

## CHAPTER 10: WASTE MANAGEMENT

### INTRODUCTION

**Objections to First Deposit**

1080/194 – WMFOE.

**Objections to Revised Deposit**

There were no objections to the Revised Deposit draft

**Key issues**

- *Should the chapter be entitled “Resource Management”;*
- *Should the Council be more ambitious in its use of resources, using resources from within the waste stream to create jobs, minimising consumption of natural resources and establishing new industries;*
- *Should the Plan specify when kerbside collection will commence.*

**Inspector’s reasoning and conclusions**

- 10.1 These objections relate to a rather different philosophy on the use of resources and management of waste than the SUDPR currently envisages. The current title of the chapter clearly relates to the management of waste, rather than the wider use of resources. I am therefore satisfied that this is the most appropriate title and that the chapter covers relevant waste management matters.
- 10.2 Para 10.0.5 confirms that the policies and proposals of the SUDPR have been designed to enable Solihull to achieve the most sustainable waste management system possible within its resources, reflecting the principles in PPG10 and the Government’s *Waste Strategy 2000*. It also reflects the principles of *Best Practicable Environmental Option* (BPEO) set out in these documents, whilst Rev 10/4 & 10/5 give greater emphasis to reduction and re-use of waste. I understand that the *Waste-to-Energy* incineration plant at Coventry plays an important part in reducing the volume of waste going to landfill, in line with the national waste hierarchy. The Packington landfill site also plays a part in waste disposal and composting.
- 10.3 SMBC is addressing the need to increase the recycling of waste by enlarging the existing waste transfer station at Bickenhill (Proposal WM6/1) and through the centralised composting facility at Packington. Criteria for the development of materials recycling facilities, composting and waste transfer stations are set out in Policies WM2, WM5 & WM6. Overall, the Review seeks to provide a framework of policies controlling development, within which other strategies, such as the *Waste Minimisation, Recycling & Recovery Plan [CD110]*, can deliver sustainable waste management initiatives. Consequently, I am satisfied that the introduction to this chapter provides an appropriate and sustainable context for the policies and proposals that follow.
- 10.4 Kerbside collections are mentioned in para 10.2.7, but I understand that SMBC is not able to give a firm date for the commencement of a full collection service at present. No doubt if further information becomes available before the Plan is adopted, it will be incorporated in this section of the Plan. Issues such as renewable energy are covered in Policy ENV24.

**Recommendation**

**10.5 I RECOMMEND NO MODIFICATIONS to the Plan to meet this objection.**

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## POLICY WM1: WASTE STRATEGY

### **Objections to First Deposit**

1338/389 – Warwickshire County Council;  
1419/973 – Trustees of the Berkswell Estate.

### **Objections to Revised Deposit**

There were no objections to the Revised Deposit draft

### **Key issues**

- *Does the Plan provide sufficient information to assess whether the policies are adequate to deal with the volumes of waste arising in Solihull, particularly bearing in mind the implications for Warwickshire;*
- *Should incineration with energy recovery be the first option for treating waste, and should waste be handled and recycled in the Borough, rather than being taken to Coventry for incineration.*

