporting Planning Statement is additionally accompanied by an Environmental Statement, which provides full details of the proposed development, and a Non-Technical Summary, the purpose of the latter document being to ensure that the findings of the studies undertaken can more readily be disseminated to the general public and that the conclusions are easily understood by non-experts as well as decision makers.

(iii) This Supporting Planning Statement provides a full review of Development Plan policies for the proposals detailed within the planning application, along with addressing other issues of sustainability and technology.

(iv) A comprehensive Design and Access Statement and Sustainability Statement, in accordance with governmental guidance, has also been incorporated within the Supporting Planning Statement.

SECTION 1 THE PROPOSED DEVELOPMENT

1.1 This planning application submitted by John Pointon & Sons Limited for the erection of a renewable energy facility to provide electricity and heat to existing industrial operations including re-grading of existing embankments at the wider John Pointon's And Sons site at Cheddleton, Staffordshire (the Site).

1.2 John Pointon and Sons Limited is one of very few rendering plants in the UK, and also the largest single plant in the country. The operations at the site provide a specialist service for the treatment of food wastes, and by products from the food production industry.

1.3 The energy demands for the operations and processes undertaken therein are substantial.

1.4 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, John Pointon & Sons have approached specialist consultants to investigate the opportunities for developing a biomass fired Combined Heat & Power (CHP) plant on the Cheddleton site to generate heat, in the form of steam and electricity to displace the millions of pounds worth of fossil fuels being consumed on the site each year.

1.5 It was quickly established that the existing site had sufficient space to allow the development of a biomass fired CHP plant and fuel preparation facility at the Eastern edge of the site and work progressed to confirm layout of the proposed development.

1.6 It was always the stated objective of John Pointon & Sons that the proposed energy generation facility should be designed as being a Combined Heat & Power operation to minimise biomass consumption and maximise the renewable thermal and electrical energy generation.

1.7 Significant work was then undertaken to identify the nature and extent of all energy consumption on the site as well as the operational requirements for all of the inter-linked energy consuming processes.

1.8 After detailed analysis by the consultants, it was confirmed that all of the steam demands for the site could be displaced by the same grade and temperature of steam being generated as part of the CHP process. It was also apparent that certain other gas

fired processes could not be altered as they formed part of the operational abatement processes.

1.9 The initial, and all subsequent, designs have been based upon the electrical generation being based upon the Organic Rankine Cycle (ORC) process, rather than traditional steam turbines. The ORC generation process is a much more reliable and robust generation process, particularly with these smaller (less than 10 MW electrical output) generation projects. ORC generation is also much more versatile across the entire output range of the generator plant and, unlike steam driven systems, will not stall out at low outputs.

1.10 The first designs included for biomass fired two boilers feeding a single ORC generation plant with an electrical output (gross) of around 4.5 MW.

1.11 Further investigation of the steam demand cycle identified that this initial configuration would not entirely satisfy the thermal demand and would also significantly limit the electrical generation capabilities.

1.12 The second design iteration considered a third biomass fired boiler and, to cope with the available thermal energy at times when the steam demand was low, a single ORC generation plant with an electrical output (gross) of around 6.5 MW.

1.13 This configuration provided an energy generation package which allowed the full thermal (steam) demand to be met while at the same time generating sufficient on-site electricity to meet the electricity requirements for the business.

1.14 The three biomass boiler system configuration provides sufficient redundancy that full steam demand can be met (at the sacrifice of electricity generation) if one boiler is out of service for any reason. When all three boilers are in operation and steam demand is low the project will also be capable of exporting zero carbon electricity into the local electricity grid.

1.15 The current design configuration will allow John Pointon & Sons Ltd to significantly reduce their environmental emissions, reduce their carbon footprint, control energy costs, safeguard local employment and provide clean electrical energy into the local community.

SECTION 2 TOWN AND COUNTY PLANNING

2.1 Introduction

2.1.1 Section 38 of the Planning and Compulsory Purchase Act 2004 reinforces the requirements of Section 54a of the Town and Country Planning Act 1990) as amended in that development is required to be in accordance with the requirements of the Statutory Development Plan for the area in which an application site sits unless material considerations indicate otherwise.

2.1.2 In respect of the application site the Development Plan comprises the following:

- Staffordshire Waste Local Plan; and
- Staffordshire Moorlands Local Plan.

2.1.3 In addition this section will also make reference to relevant supplementary policy guidance (where relevant) and national planning policy.

Site History

2.1.4 The operations at the site have been established over 80 years with many elements on site pre dating planning legislation. Development of the infrastructure and processes at the site has been achieved by the granting of numerous planning consents over time, both as county and local matters.

2.1.5 Focussing on the application site itself the recent planning history includes:-

- planning consent ref SMD/2012/0172 granted on 30 April 2012 for – the variation of the planning obligation associated with decision SMD/2008/0936;
- planning consent ref SMD/2008/0936 granted on 20 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;

- planning consent ref SMD/2000/0577 granted on 22 November 2000 for the installation of an underground effluent pipe; and
- planning consent ref SMD/2005/0179 granted on 31 March 2005 for Change of use from agriculture to game bird rearing.

2.1.6 It is therefore notable that planning consent ref SMD/2008/09 established the principle of energy generation at this specific location in support of the operations at the wider site.

2.2 Local Planning Policy

Staffordshire Waste Local Plan

2.2.1 The Staffordshire and Stoke-on-Trent Joint Waste Local Plan ("WLP") was adopted in March 2013 and replaces the previous Waste Local Plan adopted in February 2003. On the policy map that accompanied the WLP it is noted that the site is within the green belt designation, but is also identified as an Organic Treatment Facility (this being associated with the development in the 2010 planning consent). The sites proximity to the North Staffordshire Conurbation at Newcastle and Stoke is also notable on the Key Diagram.

2.2.2 Chapters 1 and 2 of the plan sets out the policy and regulatory context, whilst Chapter 3 provides a spatial portrait of the plan area, which includes consideration of existing and planned waste management infrastructure which includes that at Cheddleton. Although the site is in effect an organic treatment facility it only receives waste from industry and therefore does not form part if the MSW treatment capacity within the county.

