



MAGWATCH

TOWN AND COUNTRY PLANNING ACT 1990

SECTION 78 APPEAL

**Appeal by MVV against the refusal of a planning application by Bournemouth,
Christchurch and Poole Council for**

“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”

at Canford Resource Park, Arena Way, Magna Road, Wimborne, BH21 3BW.

Planning Inspectorate Reference: 6002440

County Council Reference: APP/23/00822/F

PROOF OF EVIDENCE: GREEN BELT ISSUES

APPENDICES



CONTENTS

APPENDIX 1 – Parcel 16 (Extract from Poole Green Belt Review)	3
APPENDIX 2 – Planning History of Lake B4 at White’s Pit (BH21 2BW)	5
APPENDIX 3 - Pre-app exchange between Savills and LPA	9
APPENDIX 4 - Dorset Heaths - Landscape Change (Natural England)	16
APPENDIX 5 - Visual and Heritage Impacts - Stephen Harper	21
APPENDIX 6 - Photos from Various Vantage Points of Canford School	28
APPENDIX 7 - Mental Health Matters	32
APPENDIX 8 - Technical Note of Behalf of Appellant	69

APPENDIX 1 – PARCEL 16 (EXTRACT FROM POOLE GREEN BELT REVIEW)

Parcel 16 - Tract of land to south of A341 Magna Road between Merley and Bearwood

Figure 34 - Parcel 16 Location Plan (not to scale)



© Crown Copyright and database rights 2017. Ordnance Survey 100024240, Getmapping plc (2009-2012), Bluesky(2007), GeoInformation Group (2000-2000).

Site Name	Parcel 16 - Tract of land to south of A341 Magna Road between Merley and Bearwood.	Score	
Essential Characteristics			
Openness	The parcel is predominantly open and free of urbanising development. Built form within the parcel is concentrated in the large collection of industrial buildings that form the waste recycling centre. This large industrial complex acts as an urbanising influence but is surrounded by undeveloped open land.	High	
Permanence	Boundaries are not marked by permanent fixed features but by a change in character / land use, separated by a fence line. The heathland marks the southern edge of the parcel with leisure and formal recreational uses to the north. The eastern boundary is marked by trees and a remnant hedgerow. The western boundary follows a track which is also the line of Footpath 125 Dorset Way to Magna Road. Some of the woodland areas are subject to Tree Preservation Orders (TPOs)	High	
NPPF Purposes			
To check the unrestricted sprawl of large built-up areas.	The parcel is immediately adjacent to an extant permission for large employment units, which will, in effect, extend the large built-up area up to the eastern boundary of this sub-parcel.	High Contribution	3
To prevent neighbouring towns merging into one another.	Development of this parcel would result in a significant narrowing of the physical gap between Bearwood and Merley but there would be open landscape to the north and east of the parcel that would preserve separation.	Medium Contribution	2
To assist in safeguarding the countryside from	The parcel is predominantly open and rural in character. Development in these open areas would constitute an encroachment into the countryside. The parcel abuts the western edge of the safeguarded land which is	High Contribution	3

encroachment.	subject to an extant planning permission for urbanising development.		
To preserve the setting and special character of historic towns.	The parcel does not form part of the setting of an historic town	No Contribution	
Status of adjacent land	Protected Heathland is situated to the south. All adjacent land parcels fall within the South East Dorset Green Belt.		
Summary	This parcel makes a High/Medium contribution.		8

Overview

116. The Stage One assessment concluded that this parcel performed well in terms of Green Belt purposes and that no change was needed to the GB boundary. However, since that time an extension to the Waste Management Facility into the open land to the south east of the facility. As this land is clearly open and free of urbanising development, there is no question that it has the essential characteristics of Green Belt in terms of Openness. With regard to Permanence, these fields remain largely as they appear on the 1870 – 1900 Ordnance Survey Map 1:2500 and therefore would score highly for this characteristic too.
117. Due to its location, this group of fields would not score highly in terms of preventing sprawl from the large built-up area, but does have a limited role in preventing the neighbouring town of Merley merging with the large built-up area at Bearwood. As a sub-parcel, this area does prevent the south-eastward spread of the urbanising development at the Waste Control Centre. In this respect, development on these fields would constitute an encroachment into the countryside.
118. The conclusion remains that the Green Belt follows the most appropriate boundary in this area.



APPENDIX 2 – PLANNING HISTORY OF LAKE B4 AT WHITE’S PIT (BH21 2BW)

Original Construction of Lake B4 (Surface Water Lagoon, 1980s)

- A2.1 Lake B4 is a man-made surface water lagoon at White’s Pit, created in the 1980 to balance and attenuate surface water runoff from the landfill. Planning permission was granted in 1985 (probably by Dorset County Council).
- A2.2 The fullest account of this lagoon is provided by Graham Garner & Partners Ltd *Surface Water Management Proposals*, a 40 page document written in 2008 and submitted as part of **APP/12/01559/F**, an application to build a Low Carbon Energy Facility adjacent to White’s Landfill.

Graham Garner’s accompanying letter states:

Having reviewed the various documents and items of correspondence submitted and discussed the matter with Andy Bremford we attach our Surface Water Management Proposals Report prepared in March 2008 in connection with an application at the same location for an extension to an existing enclosed composting facility. This earlier application included filling part of an historic attenuation pond (Lake B4), relocating its attenuation function for an adjacent landfill site to within the landfill site boundary and calculating the storage requirement of the existing and proposed composting development to be attenuated in the remaining area of Lake B4.

The current application does not include any proposals to change the remaining area of Lake B4.

- A2.3 Para 6.6 of the report says:

In conclusion the reduced area of Lake B4 indicated on the Canford Composting Site Layout Plan, 6358/SK12 has sufficient capacity to accommodate flows from the proposed composting extension and the landfill outflows. The retained wet pond should be fully enclosed with a security fence and maintained by the sec staff.

- A2.3 Interestingly, the full Graham Garner & Partners drainage report is including in the application of the Canford Incinerator (**APP23/00822/F**) as Appendix 11.1 of the Environmental Statement. That that drainage report should be considered relevant to the 2023 incinerator application is interesting, and it is perhaps worth quoting paragraph 1.5:

The construction of the lagoon was granted planning permission in 1985 and from 1989 has performed the dual role of balancing the flow of surface water and removing from that water suspended silts generated from landfill capping operations. Surface water discharges from the lagoon via a control pipe and weir to a ditch to the Knighton Stream.

This would seem to imply that the drainage function continues to be significant.

[Note: APP/13/00806/Y approved a variation of the 25 year permission, extending it until 2035]

A2.4 From Case Officer Report 00/31392/006/Y:

There is a long history associated with this site, the most relevant of which are as follows:

Outline permission was granted on 4th June 1992 (ref: 31174) for development of land as control centre for monitoring landfill gas and leachate, landfill gas handling plant and leachate collection and treatment works.

A2.5 Condition 13 of the 1992 permission states that

within 3 months of the permanent de-activation of the system' all buildings, pumps, pipes, lagoons and the flarestack shall be removed from the site, any concrete bases shall be broken up and removed and the area shall be reinstated to agriculture.

A2.6 Condition 1 of 00/31392/006/Y

This permission shall expire on 25 years from date of permission, by which date the use shall have been discontinued, any associated buildings or other structures shall have been removed from the land, and the land restored to its previous authorised state as agricultural land in all respects.

08/31329/018/F (Application refused but approved in 2009 after appeal)

A2.7 In 2008, New Earth Solutions sought to expand the in-vessel composting facility by reclaiming part of Lake B4's area. Graham Garner & Partners drainage report (March 2008) was submitted as part of the planning application, detailing how the lagoon's function would be maintained with a smaller footprint. The proposal essentially involved infilling a portion of Lake B4 to create more operational land, while ensuring the remaining water capacity and new peripheral drains could handle surface water from both the restored landfill and the Site Control Centre.

A2.8 Case Officer Report for 08/31329/018/F

The existing settlement lagoon, Lake B4, will be drained and partially filled to provide the land on which to build the proposed complex of buildings.

The land requires infilling the man made settlement lagoon. The entire site is a former gravel pit, which was subsequently filled by the Borough of Poole with household waste.

The permission to form the Site Control Centre to deal with the emissions and output from the adjacent landfill site was based on the continued discharge, once these diminished the equipment to deal with them was required to be removed and the land made good. This includes draining and infilling the settlement lagoon.



A2.9 08/31329/018/F ES 2. *Proposals and Alternatives* (para 2.14) states

Roof water from the proposed extension (considered to be clean water) will discharge into the adjacent lagoon through a dedicated drainage and pipe network. This will be reused in the process as part of NESG's grey water recycling system. Foul water from toilets and other domestic activities will be taken to a septic tank with the outfall from the tank either incorporated into the composting water treatment system or tankered off site.

A2.10 ES 3 Natural Heritage (para 4.71)

Best practice techniques will be used during the construction of the extension, inclusive of measures to protect surface and ground water. Runoff from Whites Pit landfill will be managed through the landfill restoration drainage scheme and the lagoon will continue to manage the water from the existing composting facility and adjacent recycling operations. No effect on the water environment is anticipated.

A2.11 Subsequent Development Applications Involving Lake B4

- i) APP/12/01559/F (2012) for a Low Carbon Energy Facility (with subsequent variations 2013 – 2014). While this plant was constructed (on the Site Control Centre land), it never became fully operational. In planning files, Lake B4 is part of the background drainage infrastructure. The facility's design would have utilized the established surface-water management system at White's Pit. For example, the site layout plan shows Lake B4 adjacent to the development, so any runoff from the new hardstandings would outfall via the lagoon or connected drains to the permitted Knighton Stream discharge.

- ii) APP/15/00874/Y (2015) for a commercial and industrial waste Materials Recovery Facility with new weighbridge, office and welfare building (White's Pit site). This development by Commercial Recycling Ltd established a large waste sorting and recycling plant on the White's Pit site (north of Lake B4). It was part of the post-landfill redevelopment of the area into Canford Resource Park. The MRF application recognized Lake B4 as part of the wider surface water attenuation system for the site. The design incorporated on-site drainage measures (like sealed yards and water treatment for the waste process), but excess yard runoff in storm events would still drain to the existing lagoon and discharge point as per the established consent. The MRF's planning conditions required a drainage strategy compatible with the Lake B4 lagoon and its Environment Agency discharge consent (max 4,000 m³/day to Knighton Stream).



- iii) APP/20/00533/F (2020) for Removal of Condition 3 of APP/14/00120/Y to allow permanent retention of inert recycling facility (aggregate and soil production), and installation of a washing plant. The inert recycling activities are on land adjacent to or overlapping the former lagoon area. The planning submission included a Surface Water Management Plan ensuring that wash-water and silty runoff are contained and treated. Lake B4's role remained as an attenuation basin for clean surface runoff: the consent required that peak discharge rates to the Knighton Stream remained controlled (via Lake B4 or its successor arrangements) and that the capacity of Lake B4 was sufficient post-installation of the wash plant. In effect, Lake B4 is acknowledged as a critical part of the surface water drainage scheme for the recycling facility, preventing flood flow to adjacent heathland.
- iv) APP/23/00822/F (2023) for the Canford the Canford EfW. Lake B4 figured prominently in the application's environmental and drainage documents. Part of the EfW's footprint overlaps the southwestern portion of the old Lake B4 lagoon, which had been previously infilled. The Flood Risk Assessment and Drainage Strategy submitted with the EfW application carefully accounted for the existing White's Pit surface water system: it identifies the 'former attenuation storage pond (Lake B4) at the end of the pipe from both the Resource Park and White's Pit landfill' and notes that the Environment Agency-permitted discharge point to Knighton Stream lies at the south edge of the site. 'ES App 11.1 Flood Risk Assessment Appendix D White's Pit' consists wholly of Graham Garners & Partners Ltd drainage report from 2008. Planning conditions were drafted to protect Lake B4's function – for example, the approved conditions require: (a) maintaining the existing surface water sewer from the old landfill to the lagoon outfall, entirely separate from the EfW's new drainage; and (b) ensuring no backflow or interconnection between the EfW drainage network and the Lake B4 discharge system. In short, the incinerator plans explicitly recognize Lake B4 as the established surface water control for the site, and they had to design a new attenuation pond and pipework that would work in parallel with (but not disrupt) Lake B4's outflow to the Knighton Stream.