### **Inspector's reasoning and conclusions**

- 10.6 Policy WM1 supports the national waste hierarchy for dealing with waste, referring to the BPEO, the proximity principle and regional self-sufficiency. Rev 10/2 (¶ 10.0.2) adds some additional information about current and projected waste levels arising from Solihull, with further information being given in CD145.
- 10.7 WCC is particularly concerned about the possible effect on Warwickshire of the future closure of the Packington landfill site. I understand that although the current end-date of this landfill site is 2008, the present operator (SITA) is confident that it can continue until 2011 and beyond. The recycling of waste is increasing and the reliance on landfill is declining, so this suggests that the Packington site may continue well beyond the end of the current Plan period, avoiding any implications for Warwickshire. SMBC has agreed to amend para 10.0.2 to update the information on waste arisings and disposal, to refer to the possibility that Packington landfill could reach capacity before the end of the Plan period, and to refer to the reducing reliance on landfill [SOL-WM1-2 & CD175]. I understand that this clarification satisfies WCC (O/WM1/1338/389/2), and I recommend accordingly.
- 10.8 Although I have limited information on this matter, I have no reason to doubt that incineration of much of Solihull's waste at Coventry accords with the proximity principle, which requires waste to be managed as near as possible to its source. Given the proximity of the Coventry waste incineration plant and Packington landfill site, the treatment of most waste outside the Borough boundary may not necessarily conflict with the proximity principle. Rev 10/9 & 10/12 recognise the need to accommodate changing methods and new technologies in treating waste, in the context of BPEO and the criteria in Policy WM1, including technologies such as Thermal Separation and Anaerobic Digestion. Much will depend on SMBC's waste management strategy and the arrangements for collection and disposal of waste, but in general terms, I am satisfied that Policy WM1 provides an appropriate context for considering waste management proposals, in line with national and regional waste planning policy.

### **Recommendation**

**10.9 I RECOMMEND that the Plan is modified by amending paragraph 10.0.2 in accordance with the amended text set out in SOL-WM1-2 & CD175.**

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**POLICY WM2: MATERIALS RECYCLING FACILITIES (MRFs)**

**Objections to First Deposit** 1069/1052 – GO-WM; 1419/974 – Trustees of the Berkswell Estate.

**Objections to Revised Deposit** There were no objections to the Revised Deposit draft

**Key issues**

- *Is there any conflict between Policy WM2 and the supporting text in terms of meeting the relevant criteria;*
- *Should the Plan refer to the proposed Materials Recycling Facility at Berkswell sand and gravel pit;*
- *Should the Plan give thorough consideration to alternative sites for waste treatment, recycling and recovery, along with energy utilisation and composting.*

**Inspector’s reasoning and conclusions**

- 10.10 Policy WM2 sets out criteria against which to consider proposals for MRFs, referring to industrial and waste transfer/landfill sites as possible suitable sites. Rev 10/10 addresses the apparent inconsistency between Policy WM2 as originally worded and the supporting text, and I understand that these amendments meet GO-WM’s concerns (1069/113RS).
- 10.11 In view of the detailed criteria set out in Policy WM2, I do not consider it is necessary to refer to specific sites where MRFs are proposed, particularly since I am not aware of the current position on the provision of MRFs or the status of the Berkswell sand and gravel pit proposal.
- 10.12 Policies WM2-WM6 set out specific criteria for waste treatment, recycling, recovery and composting sites, including energy recovery where appropriate. Rev 10/12 (¶ 10.2.2) also recognises the development of new technologies to enable recycling and energy recovery. In my view, this gives sufficient consideration to alternative methods and sites for waste management.
- 10.13 I also note that SMBC intends to amend para 10.2.1 to reflect the latest Regional Waste Strategy [RPG11; p.92; Table 5], which anticipates a demand for about 16 recycling and composting facilities and 8 MRFs across the West Midlands metropolitan area by 2021 [CD175]. This would appropriately update this section of the supporting text.

**Recommendation**

**10.14 I RECOMMEND** that the Plan is **modified** by amending paragraph 10.2.1 to update the demand anticipated in the Regional Waste Strategy for additional waste management facilities required, as set out in CD175.

