



Application Reference: APP/23/00822/F

Address: Canford Resource Park, Arena Way, Magna Road, BH21 3BW

Proposal: Demolition and Removal of existing structures and the erection of a Carbon Capture Retrofit Ready Energy from Waste Combined Heat and Power Facility with associated Combined Heat and Power Connection, Distribution Network Connection and Temporary Construction Compounds and associated buildings and ancillary car parking.

Case Officer: Gareth Ball

Objection to APP/23/00822/F

There are a number of material considerations associated with this application which should result in its being refused. These include: endangerment of aerodrome safeguarding; possible air pollution; violation of visual amenity; negative impact of transport network; and violation of Green Belt (NPPF Purpose c).

1. Bournemouth, Christchurch, Poole & Dorset Waste Plan (2019)

The adopted Waste Plan for the area includes several policies that are relevant to the site and proposed development. Specifically, Policy 3 allocates the existing permitted waste site at Canford Magna, Magna Road, Poole for intensification and re-development.

The allocation is dealt with in Part 7, Appendix 3, Inset 8 of BCP's *Waste Plan 2019*. The Inset notes that the Land at Canford Magna 'is an existing complex of waste management facilities adjacent to the former White's Pit landfill sites'. Significantly and relevantly, under 'Allocated Uses' it states that the site should offer

'opportunities for intensification and redevelopment of the site including the management of non-hazardous waste. Waste management facilities, *including incineration*, that would lead to adverse effects upon the Integrity of European Sites *will not be acceptable*.' (My Italics)

The above proviso regarding incineration should surely play a critical role in deciding this application and should lead to its refusal.

2. The Nature of the Proposed Development

In BCP's Summary of the application on its opening page on the planning portal, the proposal is described as

'the erection of a Carbon Capture Retrofit Ready Energy from Waste Combined Heat and Power Facility with associated Combined Heat and Power Connection.'

In their *Planning Statement*, the applicant, MVV Environment Ltd, describe their proposed development as ‘an Energy from Waste Combined Heat and Power Facility’, thereafter abbreviated to as the ‘EfW CHP Facility’, a bland assemblage of letters and the comforting word ‘Facility’. The truth of the matter is that what MVV want to build is an **incinerator**, whose polluting emissions will require a 100m+ chimney to give a degree (unknown) of safety to people, flora and fauna in the surrounding areas. The radius of area possibly affected by deposited pollutants is unknown, because it will depend upon the meteorological conditions (especially rain and wind speed and direction) at any given time.

The ‘Carbon Capture Retrofit’ part of the description, whilst having all the benefits of perfunctory virtue-signalling, is also misleading, as is indicated in the Conclusions paragraph of the *Planning Statement*, which gives the game away with the words

‘Potentially, should carbon capture and storage become viable and be installed...’

‘Potentially’? ‘Should’? In other words it is not certain to happen. Its viability is not known. Therefore, essentially what is being applied for is an **incinerator**, a ‘facility’ that will be sending the emissions of various kinds of waste that cannot be conventionally recycled into the surrounding countryside.

3. Air Quality vs Visual Amenity vs Aerodrome Safeguarding

The inability to resolve satisfactorily all the competing requirements of the EfW CHP Facility would seem to indicate a very clear reason to refuse the application.

Paragraph 3.4.7 of *Environmental Statement - Non Technical Summary* deals with scale and design of the facility and states that the proposed plant

‘will include one chimney. The height of the chimney is determined by a number of factors ... Preliminary design considerations were based on a chimney height of approximately 90m. Following initial air quality modelling outputs, *it was determined that there would be potential significant air quality effects upon the habitats that support the designation of Canford Heath, directly adjacent to the EfW CHP Facility Site.* In response to this, the chimney height has been reviewed. A range of heights were modelled to understand the likely effects upon the heath, whilst balancing the landscape and visual effects relating to the introduction of a tall feature into the landscape, and the requirements for aerodrome safeguarding associated with Bournemouth Airport. Based on the balance of the range of requirements of air quality, landscape and visual effects and aerodrome safeguarding, the chimney for the Proposed Development will have a maximum height of 110m above finished floor level and an approximate diameter of 3.1m.’
(My italics)

The balancing act proposed by the developers is no such thing beyond a clever use of words. This is because the three demands of the chimney cannot properly and satisfactorily be held in balance: Either aerodrome safeguarding and the visual amenity factor of an over-tall chimney of 100m+ require a shorter chimney and therefore endangering air quality on the adjacent SSSI site of Canford Heath; or air quality comes first and the tall chimney dominates the landscape for miles around and violates aerodrome safeguarding. The circle of competing demands cannot be squared. It can only be wishful thinking by the developers that it might be squared.