2.2.3 Chapter 3 concludes by setting out the key issues that impacted on the development of the policy. Relevant issues to the site and the proposals detailed within this application include:-

- the need to take steps to minimise the negative effects of waste management on climate change;
- the need to increase the diversion of waste from landfill; and

- the need to encourage waste operators to raise the standard of our waste infrastructure.

2.2.4 Chapter 4 of the document sets out the visions and objectives for the WLP, and it is considered that the proposal detailed within this application are consistent with and support the four strategic objectives noted in this chapter.

2.2.5 Chapter 5 of the WLP sets out a number of strategic waste and development control policies, some of which are related to the proposals, and reaffirms the National policy position of presumption in favour of sustainable development.

2.2.6 The general principles that govern the decision making process in the WLP are articulated in **Policy 1.1**. The applicant view the use of the waste wood materials to generate heat and electrical energy as a recovery activity, as the use of the materials allows for a material benefit to be achieved, in this case the provision of a more sustainable and lower carbon energy solution for the site at Cheddleton. The design of the scheme includes appropriate measures to mange environmental effects, and the rural location of the site reduces the scope for impacts on human health. In conclusion in relation to this policy it is considered that the overall (economic, social and environmental) benefits outweigh any material adverse effects identified under the EIA that accompanies this application.

2.2.7 The same principles of recovery are consisted with the aspirations of **Policy 1.2 and Policy 1.5** of the WLP as they will make better use of the waste wood materials by the inclusion of maximum energy recovery, either by combined heat and power (CHP) or electricity generation, or be CHP ready, with the supply of the energy to the operations of the wider site.

2.2.8 The diversion of the waste wood materials from landfill will ensure consistency with **Policy 2.1** of the WLP. However the proposals do not contribute to any of the other capacity gaps identified in the remainder of the subsection.

2.2.9 **Policy 2.3** provides an overarching policy for the appropriate location of waste management infrastructure. The proposed fuel supply is waste wood arisings that are usually sourced on a regional basis and therefore part d) of the policy applies. In this regard it is notable that:-

i. the site is sustainably located within the waste supply area to minimise transport impacts both in and outside the county;

ii. the ultimate goal of the application is to secure a sustainable energy supply to the operations at Cheddleton, and therefore only alterative locations on site have been considered;
iii. the scheme is of a scale and size which is proportionate and appropriate to the area;
iv. the ES that accompanies this application indicates that the scheme can avoid causing unacceptable adverse impacts; and
v. the overall (economic, social and environmental) benefits outweigh any material adverse effects identified under the EIA that accompanies this application.

It is therefore considered that the applications are broadly consistent with **Policy 2.3.**

2.2.10 **Policy 3.1** sets out the general requirements for new and enhanced facilities. In the context of this policy it is notable that:-

i. the processes detailed within the application will be fully contained within well designed purpose built structures appropriate to the technology and process;
ii. the application includes a programme of phased improvements, which are proportionate to the nature of the application, in order to bring the whole site up to modern standard;
iii. the scheme is considered to be compatible with nearby uses, and appropriate in scale and character to its surroundings;
iv. the proposals are fully integrated with the existing activities which form part of an integrated waste management facility at the site. The proposals will provide a more sustainable energy supply to the site which is considered to demonstrate an overall enhancement of the site; and,
v. the application includes a full development description on plant, process and capacity. This is detailed in the ES that accompanies this application.

It is therefore considered that the application are broadly consistent with **Policy 3.1.**

2.2.11 **Policy 4.1** sets out the sustainability criteria for new proposals, and includes for 12 specific criteria. It is considered that the proposals are wholly consistent with all criteria apart from ix-xii inclusive that are not considered to be relevant.

2.2.12 **Policy 4.2** sets out an overarching environmental protection policy. This application is accompanied by an Environmental Statement which confirms that no substantial adverse impacts are associated with the proposals. As such it is considered that the application is wholly consistent with **Policy 4.2** of the WLP.

Staffordshire Moorland Local Plan

2.2.13 The Staffordshire Moorlands Core Strategy Development Plan Document ("CS") was adopted in March 2014 and has a plan period through until 2026. On the policy map that accompanied the CS it is noted that the site is within a Special Landscape Area designation and is in proximity to a green belt designation.

2.2.14 Chapters 1 of the CS sets out the policy and regulatory context, whilst Chapter 2 provides a spatial portrait of the plan area. This acknowledges the slow growth of the economy in the plan area, but also that *"the District presents many opportunities for new industries and enterprise which, with the right level of support and intervention, will allow the District to play a positive role in the Region's economic growth and prosperity".*

2.2.15 Similar to the WLP, Chapter 3 of the CS considers the key issues that impacted on the development of the policy. Relevant issues to the site and the proposals detailed within this application include:-

- the need to ensure land identified for development makes the best use of resources and does not compromise future needs and is deliverable;
- the importance of working in partnership with other organisations and groups to deliver this growth and the necessary infrastructure improvements;
- the need to support existing major employers whilst developing policies to diversify the economic base by making sites available for modern employment facilities; and
- planning has a key role to play in mitigating the causes and effects of climate change through the location and nature of development and by helping to shape places which have lower carbon emissions and are resilient to climate change.

2.2.16 Chapters 4 and 5 of the CS sets out the visions and objectives for the plan, and it is considered that the proposals detailed within this application are consistent with and support a number of the strategic objectives including SO2, SO3, SO6 and SO8. Chapter 6 seeks to apply a hierarchy approach to development

indicating that "*the proposed development approach is one which focuses development on the 3 market towns of Leek, Cheadle and Biddulph and the larger villages but allows for limited development of other settlements to meet local needs and targets areas in need of regeneration."* The proposals set out within this application are being promoted for a specific need in relation to the wider site.

2.2.17 This approach is reflected in the Spatial Strategy in Chapter 7 of the CS which in respect of rural environs indicates that "*Development will be targeted to provide for local need, with affordable housing, shops, local services, community facilities and low impact businesses of a scale and nature appropriate to those settlements*". This approach culminated in **Policy SA3** which the proposals are considered to be wholly consistent with.