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**POLICY WM3: MINI-RECYCLING (BRING) CENTRES**

**Objections to First Deposit** 1389/1145 – Meriden Parish Council; 1419/975 – Trustees of the Berkswell Estate.

**Objections to Revised Deposit** 1504/172/R – Tidbury Green Residents Association.

**Key issues**

- *Should the Plan make provision for more waste recycling facilities, with improved management and more sophisticated operations, including more selective waste collection;*

- *Should the Plan adopt alternative strategies and technologies to kerbside collection and incineration;*
- *Does Rev 10/15 show proper commitment to recycling.*

### ***Inspector's reasoning and conclusions***

- 10.15 Policy WM3 sets out the criteria for providing mini-recycling ("bring") centres across the Borough, to enable and improve local targets for recycling waste and enable further progress in achieving *Best Value Performance Indicators*.
- 10.16 MPC's original objection requested the provision of recycling facilities for a wider range of materials, including chipping, shredding and composting. SMBC accepts that much remains to be done to achieve the national waste recycling targets, but Policy WM3 supports further mini-recycling centres. As for composting, the main facility serving Solihull is Packington landfill site, which is covered by Policy WM5 and reflects national policy in PPG10 (A10). Paras 10.1.3 & 10.2.2 recognise the potential of new technologies for waste treatment and recycling. Para 10.2.7 also recognises the importance of kerbside and other collections of recyclable materials. However, these are largely dependent on the Council's waste management and collection strategy, rather than directly related to the SUDPR.
- 10.17 Similarly, details of the management and operation of existing and new facilities are largely operational matters, outside the scope of this Plan. Other strategies, such as the *Solihull Waste Recycling Plan (1998)* & *Waste Minimisation, Recycling & Recovery Plan [CD110]*, provide more detailed guidance on these aspects. In response to MPC, I am satisfied that the waste policies of the SUDPR provide a sound framework to influence and consider future proposals for waste management and recycling facilities.
- 10.18 As SMBC says, the SUDPR provides a framework of policies relating to waste management and controlling development, within which other strategies, such as the *Waste Minimisation, Recycling & Recovery Plan [CD110]* can deliver sustainable waste management initiatives. A range of waste management methods will be needed, including recycling and composting, as well as incineration with energy recovery, and landfill. Kerbside collections and incineration both have parts to play if the targets for reducing waste to landfill are to be achieved. Rev 10/9 & 10/12 recognise that alternative methods for treating waste are being developed, which could include Thermal Separation and Anaerobic Digestion. Such alternative methods and emerging strategies would be considered against the criteria in Policy WM1 in the context of SMBC's waste management strategy.
- 10.19 Rev 10/15 (¶ 10.2.4) adds a reference to the potential for collecting other waste materials, such as plastics. The potential for recycling other waste materials largely depends on the outlets for the materials collected, since there is little point in separating such materials if there is no market for the waste or no viable recycling facility exists. The provision of facilities for the recycling of other wastes depends more on SMBC's waste management strategy than on the SUDPR. However, Policies WM1, WM2, WM4 & WM6 provide an appropriate basis for considering proposals for such facilities.

### ***Recommendation***

**10.20 I RECOMMEND NO MODIFICATIONS to the Plan to meet these objections.**

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**POLICY WM4: PROVISION FOR RECYCLING IN NEW DEVELOPMENT*****Objections to First Deposit***

1106/1083 – Solihull Residents Association;  
1419/976 – Trustees of Berkswell Estate.

***Objections to Revised Deposit***

There were no objections to the Revised Deposit draft

***Key issues***

- *Should the Policy title and accompanying text refer to household kerbside paper collection and make provision for this in the Plan;*
- *Should the Plan consider a single collection system and alternative technologies.*

***Inspector's reasoning and conclusions***

10.21 Policy WM4 requires all significant development proposals to incorporate on-site provision for segregation, recovery and recycling of waste to enable increased rates of recycling. I also note that the title of the policy has now been amended to cover all new development (Rev 10/17), with further details about the importance of recycling in Rev 10/18 (¶ 10.2.8). Reference to kerbside collections of paper is made in Policy WM3 and the supporting text. As I have already found (see above), SMBC is not able to give a firm date for the commencement of a full kerbside collection service at present.