APPENDIX 3 - Pre-app exchange between Savills and LPA

BCP Council Civic Centre - Planning Services
Bourne Avenue, Bournemouth, Dorset, BH2 6DY

Tel: (01202) 123321

Email: planning.poole@bcpcouncil.gov.uk

Web: www.bcpCouncil.gov.uk/Planning-and-building-control



Philip Saunders
Wessex House
Priors Walk
East Borough
Wimborne, Dorset
BH21 1PB

Your Ref:
Our Ref: PREA/21/00143
Contact: Gareth Ball

Date: 16/09/2022

Dear Philip

Proposal: An energy from waste combined heat and power facility
Location: Canford Resource Park, Arena Way, Magna Road, Wimborne, BH21 3BW

I refer to your request for advice received and validated in this office on 21 December 2021. Please accept my sincere apologies for the delay in sending you this response letter.

Your pre-application letter was focused around three key questions in relation to the principle of the development and the current policy position. Under this focused pre-application format, the following response letter will directly address the three questions. These are:

1. How the proposed throughput of the Canford EfW CHP Facility fits with the: (1) overall level of need for residual waste management (2) site allocation
2. Compliance with the high-level objectives of policy – the waste hierarchy, the spatial vision, self-sufficiency, and the proximity principle.
3. Compliance with Green Belt policy.

This letter benefits from the input of the Council's Planning Policy team.

Officers note that the planning department also has a pending EIA Scoping Opinion under reference PREA/22/00049. These matters will be addressed under separate cover in relation to the scoping submission.

Relevant Planning History

APP/17/00007/P - Approved 24 April 2018

Outline application (with all matters reserved) for the delivery of up to 16,000 sq.m. of employment floorspace within Use Classes B1c (Light Industrial), Class B2 and B8 uses (not including special industrial groups A-E (use classes B3-B7)) in the Town and Country Planning Use Classes Order (1987), together with associated parking, access from Magna Road and provision of infrastructure link to Canford Magna site control centre.

8/21/0207/FUL - Approved 8 March 2022

Proposed development comprising the installation of a low carbon Energy Recovery Facility for the generation of electricity and heat through a low-emission thermal process using residual waste; including a new administration building and associated car parking area; associated reconfiguration of existing and permitted uses; an increase in permitted waste throughput; landscaping and associated works.

Relevant Planning Policy

Noting the focus of this pre-application enquiry, policy relating solely to the principle of the scheme has been listed below.

National Policy and SPDs

- National Planning Policy Framework (NPPF) (2021)
- Waste Management Plan for England (2021)
- National Planning Policy for Waste (NPPW) (2014)
- Resources and Waste Strategy for England (2018)

Local Policy and SPDs

- The Poole Local Plan (PLP) (2018)
- Bournemouth, Christchurch, Poole and Dorset Waste Plan (BCPDWP) (2019)
The Poole Local Plan (PLP) (2018) advises that “the Council prepares minerals and waste plans separately to the Poole Local Plan” (Para 1.8). The BCPDWP (2019) forms one of the key development plan documents in relation to your pre-application proposal.

Planning Considerations

1: How the proposed throughput of the Canford EfW CHP Facility fits with the: (1) overall level of need for residual waste management (2) site allocation

Overall Need and Allocation

The BCPDWP (2019) identifies a significant shortfall in non-hazardous residual waste capacity, noting that landfill capacity is diminishing and stating that “the amount of

residual waste arisings suitable for treatment is projected to increase by approximately 57,000 tonnes per annum at the end of the Plan period” (Para 7.71). This culminates in a 232,000tba shortfall in non-hazardous residual waste capacity by the end of the Plan period, as noted in Identified Need 7 within the plan document.

The plan seeks to address this directly through allocation of sites for the intensification of (or additional development within) the identified in Insets 7 to 10. As such, you are advised that your pre-application site represents a strategically identified location for development to process additional residual waste.

Your pre-application submissions states that the development would result in an increase in residual waste capacity of 127,500tpa. This would reduce the throughput shortfall which is welcomed. This level of capacity is comparable to what is expected on the site, with the BCPDWP stating in Para 7.75 that *“there may be the potential for additional residual waste management capacity to come forward on sites previously designed for the management of recyclates. Potential capacity amounting to about 150,000 tpa (at Canford Recycling Centre) may also be available to deal with residual waste”*. The principle of the use on the site would be supported, noting the existing use and the allocation; however, as discussed within other sections of this letter there are other important material considerations.

Other Sites

An electricity from waste (EfW) plant was recently granted planning permission (ref 8/21/0207/FUL) within the Plan Area (allocated site Inset 7 within the BCPDWP) and is projected to have capacity for an additional 60,000tpa non-hazardous residual waste. Assuming this facility is built out, this still results in a shortfall of c. 172,000tpa by 2033. Officers are also aware of a live planning application seeking a 183,000tpa (with a maximum 202,000tpa) capacity EfW plant within the plan area in Dorset (ref WP/20/00692/DCC). Should the Dorset Powerfuel plant be approved, the plan area would have sufficient permitted plants to meet residual waste capacity requirements by 2033; however, in correspondence with officers following the initial pre-application submission documents you drew attention to Paragraph 7 of the National Planning Policy for Waste (NPPW), which informs the national approach to waste management sites, stating:

“When determining waste planning applications, waste planning authorities should ... only expect applicants to demonstrate the quantitative or market need for new or enhanced waste management facilities where proposals are not consistent with an up-to-date Local Plan. In such cases, waste planning authorities should consider the extent to which the capacity of existing operational facilities would satisfy any identified need.”

Taking into account your target submission date of late 2022/early 2023, it is very unlikely that any of the other plants will be operational by this time and officers

acknowledge that capacity will need to be measured in line with the NPPW. It should also be demonstrated that the site won't displace any existing waste streams to recycling.

Within your pre-application submission you have queried the figures within the BCPDWP, noting that the existing MBT facility in the CRP is included within current capacity figures. The impact of the proposal on the continued operation of the existing unit should be clarified in any planning submission to allow for an accurate assumption of future demand and capacity.

2: Compliance with the high-level objectives of policy – the waste hierarchy, the spatial vision, self-sufficiency, and the proximity principle.

Your submission letter suggests that the pre-application scheme would comply with the underlying principles of BCP's sustainable waste management vision, which are identified in BCPDWP Policy 1. Officers agree with this position and the pre-application development's contribution towards meeting the aims of the underlying principles of the plan, which will weigh in its favour in planning considerations. In addition, the BCPDWP encourages the co-location of waste management facilities (Para 3.20) which would apply to your pre-application site. The site is also in accordance with Policy 2 as it is collocated with an MRF, MBT and Aggregate Recycling site.

Much of the waste which enters the current CRP facility is bailed on-site and exported to other European countries for incineration. Your pre-application scheme would improve BCP's ability to move waste up the waste hierarchy in comparison to the existing process, while making a significant contribution towards BCP becoming self-sufficient in line with projected capacity requirements by the end of the plan period. It must be ensured that the plant does not divert waste from streams higher up the waste hierarchy, such as collected MRF. The location of the development would be on the site of the existing facility and is well-located to be proximate to waste collection locations.

Any application seeking planning permission should identify the particular circumstances of the site and how the development is best suited to this site. The site-specific economic and waste benefits would be taken into account if an assessment is undertaken on whether very special circumstances have been demonstrated. This includes the public benefits of energy generation.

3: Compliance with Green Belt policy.

Green Belt Harm

Your pre-application proposal would be located within the South East Dorset Green Belt. NPPF Paragraphs 149 and 150 list development which is appropriate within the

Green Belt. Your pre-application submission suggests the development would fall under the scope of Paragraph 149(g), which includes:

“Limited infilling or the partial or complete redevelopment of previously developed land, whether redundant or in continuing use (excluding temporary buildings), which would ... not have a greater impact on the openness of the Green Belt than the existing development...”

The site is previously developed land in the same use as the proposal. Your design is still in its inception and this aspect is not being considered in this policy-focused pre-application response. In the absence of detailed plans and a Landscape Views Impact Assessment including verified views from an appropriate selection of agreed viewpoints, the LPA cannot accurately comment on the impact on the openness of the Green Belt. The proposal would result in an increase of built massing across the site; however, this does not inherently entail harm. Any submission for planning permission should detail any changes in activity, including traffic generation as part of justification to demonstrate that the development would not result in a greater impact on Green Belt openness.

Your pre-application development would definitely not fall under any other exemption from being considered inappropriate development within Paragraphs 149 and 150. If, upon the submission of a planning application supported by the required information, the development is not considered to fall within the description of NPPF Paragraph 149(g), the proposal would be regarded as inappropriate development which results in harm to the Green Belt. Such development can only be approved in ‘very special circumstances’ where the harm is clearly outweighed by other considerations. Any submission seeking planning permission for your proposal should ensure that the very special circumstances are identified and presented in order to justify the development within the Green Belt.

Further, any submission should take into account Paragraph 6 of the NPPW, which reads:

Green Belts have special protection in respect to development. In preparing Local Plans, waste planning authorities, including by working collaboratively with other planning authorities, should first look for suitable sites and areas outside the Green Belt for waste management facilities that, if located in the Green Belt, would be inappropriate development. Local planning authorities should recognise the particular locational needs of some types of waste management facilities when preparing their Local Plan.

Officers acknowledge that the site is allocated; however, if the proposal is considered to be inappropriate development in the Green Belt then any submission for planning permission should demonstrate that there are no sites outside of the Green Belt that are suitable, as per the other allocated sites identified in Insets 9 and 10 of the BCPDWP at Mannings Heath Industrial Estate and Binnegar Environmental Park.

Local Policy Position

In addition to national policy on development in the Green Belt, BCPDWP (2019) Policy 21 (*South East Dorset Green Belt*) provides a local policy position. The policy provides two routes in which Green Belt development can be supported. As **your scheme would fall under the definition of inappropriate development in the Green Belt**, it must meet the requirements of parts b and c of the policy. These read as:

- b. the potential harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations to an extent that can demonstrate very special circumstances, including a need for the development that cannot be met by alternative suitable non-Green Belt sites; and*
- c. the restoration of the site, where relevant, is appropriate to the inclusion of the land in the Green Belt and enhances the beneficial use of the Green Belt.*

The supporting text of the policy goes on to make direct reference to your pre-application site in Paragraph 12.110, noting it to be “*located in the Green Belt and play an important part in the management of Bournemouth, Christchurch, Poole and Dorset’s waste*”. Paragraph 12.111 goes on to state that “*proposals that improve or enhance existing facilities located in the Green Belt and/or are minor in scale may be acceptable if they enable waste to be moved up the waste hierarchy or provide an overall operational and/or amenity benefit. Such a proposal would need to ensure that there would be no net adverse impact upon the openness of the Green Belt*”. A robust demonstration that waste is moved up the hierarchy.

Conclusions

Officers understand that your intention in this pre-application submission was to ascertain whether the pre-application development would be supported by officers from a high-level policy standpoint. Your pre-application development would make a welcome contribution towards increasing BCP’s capacity for residual waste disposal and is broadly policy compliant in terms of the general aims and objectives of the adopted local waste planning policy document. It is supported in principle in this regard and is encouraged on the site.

Following the submission of further detail, if your scheme is identified as inappropriate development in the Green Belt then very special circumstances must be identified.

While the site is allocated, this does not preclude other material considerations in assessing an appropriate use on the site. Particular considerations are identified within the allocation under Inset 8 as (but not limited to):

- Allocation is described as suitable for incineration uses
- Allocation recognises the need for ecological mitigation given SSSI proximity

- Allocation requires the need for a landscape design and management plan as a result of the proximity of the SNCI
- Impact on the landfill restoration's biodiversity enhancements
- Impact on the South East Dorset Green Belt needs to be considered.

Any submission at full planning stage must be accompanied by an Environmental Statement. These matters are subject to separate advice being provided under an EIA scoping opinion. Among considerations is the need to demonstrate that the development won't impact the Dorset Heathlands SPA and Dorset Heath SAC which are adjacent to proposed site.

An element of your pre-application scheme results in the generation of energy. It should be determined at as early a stage as possible whether the development would be considered a Nationally Significant Infrastructure Project (NSIP) by way of Section 14 of the Planning Act (2008) (as amended). The trigger for a generating station being considered an NSIP is given under Section 15 of the Planning Act.

Officers understand that you are targeting a submission date in late 2022 or early 2023, with the aim of a quick resolution. While the general principle of the development has been set out and broadly supported in this letter, there are many other facets within the determination, many of which require highly detailed analysis. You are advised to engage in further pre-application discussions with the LPA. This can be achieved through individual pre-application meetings or can be done through a Planning Performance Agreement (PPA) which would allow for a prioritisation of the application with agreed turnaround times, regular update meetings and both scheduled and ad-hoc input from an agreed team of officers across the required specialisations. Both routes would incur fees – I am happy to undertake a costing exercise for both and discuss the benefits. Given the location within the Green Belt, you are advised to seek design advice as a priority.