2.2.18 Chapter 8 sets out the core policies that will govern development during the plan period. These policies cover both spatial and development control tiers. **Policy SS1** provides an overarching framework in which the council expresses an aim that "*the development and use of land to contribute positively to the social, economic and environmental improvement of the Staffordshire Moorlands".* The policy goes on to confirm that that *"New development will make the best use of previously developed land and buildings and will follow a sequential approach to the sustainable location of development".* These themes underpin this application.

2.2.19 The positive approach to development is also carries though into **Policy SS1a** which confirms the presumption in favour of sustainable development, stating *"Planning applications that accord with the policies in this Core Strategy (and, where relevant, with polices in neighbourhood plans) will be approved without delay, unless material considerations indicate otherwise".*

2.2.20 The sub area strategies defined in policies **SS2-SS5** aren't considered to be relevant to this application, the nature of the proposal means the scheme falls outside the scope of **Policy SS6. Policy SS6a** confirms that in the areas around larger villages (such as Cheddleton) the council will for opportunities for *"improving and intensifying the use of existing employment areas and, where appropriate, expanding them".*

2.2.21 **Policy SS6c** is the main policy under which the proposals at the site can be considered. Within the policy the council indicates that *"These areas will provide only for development which meets an essential local need, supports the rural diversification and*

sustainability of the rural areas". The CS indicates that the Council and its partners will achieve this through a range of actions including by *"enabling the limited expansion or redevelopment of an existing authorised business for employment uses.*

2.2.22 Whilst the site is located within the Churnet Valley it is considered that the proposal detailed within this application fall out with the scope of **Policy SS7** of the CS.

2.2.23 The chapter goes on to consider sustainability policy, and it is notable that the aspiration to provide a greener, lower carbon cheaper energy supply to this industrial operations undertaken at the wider site, allied with the appropriate re-use of brown field land is wholly consistent with both **Policies SD1 and SD2.**

2.2.24 The assessments that have been submitted in support of this application confirm that the proposals can be undertaken without significant adverse impacts on either air, land, noise, or water, and as such are wholly compliant with **Policy SD4.**

2.2.25 In the context of the economy the proposals have the scope to generate new employment roles at a site that already employs a significant number of people in an otherwise predominantly rural area, and is therefore a significant employer in the local area. **Policy E1** confirms that *"The sustainable redevelopment, intensification or improvement of existing employment sites for new business and industrial developments will be supported provided it would not have an unacceptable impact on the amenities, character or appearance of the area and is in compliance with other policies in the Core Strategy".* The proposals along with the assessments undertaken indicate full compliance with this policy criterion.

2.2.26 Chapter 8.7 of the CS considers design and conservation policies with **Policies DC1-DC3** highlighting key themes in this regard. Policy **DC1** highlights the need for proposals to respect the setting in which they are located and incorporate techniques and designs to reduce local and global impact of development. The project at Cheddleton has gone through a design evaluation process that seeks to maximise the supply of low carbon renewable thermal and electrical energy. The design of external appearance of the proposed plant has been subject to design input from specialist landscape and air quality advisors respecting the landscape setting of the wider area and the visual characteristics of the immediate area, along with the requirements of the Industrial Emission Directive.

2.2.27 The scheme does not include for car parking capacity, as this is adequately provided in other parts of the site. However, there will be a modification to the landform which will also necessitate changes to the drainage regime on site. The drainage infrastructure along with waste water and sewage infrastructure will be designed to enable the development to proceed.

2.2.28 Policy **DC2** relates to the historic environment and in this regard it is notable that there are three Listed Building Assets at Fell House Farm. Each a Grade II Listed, and although of National Significance are not as important as Grade II* and Grade I assets. The LVIA reproduced at Appendix 1 of the ES indicates that although impacts may be generated, these would only by of moderate significance, and will not impact on the primary setting and/or the understanding of these heritage assets.

2.2.29 In respect of Policy **DC3** the LVIA reproduced at Appendix 1of the ES indicates the following:

1. the proposed development would share many of the same characteristics of the wider premises including style, colour and mass. The reports submitted conclude that there would be no significant adverse effects on landscape elements or character, although there would be a limited intensification in industrial character within the local landscape types. When viewed against the existing permitted development, however, the effects are negligible;
2. the existence of a locally industrialised landscape is reflected in the development scheme;
3. the design of the proposed units respects the existing size, mass, colour and style of existing units on site and incorporates systems to maximise the efficiency of the processes proposed therein.
4. the application site is not within open space and is not part of a wider green infrastructure network; and
5. the proposals recognise the special scenic quality of the PDNP and of the more local Churnet Valley. Whilst a local level of impact would be experienced, analysis has shown that the proposals will not adversely affect the objectives of the Churnet Valley master plan and will not adversely impact on the setting or enjoyment of the PDNP.

Accordingly it is considered that the proposals are fully compliant with Policy DC3.

2.2.30 Chapter 8.8 of the CS provides policies a further tire of policy on development in rural areas. **Policy R1** acknowledges the scope for rural diversification subject to not creating adverse

impacts, in particular on the green belt. In this regard the wider operations are long established and of major significance and the proposed development is designed to meet the energy needs of the established use in a sustainable and environmentally acceptable manner.

2.2.31 The remainder of the policy content is not considered to be relevant to the proposals detailed within this application. It is acknowledged that the council are developing other DPD's (such as a site allocation DPD), but again the nature and scale of the proposals fall outside the scope of this emerging policy. As such it is concluded that the proposals confirm in full with the Development Plan for Staffordshire Moorlands Council.

2.3 National Planning Policy

2.3.1 The National Planning Policy Framework ("NPPF") document was published on 27 March 2012 and sets out the government's requirements for the planning system, reiterating the fact that planning law requires that all applications for planning permission must be determined in accordance with the Development Plan unless material considerations indicate otherwise. The guidance has superseded previously published Planning Policy Statements and guidance notes, in particular insofar as it relates to the proposed development, it replaces PPS1, PPS4, PPS9, PPG13, PPS22 and PPS23 as referenced within the planning statement which accompanied the application.

