



MAGWATCH

SUMMARY OBJECTION

on

APP/23/00822/F

3. TRANSPORT ASSESSMENT

Relevant Planning Guidance

Proposals for waste management facilities which incorporate different types of waste management activities at the same location, or are co-located with complementary activities, will be supported unless there would be an unacceptable cumulative impact on the local area. [BCPD WP - Policy 2-Integrated waste management facilities]

Transport issues should be considered from the earliest stages of plan-making and should involve:

- f) identifying, assessing and taking into account the environmental impacts of traffic and transport infrastructure – including appropriate opportunities for avoiding and mitigating any adverse effects, and for net environmental gains'. [NPPF 109]

Planning policies and decisions should... take into account the *cumulative impacts from individual sites in local areas*. [NPPF 199]

...also cautions against approving development where: '*the residual cumulative impacts on the road network would be severe.*' [NPPF 111]

3.1 Summary of Transport Movements

This report demonstrates that the MVV Traffic Assessment (MVV TA)¹ fails to comply with the planning framework and relevant policies. It does not clearly or accurately account for all trips generated by the proposed development, nor does it assess the required cumulative and in-combination transport impacts for the wider Canford Resource Park (CRP) site.

Without a comprehensive analysis including all CRP transport movements, the highways, environmental, and public health impacts cannot be reliably evaluated.

Due to these significant omissions, the MVV TA should be considered unsafe. This non-compliance must weigh heavily in the planning officer's decision, as the scale of undocumented impacts justifies refusal of the application. It is for the applicant to provide full assessment of the cumulative effects (for both existing and planned projects) or the application should be refused.

¹ APP_23_00822_F-ES_APP_15.1_TRANSPORT_ASSESSMENT-2785212

3.2 Headline Transport Movements

Table 1 – Combined CRP Waste Transport Movements (HGVs only)

Company	Type of Waste Processing	Capacity	HGV Trips
MVV (proposed)	Waste Incineration	260,000 tpa	94,276 pa
MVV (future)	Carbon Capture & Storage (CCS)	247,000 tpa	27,100 pa
NES	MBT (Mechanical Biological Treatment)	125,000 tpa	13,750 pa
CRL	MRF (Materials Recovery Facility)	175,000 tpa	19,250 pa
AMS	Inert Waste (construction)	250,000 tpa	27,500 pa
AMS	Concrete services (estimated)		15,444 pa
Total	Total permitted 810,000 (1,620,000mtpa transported including return journeys)	810,000 tpa	197,320 pa

This table was compiled by Magwatch. MVV proposed trips are based on baseline HGV movements at MVV's Devonport site (265,000tpa) and recalculated across to the proposed site (260,000tpa), which is a reduction of 1.9% to reflect the difference. All other calculations with the exception of AMS concrete services use the capacity volumes divided by 20t HGVs, plus 10% additional trips for maintenance/operations/consumables. AMS concrete capacity is unknown but a minimum known fleet of 6 vehicles at 36 trips per week + 50% to represent client collections.

Key takeaways: Existing permitted waste processing at the site is 550,000tpa. Including the proposed development, CRP would process 810,000tpa of waste, generating circa 197,320 HGV trips (including carbon capture storage (CCS) operations). Without CCS the total HGV trips would be 170,220 pa.

Within the MVV TA (s15.5.25) – HGV generated trips based on the applicant's figures would be 61,880 HGVs pa, although you will not find the total annual number documented, as this would be an eye-watering figure, and would likely not make for good reading (from the applicant's perspective). This is based on their assessment of 170 HGV trips per day (rounding up the fraction from the calculation of 169+ in the TA).

Yet, this is significant number is far less than the 94,276 figure in Table 1 above, which is calculated against the transport figures documented by MVV for their Devonport waste incinerator site of 96,096 HGV movements pa and 121,576 total vehicle movements pa. MVV Devonport being permitted (at the material time) to process 265,000tpa, a margin of 1.9% or 5,000tpa difference to the proposal for Canford at 260,000tpa. All calculations in this section are based on waste acceptance over 364 days a year as per MVV Devonport. However, it is noted that the Canford proposal, as per section 2.1.1 of the TA, has submitted extended daily hours for waste acceptance 365 days a year.

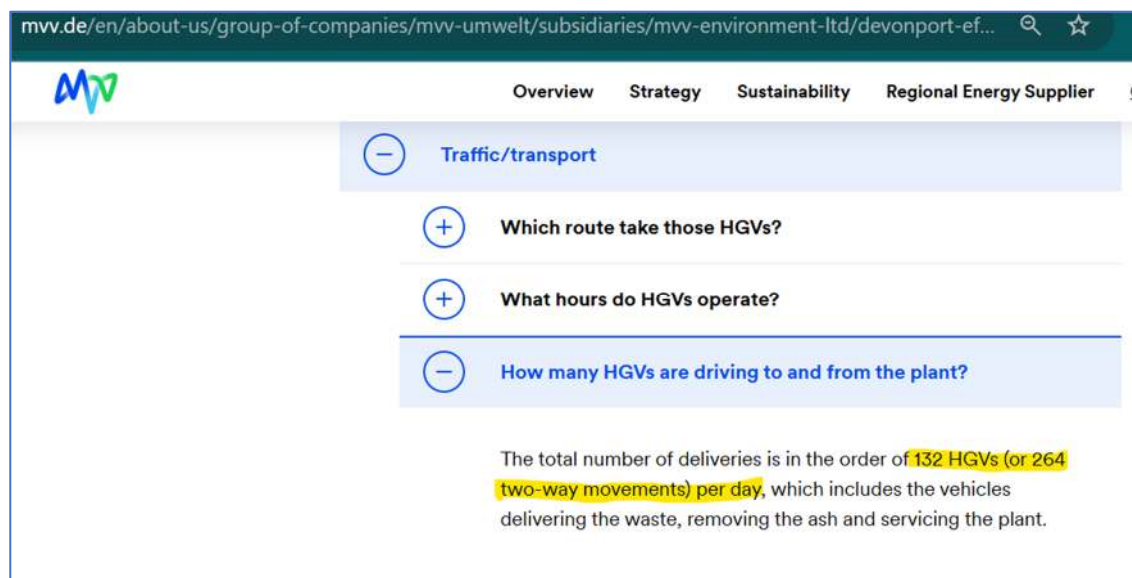
Why is this a material consideration?