Please note that these views are based upon my own professional opinion and given without prejudice to any decision that the Local Planning Authority may make should an application be submitted. Should an application be submitted, then through the consideration of that application further issues may come to light, which are unknown at this stage, and may if considered material require additional modification to the proposals or if necessary refusal of the application if changes are not made.

Yours faithfully

Gareth Ball
Senior Planning Officer



National Character Area 135

Dorset Heaths - Landscape Change

Monitoring Landscape Change

Drivers for change

Dorset Heaths mostly consist of large areas of lowland heath, providing wilderness and tranquillity despite proximity to a major conurbation, leading to recreational pressures on the landscape. Despite strong development and recreation pressures, the numerous national designations and international conservation designations provide protection. Other pressures include rising sea levels and storms which may challenge coastal defences, and drier conditions which may impact the important areas of heath habitat and conifer forests.

Monitoring landscape change

The most recent monitoring of landscape change within NCAs forms part of the [Environmental Improvement Plan Environmental Indicator Framework](#). This includes indicator [G1: Changes in landscape and waterscape character](#), informed by indicator component G1a: Changes in the landscape characteristics of NCAs in England.

Indicator component G1a measures the extent to which landscape change is achieving the aspirational landscape outcomes described in the NCA Statements of Environmental Opportunity (SEOs). For this purpose, SEOs across all NCAs are distilled into 34 Super Landscape Objectives (SLOs).

NCAs with broadly similar character and pressures for change have been grouped into 18 sub-Agricultural Landscape Types (sub-ALTs) that represent rural, urban and coastal landscapes. Equal numbers of relevant SLOs were identified for monitoring within each sub-ALT and their associated NCAs. These SLOs were assessed based on changes between 2015 – 2023 (or the closest approximations to those dates with the data available). The results of each SLO were combined to form an integrated view of overall landscape change within each NCA during this time period.

For further details on this landscape monitoring, refer to the [G1a Landscape Change Atlas and report](#), which are also available via the Landscape Change Evidence Hub.

[Landscape Change Evidence Hub](#)

The Natural England Landscape Change Evidence Hub has been created to provide access to information that can help us understand how, where, and why England's landscapes are changing, and how to manage change into the future. This includes the information on the Environmental Improvement Plan Environmental Indicator Framework, indicator G1, and the indicator component G1a Landscape Change Atlas and report.



Results of G1a: Changes in the landscape characteristics within this NCA

Listed below are:

- the overall trend for this NCA
- the results of the underlying analysis for each of the individual Super Landscape Objectives considered relevant to the NCA; this includes the ‘provisional status’ (i.e. current understanding of state/condition) and the ‘change trend’ associated with each SLO.

Reporting of the 2015-2019 and 2019-2023 time periods can be seen in the short term change results of G1a: Changes in the landscape characteristics within this NCA below.

The following SLOs are considered relevant to this NCA. The current provisional status of each objective and the assessment of change (expressed as a trend) is listed below. The overall integrated trend assessment is also listed.

The below section is in development.

NCA_Name Overall trend 2015-2023: Dorset Heaths In progress

SLO Code	Super Landscape Objective	Provisional Status 2023	Change Trend 2015-2023
SLO1	Conserve and enhance landscapes for their tranquillity and dark skies particularly where they are under pressure from the potential impacts of development and associated infrastructure.	In progress	In progress
SLO2	Conserve and enhance our priority habitats for their contribution to landscape character and quality (including natural/cultural values).	In progress	In progress

SLO Code	Super Landscape Objective	Provisional Status 2023	Change Trend 2015-2023
SLO3	Improve the ecological condition of rivers and canals as important landscape features including habitats, connectivity and cultural significance.	In progress	In progress
SLO4	Conserve and enhance our heritage assets for their physical and cultural contribution to landscape/waterscape character and quality.	In progress	In progress
SLO5	Ensure that agri-environment schemes are contributing positively to landscape and waterscape character.	In progress	In progress
SLO6	Conserve and enhance the field boundary features and patterns that characterise our varied landscapes.	In progress	In progress
SLO7	Improve access to and through landscapes with cycle paths and long distance footpaths, to increase recreational and educational opportunities for engagement with the natural environment.	In progress	In progress
SLO8	Enhance the visual and experiential quality of our landscapes and waterscapes.	In progress	In progress
SLO9	Improve the overall condition of Sites of Special Scientific Interest for their contribution to landscape character and quality.	In progress	In progress
SLO10	Seek to mitigate climate change through enhancement of carbon sequestration capacity within the landscape, and increasing above ground carbon stocks within vegetation and soil.	In progress	In progress
SLO11	Seek to mitigate climate change through enhancement of carbon sequestration capacity within the landscape, and increasing below ground carbon stocks within vegetation and soil.	In progress	In progress
SLO12	Seek to conserve, enhance and increase characteristic broadleaved woodland through appropriate management.	In progress	In progress
SLO13	Manage and maintain the coastal landscape and its unique habitats for climate resiliency, regenerating marine ecosystems and preparing for the future impacts of climate change.	In progress	In progress
SLO18	Improve the landscape and waterscape character and quality of watercourses and waterways, where appropriate improving	In progress	In progress

SLO Code	Super Landscape Objective	Provisional Status 2023	Change Trend 2015-2023
	visual and physical access and increasing riparian vegetation and tree cover, and thereby providing additional filtration, flood mitigation, and habitat.		
SLO21	Manage arable land to benefit landscape character and biodiversity, by maintaining soil health and minimising erosion and runoff through enhancement of biodiverse hedgerows, linear scrub and buffer strips.	In progress	In progress
SLO24	Connect existing broadleaved woodlands and enhance woodland cover, increasing extent of habitat connectivity where appropriate.	In progress	In progress
SLO28	Conserve and enhance traditional orchard habitats as characteristic landscape features strengthening the historic sense of place.	In progress	In progress
SLO29	Conserve and enhance lowland meadows and acidic grasslands as characteristic landscape features strengthening the historic sense of place.	In progress	In progress
SLO32	Protect and conserve the varied coastal geologic features for their distinctive character and natural beauty, which support important and niche habitats.	In progress	In progress

[From: <https://nationalcharacterareas.co.uk/dorset-heaths/landscape-change/>]



G1: Changes in landscape and waterscape character

Short Description

The [Council of Europe Landscape Convention](#) defines landscape as ‘...an area, as perceived by people, whose character is the result of the action or interaction of natural and/or human factors’. Landscape character, therefore, includes not only natural physical features such as hills, forests, rivers and lakes, but also man-made features like buildings and transport infrastructure. It is made up of the characteristics of all these individual features on their own, and the way they fit together in a place.

This composite indicator describes changes in physical, visual, cultural and experiential attributes of landscape character in England. It uses the 159 [National Character Areas](#) (NCAs) as the underpinning spatial and analytical framework. Indicator components G1a and G1b assess the extent to which these changes contribute positively towards achieving the aspirational landscape outcomes described in the NCA Statements of Environmental Opportunity. These statements refer to any one of a range of opportunities outlined in each NCA profile produced by National England. Component G1c uses spatial analysis to show how 5 attributes of landscape character (positive visual, negative visual, experiential, cultural and access) are changing over time. A further measure, currently in development, will draw upon new questions added to Natural England’s People and Nature Survey to establish people’s perceptions about the character of their local landscape.

[From: <https://oifdata.defra.gov.uk/themes/natural-beauty-and-engagement/G1/>]

APPENDIX 5: Interested Party Statement - Stop Parley & Canford Incinerators (Part 2 of 2: Visual and Heritage Impacts - Stephen Harper)

OF VIEWPOINT R, STEPHEN HARPER WRITES:

At location 50.760039, -1.9549829. Grid Reference: SZ 03272 95606. Total distance from site: 1.10 km, On this footpath the view of the proposed incinerator would consistently be in your field of vision as you walk towards the gate in the right-hand corner of the Heath in order to join bridleway 118. An experience of openness is derived from this historic route. As you walk further along this path, the openness of the surrounding heath is appreciated as part of the wider setting, contributing to the area's expansive sense of scale. This sense underpins its aesthetic significance. The existing chimney acts as a vertical marker that distracts the eye from moving freely across the landscape and from the prominence of the heath itself. (SPCI-2, paras 5.13 – 17)

RELIABILITY OF APPELLANT'S PHOTOMONTAGES

In Chapter 4, pp 36 ff, of Interested Party Submission Stop Parley & Canford Incinerators Part 2 ["SPCI-22"] [CD9 1.48(a)], Stephen Harper offers a detailed appraisal of the applicant's viewpoints, analysing in considerable depth the composition of images and the way the eye perceives them.

Overall, where landscape assessments have been carried out using the photomontages in MVV's ES Appendix 12.1: Landscape and Visual Impacts any landscape assessments that relied on these critiqued photomontages would be inadequate, resulting in any conclusions and summaries also being similarly inadequate. In the three identified instances, the visual impacts have been materially understated within the appellant's evidence. (para 472)

PVP 5



PVP 5, on the Stour Valley Way, raises serious issues about the reliability of the LVIA

This is a view westwards from the Stour Valley Way at the Canford SANG car park, with the photograph seemingly taken from the bottom of an embankment.

The vertical features of this photograph, the fence posts, complicate the viewer's perception of its intended subject. Stephen Harper notes:

In taking this photograph below the eye level, it has brought the fence posts above the horizon, adding to the number of vertical features in this composition... Breaking this composition down to its elements, the addition of one further vertical element will make less of a visual impact to the five existing vertical features. This is due to the low viewing angle in relation to the horizon line, the photograph compresses vertical scale. As a result, the introduction of one additional vertical structure, would appear less visually prominent when seen alongside the five vertical posts already present. One more example is that the chimney's impact is understated because of the perspective is the tonal/colour contrast, which is not representative of what people will always see. (SPIC2 4.7)

PVP 10

The effect of vertical features of view is seen again in PVP 10 (EDP10).



Stephen Harper notes (SPCI-2 4.49), that the 'most creative' technique of using other vertical shapes in photomontage views appears to be an attempt to diminish the impact of the chimney stack on the surrounding landscape. The light grey fence posts mimic the symmetry

and tonal value of the chimney stack, thus diminishing its impact: As white vertical lines already appear in the landscape, it does not seem out of place if there is one extra, the chimney stack.

He says:

I had to ask myself, why was it necessary to include fence posts in the photograph EDP 10? It would have been just as easy to walk closer and take a photo over the fence. But it would have increased the visual impact of the facility. (SPCI-2 4.50)

In the second image of PVP (EDP) 10, the white vertical posts have been removed, showing clearly the different degrees of visual impact in the two versions of the photomontage.

PVP 1

The *Landscape and Visual Impact Assessment (A12.1)* photo from PVP1 (from Bridleway 118) does not offer a 'proposed view' of the proposed EfW.

Incinerators 2 (SPCI-2). The locations have been chosen carefully and the reasoning and methodology explained in detail. The photomontages illustrate very clearly the detrimental impact on the landscape character of the area.



An alternative photo¹ is taken from Stephen Harper's Viewpoint V, which he explains the significance of:

From a local perspective, people visiting the SANG or the Heath usually walk in or park at the end of Wheelers Lane. To reach the Heath, they follow the 118 Bridleway, passing through a gate and walking through a small wooded area. Before the bridleway begins to slope downhill, there is another gate. Just beyond this, on the right, the view opens up. People often pause here, as the elevated, open position offers a wide vista across the landscape. From here, the eye is drawn to the patterns, scale, and distance of the surrounding countryside, making it a moment to take in and

¹ The photographs were taken with a 50 mm lens, as this lens is often considered to provide a field of view that closely resembles what the human eye sees. This makes it a popular choice for creating natural-looking images without distortion. It is also in accordance with GLVIA guidelines.

enjoy the setting... This viewpoint is significant due to the way it is experienced along the track. As users move along the path, the opening between the trees naturally draws attention forward, gradually revealing open views of the surrounding landscape as it falls away beyond the site. This transition from a semi-enclosed environment to a more open setting enhances the visual experience and reinforces the importance of the viewpoint within the landscape. The resulting transition from a semi-enclosed space to an open view is clearly perceptible and contributes to the visual sensitivity and importance of the viewpoint. (10.15–10.25)



Viewpoint V by FP 118 (Grid Ref. SZ 03756 96293, approximately 469m from site)

VIEWPOINT X (THE BOWL BARROW 650M SOUTH OF THE PROPOSED DEVELOPMENT)



Viewpoint X.1. Approx 110 ° view



Viewpoint X.2 Photomontage: A visualisation of the proposed development superimposed upon the baseline panoramic photograph X.1

3.22. Photos taken from the location of Heritage Category: Scheduled Monument. List Entry Number 1018487: Bowl barrow on Canford Heath 650m south of southern corner of New Covert at National Grid Reference: SZ 03448 96150 in the direction of the site. (SPCI-2 para 3.22)

Steve Harper writes:

The panoramic photo X.1 was taken from viewpoint X . I am actually standing on the site of the Scheduled Monument, looking towards the existing site.