2.3.2 The Ministerial Foreword that accompanies the NPPF highlights that the purpose of planning is to aid and facilitate sustainable development, with "sustainable" being defined as aiming to create better lives for ourselves in the present without compromising the quality of life for future generations. "Development" on the other hand relates to growth in both an economic and quality of life sense.

2.3.3 The NPPF confirms that the globally recognised definition of sustainable development as provided by the United Nations General Assembly is *"development which meets the needs of the present without compromising the ability of future generations to meet their own needs"* and highlights that the UK Sustainable Development Strategy is based on five guiding principles, as follows:

1) living within the planet's environmental limits;
2) ensuring a strong, healthy and just society;
3) achieving a sustainable economy;

4) promoting good governance; and
5) using sound science reasonably.

2.3.4 The three dimensions to sustainable development are reaffirmed as being economic, environmental and social, and as such these are key focus areas of planning policy provided throughout the NPPF.

2.3.5 Paragraph 8 highlights that to achieve sustainable development, economic, social and environmental gains should be sought in tandem through the planning system with the aim of improving the built, natural and historic environment.

2.3.6 Paragraph 15 further reaffirms the presumption in favour of sustainable development, explicitly stating that *"policies in local plans should follow the approach of the presumption in favour of sustainable development so that it is clear that development which is sustainable can be approved without delay".*

2.3.7 In respect of the deliverability of sustainable development, paragraph 18 of the NPPF confirms that the government is committed to securing economic growth in order to create jobs and prosperity, building on the country's inherent strengths, and meeting the twin challenge of global competition and of a low carbon future. The following paragraph confirms that the government is committed to ensuring that the planning system does everything possible to support sustainable economic growth and that *"planning should operate to encourage and not act as an impediment to sustainable growth."*

2.3.8 In the context of the planning application, the proposed development has been designed to deliver benefits across the three dimensions of sustainable development. In terms of the main environmental benefit of the proposed development, this is essentially generation of energy with significantly fewer carbon emissions than generation of the same energy using fossil fuels and therefore has less impact on climate change and air quality.

2.3.9 In terms of the economic and social benefits of the proposed development, as highlighted within the Supporting Planning Statement, a significant number of jobs will be created during both the construction and operation of the development which will complement the significant employment roles already maintained at the site. The site's situation in a rural context and these proposals for growth are entirely consistent with paragraph 28 of the NPPF.

2.3.11 As highlighted within the Environmental Statement, heat produced will be made available for use in the adjacent industrial premises replacing heat energy derived from fossil fuel fired boiler systems currently in place.

2.3.12 Section 4 of the NPPF sets out policy in regard to promoting sustainable transport. Paragraph 30 states that *"encouragement should be given to solutions which support reductions in greenhouse gas emissions and reduce congestion".* Paragraph 32 additionally states that all developments that generate significant amounts of traffic movements should be supported by a Transport Statement or Transport Assessment.

2.3.13 In the context of the proposed development, a Transport Assessment was undertaken as part of the previous planning applications which incorporated site access design. The assessment concluded that the proposed 16 daily vehicle movements (plus 2 on a weekly basis) will have no material impact on the adjacent highway network and there are no specific issues which would warrant the implementation of mitigation measures given the recently established purpose built access from the wider site to the public highway.

2.3.14 Paragraph 35 highlights that Local Plans should protect and exploit opportunities for the use of sustainable transport modes for the movement of goods and vehicles and sets out a series of factors that should be considered when putting together proposals. These factors are as follows:

- accommodate the efficient delivery of goods and supplies;
- give priority to pedestrian and cycle movements, and have access to high quality public transport facilities;
- create safe and secure layouts which minimise conflicts between traffic and cyclists or pedestrians, avoiding street clutter and where appropriate establishing home zones;
- incorporate facilities for charging plug-in and other low level emission vehicles; and
- consider the needs of people with disabilities by all modes of transport.

2.3.15 The proposals will be developed on land within the confines of the existing industrial operations t which access for the general public is restricted. Notwithstanding the design scheme incorporates changes to the internal site layout so as to allow the safe movement of vehicles that will access the REF.

2.3.16 Section 7 of the NPPF relates to the design of the built environment. Paragraph 56 states that good design is a key aspect of sustainable development. Paragraph 57 highlights that *"it is important to plan positively for the achievement of high quality and inclusive design for all development including individual buildings, public and private space and wider area development schemes".*

2.3.17 The "built" elements of the proposed development have been designed to take account of the location in which the site is situated and adequately incorporate both operational and health and safety requirements. No public access infrastructure has been incorporated due to the nature and scale of processes envisaged.

2.3.18 As is highlighted within the Design, Access and Sustainability Statement (see below), careful consideration has been given to both the occupational environment to ensure that the facility can be constructed and operated efficiently and with minimal exposure to sensitive plant and equipment.

2.3.19 The proposed development has also been designed to be sustainable and serve as a long term asset for this established industrial location.

2.3.20 Paragraph 65 further highlights that local planning authorities should not refuse planning permission for buildings which promote high levels of sustainability on the basis of concerns about incompatibility with an existing townscape if these designs have been mitigated by good design.

2.3.21 The protection of Green Belt land is embodies in Section 9 of the NPPF. Paragraphs 79-80 provide clarification on the fundamental importance of this designation in the planning system. The Green Belt in the District of Staffordshire Moorlands has been well defined for some time, but has accommodated industrial development on and in the vicinity of the site in a sustainable manner over the past 50 years.

2.3.22 The application is entirely consistent with paragraph 89 of the NPPF which confirms that certain forms of development are not inappropriate in the Green Belt. These include:

- limited infilling or the partial or complete redevelopment of previously developed sites (Brownfield land) whether redundant or in continuing use, which would have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development.

These elements are relevant to the proposals set out within this application and therefore no conflict with this core fundamental policy exists and it is therefore suggested that there is no requirement to prove very special circumstances.

2.3.23 It is also notable that as part of the 2010 decision (refer Section 2.1 above) Staffordshire Moorlands Council has already accepted in principle the establishment of a power generation facility at this location.