10.22 Although keeping waste streams separate may not always be the most effective way of increasing recycling rates, separating waste materials for re-use and recycling helps to reduce the amount of waste requiring treatment and disposal, and will probably help to achieve the national recycling targets. Details of the system of collection are outside the scope of the SUDPR, whilst Rev 10/12 (¶ 10.2.2) recognises that new technologies for treating and recycling waste are being developed. Other strategies, including the *Waste Minimisation, Recycling & Recovery Plan [CD110]* will also help to deliver sustainable waste management initiatives. I am therefore satisfied that the SUDPR provides an appropriate framework to make adequate provision for recycling in new developments.

***Recommendation***

**10.23 I RECOMMEND NO MODIFICATIONS to the Plan to meet these objections.**

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**POLICY WM5: COMPOSTING SITES*****Objections to First Deposit***

1069/1053 – GO-WM; 1126/293 – Hampton-in-Arden Society; 1419/977 – Trustees of the Berkswell Estate.

***Objections to Revised Deposit***

1126/518/R – Hampton-in-Arden Society;  
1275/125/R – CPRE.

***Key issues***

- *Is there any inconsistency between Policy WM5 and the supporting text;*
- *Should the Policy include a minimum size of 2.5ha for commercially operated sites;*
- *Should the Plan consider and evaluate alternative technologies to composting, such as Thermal Separation and Anaerobic Digestion;*
- *Rev 10/19: Should composting facilities be located where complementary waste management activities take place; and should the Council secure specific facilities for composting within the Borough;*

- *Rev 10/19 - Criterion (i): Should the Policy ensure that sites are served by adequate road access, with acceptable environmental impacts, limited lorry movements, and minimal highway improvements that do not harm the character of the countryside.*

***Inspector's reasoning and conclusions***

- 10.24 Policy WM5 sets out the criteria for permitting facilities for the composting of green waste (except for individual householders), reflecting national guidance in PPG10 (A4-A6). Rev 10/19 rewords the Policy and criteria to remove any inconsistency between the Policy and supporting text. GO-WM confirms that these amendments address its concerns (1069/114/RS).
- 10.25 HIAS suggests that commercial composting sites should have a minimum size of 2.5ha, as in the Coventry UDP, for consistency in the *Meriden Gap*. SMBC explains that Policy WM5 only relates to composting proposals requiring planning permission, and outlines the current arrangements for using the composting facility at Packington landfill site. Planning permission has also been granted for a farm-based composting facility at Hawkhurst Moor Farm. There is no guidance in PPG10 about the minimum size for composting sites, and apart from consistency with Coventry, I can see little advantage in specifying any minimum size in Solihull. On the contrary, a size constraint could detract from the general encouragement given to composting facilities, and not help to meet recycling targets, whilst very small sites would probably be commercially uneconomic.
- 10.26 I realise that emerging waste treatment technologies, such as Thermal Separation with Anaerobic Digestion, produce compost and so it is not always necessary to take out green waste from the general waste stream. However, other parts of this chapter recognise the development of new technologies (eg. paras 10.1.3/10.2.2), and do not rule out such processes in the future. Policy WM5 recognises that new proposals for composting are likely, helping to meet the increased need for recycling. Rev 10/20 (¶ 10.2.9) recognises the advantages of taking green waste out of the main waste stream to serve the centralised composting facility at Packington landfill site. Other waste management strategies are also likely to help deliver sustainable waste management initiatives.
- 10.27 On Rev 10/19, I am satisfied that amended Policy WM5 gives examples of suitable sites, such as landfill, where composting might take place. This is in line with PPG10 (A14-A15) which confirms that co-locating waste management facilities can bring economic and environmental benefits. It also minimises transportation and may provide a sustainable solution to waste management.
- 10.28 In amended criterion (i) and para 10.2.9, SMBC intends to confirm that the scale of lorry *and other road-based delivery* movements is minimised [CD156/175], thus meeting the other element of HIAS' objection. CPRE's concern relates to the impact of additional traffic and road improvements associated with composting facilities on the character of the countryside. However, criterion (i) includes a proviso requiring any highway and environmental impacts to be acceptable, so this should enable this matter to be addressed. PPG10 (A13-A22) confirms that access to a site is a relevant consideration, with planning conditions ensuring that satisfactory access is provided. S106 obligations could also specify the number and routes of lorries, and any highway improvements would have to be considered against the transport policies in Chapter 5 of the Plan, thus largely addressing CPRE's concerns.