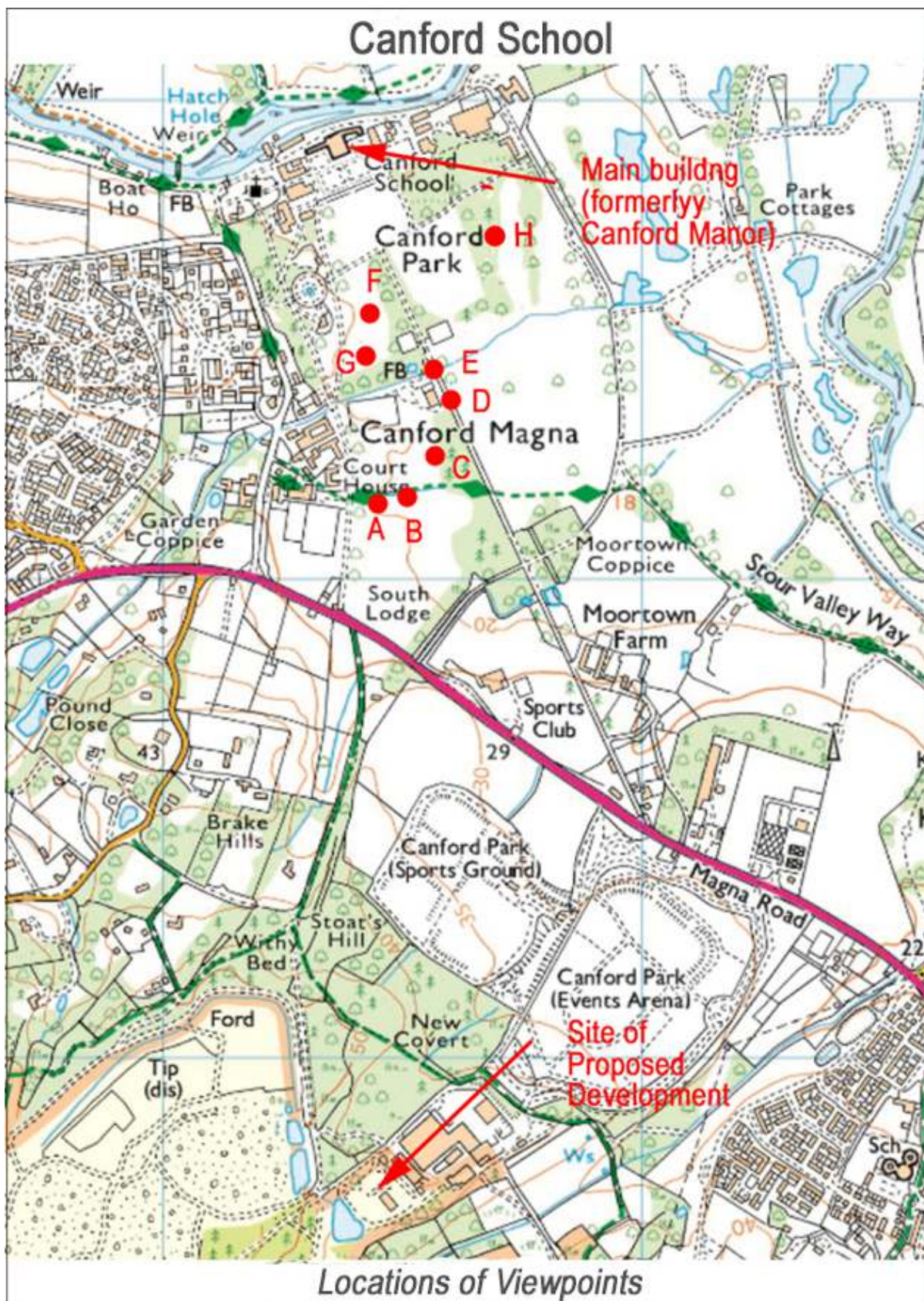
For this panoramic photograph I captured a wider angle of view in order to show the baseline setting. (SPCI-2 para 3.26)

He quotes Historic England:

The monument includes a bowl barrow 650m south of southern corner of New Covert, part of a dispersed group of barrows on Canford Heath. The barrow lies near the edge of a plateau overlooking a valley to the north west and north. The barrow has a mound 15m in diameter and 1.6m high with a slight depression in the top of it suggesting that it may have been partially excavated in the past. Surrounding the mound is a quarry ditch from which material to construct it was derived. This survives as a slight depression on the northern side of the mound but has been disturbed by surface gravel digging on the south western and south eastern sides. It will however survive as a buried feature approximately 2m wide. (SPCO-2 para 3.23)

APPENDIX 6 - Photos from Various Vantage Points of Canford School

The purpose of this collection of photographs is to dispel the notion of a 'surrounding urban experience' in this heritage setting.





View North from Viewpoint B



View South from Viewpoint B



View West from Viewpoint A



View East from Viewpoint A



View South from Viewpoint F



View West from Viewpoint F



View West from Viewpoint F



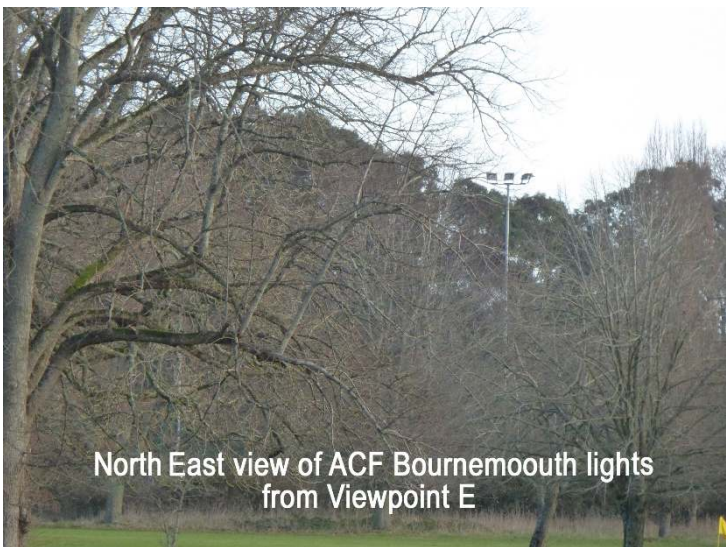
View East from Viewpoint F



Panoramic view West to North NE from Viewpoint G



Panoramic view North NW to East from Viewpoint D



North East view of ACF Bournemouth lights from Viewpoint E



View East from Viewpoint H showing AFC Bournemouth training facility



View South from Boardroom



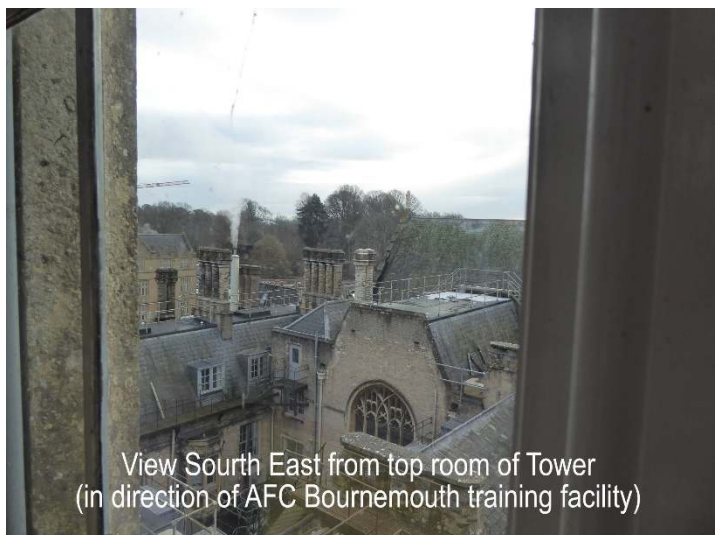
View North East from middle room of Tower



View North West from middle room of Tower



View West from middle room of Tower



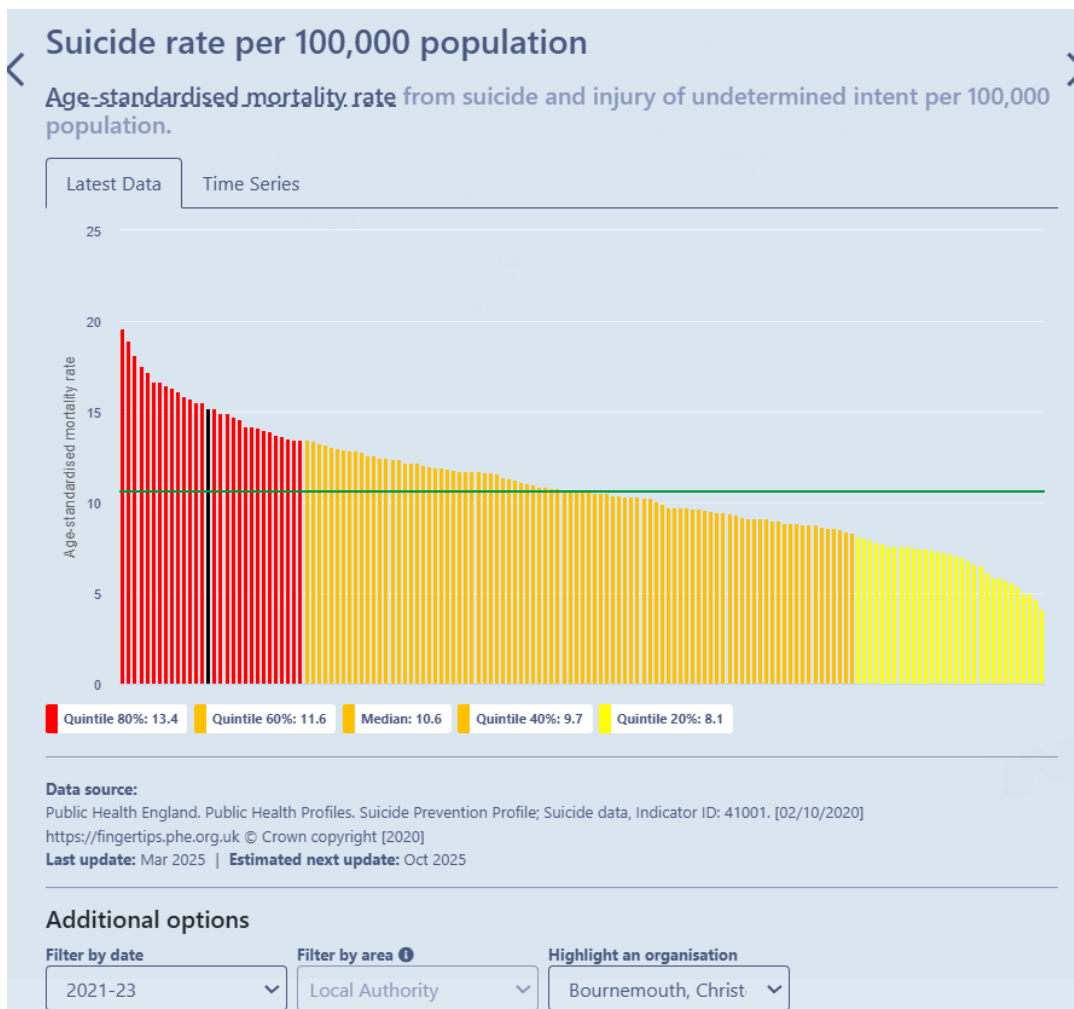
View South East from top room of Tower
(in direction of AFC Bournemouth training facility)