Section 5.3 of MVV's traffic assessment states it was agreed with BCP that

‘the estimates of trip generation have been calculated on a first principles basis, informed by data from the Applicant's existing facilities in the UK’.

Ergo, using the transport figures from MVV Devonport, a similar scale EfW to the Canford proposal enables a robust comparison. We assess these figures to hold a high level of integrity

because they have been consistently, formally, and legally relied upon by MVV for a significant period of time (14 years). They were used in the original planning application in 2011. More recently these figures were used by MVV in 2023 to support a planning application to increase their Devonport plant throughput limit, and they are currently documented on the MVV Devonport website (2025.). The figures outlined in the MVV Devonport TA table below should therefore be viewed with a high level of accuracy.



Source: MMV Devonport website

6. TRAFFIC AND TRANSPORT

6.1 The proposals do not propose any new development and will not increase the number of employees or visitors. The proposed additional 10,000 tonnes per year has been calculated to generate an additional 1.8 vehicles per day, or 671 additional vehicles per year. Rounding this up to 2 additional vehicles per day, equating to 4 two-way vehicle movements per day, this increase would be negligible in the context of the 334 two-way vehicle movements per day assessed by the original Transport Assessment for the plant with a throughput of 265,000 tonnes per year.

Source Environmental Statement Addendum: Non Technical Summary (May 2023). MVV Devonport Lt. – Section 73 Planning Application for Increased Plant Throughput Limit EfW CHP Facility, Creek Road, Plymouth.

Debunking MVV's Traffic Assessment

MVV's TA assessed two scenarios for Canford, which we debunk below:

Scenario 1 “‘worst case’ i.e., all HGV vehicle movements are additional to the highway network (and Canford Resource Park (CRP))”.

Debunking Scenario 1 Based on a worst-case scenario all trips are assessed as new trips, this being the scenario against which a planning decision must be weighted (as agreed in the scoping report).. Within the TA the applicant fails to document the annual total as opposed to the daily total, which would be 96,096 for all vehicle type movements pa including 61,880 HGV movements pa. This obscures the true scale and significant impact of vehicle movements.

However, the above MVV figures are not deemed as accurate and underestimate. The table below is from the MVV Devonport TA based on 265,000tpa throughput. By calculating for 260,000tpa by subtracting 5000tpa (1.9%), we can extrapolate the vehicle trips that would be

generated by the Canford proposal. The tables below illustrate the number of assessed generated trips.

MVV Devonport TA (source: MVV Devonport Traffic Assessment)

Time	HGV Two-Way Movements	Staff	Combined Total
05:00–06:00	-	5	5
06:00–07:00	-	5	5
07:00–08:00	-	9	9
08:00–09:00	18	11	29
09:00–10:00	20	0	20
10:00–11:00	34	0	34
11:00–12:00	32	0	32
12:00–13:00	24	0	24
13:00–14:00	30	5	35
14:00–15:00	46	5	51
15:00–16:00	30	4	34
16:00–17:00	16	9	25
17:00–18:00	12	7	19
18:00–19:00	2	0	2
19:00–20:00	-	0	0
20:00–21:00	-	0	0
21:00–22:00	-	5	5
22:00–23:00	-	5	5
Total	264	70	334

MVV Devonport – HGV Waste Acceptance/Dispatch (Source: MVV Devonport Traffic Assessment)

Day	Opening Times
Monday to Friday	08:00 – 19:00
Saturdays	08:00 – 18:00
Sundays	08:00 – 16:00
Bank Holidays (Except Christmas and Boxing Day)	08:00 – 18:00
Christmas Day	Closed
Boxing Day	08:00 – 16:00

Note: Currently there are no CRP operations on Sundays, Christmas Day or Boxing days, and Saturdays are half days. The applicant's proposal, quite frankly is insanity. MVV seeks to extend the daily hours from 0700 to 2000 (more than the Devonport site) with MVV proposing CRP waste acceptance from 07.00 to 20.00 for 365 days a year as per section 2.1.1 of their TA.

from Section 2.1.1 of their TA(2. Operational Traffic Management Plan):

2.1 Operational hours

2.1.1 The EfW CHP Facility would be capable of processing up to 260,000 tonnes of residual commercial, industrial and household waste 24-hours a day, up to 365-days a year. Operational hours for the acceptance of waste would be limited to 07:00 to 20:00 during the 365-days. Outside of these hours, to ensure the EfW CHP Facility's continued operation, and for security purposes, a shift team would be present.