2.3.24 Section 10 of the NPPF relates to meeting the challenge of climate change, flooding and coastal change. Paragraph 93 specifically states that planning plays a key role in helping shape places to secure radical reductions in greenhouse gas emissions, minimising vulnerability and providing resilience to the impacts of climate change, and supporting the delivery of renewable and low carbon energy and associated infrastructure.

2.3.25 Paragraph 95 highlights that local planning authorities should plan for new development and ways which reduce greenhouse gas emissions. Paragraph 97 further sets out a number of development-orientated objectives that local planning authorities should consider to facilitate energy generation for renewable and low carbon sources, which are as follows. Local Planning Authorities should:

- have a positive strategy to promote energy from renewable and low carbon sources;
- design their policies to maximise renewable and low carbon energy development while ensuring that adverse impacts are addressed satisfactorily, including cumulative landscape and visual impacts;
- consider identifying suitable areas for renewable and low carbon energy sources, and supporting infrastructure where this would help secure the development of such sources;
- support community-led initiatives for renewable and low carbon energy, including developments outside such areas being taken forward through neighbourhood planning; and
- identify opportunities where development can draw its energy supply from decentralised, renewable or low carbon energy supply systems and for co-locating potential heat customers and suppliers.

2.3.26 The proposed development seeks to provide a renewable, reliable and sustainable form of energy through the re-use of materials that could otherwise be disposed of at landfill.

2.3.27 In direct reference to the final bullet point above, the need to co-locate potential heat customers and suppliers to provide a decentralised supply of renewable energy was a key factor in the site selection process, with the potential heat customers being identified before the proposal itself was put together.

2.3.28 Suitable high density heat loads were identified, that were both technically capable and economically viable to connect with pre-insulated underground heating pipelines. A suitable grid access point was then identified. A site in a suitable and industrial landscape was finally identified to bring the proposals together.

2.3.29 The main environmental benefit is that there will be a significant reduction in carbon and greenhouse gas emissions if the same energy were to be generated using fossil fuels.

2.3.30 Paragraph 98 states that Local Planning Authorities should not require applicants for energy development to demonstrate the overall need for renewable or low carbon energy, recognising that even small scale projects such as that which is proposed provide a valuable contribution to cutting greenhouse gas emissions.

2.3.31 The same paragraph of the NPPF also goes on to state that local planning authorities should approve such an application if its impacts are (or can be) made acceptable through the use of appropriate planning conditions.

2.3.32 Section 11 of the NPPF relates to conserving and enhancing the natural environment and Paragraph 109 confirms that the planning system should contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes, recognising the wider benefits of eco-system services, minimising impacts on biodiversity and providing net gains in biodiversity where possible, contributing to the government's commitment to halt the overall decline of biodiversity by establishing coherent ecological networks that are more resilient to current and future pressures.

2.3.33 Paragraph 110 goes on to state that *"in preparing plans to meet development needs, the aim should be to minimise pollution and other adverse effects on the local and natural environment and that plans should allocate land with the least environmental or amenity value where consistent with other policies in this Framework."*

2.3.34 In the context of the proposed development, the proposals are designed to be sensitive to the local environment in which the

site is situated and a full suite of environmental and technical assessments was undertaken as part of the EIA process.

2.3.35 Paragraph 113 highlights that planning authorities should set criteria-based policies against proposals for any development on or affecting protected wildlife or geodiversity sites or landscape areas and that distinctions should be made between the hierarchy of international, national and locally designated sites, so that protection is commensurate with their status and gives appropriate weight to the importance of contribution that they make to the wider ecological networks.

2.3.36 Paragraph 114 goes on to state that planning authorities should set out a strategic approach in their local plans *"planning positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure".* Paragraph 118 further states that local planning authorities should aim to conserve and enhance biodiversity by ensuring that significant harm resulting from development is avoided or adequately mitigated or compensated for.

2.3.37 In respect of pollution and contamination, Paragraph 120 highlights that responsibility for securing a safe development rests with the developer and/or landowner. As was highlighted within the Environmental Statement, if required a land contamination study can be undertaken and a management strategy prepared prior to the commencement of development in accordance with CDM Regulations.

2.3.38 Paragraph 122 additionally goes on to state that local authorities should focus on whether the development itself is an acceptable use of the land, and the impact of the use, rather than the control of processes or emissions themselves where these are subject to approval under pollution control regimes, and that where a planning decision has been made on a particular development, the planning issues should not be revisited through the environmental permitting regimes operated by pollution control authorities.

2.3.39 As is highlighted within the Environmental Statement, the application site has been identified as essentially brownfield land within an established industrial setting.

2.3.40 Planning policy in respect of the noise impacts of a proposed development is provided at Paragraph 123 of the NPPF. The paragraph highlights that *"planning policies and decisions should aim to avoid noise from giving rise to significant adverse impacts on health and quality of life as a result of new*

development". However it states that development will often create some noise.

2.3.41 In respect of air quality, Paragraph 124 confirms that planning policies should sustain compliance with and contribute towards national objectives for pollutants, taking into account the presence of Air Quality Management Areas, and that new development should be consistent with the local Air Quality Action Plan. Furthermore, Paragraph 125 encourages a good design (of built development) to limit the impact of light pollution from artificial light on local amenity and nature conservation.

2.3.42 In regard to the proposed development, the potential for adverse impacts in respect of noise and air quality at the application site were identified at the design stage. Noise and Air Quality Assessments have been prepared in support of this application, and are appended to the Environmental Statement. The Noise Assessment found that the noise levels generated by the development would be well within acceptable limits for noise sensitive properties. In respect of air quality, emissions to air from the stacks were also found to be within acceptable limits.

Planning Practice Guidance

2.3.43 In order to support and develop the themes set out in the NPPF, central government has released 41 Planning Practice Guidance documents. These provide guidance on administrative matters such as "Consultation and Pre-Decision Matters", environmental matters such as "Air Quality", and topic-specific matters such as "waste".