APPENDIX 7 - Mental Health Matters

Suicide and Self-Harm Data

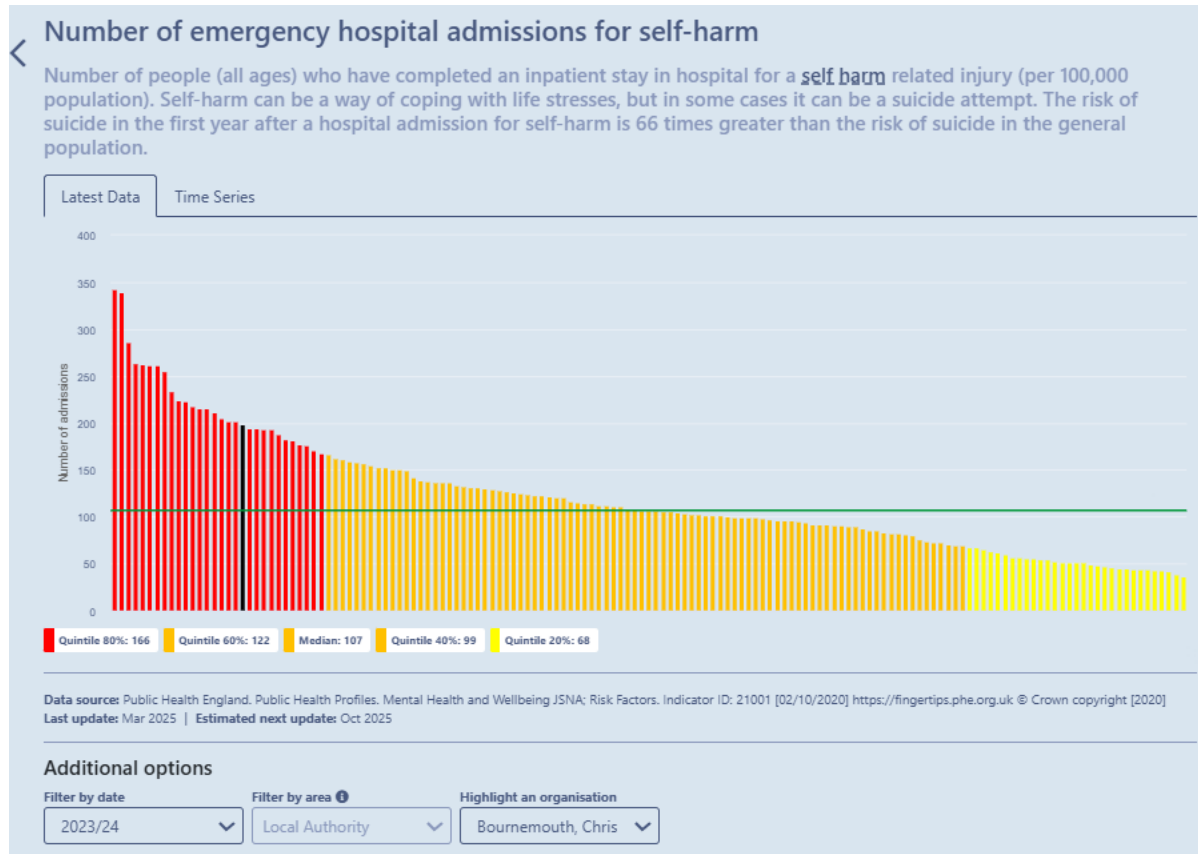
The Suicide and self-harm Data Maps below were established through consultation with clinical expertise, with the data itself drawn from a number of sources, including the Office for National Statistics (ONS), health and local authority datasets, bespoke or specific benchmarking, national audits and surveys.

Suicide Graph in comparison to national average:

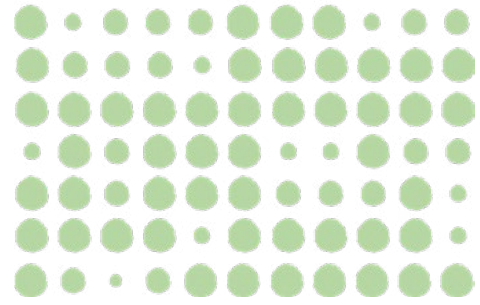


<https://www.zsbenchmarking.co.uk/maps/suicide-rate/2021-23?org=E06000058&tier=2>

Self-Harm Hospital Admissions Graph in comparison to national average:



<https://www.zsbenchmarking.co.uk/maps/emergency-hospital-admissions-for-intentional-self-harm/2023%2F24?org=E06000058&tier=2>



Introduction

Every life lost to suicide is a tragedy

Suicide has a devastating impact on families and communities. It is estimated that up to 135 people are impacted by every suicide¹ – meaning that nearly 900,000 people a year could be affected across the UK. Losing someone to suicide can also increase a person's risk of taking their own life.

“ The second year was a lot worse than the first year in many respects, I think because of shock. I think you start to live alongside all the mishmash of feelings and they... they don't go away...they haven't gone away or subsided. ”

Tasha, bereaved parent²

At Samaritans, there wasn't a single second in 2022 when we weren't on the phone providing emotional support. In 1 in 4 of these calls the person expressed suicidal feelings, and in 30,000 emotional support calls the person mentioned losing someone to suicide.



It is estimated that up to 135 people are impacted by every suicide¹

In 2022, 6588 people died by suicide in the UK*:

- **England 5284³**
- **Wales 339⁴**
- **Scotland 762⁵**
- **Northern Ireland 203⁶**

Suicide rates change each year, however in England they are currently the same as they were over 20 years ago. While the most significant impact of these high suicide rates is the devastating loss felt by families and communities, this paper focuses specifically on the economic impacts caused by suicides. These impacts range from financial losses due to lost years of life in employment, to costs felt by the healthcare system, police and coroners.

In this paper, we present analysis of the societal costs caused by suicides in the UK in 2022, with a focus on England. These figures demonstrate that suicide prevention is a crucial area for public investment due to the significant financial and emotional costs which are caused by suicides every year.

* 6588 deaths were registered as suicide in 2022. Because of delays in the way suicide is registered after someone dies, these numbers can include deaths which occurred in previous years.

The cost of a suicide



In 2022, the cost of suicide to the economy was substantial - at a total cost of at least **£9.58 billion across the UK**, and an average cost of at least **£1.46 million for every life lost to suicide**. In England alone, the economy lost £7.7 billion, Scotland lost £1.1 billion, Wales lost £0.48

billion, and Northern Ireland lost £0.3 billion. Table 1 shows the different types of costs related to suicides in 2022 in the UK – these are conservative estimates, and in reality may be even greater (see Appendix 1 and 2).

Table 1: Summary of conservative cost estimates for suicides and self-harm recorded in 2022, according to 2022 prices

	Costs in £				
	UK	England	Northern Ireland	Scotland	Wales
Employment productivity losses	3,075,960,216	2,479,420,721	98,118,192	342,671,694	155,749,609
Other productivity losses	1,793,783,884	1,435,194,911	56,355,631	211,301,061	90,932,281
Intangible costs	4,306,734,989	3,449,064,560	136,429,782	503,881,712	217,358,935
Suicide health care costs	1,765,738	1,415,757	54,483	204,513	90,984
Self-harm health care costs	352,501,640	297,293,953	11,411,240	28,048,127	15,748,320
Emergency services costs	6,508,968	5,218,849	200,839	753,889	335,391
Coroner / legal costs	29,772,230	23,871,310	918,649	3,448,330	1,533,941
Family costs	16,600,611	13,310,264	512,224	1,922,734	855,389
Total	9,583,628,277	7,704,790,325	304,001,041	1,092,232,059	482,604,852
Average cost per suicide	1,454,710	1,458,136	1,497,542	1,433,375	1,423,613

Source: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/939479/PHE_LA_Guidance_25_Nov.pdf

10 things that everyone needs to know about suicide prevention

- 1** Suicides take a high toll

There were 5,021 deaths from suicide registered in England in 2018¹ and for every person who dies there are likely to be 135 people who will have known them and therefore may be affected in some way.⁵
- 2** There are specific groups of people at higher risk of suicide

Three in four deaths by suicide are by men.¹ The highest suicide rate in England is among men aged 45-49.¹ People in the lowest socio-economic group and living in the most deprived geographical areas are 10 times more at risk of suicide than those in the highest socio-economic group living in the most affluent areas.⁶
- 3** There are specific factors that increase the risk of suicide

The strongest identified predictor of suicide is previous episodes of self-harm. Mental ill-health and substance misuse also contribute to many suicides. Suicide prevention strategies must consider and link to programmes of early identification and effective management of self-harm, mental ill-health and substance misuse.⁷
- 4** Preventing suicide is achievable

The delivery of a comprehensive strategy is effective in reducing deaths by suicide through combining a range of integrated interventions that build community resilience and target groups of people at heightened risk of suicide.⁷ Directors of public health and health and wellbeing boards have a central role. Their involvement is crucial in co-ordinating local suicide prevention efforts and making sure every area has a strategy in place.
- 5** Suicide is everybody's business

A whole system approach is required, with local government, primary care, health and criminal justice services, voluntary organisations and local people affected by suicide having a role to play. Suicide prevention can also be part of work addressing the wider determinants of health and wellbeing.

IoD All Ranks Scores Deciles Population Denominators-Bearwood & Merley

Key:

IMD Decile Colour coding

1 to 4	Representing highest levels of IMD
5	Representing average level of IMD
6 to 10	Representing above average levels of IMD

Bearwood LSOA Codes

LSOA code (2021)	LSOA name (2021)	Index of Multiple Deprivation (IMD) Decile (where 1 is most deprived 10% of LSOAs)	Income Decile (where 1 is most deprived 10% of LSOAs)	Employment Decile (where 1 is most deprived 10% of LSOAs)	Education, Skills and Training Decile (where 1 is most deprived 10% of LSOAs)	Health Deprivation and Disability Decile (where 1 is most deprived 10% of LSOAs)	Crime Decile (where 1 is most deprived 10% of LSOAs)	Barriers to Housing and Services Decile (where 1 is most deprived 10% of LSOAs)	Living Environment Decile (where 1 is most deprived 10% of LSOAs)	Income Deprivation Affecting Children Index (IDACI) Decile
E01015312	Bournemouth, Christchurch and Poole	1	2	1	1	2	1	3	9	2
E01015308	Bournemouth, Christchurch and Poole	3	4	3	2	4	4	3	7	5
E01015302	Bournemouth, Christchurch and Poole	5	5	4	3	6	5	4	7	4
E01015435	Bournemouth, Christchurch and Poole	5	5	5	4	6	5	3	10	5
E01015311	Bournemouth, Christchurch and Poole	9	9	8	5	8	8	8	9	7
E01015436	Bournemouth, Christchurch and Poole	7	7	5	5	6	7	4	9	7
E01015437	Bournemouth, Christchurch and Poole	8	9	6	6	6	8	6	10	9

Merley LSOA Codes

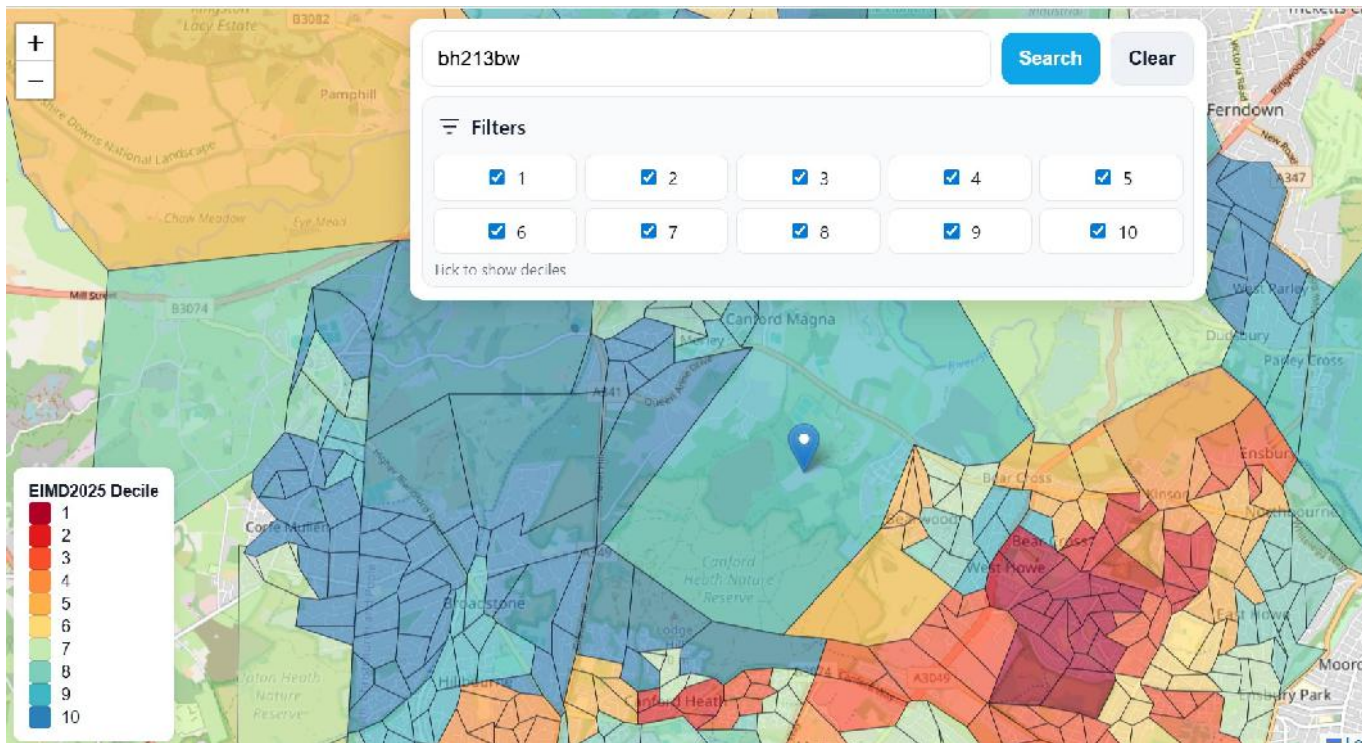
LSOA code (2021)	LSOA name (2021)	Index of Multiple Deprivation (IMD) Decile (where 1 is most deprived 10% of LSOAs)	Income Decile (where 1 is most deprived 10% of LSOAs)	Employment Decile (where 1 is most deprived 10% of LSOAs)	Education, Skills and Training Decile (where 1 is most deprived 10% of LSOAs)	Health Deprivation and Disability Decile (where 1 is most deprived 10% of LSOAs)	Crime Decile (where 1 is most deprived 10% of LSOAs)	Barriers to Housing and Services Decile (where 1 is most deprived 10% of LSOAs)	Living Environment Decile (where 1 is most deprived 10% of LSOAs)	Income Deprivation Affecting Children Index (IDACI) Decile
E01015431	Bournemouth, Christchurch and Poole	9	10	10	6	9	10	3	10	10
E01015432	Bournemouth, Christchurch and Poole	8	7	8	8	8	9	4	10	6
E01015433	Bournemouth, Christchurch and Poole	10	10	10	9	10	10	5	8	10
E01015434	Bournemouth, Christchurch and Poole	10	10	10	9	9	10	5	10	10