2.1.2 There may be some occasions when waste deliveries are accepted outside the normal opening hours; for example, in the case of an emergency or to accommodate the delivery of waste where vehicles have been unavoidably delayed, or in other similar circumstances. It is therefore proposed that the EfW CHP Facility be able to accept waste outside the operating hours stated above in these circumstances".

What stands out in Section 2 of the MVV TA is a striking example of corporate illusion, crafted to appear as though they are imposing limitations intended to protect and benefit the local community. In reality, it is nothing short of absurd for MVV to suggest that the proposed operational hours for waste acceptance, 13 hours a day, 365 days a year, plus additional hours at their discretion, constitutes any meaningful limitation. Quite clearly, this represents the opposite of any form of restriction, and the impact on the local amenity would, in fact, be most severe.

The planning officer and committee may wish to carefully consider the following: Why does the Canford site require longer operating hours and more operating days than the slightly larger MVV Devonport facility? Is it because the applicant is fully aware of the *true cumulative impact arising from the combined traffic of the CRP and surrounding developments*, and the severe consequences this will have on the local amenity and road network? Moreover, the analysis reveals that the volume of HGV traffic associated with the wider CRP would, in fact, require even longer operating hours than those currently proposed by MVV, highlighting yet another instance of undocumented traffic assessment/impacts within MVV's TA.

MVV Devonport Annual Total

	HGV	Staff	Total
Total (Daily)	264	70	334
Total Annual	96096	25,480	121,576

MVV Canford Proposal – MVV Annual Total Traffic Movements (Based on 1.9% less than MVV Devonport)

	HGV	Staff	Total
Total (Daily)	259	69	328
Total Annual	94,276	25,116	119,392

Scenario 2: MVV TA - 'Realistic scenario' where residual waste created by existing treatment processes at CRP is diverted to the EfW CHP Facility rather than being exported off-site for disposal/treatment elsewhere (current situation).

Debunking Scenario 2 – MVV TA section 5.16 – states "Based on information from the Environment Agency's Waste Data Interrogator, it is likely that of the 260,000tpa capacity of the EfW CHP Facility, the sources would be:

- 30,000-tpa from the adjacent MRF
- 110,500-tpa from the adjacent MBT

- 119,500-tpa from elsewhere”

This scenario is not credible. No evidence exists that the MBT facility will cede waste to MVV (110,500-tpa). Indeed, they are at liberty to dispose of waste where they choose, as confirmed by the BCP environmental team (FOI-13507). Moreover, in the Appeal Decision and Inspector’s Report concerning the Portland/Powerfuel ERF (APP/D1265/W/23/3327692), it outlines

‘such an arrangement is only subject to contracts expiring in 2027, and the current incumbent of those contracts has expressly stated their preference to take the MBT output to the Portland proposal, which it is at liberty so to do.’²

Tellingly, the company operating the MBT, New Earth Solutions, are also the only waste treatment company located at CRP who did not provide a letter of support to MVV.

The MRF, is operated by Commercial Recycling Ltd (CRL) who provided a letter of support provisionally offering only 30,000tpa, a mere 11.5% of the proposed waste incinerator volume of 260,000tpa. It should also be considered that the CRP landowner (who would also benefit from the MVV proposal) also has interests in CRL, which brings the veracity of this provisional offer into question.

Given the above, there is absolutely no basis on which MVV can substantiate their claims for scenario 2, it is purely speculative.

Importance of Weighting the Cumulative Impact of All CRP Traffic

Table 2 - Combined MVV & CRP HGV only movements - Time Between Vehicles

Day Type	Combined Movements/Day	Total Hours/Day	Movements/Hour	Time Between Vehicles
Weekday (Mon–Fri)	637	13	58	73 sec
Saturday	469	13	37	97 sec
Sunday	169	8	13	276 sec

Key takeaways: The table 2 illustrates the enormity and significance of evaluating the cumulative effect (in-combination effect) of *all* CRP HGV movements. It represents movements across the week, 364 days a year, with an HGV being accepted or dispatched from the site every 73 seconds. The impact to local amenity and traffic network would be severe. Again, the applicant’s TA does not accurately assess the impact on the local amenity, which would be unsustainable. With the cumulative effect of all CRP traffic, it has a clear potential to bring the A341 (already over-saturated) to a standstill, and cause HGVs to queue at the site entrance. Accordingly, appropriate weighting should be afforded by the planning officer to reflect the balance of harm to the green-belt, the local amenity and the road network.

Table 3 - MVV HGV only movements (not including CCS) Time Between Vehicles

Day Type	MVV Movements/Day	Total Hours/Day	Movements/Hour	Time Between Vehicles
Mon–Sat	274	13	21.08	171 sec
Sunday	169	8	21.08	171 sec

Key takeaways: The significance of MVV generated HGV trips in isolation would also call for further evaluation. The impact to the local amenity and local traffic network remains significant, with acceptance or dispatch of one HGV every 171 seconds, 364 days a year.

² See Appendix 2 for further detail

3.4 Trip Generation Calculations

Car/staff generated trips represent an additional 26.5% increase to HGV movements, as per figures taken from MVV's Traffic Assessment, s5.12.