***Recommendation***

**10.29 I RECOMMEND** that the Plan is **modified** by amending criterion (i) and paragraph 10.2.9 to include **other road-based delivery movements**, as set out in CD156/175.

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## POLICY WM6: WASTE TRANSFER STATIONS

**Objections to First Deposit** 1275/153 – CPRE; 1419/978 – Trustees of the Berkswell Estate.

**Objections to Revised Deposit** 1275/126/R – CPRE; 1037/339/R – Network Rail; 1126/505/R – Hampton-in-Arden Society

### **Key issues**

- *Should criterion (iii) also ensure that the development is consistent with Green Belt policy;*
- *Should Policy WM6 consider alternative technology and alternative sites, including the sand and gravel operations at Berkswell Estate, which could include a MRF and thermal separation processes;*
- *Rev 10/23: Should para 10.3.2 refer to the possibility of re-opening the former railway line from Hampton-Whitacre Junction for the transport of waste materials, or give stronger support to the re-use of the railway line, including other uses.*

### **Inspector's reasoning and conclusions**

- 10.30 Policy WM6 sets out the criteria for waste transfer station proposals. Rev 10/21 adds a further criterion requiring the development to be consistent with the Countryside policies of the Plan. These would include Green Belt policies, thus addressing CPRE's concerns. Although the provision of waste transfer stations in the Green Belt could cause visual and environmental impact, the nature of the waste management activities involved and the benefits of linking them with complementary activities means that Green Belt locations cannot be ruled out, subject to complying with the terms of Green Belt policies.
- 10.31 Policy WM6 is a general policy encouraging the provision of waste transfer stations, subject to specific criteria. It does not propose specific sites; that is the subject of Proposal WM6/1. However, sites such as the sand and gravel operations on the Berkswell Estate, could be considered under the criteria outlined in Policy WM6. On the basis of the limited evidence before me, I have insufficient information to consider making a specific proposal for this site. Other parts of this chapter recognise the development of alternative waste management and treatment technologies.
- 10.32 Rev 10/23 (¶ 10.3.2) introduces the expectation that any proposal for an enlarged waste transfer station at Bickenhill should explore the potential for re-opening the adjacent disused railway line for the transport of waste materials. I have considered this matter earlier, under Policy T7 in the Transport chapter. In the context of waste and para 10.3.2, SMBC confirmed at the inquiry (in response to CPRE & HIAS), that this is not a definite requirement or proposal to reopen the line, but simply to ensure that this possibility is examined. I understand that the line was lifted in 1952, but much of the route remains intact. However, around the A45 junction near Arden Brickworks at Middle Bickenhill, the route has been obliterated by road improvements and slip roads. I also realise that engineering works and transport of waste materials by rail might have some environmental impact on nearby residents in Hampton-in-Arden, and could affect the character of the sensitive *Meriden Gap* tract of the Green Belt.
- 10.33 In addition to the guidance in PPG13 (¶ 45/74) & RPG 11 (Policy T10), national policy in PPG10 (A16) specifically encourages the use of rail to

transport waste. This expectation (¶ 10.3.2) is thus fully in line with national and regional planning policy. Questions about the precise route, the necessary engineering works and the environmental and amenity impacts of reopening this rail line would be considered if and when detailed proposals came forward, in accordance with Policy WM6 and other policies in the Plan. Much would depend on which section of the railway was reopened and the routing for the waste materials. Para 10.3.2 is merely seeking to ensure that the potential for reopening this rail line is explored; it would not be a prerequisite for any subsequent planning permission. In my view, this properly reflects national and regional policy and is a wholly appropriate and reasonable stance to take in this instance.