Bearwood LSOA codes - continued

Income Deprivation Affecting Older People (IDAOPI) Decile	Children and Young People Sub-domain Decile (where 1 is most deprived)	Adult Skills Sub-domain Decile (where 1 is most deprived)	Geographical Barriers Sub-domain Decile (where 1 is most deprived)	Wider Barriers Sub-domain Decile (where 1 is most deprived)	Indoors Sub-domain Decile (where 1 is most deprived 10% of)	Outdoors Sub-domain Decile (where 1 is most deprived 10% of)	Total population: mid 2022	Dependent Children aged 0-15: mid 2022	Older population aged 60 and over: mid 2022	Working age population 18-66 (for use with Employment)
3	1	2	6	2	9	7	1506	348	325	904
4	2	3	3	3	8	5	1850	393	392	1144
6	3	3	5	3	7	5	1839	269	687	1038
5	3	7	2	4	9	10	2056	469	306	1370
10	5	5	5	7	10	6	1406	112	748	699
9	5	5	3	5	8	8	1369	237	441	799
10	6	5	3	6	10	9	1253	217	414	709

Merley LSOA codes - continued

Income Deprivation Affecting Older People	Children and Young People Sub-domain Decile	Adult Skills Sub-domain Decile (where 1 is most deprived)	Geographical Barriers Sub-domain Decile	Wider Barriers Sub-domain Decile (where 1 is most deprived)	Indoors Sub-domain Decile (where 1 is most deprived)	Outdoors Sub-domain Decile (where 1 is most deprived)	Total population: mid 2022	Dependent Children aged 0-15: mid 2022	Older population aged 60 and over: mid 2022	Working age population 18-66 (for use with Employment)
10	4	9	2	8	9	10	1456	318	392	672
6	8	7	2	6	9	10	1730	284	643	921
10	8	9	2	9	8	6	1417	172	589	773
10	9	9	2	9	10	9	1578	213	740	780



Index of Multiple Deprivation Index Map- The pin marker depicts the site of the proposed development - The South East depicts areas Ki nson and West Howe, directly adjacent to Bearwood with severe areas of deprivation (red/orange).- The North West is more affluent and includes Merley (blue).

From: [Rob Asquith](#)
To: [Senjuti Manna](#)
Cc: [Tim Marks](#)
Subject: RE: APP/23/00822/F - Mental Health Risk - Precautionary Principle
Sent: 02/05/2025 14:14:30

Senjuti

We did not discuss this this morning.

I asked my colleagues Dr Andrew Buroni, who is Director of Health and Social Impact Assessment at Savills, and Tara Barratt, an Associate Director in our team, to comment on the document you had been sent.

ES Chapter 14 Population and Health was authored Tara, and reviewed by Andrew. Andrew's LinkedIn profile states *Andrew provides specialist expertise on investigating, assessing and addressing potential health, social and wellbeing outcomes, and building health benefits and social value into projects to address existing burdens of poor health, inequality and reinforcing health and social care.* He has a PHD in Health Impact Assessment and 20+ years professional consultancy experience. Tara has a Masters Degree in Environmental Epidemiology and has co-authored technical guidance on Health issues in EIA, and has worked closely with Andrew for several years.

Andrew's and Tara's comments on the document you sent are as follows:

1. Following a review of the Magwatch report on the mental health effects from industrial sites, it is understood that the underpinning health evidence applied is incorrect, and the calculation offered is unsupported.
2. All credible health pathways associated with the construction and operation of the proposed development have been assessed, and found to have no measurable risk to public health.
3. This coincides with the UKHSA's position, that modern, well run and regulated municipal waste incinerators are not a significant risk to public health. The UKHSA will continue to review its advice in light of any new substantial research on the health effects of incinerators published in peer-reviewed journals. To date, UKHSA is not aware of any evidence that requires a change in the position statement.

<https://questions-statements.parliament.uk/written-questions/detail/2024-10-08/hl1411>

Rob Asquith
Director - Head of National Infrastructure Planning
Planning

Savills, Wessex House, [REDACTED]



Website : www.savills.co.uk
[\[REDACTED\]@savills.com](mailto:[REDACTED]@savills.com)



From: Senjuti Manna [REDACTED] <[\[REDACTED\]@bcpcouncil.gov.uk](mailto:[REDACTED]@bcpcouncil.gov.uk)>
Sent: 11 April 2025 13:37
To: Rob Asquith [REDACTED] <[\[REDACTED\]@savills.com](mailto:[REDACTED]@savills.com)>
Cc: Tim Marks [REDACTED] <[\[REDACTED\]@mvvuk.co.uk](mailto:[REDACTED]@mvvuk.co.uk)>
Subject: FW: APP/23/00822/F - Mental Health Risk - Precautionary Principle

EXTERNAL EMAIL: Be cautious when opening attachments or clicking links

Hi both,

Please see the attached document and the email below. Also, I am yet to hear back from the Airport.

Thanks

Kind regards,

[REDACTED]



Senjuti Manna, PhD, MRTPI
Team Leader, Strategic Applications
Planning Services

[\[redacted\]@bcpcouncil.gov.uk](mailto: [redacted]@bcpcouncil.gov.uk)

BCP Council Customer Services 01202 321123

[Sign up](#) to BCP Council's email news service

Please note, this email is an opinion of an officer of this council which is of an advisory nature only, and is given without prejudice to any formal decision taken in respect of development under the Town and Country Planning Act 1990.

From: P [redacted] <[\[redacted\]@gmail.com](mailto: [redacted]@gmail.com)>
Sent: 11 April 2025 13:04
To: Senjuti Manna [redacted] <[\[redacted\]@bcpcouncil.gov.uk](mailto: [redacted]@bcpcouncil.gov.uk)>; Magwatch [redacted]
Subject: APP/23/00822/F - Mental Health Risk - Precautionary Principle

Dear Senjuti,

I hope this email finds you well!

Please find attached a submission of serious concern relating to mental health harm. It may not have come to your attention prior, however, the local population of Bearwood & Mereley suffer from some of the highest rates of suicide, serious self-harm requiring hospital stays, and long-term mental health rates in England and regionally.

We are extremely concerned that this has been overlooked as risk modelling demonstrates a high likelihood that the proposal would lead to increased, but preventable loss of life and further significant mental health harms.

Moreover, the applicant has failed to prove there will be no public health harm in this respect. As a result, we are pressing for the precautionary principle to be applied.

Aerodrome safety:

On a secondary point, have you received any further updates from Bournemouth Airport? I have had no further response from my correspondence to the airport compliance officer, which I shared with you.

In the absence of any further update, we do not believe this is a matter the applicant or the airport can resolve within a timeframe that would not take many years, if at all. Again, we would see the weighting of this matter as leading to a straight refusal of the application on safety grounds if not satisfactorily resolved.

Kind regards,

[redacted]
DISCLAIMER: This email and any files transmitted with it may be confidential, legally privileged and protected in law and are intended solely for the use of the individual to whom it is addressed. The copyright in all documentation is the property of BCP Council (Bournemouth, Christchurch and Poole Council) and this email and any documentation must not be copied or used other than as strictly necessary for the purpose of this email, without prior written consent which may be subject to conditions. Any view or opinions presented are solely those of the author and do not necessarily represent those of BCP Council. BCP Council reserves the right to inspect incoming and outgoing emails. If you have received this email in error please contact the sender by return and confirm that its contents have been destroyed.

***** This email and any files transmitted with it are confidential and intended solely for the use of the individual or entity to whom they are addressed. If you have received this email in error please notify the system manager. This footnote also confirms that this email message has been checked for the presence of computer viruses.

Local Community Mental Health Harms

1. Sample of public posts demonstrating the impacts on mental health
2. Letter to Vikki Slade MP from member of the public (5 June 2025)
3. Bournemouth Echo report – Fire Crews tackle extremely large fire at Canford Resource Park
4. BBC report – Fire at Canford Recycling Centre


Sample of public posts & serious fire at the proposed site demonstrating the impacts on mental health of the local population

 **Anonymous participant**
28 March 2025 · 🌐

Posting anonymously as I feel a little silly! But is anyone else feeling like the proposed incinerator is really getting to them? I'm struggling to sleep over it, my mental health is struggling & im worried for my children & potentially having to try & move home if it goes ahead. Let alone the impact it might have on the value of houses in the area, on top of health risks & the damage to the environment 🙄 I feel like we're just being ignored & our feelings aren't being taken in to consideration. Our posters are being taken down. It's seems like the online petition is unusually hard to sign & we can't get it in the local news with many residents not knowing anything about the proposal. I've spoken to so many people who just aren't aware, how can they do this to us! Surely everyone that it will affect should of been notified & been given an opportunity to say their piece whether they agree with it or not 😞

👍 24 💬 7 ➦

👍 🙄 😞

 **Anonymous participant**
10 June 2025 · 🌐

Looking at this objectively, they cannot grant permission for this thing can they? I mean seriously. I think they're looking at this like "oh the residents are exaggerating and thinking worst case and scare mongering"

Condemning thousands of us to eventual lung-related deaths is not an exaggeration is it? (Look at the science)

Condemning thousands of us to losing thousands on our home is not an exaggeration is it? (Look at historical figures)

Condemning thousands of us to live next to a whopping great poison tube is going to cause mental health illnesses to thousands who will be trapped living next to it with no means of escape is not an exaggeration is it? (Look at minds mental health stats for people living in affected areas)

I just cannot see how they would allow this for the sake of meeting some target or getting some funding????

Am I alone here?

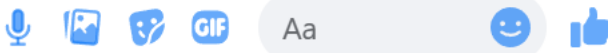
 1y

Ultimately, it's an easy decision: prioritizing the health and wellbeing of our communities and environment over a decision that can do more harm than good.

04/03/2025, 22:07

Please try not to overly worry, there is a lot of support available if you need it, from local Doctors to other support groups. Remember you are not alone.

Sent



Letter to Vikki Slade MP from member of the public (5 June 2025)

[This letter was posted publically on a social media group]

I have just sent this email to Vikki Slade 4 Mid Dorset & North Poole regarding the proposed incinerator development in our area. I'm sharing it here for transparency and to raise awareness about the real impact this has on our community's health and wellbeing. It's important that our voices are heard, especially when it comes to the safety of our children, environment and mental health.

I hope this message finds you well. I am writing to you as a concerned resident of your constituency regarding the proposed incinerator development currently under consideration by BCP Council.

*Like many others, I wish to express my deep concern about this proposal. I feel compelled to speak out not only on my own behalf but also on behalf of the **many local families who are being profoundly affected, both emotionally and in terms of their future in this community.***

*As someone who has worked hard to settle here, **I chose this area for its quality of life: open spaces, good schools, and a safe and supportive environment for raising a family. That vision is now under serious threat.** I have had to consider uprooting everything we have built here, and I know I am not alone. **Many families are now contemplating leaving too, which could drastically alter the fabric of our community.***

Not a single person I have spoken to locally supports this application. Public opposition is widespread, yet the community feels ignored and increasingly disillusioned with a decision-making process that appears weighted toward approval. Many of us feel that BCP Council is not acting in our interests and that the process has lacked full transparency.