Car movements related to staff across the CRP site have been calculated against a baseline, which shows that 26.5% of the proposed MVV total trips generated are from staff (i.e. MVV Devonport TA: 70 cars of 264 HGVs = 26.5%). Using this methodology an additional 26.5% has been drawn from each of the waste management company's processing capacity (as at Table 1) for calculating staff/car movements.

The combined number HGVs and cars for total CRP generated traffic are 249,620 movements pa.

Total CRP HGV and car movements combined:

- 256,610 movements pa
- 686 vehicles per day (364 days, This would be increased across weekdays as non-MVV companies operate reduced hours on Saturdays and not on Sundays)
- 1 vehicle every 63 seconds

Total All CRP combined HGV movements (inc MVV):

- 197,320 movements pa
- 543 HGVs per day (364 days. This would be increased across weekdays as non-MVV companies operate reduced hours on Saturdays and not on Sundays)
- 1 HGV every 73 seconds

Total MVV HGV only movements (not including CCS or cars)

- 94,276 movements pa
- 259 movements per day (364 days a year)
- 1 HGV every 180 seconds

Existing site trip generation

The combined impact of all waste management activities at the Canford Resource Park (CRP) is projected to generate approximately *197,320 HGV movements per year*—equating to *one HGV movement every 73 seconds and one vehicle type every 63 seconds on weekdays*. There would be even less time between vehicles if MVV Devonport operating hours were used (11 hours per day) rather than the 13 hours proposed for Canford. This is the impact of processing a total of 810,000 tonnes of waste annually at CRP.

Despite the scale of this activity (with or without CCS), the applicant has failed to assess the cumulative or in-combination effects of these movements on the environment (including sensitive habitats and air quality), public health, and the local road network.

MVV TA section 5.2 - Existing site trip generation, and section 5.3 - Proposed development trip generation of the MVV TA have failed entirely to capture the existing trips generated by the CRP site. Section 5.2 states

'it is assumed that there are no existing trips generated by the site and the following analysis is therefore considered robust'.

This statement is misleading, inaccurate and wholly false. It misleads the committee by intimating there are no other trips generated at the site, contrary to the identified, existing 75,944 CRP generated HGV movements. In this, the applicant's TA is proven to be inaccurate, and not robust as claimed. *It must therefore be re-assessed along with all relevant Environmental Impact Assessments.*

3.5 Policy Review & Cumulative Impact

The *BCPD Waste Strategy (2019)*, Policy 2 explicitly states

‘Proposals for waste management facilities which incorporate different types of waste management activities at the same location, or are co-located with complementary activities, will be supported unless there would be an unacceptable cumulative impact on the local area.’

The applicant claims, in section 2.10 of their Transport Assessment, that their submission aligns with these policy principles. However, this claim is entirely unsubstantiated.

Inexplicably, in section 2.9 it asserts that

‘no specific development considerations are identified in relation to transport for the site allocation.’

This reflects a fundamental misunderstanding—or deliberate dismissal of the scale, intensity, and combined impact of total HGV traffic generated by both existing and proposed activities at CRP.

Moreover, there is no assessment of traffic involving Magna Business Park, the 27,000m³ warehousing facility, which is accessed from Magna Rd and is named for heat off-take from the proposal. No traffic assessment has been provided for this development, or the additional HGV, commercial traffic and employee generated trips³.

The applicant has provided no evidence of performing a robust, *cumulative impact* assessment or calculation for the existing vehicle movements from the multiple waste management operations already active at the CRP site and it is incumbent upon the applicant to do so.

To illustrate:

- Existing waste processing activities at CRP are permitted for 550,000 tpa, resulting in assessed 75,944 HGV only movements pa.
- The proposed development seeks an additional 260,000 tpa, an increase of 47%. The assessed annual HGV only movements are 94,276, plus 27,100 for carbon capture. (total 121,370 HGV movements pa).

Indeed, the acceptance and dispatch hours at CRP are meant to be set to ensure protection to the local amenity. This was articulated in a CRP related application, which was approved in 2022, refer APP/22/01334/F. This application made clear that the local road network was already too congested in respect of CRP and was the rationale given for applying for extended hours of dispatch.

It is therefore difficult, in fact, impossible for any party to interpret that the proposed development does not breach this policy. Further waste treatment at the site of 260,000tpa would represent a 51% increase on existing permitted waste processing at CRP. This inherently creates an *unacceptable cumulative impact* on the local area, inclusive of harm to green-belt, harm to SSSI, SAC, SAR, RAMSAR, air quality, openness and visual amenity, impact to the local road network, vehicle and waste incineration pollution, and impacts to public health. This is not an exhaustive list of the impacts that would befall the local community.

It is therefore abundantly clear that the Policy 2 cannot be satisfied and the application merits refusal.

³ <https://www.magnaparkpoole.co.uk/>

When should cumulative effects be assessed?

Government guidance on environmental impact assessments state:

‘Each application (or request for a screening opinion) should be considered on its own merits. There are occasions, however, when other existing or approved development may be relevant in determining whether significant effects are likely as a consequence of a proposed development. The local planning authorities should always have regard to the possible cumulative effects arising from any existing or approved development’⁴.