3.1 Air Safety

It is no surprise whatsoever to see that Bournemouth Airport has objected to the application, stating that

‘This proposal has been examined from an Aerodrome Safeguarding aspect and it does appear to conflict with safeguarding criteria.’

3.2 Visual Amenity

The chimney will be toweringly visible from all parts of the adjacent Canford Heath, the recently created SANGs the far side of Magna Road, from Poole Harbour and from many miles in all directions.

This much is admitted in para 3.4.7 of the *Environmental Statement - Non Technical Summary* admits that:

‘the Canford Resource Park – which the ‘Facility’ is a part – is unusual in that it is an industrial enclave in a principally rural setting... (and) will be visible from a distance.’

However, the applicant, like Baldrick, has a cunning plan to disguise the ‘facility’, with its 100m+ chimney. Para 3.4.7 continues:

‘Different design options have been considered by the Applicant and a number of options were presented to BCP Council. The preferred design features curved design aspects to ensure that the building is as unobtrusive as possible and to best complement long distance landscape views. This preferred design has been refined from the initial model to consider the following elements:

- provision of green roofs; and
- consideration of materials, colours and finishes to minimise the visual impact of the taller elements of the EfW CHP Facility.’

That the ‘materials, colours and finishes’ will in any way significantly affect the visual effect of the chimney is as silly as the proverbial ostrich burying its head in the sand and believing it is invisible!

The conclusion to the applicant’s *Environmental Statement* suggests that the ‘visual impact’ from various points around the proposed site will vary from ‘Minor to moderate adverse’ and that the impact from the SSSI Canford Heath will be ‘Major to Moderate Adverse’.

Surely the ‘Major to Moderate Adverse’ judgement is a significant enough material consideration to lead to the application being refused.

3.3 Air Quality

The negative aspects of the proposed plant have been played down, with the applicant using that word beloved of developers – ‘mitigation’. Para 4.48 of *Environmental Statement - Non Technical Summary* states:

‘Overall, the majority of potential significant negative effects have been avoided or reduced through inherent mitigation incorporated into the Proposed Development’s design and specifications.’ (My italics and underlining).

Amongst the supposed mitigations (excluding, of course, air safety) are the 100m+ chimney, which the same paragraph says

‘has been designed to be as high as possible (whilst balancing landscape impacts and aerodrome safeguarding constraints) to allow greater dispersion of the emission gasses, thereby reducing the concentration of pollutant deposition on habitats’.

Only ‘**reducing**’ ‘the concentration of *pollutant deposition* on habitats’? Really? Are BCP happy with this, a council which has stewardship of significant swathes of Dorset Heathland, which are internationally noted to be amongst the most biodiverse areas in the entire UK?

The conclusion to the applicant’s *Environmental Statement* suggests that the

‘Operational direct and indirect gas emissions of the proposed development will be ‘**Minor to moderate adverse**’.

Is this really acceptable to a council that declared a Climate Emergency in 2019?

4. Transport

Paragraph 4.5.2 of the applicant’s *Statement of Community Involvement* states that:

‘Traffic and transport is by far the most important topic, based on the feedback received. Concerns include the capacity of the existing road infrastructure to accommodate additional vehicles and the cumulative increase in vehicles on the roads due to recent housing developments in the local area.’

This is small wonder, given the experience of local people using Magna Road/ Queen Anne Drive (A341) in recent years. Sadly, the applicant’s analysis of current and future problems, as outlined in the *Transport Assessment*, is not rooted in any realistic assessment of traffic levels or of the experience of local people. Sadder still is that BCP has always appeared deaf and blind to the particular needs of local people in this peripheral part of the authority, readier, it seems, to listen to what the developers have to say.

4.1 Transport Implications of EfW CHP Facility

Para 5.5 of the applicant’s *Transport Assessment* quantifies the number of vehicles that would be generated by the ‘facility’: an extra 20,536 HGVs per annum carrying 260,000 tonnes along Magna Road.

According to paras 7.4 and 7.5 of the Conclusion of the *Transport Assessment*,

‘The percentage increase in flows across junctions in the study area would be negligible. In addition, modelling of the Arena Way/Magna Road/Garden Centre junction shows that the impact upon queues, delays and capacity would be minimal... The impact of the Proposed Development upon the road network would not be severe.’

These (relatively) optimistic judgements would pertain **only** if Magna Road / Queen Anne Drive and the junctions at each end were currently underused. They are not, as I will outline below.