*Personally, **I am not someone who is easily shaken, but this process has had a significant impact on my mental health.** It has felt disheartening and, at times, hopeless – as though the*

outcome is already predetermined, and significant public objections are little more than a formality. **I have had to seek support, which is entirely out of character for me.**

Equally, this is not merely a matter of personal inconvenience. The area risks becoming less attractive to young families – the very people who bring energy, vitality, and long-term economic stability. Such a shift would **inevitably affect house prices, school enrolments**, and reduce council revenue. As you are also a local resident, I trust you understand the significance of these outcomes.

There is growing evidence that this development is inappropriate for this location, a view that is supported by central government, which appears to be moving away from expanding incineration capacity in favour of more sustainable and circular waste solutions. This shift aligns with national plans to expand the UK Emissions Trading Scheme in 2026 to include energy from waste facilities, potentially imposing a tax on incinerators. This tax, intended to reduce emissions and encourage investment in cleaner waste management, may be passed on to councils through higher incineration fees, thereby incentivising waste reduction, reuse, and recycling. In this context, it is particularly difficult to understand why such a facility is being considered.

What is more, the proposal would directly impact the residential areas with schools and young families. Children are especially vulnerable to airborne pollutants, including those from incinerators, making them more susceptible to long term harm. This risk is heightened by the large chimney needed to disperse emissions over the heath, spreading pollutants across a wide area. The health and wellbeing of children and families must be the top priority and must not be compromised.

I would also argue that, depending on weather conditions, toxins could fall directly onto the heath, thereby affecting the area officially designated as a Site of Special Scientific Interest and forming part of the Dorset Heathlands Special Protection Area. As you are aware, this heath is one of the largest lowland heathlands in the United Kingdom and provides a vital habitat for numerous rare and endangered species.

Furthermore, the application appears to misapply the proximity principle, which states that waste should be managed as close to its source as possible. There are clear indications that this incinerator would process waste from outside the local area and county, directly undermining that principle. This raises an unavoidable question: why is this application being considered despite substantial environmental, health, planning, and ethical concerns?

From both environmental and economic perspectives, the proposal feels outdated and incompatible with national objectives. With tighter regulation and increased taxation on incineration on the horizon, this development seems like a short-term fix with long term costs. If such facilities are truly safe and necessary, why are they not being proposed in every county, including more affluent or politically influential areas?

I respectfully request that this email be given proper consideration, as it **reflects the very real impact on individuals in the immediate area, including the effect on mental health**. To conclude, sufficient weight must be given to the precautionary principle: if there is any doubt, particularly where **public health and the long term wellbeing of children** are concerned, rejection must be the default, not approval.

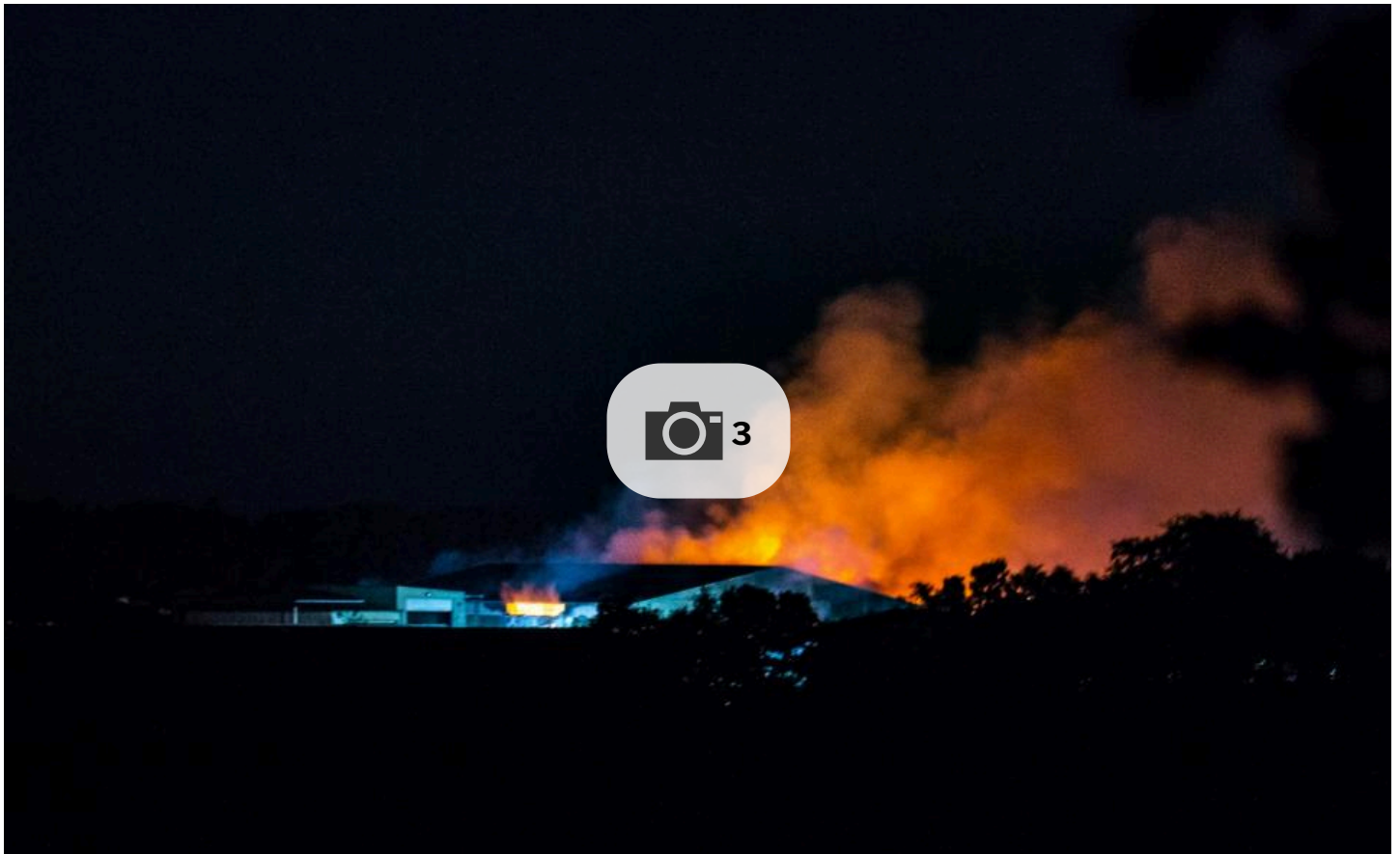
I ask you, as my elected representative and a fellow local resident, to continue raising this issue at the highest possible level and to help ensure the health, future, and voices of our community are placed at the centre of this process.

Thank you for taking the time to consider my concerns.

UPDATED

Fire crews tackle "extremely large fire" at Canford Recycling Centre

25TH JULY 2018 [POOLE](#)



Share

0 comments

Fire crews have been dealing with an "extremely large fire" at a recycling centre in Poole.

Crews were called to Commercial Recycling (Southern) Ltd at the Canford Recycling Centre off Magna Road at 9.40pm last night.

Dozens of people reported seeing flames and smoke from around the site.

Dorset Fire and Rescue have issued a warning to people in the Poole and Bournemouth areas that they could be affected by smoke still rising from the blaze.

Some parents with children at **Bearwood** Primary School have kept youngsters at home today because of the smoke. However, the school is open and the headteacher has liaised with the fire service.

Fire crews called to the scene found a large single-storey building used for storing waste well alight.

At the height of the blaze, ten fire engines, three water carriers and other support appliances were in attendance.

Mr Baker said: "Although the fire is now under control, and we have scaled back our attendance, it is likely to be a couple of days before it has burnt out completely.

"There is still a lot of smoke rising from the site so local residents may want to keep doors and windows closed, especially if they have a pre-existing respiratory condition."

The police helicopter attended at scene and assisted firefighters by identifying how the fire was spreading.

Mr Baker reminded people to dispose of rubbish including disposable barbecues and ashes carefully.

He said: "We often see fires at recycling centres in the summer, as people get rid of disposable barbecues, used barbecue ashes and other high risk rubbish.

"Barbecues should always be completely cold before being thrown away and, ideally, the used coals should be drenched in water as well.

"Equally, where there is open land, we would urge people not to have camp fires and to be careful when disposing of cigarettes."

The cause of fire is yet to be established. However, it is not believed to be malicious.

Stuart Mariner of Commercial Recycling said the alarm had been raised by security staff. Senior management arrived at the scene not long after the firefighters, Mr Mariner said.

"One of our storage facilities has been badly damaged," he said.

"The size of the facility is 40 metres by 100 metres, and around 300 to 400 tonnes of waste was inside, although not all of that has burned."

He thanked firefighters and staff for their work.

"All of the fire crews have been so impressive," he said.

"They responded quickly and they've done amazing work."

2210 lifted to assist [@BTPHants](#) with checking railway line in [#cosham](#) area but stood down en-route.

Quick check on this fire that [@DWFireRescue](#) [@DWFireControl](#) are dealing with at [#canfordarena](#)

Spare a thought for the [#wholetime](#) and [#retained](#) crews working hard [#DR](#)
pic.twitter.com/6sXYX3fwMG

— NPAS Bournemouth (@NPASBournemouth) [July 23, 2018](#)

[@Bournemouthecho](#) Huge fire at Canford Recycling / [Canford Heath](#)
pic.twitter.com/BRxrCVJqN7

— Louisa Elliott (@ElliottLouisa) [July 23, 2018](#)

[@Bournemouthecho](#) Taken from Kinson, opposite direction to Airport but looks like something else is on fire pic.twitter.com/XgQMvMXr4D

— Jake (@Jake_afcb) [July 23, 201](#)

[@Bournemouthecho](#) pic.twitter.com/tKpqIDBGx7

— Laura Graham (@l_kgraham) [July 23, 2018](#)

[POOLE](#)

Share



0 comments

Get involved
with the news

Send your news & photos

NEWS

Home | UK | World | Business | Culture | Politics | Health | Tech | InDepth |

More

BBC Verify | Climate

England | Local News | Dorset

Fire at Canford Recycling Centre in Poole

24 July 2018



BRYAN WHITING

The blaze started on Monday evening

A large fire has ripped through a recycling centre in Dorset.

The blaze at Canford Recycling Centre on Arena Way, Poole, started at about 21:40 BST on Monday and smoke plumes from the fire were seen from several miles away.

Residents in the Merley and Bearwood areas were advised to keep their doors and windows closed.

Fire crews remain at the scene, although the blaze is now out. No-one was injured.



BRYAN WHITING

Residents were advised to keep their doors and windows closed



CANFORD BUSINESS PARK

No-one was reported injured in the fire



Fire crews remain at the scene, but the blaze is now out

Related internet links

[Dorset & Wiltshire Fire Service](#)

The BBC is not responsible for the content of external sites.



Mental Health Concerns Linked to Proposed Canford Incinerator

<[REDACTED]@dorsetmind.uk>

4 June 2025 at 10:34

To: [REDACTED]

Hi [REDACTED]

Good to talk with you on Monday, as promised here are a few suggestions.

First, I would urge people affected by the plans to reach out for support, although I acknowledge that Dorset Mind doesn't currently offer much direct support in your area. I hope that will change in time.

If our active monitoring service appeals to people, I would urge them to request the service through their local doctor's surgery. We currently work with 12 Primary Care Networks across the county, but not in your area. Our ambition is to be in all 18.

Here is a link to our services and also some resources

<https://dorsetmind.uk/what-we-offer/>

In terms of suicide ideation, that's a crisis and I would urge you to share this link with people:

<https://dorsetmind.uk/urgent-help/>

National Mind also offers support

<https://www.mind.org.uk/information-support/helplines/>

In terms of supporting the campaign, I'm talking to our CEO about a form of words we could supply that may help. I appreciate that you need that early next week.

In terms of media support:

I'd contact [REDACTED] at the Bournemouth Echo: [REDACTED]@bournemouthecho.co.uk

Also [REDACTED] at South Today [https://www.linkedin.com/search/results/all/?keywords=\[REDACTED\]&GLOBAL_SEARCH_HEADER&sid=y%3Ag](https://www.linkedin.com/search/results/all/?keywords=[REDACTED]&GLOBAL_SEARCH_HEADER&sid=y%3Ag)

Definitely, focus on the mental health impact and the particularly worrying stats for your area.

I hope this is of some help.