The Planning Inspectorate’s guidance on Habitats Regulations Assessment (HRA), updated in September 2024 and revised in March 2025, addresses the consideration of in-combination effects:

‘The Habitats Regulations Assessment (HRA) process assesses the potential impacts of a plan or project on European sites, *both alone and in combination with other plans or projects*.’⁵

This underscores the necessity of evaluating the combined impacts of the proposed development with the impacts of carbon capture (as a project which MVV have documented), and the other existing combined impacts at CRP that all affect the same site.

3.6 Conclusion

Such immense intensification demands a full cumulative transport assessment. Its omission from the MVV TA and the level of undocumented trip generation from existing and future projects breaches a number of policy planning framework requirements.

This failure by the applicant to account for cumulative impacts renders the application **non-compliant** with:

- The National Planning Policy Framework (NPPF)
- The Habitats Regulations, which require assessments to be made “in combination with other plans or projects”
- Policies 2 and 12 of the BCPD Waste Plan (2019)
- The NSIP Advice on Cumulative Effects Assessment
- Environmental Impact Assessment (EIA) Directives

It is a fundamental requirement of national planning policy that applicants provide full, accurate, and comprehensive assessments of potential impacts — particularly in relation to Traffic and Transport — in accordance with the National Planning Policy Framework (NPPF).

This includes the requirement to assess cumulative impacts, and/or in-combination effects, not only in isolation but in combination with existing and permitted developments.

This application falls far short of that standard in assessing cumulative impacts for all Canford Resource Park (CRP) existing and future proposals.

[NOTE: See Appendices 1.1 – 1.3 (page 48) for a fuller demonstration of our workings.]

⁴ <https://www.gov.uk/guidance/environmental-impact-assessment>

⁵ <https://www.gov.uk/guidance/nationally-significant-infrastructure-projects-advice-on-habitats-regulations-assessments>

APPENDIX 1.1

TRANSPORT – TRIP GENERATION

The calculations within illustrate the true total of traffic which would be generated by the proposed development.

Trip Generation: Using traffic volumes articulated by MVV for their Devonport waste incinerator as a baseline, and which is similar in scale. These figures are exponentially higher than those the applicant has articulated in their traffic assessment.

More importantly, as per section 5.3 of the traffic assessment, it was agreed with BCP “*the estimates of trip generation have been calculated on a first principles basis, informed by data from the Applicant’s existing facilities in the UK*”. On the basis of **Image 1** later in this report, it is clear that annual HGV movements to be associated with the proposed development are much higher, at **94,276 HGVs pa**. MVV Devonport is permitted for 265,000tpa, this is 1.9% higher than the 260,000tpa proposed for CRP. The transport calculations have been reduced by 1.9% based on the MVV Devonport figures, which aligns to the applicant’s agreed estimate basis with BCP.

Image 1 - MVV Devonport website (accessed 13/04/2025)

The screenshot shows the MVV Devonport website. The navigation bar includes links for Overview, Strategy, Sustainability, Regional Energy Supplier, and Group of companies. The main content area has two expandable sections. The first section, titled 'What hours do HGVs operate?', lists the facility opening hours for waste deliveries: Monday to Friday (08:00 – 19:00), Saturday (08:00 – 18:00), Sunday, Bank Holidays, Boxing Day (10:00 – 16:00), and Christmas Day (Closed). The second section, titled 'How many HGVs are driving to and from the plant?', states that the total number of deliveries is in the order of 132 HGVs (or 264 two-way movements) per day, which includes the vehicles delivering the waste, removing the ash and servicing the plant. A text box on the left side of the screenshot contains the calculation: MVV state: 264 HGVs x 364 days = 96,096 HGV movements.

The Facility opening hours for waste deliveries are	
Monday to Friday	08:00 – 19:00
Saturday	08:00 – 18:00
Sunday, Bank Holidays, Boxing Day	10:00 – 16:00
Christmas Day	Closed

MVV state:
264 HGVs x 364 days =
96,096 HGV movements

The total number of deliveries is in the order of 132 HGVs (or 264 two-way movements) per day, which includes the vehicles delivering the waste, removing the ash and servicing the plant.

1. CRP Existing Trip Generation

Calculation for 550,000tpa:

- $550,000\text{t} / 20\text{t HGVs} = 27,500 \text{ HGV movements pa}$
- $27,500 \text{ HGVs} \times 2 \text{ (for return journeys)} = 55,000 \text{ HGV movements pa}$
- $55,000 \times 10\% \text{ operational/maintenance vehicles} = 5,500 \text{ HGV movements}$
- $5,500 \times 2 \text{ (for return journeys)} = 11,000 \text{ HGV movements pa}$
- $55,000 \text{ HGVs} + 11,000 \text{ HGVs} = 66,000 \text{ HGV movements pa}$

Total CRP HGV movements pa 66,000 (does not include MVV)

2. CCS Trip Generation

The proposed **Carbon Capture Unit (CCS)** system would capture up to **95% of the carbon emissions** from Energy from Waste (EfW) processing. If the proposed EfW ran at maximum capacity of 260,000tpa then this would create approximately 260,000tpa of Co2. 95% of 260,000tpa equates to 247,000tpa of Co2. The Co2 would then be liquified for tanker transportation.

The captured Co2 must also be transported from the site, for which the only viable option is tanker movements (shipping, pipeline and railhead are not feasible transport options for the CRP site).