- 10.34 Conversely, in the absence of any further details about the likely use and impact of any reopened line, it would be inappropriate to give stronger support for this possibility, including possible re-use, as suggested by Network Rail, particularly since the line passes through a sensitive area of Green Belt with a presumption against inappropriate development. Consequently, I am satisfied that no further amendments to para 10.3.2 are needed in response to the objections from CPRE, HIAS & Network Rail.

### **Recommendation**

**10.35 I RECOMMEND NO MODIFICATIONS to the Plan to meet these objections.**

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## **PROPOSAL WM6/1: ENLARGED WASTE TRANSFER STATION ON THE A45 ADJACENT TO THE CIVIC AMENITIES SITE**

### **Objections to First Deposit**

1037/692\* – Network Rail; 1054/1075\* – Highways Agency; 1126/291 – Hampton-in-Arden Society; 1275/152 – CPRE; 1381/559 – Jones Plant Services Ltd; 1419/979 – Trustees of the Berkswell Estate.

### **Objections to Revised Deposit**

There were no objections to the Revised Deposit draft

### **Key issues**

- *Should the text highlight the existence of the disused railway line next to the site to encourage re-use for waste movements;*
- *Should Proposal WM6/1 require any application to demonstrate through a transport assessment that expansion would not have a detrimental impact on the free flow and safety of traffic on the A45;*
- *Is Proposal WM6/1 sufficiently precise and certain in terms of the location of an enlarged waste transfer facility;*
- *Is this an appropriate development in the Green Belt, and sufficiently justified, and would it have unacceptable traffic implications;*
- *Should Proposal WM6/1 consider other potential sites for waste transfer stations, including the sand and gravel operation on the Berkswell Estate.*

### **Inspector's reasoning and conclusions**

- 10.36 Proposal WM6/1 addresses the need to expand waste transfer facilities in the Borough. Rev 10/23 (¶ 10.3.2) adds the expectation that any proposal should explore the potential for reopening the adjacent disused railway line for the transport of waste, thus addressing Network Rail's point. I have addressed this point more fully under Policy WM6 (see above).
- 10.37 Policy T1 (as amended by Rev 5/1) requires transport assessments to be submitted for development proposals that are likely to have significant transport implications. Any proposal would also be subject to the criteria in

Policy WM6, which includes a requirement that development will not result in an unacceptable impact on highways. Given that the SUDPR has to be read as a whole and bearing in mind the references to highway considerations, I do not consider that any further reference to the need to undertake a transport assessment is necessary given the general terms of this proposal. If the proposal would be likely to have a significant impact on highways and traffic, a transport assessment would undoubtedly be required.