2.3.44 The following PPGs have been reviewed in support of this policy review:

- conserving and enhancing the historic environment;
- waste;
- natural environment; and
- noise.

Addressing each in turn.

Conserving and Enhancing the Historic Environment

2.3.45 The application site is located in an area of complex historical development, with important archaeological and cultural heritage assets in close proximity. The need to protect such assets is clearly articulated in the NPPF and attendant planning

legislation. It is recognised that heritage assets are an irreplaceable resource and therefore a flexible and thoughtful approach is required for the evaluation of, as yet undiscovered, areas of archaeological interest.

2.3.46 Under the decision making heading, the term significance is key in being able to assess the nature, extent and importance of a given heritage asset. The significance of the archaeological remains of the site has been the subject of much pre-application discussion between the applicant and the MPA. The majority of the PPG is associated with where the development directly affects a heritage asset. However, where assets are not designated the PPG notes that local planning authorities should provide a "proportionate response" when undertaking decision making in such a situation.

Waste

2.3.47 The Waste PPG identifies that there may be significant changes in, for example, technological impact and land ownership that occur over a short period of time and provide opportunities for the development of waste management infrastructure at un-allocated sites. In relation to this site it is notable that consent already exists for a waste related use.

2.3.48 In this regard the PPG goes onto indicate that it is be important to consider both permissions granted and additions to the stock of waste management facilities, both by waste management type and by waste stream. WPA's should be taken of any sites that have been closed, completed, or that have reached the end of their lifetime. As the consent for the current waste use has not been implemented as the technology is no longer viable, the proposed change in approach detailed within this application is broadly consistent with policy guidance in this regard.

Natural Environment

2.3.49 The Natural Environment PPG considers three distinct topics: Landscape; Biodiversity; and Brownfield Land, Soils and Agricultural Land. Under the Landscape heading, the importance of character is noted as one of the core principles of the NPPF. This applies to both nationally important landscapes and the wider countryside. The vast majority of this section of the PPG is related to nationally important designations (ie National Parks, AONBs, etc).

2.3.50 Under Biodiversity, Ecosystems and Green Infrastructure, the PPG notes the importance of the Rural Environment and Rural

Communities Act 2006, in placing a duty on planning authorities to conserve biodiversity. Whilst this is achieved primary through forward planning and liaison with interested stakeholders, the PPG does confirm that consideration of such matters should also be taken into account when preparing a planning application.

2.3.51 Under such circumstances an ecological survey is confirmed as being necessary, with pre-application discussions with the district/county ecologist informing the level of work required. Planning authorities should however only require such surveys where clearly justified. Assessments should be proportionate to the nature and scale of the development.

2.3.52 The section of the PPG goes on to provide decision making tools for planning authorities and guidance on how mitigation measures can be ensured.

2.3.53 Finally, under the Brownfield land, soils and agricultural land heading, the PPG notes the ecological value of Brownfield land, but more importantly in the context of these proposals, considers the importance of soils and ALC, with Natural England confirmed as the statutory body in this regard.

Noise

2.3.54 The Noise PPG confirms that noise should be considered when *"new developments may create additional noise …".* The PPG offers guidance on the determination of noise impacts, consistent with the Explanatory Note on the Noise Policy Statement for England, and provides guidance on recognition of when noise could be a concern, setting out a noise exposure hierarchy. It is considered that the proposals at Fairlop would fall under the "noticeable and intrusive" heading, reducing to "not intrusive" with mitigation.

2.3.55 Whilst no adverse effects have been identified, the use of engineering, layout design and appropriate planning conditions as broad types of mitigation will ensure that the development can be undertaken in accordance with the approved guidance.

National Planning Policy for Waste

2.3.56 It is recognised that central government have recently adopted a National Planning Policy for Waste, which *"sets out the Government's ambition to work towards a more sustainable and efficient approach to resource use and management".*

Paragraph 1 of the document confirms that positive planning is key in delivering a sustainable waste regime.

2.3.57 At Paragraph 4 the importance of co-location of waste management activities is noted (such as at Chedderton) as is the re-use of previously developed land.

2.3.58 The document is primarily focused on developing suitable planning policy documents, but at paragraph 7 has specific guidance in relation to the determination of planning applications. The Paragraph confirms that the planning authority and applicants need to consider the commercial need for the scheme, the scope for environmental impact (whilst not getting bogged down in process) assuming that the pollution prevention regime will be properly applied and enforced.

2.4 Energy and Climate Change Policy

2.4.1 In addition to the planning policy guidance notes discussed above, the government has also published a variety of guidance notes and policy documents focused around specific energy sectors, renewable energy and reducing carbon emissions, all of which are of direct relevance to, and supportive of, the proposals set out within this application.

2.4.2 The government policy documents and guidance notes of specific relevance to the planning application include, but are not limited to:

- 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 Climate Change Programme;
- The UK Renewable Energy Strategy (2009);
- The UK Low Carbon Transition Plan (2009); and
- The UK Low Carbon Industrial Strategy (2009).

2.4.3 Various targets for carbon reduction and improvements in energy infrastructure, including increased contribution from renewable energy infrastructure, are set out within the policy documents and guidance notes; however, the aims and objectives of each document are generally broadly similar. Furthermore, it is the stated objective of the UK Government to see decentralised energy production competing alongside other

sources and that there should be more schemes brought forward that put waste heat to better use.

2.4.4 The Energy White Paper 2003 identifies three energy challenges, including climate change, decline of the UK's indigenous energy supplies, and the need for competitive markets to keep energy costs down.

2.4.5 Under the Kyoto Protocol, the government is committed to reducing greenhouse gas emissions by 12.5% below 1990 levels by 2012, reducing carbon dioxide (CO2) emissions by 20% by 2020, and reducing CO2 emissions by 60% by 2050. Under the Climate Change Act 2008, the target for reducing greenhouse gas emissions is set even higher at 80% by 2050.

2.4.6 Whilst a move towards being more energy efficient is one way of reducing greenhouse gas and CO2 emissions, increasing the energy contribution from renewable energy sources is a long-term and sustainable way of accommodating a national reduction in greenhouse gas emissions.