Using 20-tonne tankers (including return journeys) and 10% vehicles for maintenance/operations, the additional transport required for CCS is:

- $247,000\text{t} / 20\text{t tankers} = 12,350$
- $12,350 \times 2 \text{ (for return movements)} = 24,700 \text{ HGV movements pa}$
- $24,700 \text{ HGVs} \times 10\% = 2,470$
- $24,700 \text{ HGVs} + 2,470 \text{ HGVs} = 27,170$

Total number of HGV movements pa 27,170

3. AMS Concrete Services – Trip Generation

Vehicle movements related to AMS concrete services located at the CRP, these include HGV movement from AMS concrete arm, Donovan's (recently acquired by AMS), and Ready to Mix Ltd who are also located at the CRP. These companies, and clients of AMS concrete services generate thousands of additional HGV movements pa, which have not been able to be assessed in this report. This is a fleet of at least 6 concrete HGVs, plus other customer concrete trucks (assessed at 50% for contrast) using the facility.

Assessed minimum traffic generated:

$6 \text{ HGVs} \times 6 \text{ daily movements (including return journeys)} = 36 \text{ HGV movements}$

$36 \times 5.5 \text{ operating days per week} = 198$

$198 \times 52 \text{ weeks} = 10,296$

$10,296 + 50\% \text{ (assessed customer HGVs)} = \mathbf{15,444 \text{ HGV movements pa}}$

HGV WASTE ACCEPTANCE OPERATIONAL HOURS

In the Environmental Statement Chapter 3: Description of the Proposed Development, the applicant has documented the operational hours for the acceptance of waste in section 3.8.47 to be limited to 07:00 to 20:00, 365 days. As per Image 1 above, the applicant has not clearly documented the operating days or timings, or the cumulative impacts, including to the local amenity.

The applicant also proposes in section 3.8.49 that, there may be some occasions when waste deliveries are accepted outside the normal opening hours, for example in the case of an emergency or to accommodate the delivery of waste where vehicles have been unavoidably delayed, or in other similar circumstances. It is therefore proposed that the EfW CHP Facility be able to accept waste outside the operating hours stated above. Vehicles accepted onto the EfW CHP Facility Site outside of the hours stated above would park up and then be processed during normal hours.

5. Current CRP HGV Waste Acceptance - Operational Hours

The CRP waste acceptance timings recently changed in December 2022 via application (APP/22/01334/F) to amend restriction on time of vehicle movements. The variation to previous planning conditions was for vehicle operational hours which was approved to extended vehicles to leave the site from 0500 instead of 0700 Monday to Saturday.

The variation was submitted on the basis that:

“The request to extend the despatch hours is requested to ensure the despatch lorries would avoid the morning traffic along Magna Road and the nearby roads and reduce the congestion during the morning rush hours...”

No heavy goods vehicles shall be despatched from the site other than between 05:00 - 18:00 on Mondays to Fridays (inclusive), 05:00 - 13:00 on Saturdays, and not at any time on Sundays, Christmas Day, Boxing Day or New Years Day”⁶.

6. What does this tell us about CRP site capacity?

- By virtue of APP/22/01334/F to amend restrictions on time of vehicle movement it is admitted by CRL that vehicles on the site are not able to operate effectively due to the level of traffic and congestion. Therefore, on this basis, adding further (significant) vehicle traffic to and from the site will have further impacts to the local amenity and add to further pressure on the local road system, which would likely cause traffic to come to regular standstills with HGVs queuing at the site.
- Any significant queuing on site would also have further unassessed impacts to sensitive habitats and SSSI, requiring further environmental assessments for vehicle emissions. Further assessments are also required due to the now identified number of HGVs. The cumulative impact of all of the CRP waste management vehicle movements must be taken in to consideration, as collectively they contribute to combined volume of traffic and impact to the green belt.

⁶ APP/22/01334/F BCP Case Officer Report

- MVV have failed to document full operating hours for waste acceptance, indicating an intent for waste acceptance every day of the year except Christmas day (including Sundays). This would have significant impact on the local amenity and in effect rollback and remove all current protections.
- It appears coincidental that variations to planning conditions for extended vehicle dispatches were submitted by Commercial Recycling (Southern) Ltd (CRL) just months before MVV's proposal was submitted. WH Whites, the site landowner has interests in CRL, accordingly it would be expected that given MVV's interest they would be aware of the site's concerns over congestion on the local road network and to the site itself. This becomes relevant given that AMS acquired CRL in May 2024. Given that AMS and CRL provided letters of support to MVV, it follows that they are engaged with each other and therefore MVV would be well aware of the traffic constraints yet failed to address them within their Traffic Assessment, or provide robust assessment of the cumulative effects⁷.
- MVV have proposed longer waste acceptance hours than in operation at their Devonport EfW site even though that site is larger in permitted scale, as documented by MVV. This is likely due to the cumulative effect of existing and futures projects at CRP, of which MVV would be well aware yet failed to assess.
- Futureproofing with required CCS will adds even further unrealistic volumes of vehicle traffic that simply cannot be managed.
- It does not appear that any planning committee or planning officer has reviewed the cumulative total traffic movements/impact related to the CRP to date. Only assessments in isolation appear to have occurred without substantive calculations in any prior planning applications (i.e. no robust figures are apparent in previous CRP related applications).
- Magna Business Park traffic impacts have not been assessed within the MVV TA.
- Are the planning committee and case officer fully cognisant that if approved the intensification of the CRP, green belt site and adjacent sensitive habitats would become one of the largest waste management sites in the UK at 810,000tpa and 1,057,000tps including carbon capture. This remains part of the undocumented impact. This significant scale calls for further cumulative re-assessment or application refusal. It is incumbent upon the applicant to prove there is no significant cumulative impact, which they cannot.