- 10.38 At present, Proposal WM6/1 is marked on the Proposals Map with a green triangle, rather than a precise site area. At the inquiry, SMBC confirmed that this is effectively a preferred location, rather than a specific site, in line with the guidance in PPG10 (¶ 33). No details of the precise nature or size of the enlarged facility are known and, although the impetus for the proposal comes from SMBC, it would probably be implemented by SITA, the current operator of the existing Civic Amenities facility. I understand that the proposal is generally referred to in SMBC's *Draft Municipal Waste Management Plan*, but there are currently no specific proposals to expand facilities on this site, since the priority is to support incineration at Coventry. Current plans envisage an enlarged Public Waste Disposal & Recycling Facility, with no on-site treatment of waste. Any such proposal would have to be considered against Policy WM6, together with the Countryside & Green Belt policies of the Plan. Any proposals for new or enlarged buildings would have to be justified on the grounds of very special circumstances and in terms of maintaining the openness of the Green Belt, in line with PPG2.
- 10.39 I recognise that there is currently a lack of details about the precise nature of this proposal, but this does not necessarily make the proposal void for uncertainty. However, in order to ensure that the proposal reflects what is actually envisaged and avoid any misunderstanding about the possibility of on-site storage and treatment of waste, I consider the Policy and accompanying text should refer to a *Public Waste Disposal & Recycling Facility*. At the inquiry, SMBC confirmed that this description would not cause any difficulties. In view of the lack of information about the precise size, extent and location of the proposal, I am satisfied that an indication of its general location as a preferred site on the Proposals Map is sufficient in this instance. However, the accompanying text should confirm that this is a preferred location, rather than a specific site. These changes would go some way to addressing HIAS & CPRE's concerns.
- 10.40 Rev 10/23 (¶ 10.3.2) confirms that the proposed site lies in the Green Belt, where any development would have to maintain openness and be justified by very special circumstances, and also cross refers to PPG2 & Policy C2. Rev 10/24 also deletes reference to the possibility of a re-sited Council depot. These amendments address the concerns about the possibility of new development in the Green Belt. Any proposal for an enlarged waste facility would also have to accord with Policy WM6, which includes a requirement that development should not have an unacceptable impact on highways or the environment. As for CPRE's general comments about the Arden Brickworks site, SMBC confirms that parts of the site have been worked for minerals and do not fall within the definition of *previously developed land*. However, the former brickworks and adjoining clay stacking area, Civic Amenities site and plant hire depot correctly fall within this definition, as confirmed in Rev 10/23.
- 10.41 I have already concluded that sites such as the sand and gravel operations on the Berkswell Estate could be considered under the criteria outlined in Policy WM6 (see above). However, on the basis of the limited evidence before me, I have insufficient information to consider making a specific proposal for a waste transfer station at this site.

**Recommendation**

**10.42 I RECOMMEND** that the Plan is **modified** by:

- (i) *amending the title and text of Proposal WM6/1 and paragraph 10.3.2 to refer to a **Public Waste Disposal and Recycling Facility**;*
- (ii) *amending the text of paragraph 10.3.2 to confirm that this is a preferred location, rather than a specific site.*

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**PROPOSAL WM6/2: SEARCH FOR NEW CIVIC AMENITIES SITE****Objections to First Deposit**

There were no objections to the First Deposit draft.

**Objections to Revised Deposit**

1126/506/R – Hampton-in-Arden Society;  
1305/54/R – Berkswell Society.

**Key issues**

- *Should Proposal WM6/2 relate to Civic Amenities sites and concentrate the search for provision in the north and south-west of the Borough.*

**Inspector's reasoning and conclusions**

10.43 Proposal WM6/2 confirms that SMBC will continue to search for a new Civic Amenities Site in the south of the Borough, south of the A45. I understand that there is only one Civic Amenities Site within Solihull, at Bickenhill. SMBC is satisfied that there is adequate provision of facilities to serve the north of the Borough, including this site and other facilities outside the Borough at Castle Bromwich and elsewhere in Coventry and Birmingham. There are also over 30 mini-recycling centres.

10.44 The more pressing need for additional facilities therefore seems to be in the south and west of the Borough, which would not be met by Proposal WM6/1. Although this need was acknowledged in the adopted UDP, no site has come forward in the last 10 years. However, there is no certainty that an additional site may actually be necessary, if continued progress is made in improving recycling and introducing kerbside collections. Proposal WM6/2 envisages a wide area of search, covering both the south and south-west of the Borough. This reflects the difficulty in finding a suitable site, whilst addressing the possible need for additional facilities to serve existing and developing areas. In the meantime, the Bickenhill facility is reasonably accessible to most parts of the Borough. Consequently, I conclude that no amendments to Proposal WM6/2 and the supporting text are needed in response to these objections.