2.4.7 Under the UK Climate Change Programme and other policy documents, the government is striving to increase the proportion of electricity generated from renewable sources to 20% by 2020. Under the UK Renewable Energy Strategy, the target for energy generated from renewables has been set at 15% by 2020.

2.4.8 Whilst government targets for renewable energy generation and reducing CO2 and greenhouse gas emissions may vary from policy documents and document, there is generally an upward-moving trend in the target towards cleaner and renewable energy technologies.

2.4.9 Under the UK Renewable Energy Strategy (2009) and the UK Low Carbon Industrial Strategy (2009), the target for sourcing 15% of energy from renewable sources is further reaffirmed, and wood-based fuels are highlighted as viable and a potential renewable energy fuel source.

2.4.10 Whilst the proposals for the renewable energy facility set out within this submission are relatively small-scale in a national context, there will be significant reductions in CO2 emissions through the generation of electricity using wood-based fuel sources in place of electricity generation using fossil fuels.

2.4.11 Total savings of CO2 from the proposed energy facility will provide a significant opportunity to meet the government's

(both local and national) broader aims for energy generation and climate change reduction.

SECTION 3 DESIGN ACCESS AND SUSTAINABILITY STATEMENT

3.1 General

3.1.1 This section of the supporting statement addresses the requirements of Circular 01/2006 and the Planning and Compulsory Purchase Act 2004, so far as the need for a formal design and access statement is required to accompany the planning application for the proposed development. Regard has also been made to Staffordshire Moorland Councils published guidance on the requirements of a Design and Access Statement.

3.1.2 This section of the supporting statement has also been prepared with full regard and is in accordance with the requirements of the Confederation for Architecture in the Built Environment ("CABE") Best Guidance Practice Guidance note.

3.2 Design Statement

3.2.1 This design statement has been prepared in connection with the proposed development and examines the following key design principles:

- site context and use;
- layout and scale; and
- landscaping and appearance.

Site Context and Use

3.2.2 The application site is situated in the long-established John Pointon and Sons site at Cheddleton. The location of the application site in the context of the wider local area is illustrated on the plan attached.

3.2.3 The application site is centered on Grid Reference SJ 97591 50467 and extends across an area of approximately 2.24 hectares and is wholly within the footprint of the established industrial operations.

3.2.4 The application site comprises a cleared terrace of land immediately between operational units on the Pointins site..

3.2.5 In terms of current land uses, the application site is situated within a predominantly rural setting. However, land uses in the immediate vicinity of the application site include industrial based (B1, B2 and B8) associated with the existing operations undertaken by J Pointon & Sons. However, there are also

residential land uses nearby, with Fellhouse Farm located approximately 100 m to the north-east which has been a key factor in the design of the proposals.

3.2.6 Based on the historical context and existing landuses, the proposals are located in an appropriate context and once established, will have a use that is complementary to the adjacent industrial activity.

Layout and Scale

3.2.7 The proposed development is essentially for the construction and operation of a renewable energy centre within the confines of the site at Cheddleton.

3.2.8 .Full details of the proposed site layout are illustrated on the plans redroduced at appendix 6 of the Environmental Statement.

3.2.10 In regard to the internal layout of the buildings this is illustrated on the layout plan appended to the Environmental Statement. The internal layouts of the buildings have been designed to simplify the process flow element of the system. The electricity generation equipment requires strict design rules controlling the best use of layout and space to maximise the efficiency of each component.

3.2.11 Appendix 6 of the ES also includes all four elevations of the proposed plant and equipment

3.2.12 The maximum height of the building itself will be 20.5 m, although incorporating the emission stacks, this will be up to 35 m. The scale of the proposed unit is indicative of existing industrial units on the existing site, as is the proposed stack.

Landscaping and Appearance

3.2.13 As stated previously, the application site is situated within an established industrial area and is relatively isolated from residential land uses. Notwithstanding, natural visual screening is provided by the existing established vegetation along the eastern, southern and western perimeters. Existing industrial premises are located to the south and west of the application site.

3.2.14 In addition to the above-mentioned windows, doors and access points, the external components of the proposed building will also comprise faced blockwork and flat platisol sheeting panels.

The majority of the building will be painted to colour RAL 6002, Leaf Green, as it was considered that this would blend in with the surrounding green infrastructure and not be as visually obtrusive as other bolder colours. However, this may be subject to change following consultation.

3.2.15 The modular/regular appearance of the unit is also indicative of the industrial architecture of the wider site. The primary building will also be supported by secondary plant and equipment such as silos, skips and adiabatic condensers required to operate the plant in accordance with regulatory requirements.

3.3 Access Statement

3.3.1 This access statement has been prepared in accordance with the guidance set out in the CABE Good Practice Guidance note that accompanies the requirements of Circular 01/2006.

3.3.2 The application site is located off Bones Lane and benefits from. an established means of access for industrial development with subsequent access onto the A520.

3.3.3 Full details of the access design are highlighted within the development scheme reproduced at appendix 6 to the Environmental Statement.

3.3.4 Internal to the application site the proposed design and layout of the building in relation to the external ancillary facilities seeks to employ a one- way system, although the need for HGVs reversing to deposit incoming loads is unavoidable. The design will include provisions to provide clear instructions to HGV drivers.

3.3.5 On the basis of the above it is concluded that the design of the application site and proposed access arrangements adequately incorporate both operational and health and safety requirements with sufficient environmental and amenity control measures in place. The application site has also been designed to be sustainable and serve as a long term asset for the community from a social, economic and environmental perspective.

SECTION 4 SUSTAINABILITY STATEMENT

4.1 As part of the design stage of the proposed development, it was necessary to ensure that the development not only avoids significant adverse impact on the environment and public amenity but also has a positive impact on the environment, society and local economy where possible.

4.2 The proposed development would also bring an innovative, renewable and clean technology to the site and enable the substitution of fossil fuels in an established industrial process..The technology itself has been successfully used across Europe for many years and would be an economic and technological asset for the city.