⁷ <https://www.avonmaterialsupplies.co.uk/AMS/ams-acquire-commercial-recycling/>

APPENDIX 1.3

BASED ON MVV TA B HGV MOVEMENT CALCULATIONS – PLUS EXISTING CRP

Table 1a – All CRP HGV Movements

Company	Type of Waste	Capacity	HGVs
MVV (proposed)	Waste Incineration	260,000 tpa	61,880 pa
MVV	CCS	247	27,100 pa
NES	MBT (Mechanical Biological Treatment)	125,000 tpa	13,750 pa
CRL	MRF (Materials Recovery Facility)	175,000 tpa	19,250 pa
AMS	Inert Waste (construction)	250,000 tpa	27,500 pa
AMS	Concrete services (estimated)		15,444 pa
Total	Total permitted 810,000 = 1,620,000m tpa transported including return journeys	810,000 tpa	164,924 pa

Methodology based on 364 days per year divided by 13 hours. This is a conservative estimate as daily hours including weekend days are calculated across 13 hours. If weekend hours are compressed then time between vehicles over weekdays decreases. This represents only 27,390 less HGV movements than using existing facilities at MVV Devonport as a baseline.

Total CRP HGV and car movements:

- 214,402 movements pa
- 590 vehicles per day (364 days)
- 1 vehicle every 79 seconds (over 13 hours per day)

Total CRP combined HGV only movements:

- 164,924 movements pa
- 454 HGVs per day (364 days)
- 1 vehicle every 102 seconds (over 13 hours per day)

Total MVV HGV only movements (not including CCS or cars)

- 61,880 movements pa
- 170 movements per day
- 1 HGV every 4min 17seconds

Total MVV HGV only movements including CCS movements (not including cars)

- 88,980 movements pa
- 245 movements per day

- 1 HGV every 189 seconds

MVV Traffic Assessment HGVs only based on 364 days (LGVs / cars not included):

Methodology – the tables below are calculated against 364 operating days and operating hours at image 1. Vehicle movements are averaged across the daily hours. All movements only relate to HGVs (not including LGVs and cars). MVV only based on 66,880 HGVs pa as per the MVV TA.

MVV only

Day Type	Days	Hours/Day	Movements/Day	Movements/Hour	Time Between Vehicles
Mon–Sat	312	13	~80	13.84	260 sec
Sunday	52	8	110	13.84	260 sec

MVV + CRP

Day Type	Combined Movements/Day	Total Operating Hours	Movements/Hour	Time Between Vehicles
Weekday (Mon–Fri)	260 (CRP) + 180 (MVV) = 440	11 (CRP)	40.0	90 sec
Saturday	141 (CRP) + 180 (MVV) = 321	13 (MVV)	24.7	146 sec
Sunday	0 (CRP) + 110 (MVV) = 110	8 (MVV)	13.75	262 sec

MVV + CCS only

Day Type	Days	Movements/Day	Hours/Day	Movements/Hour	Time Between Vehicles
Mon–Sat	312	$88,980 \times (4,056 \div 4,472) \approx 80,712 \rightarrow$ 259/day	13	19.9	181 sec
Sunday	52	$88,980 \times (416 \div 4,472) \approx 8,268 \rightarrow$ 159/day	8	19.9	181 sec

What is not documented by the applicant is how other waste management traffic would also would operate at the CRP site. Table 1 below gives a breakdown of the volume of total permitted and proposed waste processing at the CRP.

In addition to the outlined existing permitted waste processing and the concrete business with fleets of specialised concrete HGVs, there are additional operating companies located at CRP, such as Biffa waste services and other commercial businesses whose transport activities

have not been documented by the applicant. The assessment also fails to document the volume of other, unrelated HGV movements passing the site on the A341.

MVV Traffic Assessment for Vehicles pa

Source	Vehicle	Volume (tonnes)	Average weight	Vehicles pa
C&I	RCV	54,000	10	5400
	WF	54,000	24	2250
LACH	RCV	77,000	8	9,625
	WF	75,000	23	3,261
	Total	260,000	-	20,536

Table 2: Calculation of annual vehicle movements

MVV Assessment - 5.16 Based on information from the Environment Agency's Waste Data Interrogator, it is likely that of the 260,000tpa capacity of the EfW CHP Facility, the sources would be:

- o 30,000-tpa from the adjacent MRF
- o 110,500-tpa from the adjacent MBT
- o 119,500-tpa from elsewhere

However, the planning inspectorate report (para 8.5) on Powerfuel's Portland ERF makes the above MVV asserted scenario is unlikely and no evidence exists that the MBT will cede waste to MVV (110,500-tpa), Indeed, they are at liberty to dispose of waste where they choose, as confirmed by the BCP environmental team⁸. Moreover, such an arrangement is only subject to contracts expiring in 2027, and the current incumbent of those contracts has expressly stated their preference to take the MBT output to the Portland proposal, which it is at liberty so to do.⁹. Tellingly, the company operating the MBT are the only waste management company located at CRP who have not provided a letter of support to MVV¹⁰.