4.2 Current and future issues on the A341

The junction at both ends of this road (the A341) – the Bear Cross roundabout at one end, the junction with the A349 at Gravel Hill – are already at or close to capacity. This was publically stated by BCP's own Transport Development Team Leader in 2021:

'With regards to general traffic congestion it is right to say that both junctions at either end of Magna Road, at top end of Bear Cross roundabout and Queen Anne Drive are at capacity or close to capacity at the moment.'

This statement was made at a Planning Committee meeting on 18th March, which was considering the application to build 800 houses at Knighton (Land North Bearwood) and before approval was given to build 550 houses at Cruxton Farm (Land North of Merley). The BCP Transport Development Team Leader went on to say:

'On a wider point of view we accept from a Highways point of view that this proposal will lead to extra congestion... We at the Highway Authority are not saying there won't be congestion as a result of this proposal. It is when we look at what is that congestion, so if you are approaching Bear Cross roundabout you will queue at the moment and those queues will lengthen as a result of the development, so effectively people will be queueing longer and taking longer to get to work and that is a reality of the delivery of what, should this application get consent, the delivery of 800 homes on this site.'

The applicant's *Transport Assessment* takes no heed of the current congestion – even before the building of an extra 1300 homes, relying instead on BCP's vacuous Transforming Travel Scheme:

'Furthermore, BCP are in the process of improving facilities for pedestrians, cyclists and bus users across various parts of the road network, as part of their Transforming Travel scheme. This includes the A341 from Gravel Hill to Bear Cross roundabout and beyond. ' (*Transport Assessment*, para 3.11)

The reality is that the desired Modal Shift will not take place in Merley and Knighton / Bearwood because of their locations, which are some miles away from the main employment areas of Bournemouth, Poole and beyond. BCP were told this by Dorset Police and by their own transport consultancy in 2019.

Given the location of the development, there is agreement that most of its residents will have to travel some miles to their places of work. The Dorset Police submission for the Cruxton Farm application (APP19/00955) [September 2019]] makes this point. Acknowledging 'the Council Policy to reduce dependence on single car travel,' they nevertheless stress that

'accepting this is Policy, it is still aspirational. The reality is that due to the distance from the main employment areas of Bournemouth and Poole, a great number of residents will have cars, and may continue to use them. This could place a strain on the infrastructure.'

The point was confirmed in Para 3.2 and 3.5 of the BCP's own Transport Assessment (conducted by WSP in July 2019):

'The main employment centres are identified as the urban areas of Poole, Bournemouth and Christchurch, which fall outside of comfortable walking and cycling journey times...

... Existing and future residents can access large employment centres by bus during morning and afternoon commuting hours. However, an estimated peak time bus journey time of 50 minutes to Poole and 55 minutes to Bournemouth is unlikely to be considered an attractive alternative to private car use which, undertaking a Google Maps search, indicates that these journeys could be completed in 35 and 45 minutes respectively by private vehicles. '

This inconvenient truth was ignored by BCP when considering the applications for the large developments at Knighton and at Cruxton Farm.

4.3 Conclusion

Given that the location of housing developments that feed onto Magna Road / Queen Anne Drive militates against the desired Modal Shift and that BCP's own Transport Development Team Leader has blithely admitted that existing congestion will worsen when the two Urban Extensions (Knight and Cruxton Farm) come on stream, can BCP's planners really allow an extra 20,536 HVGs on the road. These vehicles will, of course, trigger red traffic lights every time they try to exit the site, lengthening long queues up and down Magna Road /Queen Anne Drive.

It is time for BCP to become realistic about transport issues in north Poole.

5. Green Belt Intrusion

Parts of Section 8 of the *Planning Statement* consider Green Belt issues, including adherence to the NPPF's five purposes of Green Belt. Para 8.2.78 of the *Planning Statement* considers Green Belt Purpose (c), which is 'to assist in safeguarding the countryside from encroachment'.

The development site is 2.3 Ha of Green Belt land, part of a 104.74Ha parcel of land (Outer Area 31). BCP's *Strategic Green Belt Assessment* of 2020 classified this as 'countryside', adjudging its contribution to Green Belt Purpose c) '**Strong**'. Significantly, the proposed development site is immediately adjacent to the 'Absolute constraint' of the Dorset Heaths SAC (Canford Heath).

It seems inconceivable, then, that permission would be granted to go ahead with this damaging encroachment on the countryside adjacent to SSSI Canford Heath. It seems especially unlikely, given that in January 2023 BCP pledged that there would be no further development on Green Belt land, a pledge that the new BCP administration has not retracted.

This is yet another material objection to the application which should result in its refusal.

6. Conclusion

When each and all of the material considerations outlined above are examined, a very clear case for the refusal of the application is inarguable. The harms of this proposed development clearly outweigh any benefits.

Frank Ahern



24th August 2023