**Recommendation**

**10.45 I RECOMMEND NO MODIFICATIONS** to the Plan to meet these objections.

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**POLICY WM7: CIVIC AMENITIES SITE****Objections to First Deposit**

1305/248 – Berkswell Society

**Objections to Revised Deposit**

There were no objections to the Revised Deposit draft

**Key issues**

- *Should Policy WM7 indicate that any new Civic Amenities Site should be within easy and sustainable reach of the bulk of the Borough's population, with an area of search to the south-west of the A45.*

**Inspector's reasoning and conclusions**

10.46 In the Revised Deposit version of the Plan, Policy WM7 has been deleted (Rev 10/25), so this objection is no longer relevant. The issue is dealt with under Proposal WM6/2, above.

### **Recommendation**

**10.47 I RECOMMEND NO MODIFICATIONS to the Plan to meet this objection.**

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### **POLICY WM8: LANDFILL**

#### **Objections to First Deposit**

1126/290 – Hampton-in-Arden Society; 1305/249 – Berkswell Society; 1403/1096 – RMC Aggregates (Western) Ltd.

#### **Objections to Revised Deposit**

1126/519/R – Hampton-in-Arden Society.

#### **Key issues**

- Does Policy WM8 reflect national guidance on landfill in Circular 17/89 & the Landfill Regulations 2002;
- Does Policy WM8(iii) adequately protect nearby existing development;
- Does the Policy and supporting text fail to acknowledge that landfill can fulfil an environmentally positive objective by restoring mineral workings or reclaiming damaged, degraded or derelict land;
- Rev 10/29: Are the references in Policy WM8(i) and para 10.3.7 to the Landfill Directive and Landfill Regulations correct.

#### **Inspector's reasoning and conclusions**

- 10.48 Policy WM8 sets out the criteria for new landfill sites and extensions to existing sites. SMBC explains that Policy WM8 is intended to provide for circumstances when a new landfill site may be needed, even though there will be much less reliance on landfill for waste disposal in the future. SMBC also confirms that Policy WM8 now accurately reflects the guidance in Circular 17/89 & the Landfill Regulations 2002, following changes made at the Revised Deposit stage at the request of the Environment Agency (Rev 10/29).
- 10.49 In response to HIAS' other detailed points, the term *other waste streams* in criterion (i) covers industrial, commercial, construction and demolition waste, reflecting the Landfill Regulations 2002, which prohibit liquid waste. Details of the types of waste acceptable at particular sites would be determined on a site-by-site basis, in association with the Environment Agency. The distance of 250m in criterion (iii) is based on guidance in Circular 17/89 (¶ 10-11), and is acceptable to the Environment Agency (1168/27/RS). HIAS's suggestion of 400m is based on guidance in the GPDO about agricultural buildings and operations, rather than relating specifically to landfill sites. I understand that the *Draft Municipal Waste Management Strategy* has been approved, will be published for consultation and adopted in 2005. I am satisfied that the other disputed terms in the Policy and accompanying text are clear and relevant.
- 10.50 Criterion (iii) requires a satisfactory distance to be maintained from existing development, specifying a minimum distance of 250m unless it can be demonstrated that there will be no unacceptable loss of amenity or risk due to escape of landfill gas or leachate. This establishes a guideline distance, in order to protect existing developments, but recognises that the potential impact of a landfill site may not always need a buffer zone of this distance. In my view, this provides the right level of certainty, with some flexibility to respond to particular circumstances, addressing Berkswell Society's concerns.
- 10.51 Rev 10/30 (¶ 10.3.7) recognises that, in certain circumstances, landfill may fulfil environmental benefits through the restoration of mineral workings or the reclamation of damaged, degraded or derelict land, addressing RMC's point.

SMBC also intends to amend the reference to the Landfill Directive to the Landfill *Regulations* [CD156/175], meeting HIAS's other concern.

**Recommendation**

**10.52 I RECOMMEND** that the Plan is **modified** by replacing the reference in paragraph 10.3.7 to the Landfill Directive with Landfill **Regulations** [CD175].

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