Given the above, there is no basis on which MVV can make this claim, and again they shown to only be able to provide highly speculative, finger in the wind assessments. Moreover, their traffic assessment is supposedly based on weighbridge information from their Devonport waste incinerator, which does not account for all traffic to the site, nor does it explain from where the waste has been derived (imported), or what percentages are from genuine LACW sources.

According to MVV. the Devonport plant creates 264 HGV movements per day, every day of the year less Christmas Day. This equates to 96,096 HGV movements per year (264 HGVs x 364 days). The Devonport EfW is permitted to process 265,000tpa, whilst the Canford

⁸ Magwatch email correspondence with BCP Environmental team/FOI.

⁹ Planning inspectorate on Portland ERF (Powerfuel)

¹⁰ Planning inspectorate on Portland ERF (Powerfuel)

proposal is for 260,000tpa (1.9% or 5,035 HGVs less). Extrapolating the same methodology would mean the expected HGV movements at Canford EfW would be 94,276. This is almost double the number of MVVs calculated HGV movements for Canford (as per their Transport Assessment) and does not include additional calculations/HGV movements for carbon capture (CCS).

Using MVV figures from their Devonport EfW as a baseline, the volume of HGV movements is 41% higher than documented in their Canford submission.

APPENDIX 2

AIR SAFETY

At the EIA Scoping stage, the Council offered the following advice to the applicant:

'The Applicant's specialist safeguarding consultant contacted their counterpart at Bournemouth Airport and commented that if the proposed development would not penetrate any safeguarded surfaces, then there would be no requirement for an Instrument Flight Procedure (IFP) check to be undertaken. IFP design relates to route planning for aircraft and is a complicated, technical and highly regulated process. The Airport's representative carried out a brief initial assessment in this regard which indicated that there would be no effect on some relevant surface, approach and departure area considerations. However, it also identified a significant penetration of the Airport's "Type A" surface. The "Type A" surface describes parameters which enable an aircraft operator to comply with the relevant International Civil Aviation Organisation (/CAO) limitations. The responsibilities of the /CAO include establishing the requirements that exist internationally for aviation safety. These limitations are intended to ensure that for each flight, accurate take-off performance calculations are made and, in the event of an engine failure, an aircraft can either abandon the take-off run and stop safely or become airborne and clear obstacles by the required margins. Such assessments are not generic. Rather, they are unique to the aircraft type being used by the individual airline at the specific setting, so any one airline may have different assessments against the same obstacle environment. The Applicant's consultant was therefore advised that an in-depth IFP assessment would be required to support an application. This would be needed in addition to provision of other relevant details, including for example in relation to risk of bird strike.

If the Applicant's IFP assessment identifies any performance impacts in relation to current arrangements, then this is very highly unlikely to be acceptable to the Airport and the airlines operating from it as it may (for example) demand reduced payloads or changes in the type of aircraft operating. Any changes to IFPs to accommodate the scheme would also be unacceptable. Even if an alternative could be identified it would have to be agreeable to the airlines and acceptable in terms of the altered impacts on local people from modified flight paths, and even then, go through a full redesign and approval process which would be expected to take a period of years. In essence, any impact from the proposed development in this regard is unlikely to be acceptable. The Airport represents infrastructure of considerable economic importance to the BCP area and wider sub-region. It was impacted heavily by the pandemic and any threat to its recovery from that will be strongly opposed. In this context any planning application for a facility of the nature anticipated at Canford will be subject to very careful scrutiny.'

APPENDIX 3

bpp Consulting who, on behalf of Dorset Council, produced an independent report, *Rebuttal of Appellant's¹¹ Planning (Need) Proof of Evidence* (dated 28 November 2023)

Appendix 3 - Page 26 demonstrates that 16ktpa of RDF from NES MBT did not arise from BCPD P17 - Table 8 shows that residual waste arisings that may be catered for by the Appeal proposal will always fall below the proposed peak capacity of the plant and could equate to just over 50% of the proposed capacity by 2050. That is only 25 years into a probable 40 year life. When projecting arisings to the end of the proposed plant projected life (2065) applying this approach I find that the Plan area residual waste arising may be around 89,000 tonnes. This represents less than 45% of the proposed Appeal plant capacity of 202,000tpa

P2 1.7 -. I remain of the view that a value of c185,000 tonnes of residual waste that may be suitable for incineration was produced in the Plan area in 2022 and that this amount can be expected to fall over time.

Conclusion

1.9 I conclude between the two methods applied that, to 2050 available residual waste arisings from the Plan area will be significantly less than the capacity of the plant proposed at this Appeal. Bearing in mind that the plant is intended to principally serve the Plan area, and the LACW produced within the Plan area is contracted for management elsewhere, this reduces the available tonnage of residual waste further. In addition, if capacity at the recently consented EfW plant at Parley, one of the sites allocated in the Dorset Waste Plan, of c60,000tpa is counted, the tonnage falls further. It should also be borne in mind that the EfW plant at Bridgwater (109,000 tpa capacity) is already accommodating the residues from the Canford Magna MBT plant, and so the residual waste need of the Plan area is already adequately provided for, without substantial landfilling or RDF export, and there is no apparent need for an additional plant of the capacity proposed in the Plan area.

¹¹ Portland Powerfuel