4.3 Valuable use would also be made of the wood fuel which would otherwise be treated as a waste material.

4.4 Local Planning Policy indicates that all new buildings must be designed to reduce emissions of greenhouse gases and function in a changing climate. The very nature of 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. Notwithstanding, the building itself has been designed to be energy efficient. In addition, heat energy from the process will be put to use in the supply to a local housing estate.

4.5 The design provides a third biomass fired boiler and, to cope with the available thermal energy at times when the steam demand was low, a single ORC generation plant with an electrical output (gross) of around 6.5 MW.

4.6 In terms of environmental protection, the proposed development has been designed to be sensitive to the surrounding environment. A number of technical studies have also been undertaken in support of the proposed development addressing ecology, air quality, hydrology and hydrogeology, nose and traffic, each of which demonstrated that the proposed development would not have significant adverse impact in these areas.

4.7 Nevertheless, it is recognised that the application site forms part of an Air Quality Management Area and the operations will be regulated under the provisions of an Environmental Permit which will place strict controls on stack emissions and other operational aspects of the plant, as well as a statutory requirement for continuous 24/7 monitoring.

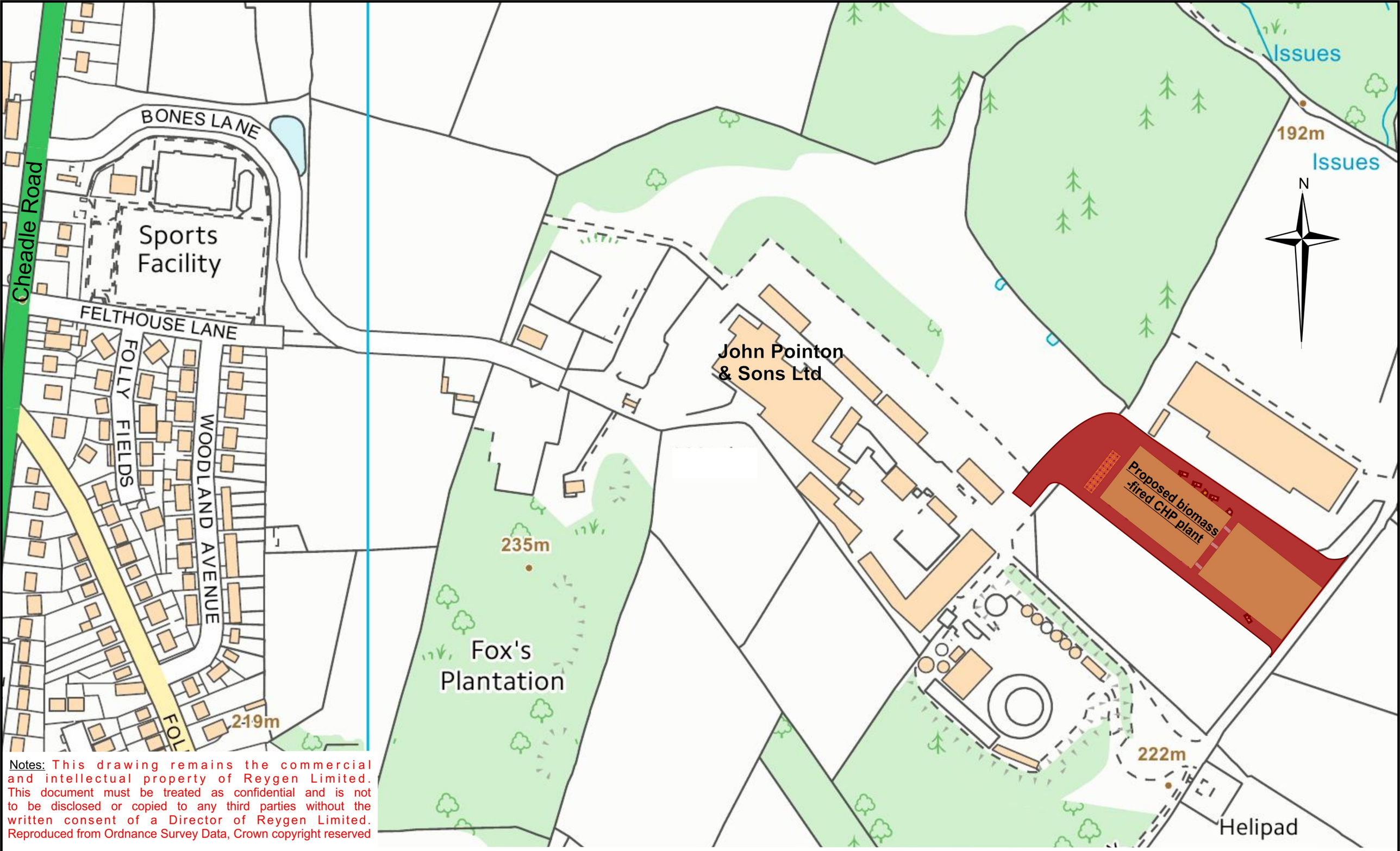
4.8 The Permit will also regulate the management and use of water resources on site and the storage and use of thermal oils, lubricants and any chemicals used in the process. The Permit will be subject to regular inspection and enforcement by the Environment Agency to ensure the installation is operated in an appropriate manner.

4.9 The development has been designed to take account of operational requirements and health and safety factors, and a number of environmental and amenity controls are proposed. The technology to be used in the electricity generation is of a proven successful and highly sustainable design that can be easily constructed via a modular system.

4.10 Careful consideration has been given to both the occupational environment and the ancillary educational facilities to ensure that the facility can be constructed and operated efficiently and with minimal exposure to sensitive plant and equipment.

Summary

4.11 On the basis of the above it is concluded that the design of the application site and proposed access arrangements adequately incorporate both operational and health and safety requirements with sufficient environmental and amenity control measures in place. The application site has also been designed to be sustainable and serve as a long term asset for the community from a social, economic and environmental perspective.



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Project
PROPOSED BIOMASS CHP PROJECT FOR JOHN POINTON & SONS

Title
SITE LOCATION PLAN

Scale
1:2,500@A3

Date
4/07/16

Drawn by
SB

Drawing No.
1782/2/004A3b

Rev.