Kind regards,
Nick

This email is intended only for the person to whom it is addressed and may contain sensitive or confidential information. If you have received this email in error, please notify the sender and delete this email - which must not be copied, distributed, or disclosed to anybody else. Any views or opinions presented within this communication are solely those of the sender and do not necessarily represent those of Dorset Mind. Nor can any contract be formed on behalf of Dorset Mind via email. Virus checking: Whilst all reasonable steps have been taken to ensure that this electronic communication and its attachments whether encoded, encrypted or otherwise supplied are free from computer viruses, Dorset Mind accepts no liability in respect of any loss, cost, damage, or expense suffered as a result of accessing this message or any of its attachments. For information on how Dorset Mind processes your information, please see <https://dorsetmind.uk/privacy-policy/>



Mental Health Concerns Linked to Proposed Canford Incinerator

TO: [redacted]@dorsetmind.uk>

4 June 2025 at 11:50

Hi [redacted]

Here's our statement, sorry it isn't more definitive. At least you can say we support your concerns

Kind regards,

Nick

Dorset Mind recognises the particular stress and anxiety that the people of Bearwood are currently facing with the looming Canford Incinerator. Their fears are real fears, and we will support them in any way we can. Dorset Mind's CEO Linda O'Sullivan



Nick Rowe

Corporate and Major Donor Fundraiser
Mental Health First Aider
Dorset Mind

Working hours:
9am - 5pm Mon to Thur

8 Stratfield Saye,
20-22 Wellington Road,
Bournemouth, BH8 8JN.
w: dorsetmind.uk



You're only ever one conversation away from help!

Dorset Mind provide vital support for adults & young people (11+):
1-2-1 and Group Support | Counselling
Education | Volunteering

dorsetmind.uk • [#JoinourMovement](https://twitter.com/JoinourMovement)

From: [REDACTED]@dorsetmind.uk>

Sent: Wednesday, June 4, 2025 10:34 AM

To: [REDACTED]

Subject: Mental Health Concerns Linked to Proposed Canford Incinerator

[Quoted text hidden]



Your enquiry re Municipal Waste Incinerators Our ref: 200434930

swhpt <swhpt@ukhsa.gov.uk>

21 February 2025 at 12:05

To: [REDACTED]

Dear Paul,

Thank you for your initial email of Saturday 01/02/25, and your subsequent follow up emails ,latest one copied below.

Since your initial email we processed your enquiry internally to our National Environmental Hazards team, please see their response below:

Reply received from UKHSA Environmental Hazards team:

“Many thanks for your enquiry regarding the mental health impacts of living close to municipal waste incinerators. Having liaised with colleagues in the team they have advised at the present time, the 2019 statement remains current, although it is acknowledged this research by Imperial did not consider risks to mental health. This is an area which may be subject to further research in the future.”

It is also worth noting that most developments for waste facilities require planning permission, this process is managed by local authorities. For the area you mention this would be [Bournemouth, Christchurch and Poole Council](#)

Apologies we were unable to respond to your enquiry in the timeliness you expected, whilst our remit covers some aspects of Environmental Hazards our primary function is the public health management of acute infectious disease.

We have a prioritisation process based on the health of the population we are protecting, Emails are reviewed continually and prioritised according to urgency of public health action; prevention and control of infectious disease.

Do hope this helps with your enquiry,

Kind regards, Kate

From: [REDACTED]

Sent: Wednesday, February 19, 2025 9:59 AM

To: swhpt <swhpt@ukhsa.gov.uk>; phe.swhpt@nhs.net

Subject: Re: PHE statement on modern municipal waste incinerators (MWIs)

EXTERNAL: This email originated outside of UKHSA. Do not click links or attachments unless you recognise the sender.

Hello,

I hope you can assist with my query below or direct me to the relevant contact. I have sent several emails on this matter without reply.

I have been reviewing the Public Health England (PHE) risk assessment regarding municipal waste incinerators (MWI), as outlined in the PHE statement on modern municipal waste incinerators (MWIs) (link). The assessment was published around 2019, and I would appreciate it if you could confirm whether a more recent risk assessment on MWIs has been conducted.

Additionally, I note that the existing risk assessment does not appear to include an evaluation of potential mental health impacts. In my local area—Bearwood and Merley—mental health indicators are below both regional and national averages, with higher rates of hospital stays for self-harm and an elevated suicide rate. Given these factors, individuals in the community may be more vulnerable to environmental changes, which should be considered in the context of any proposed MWI developments.

A proposal for an MWI has been put forward for the Bearwood/Merley area (details below), and I am keen to understand whether PHE or any other relevant body has conducted risk assessments or research specifically examining the impact of MWIs on mental health. If such assessments exist, I would be grateful if you could direct me to them. Alternatively, please do let me know if no such assessment has been undertaken.

Waste Incinerator Planning Application:

APP/23/00822/F | 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. | Canford Resource Park, Arena Way, Magna Road, Wimborne, BH21 3BW

Thank you for your time and assistance. I look forward to your response.

Best regards,

[REDACTED]

You don't often get email from [REDACTED]. Learn why this is important

EXTERNAL: This email originated outside of UKHSA. Do not click links or attachments unless you recognise the sender.

Hello - is anyone monitoring this email address?

On Thu, 13 Feb 2025 at 23:54, [REDACTED] wrote:

Hello,

please could you confirm you have received my emails and they are being reviewed.

Kind regards,

[REDACTED]

On Tue, 11 Feb 2025 at 23:53, [REDACTED] > wrote:

Hello,

please could you provide a status update on my email.



Home

News

Sport

Weather



NEWS

Home | UK | World | Business | Culture | Politics | Health | Tech | InDepth |

More

BBC Verify | Climate

Climate

Flies, rats and offers of hush money - the price of living next to a 'monster' incinerator



BBC / JON PARKER LEE

George and Mandy are among the residents who refused to sign an NDA agreement and can speak about the Runcorn incinerator

Esme Stallard, Matt McGrath, Patrick Clahane & Paul Lynch

BBC News

16 October 2024

“We have been inundated with flies, rats, smell, noise. It's just been horrendous,” says Mandy Royle, who lives in the closest home to the UK’s biggest waste incinerator at Runcorn in Cheshire.

The facility generates electricity from burning nearly a million tonnes of household rubbish every year - but much of that waste doesn't come from Ms Royle's local area. Like many incinerators, deliveries come from hundreds of miles away.

BBC analysis suggests the burden of the UK's waste is disproportionately falling on deprived areas such as Runcorn, which are 10 times more likely to have an energy-from-waste incinerator in their midst than in the wealthiest areas.

- [Burning rubbish now UK’s dirtiest form of power](#)

Watch on iPlayer

The Nightmare Next Door



Many families nearby shared a £1m settlement after 180 of them launched a legal action over the pollution and disturbances from the Runcorn incinerator, the BBC can reveal.

But Ms Royle was one of a handful of people who did not sign the agreement, allowing her to speak out about life in the shadow of one of the UK's giant waste plants.

“I’m just stuck in this little corner with a big monster staring at me and throwing what it does over me,” she says.

The others who took the cash, worth about £4,500 per family after legal costs, had to sign a strict non-disclosure agreement (NDA).

“Well, I think they’re being unfair in what they're paying, and completely unfair in what they are doing,” says George Parker, who runs a local garage and also refused to sign the deal.

“It’s a million-pound hush fund and a gagging order. That's why they're doing it, they’re keeping everybody quiet.”



Viridor, which runs the Runcorn plant, said it would not comment on the settlement or on the non-disclosure agreement.

It said that noise and odour remained within permitted levels - regulated by the Environment Agency - and any complaints were fully investigated with feedback provided to residents.

Incinerators put in deprived areas

Energy-from-waste incinerators have boomed over the past decade as local councils have faced higher charges to bury rubbish in landfill sites.

This shift, though, has come at a big cost to the environment, with [a BBC investigation showing](#) that these plants now produce as much carbon per unit of energy than as if they were burning coal.

It also comes at a cost to those who live near them, say Ms Royle and Mr Parker.

“They put them in deprived areas, so people won’t complain because they know the majority of the people are in such a state they don’t know how to complain basically,” Mr Parker says.

More waste is incinerated in the most deprived areas in England

Total tonnes of waste incinerated in each Index of Multiple Deprivation (IMD) decile, 2022-23

1 = most deprived areas; 10 = least deprived

30m _____

Our investigation found breaches of air quality controls increased both at Runcorn and across incinerators in England between 2019 and 2023.

These controls restrict the levels of gases such as carbon monoxide that can be emitted.

The number of these permit breaches has risen from an average of 3.4 in 2019 to 5.5 per incinerator in 2023. Last year 73% of facilities in England reported transgressions.

Runcorn's energy-from-waste site breached its permit 17 times in the past five years.

"The Runcorn Energy Recovery Facility (ERF) operates within a strict Environmental Permit and is heavily regulated by the Environment Agency, meaning it must comply with all the necessary regulations and permit conditions," Viridor said in a statement.

"Should a permit limit be exceeded, a full and thorough investigation into the cause is carried out."

Household waste is also being sent hundreds of miles across the country to be burned, or even sent abroad, BBC analysis of UK council data showed.



BBC / JON PARKER LEE

Residents who live near the Runcorn incinerator have been psychologically impacted, says food bank manager Eddie Thompson

In one of the worst examples, waste from Derby City Council and Derbyshire Council ended up at 19 different incinerators in one year - from Milton Keynes to North Yorkshire.

The increased movement of waste by train and lorry is producing even more carbon emissions and worsening local air pollution.

A spokesperson for Derby City Council and Derbyshire County Council said the councils had signed a new contract which will reduce this number to 13, and that "reducing waste miles is a key part of our strategy."

In another case, County Durham sent 1,300 tonnes of waste last year to an undisclosed incinerator facility in Cyprus, even though there are incinerators nearby in north-west England. The council said it was "standard industry practice to divert waste from landfill through energy-from-waste facilities".

'The rubbish backyard of England'

While Runcorn is home to the UK's biggest incinerator, a significant proportion of the town's local rubbish is not burned at the site.

Instead, some of the waste from the borough of Halton, where Runcorn is located, and from other Merseyside towns, is sent by train about 150 miles across the country to the east coast, to be burned on Teesside.

This whole area along the River Tees has emerged as a UK hotspot for energy-from-waste. The region is now home to three active incinerators, with three more in various stages of planning.

"We have become a dumping ground for everybody else's rubbish by stealth," says an independent councillor in Redcar, Dr Tristan Learoyd.

He says that incinerators in the area are tied into long-term contracts with councils across the country, which he believes will see large amounts of carbon emitted every year for decades to come.

"There's a potential here for the number of incinerators to be in double figures," he says.

"For my hometown, which has suffered a massive decline over the years, it's just another kick in the face. We're becoming the rubbish backyard of England."

Linda Martin lives on the nearest street to the Wilton 11 incinerator in Billingham, Teesside, which burns more than 400,000 tonnes of rubbish every year.

She questions whether people in the locality are seeing any direct economic benefit from the facility.

Mental Health - Pollution, Toxins, Health Impact - References

Air Pollution-Induced Neurotoxicity: The Relationship Between Air Pollution, Epigenetic Changes, and Neurological Disorders (2025)

<https://www.mdpi.com/1422-0067/26/7/3402>

Pollution from Waste Incineration A Synopsis of Expert Presentations on Health and Air Quality Impacts (2021)

<https://ukwin.org.uk/files/pdf/211208-waste-incineration-and-public-health-appg-air-pollution-report.pdf>

The DEFRA UK Air Information resource, 'Particle Concentrations and Numbers Network

<https://uk-air.defra.gov.uk/networks/network-info?view=particle>

"Exposure to airborne PM [particulate matter] is associated with a range of adverse effects on human health including effects on the respiratory and cardiovascular systems, leading to hospital admissions and mortality. There is increasing evidence that fine (PM_{2.5}) and ultrafine particulate matter (<100nm) plays a more significant role than previously thought...There is also evidence to suggest that particle number concentrations and chemical composition are of greater significance than mass concentrations in the determination of certain health effects. Particle number concentration is the total number of particles per unit volume of air..., whereas particle mass concentration is the total mass of particles per unit volume...Mass concentrations are typically dominated by larger particles"

Waste incineration, air quality & public health

A synopsis of expert presentations

'Ultrafine particulates are, because they are so small, it's very difficult to find a filtration process that can capture them all. I think what we need to ensure is that we have a method by which we are able to monitor the presence of substances in the environment. [...] When you've got significant point sources of pollution, the further away they are from people, the less people are exposed.'

– Dr Bill Parish, Head of Air Quality and Industrial Emissions,
Department for Environment, Food and Rural Affairs, 6 July 2021⁶

1. Toxicology of fine particulate matter

Prof. Vyvyan Howard is a medically qualified toxico-pathologist and Emeritus Professor of Bioimaging in the Centre for Molecular Biosciences at the University of Ulster. In 2019, he served as a member of the Particulate Research Group, which found that filter systems of waste incinerators may not be effective at blocking nanoparticles (PM_{2.5} and smaller), raising concerns about long-term health impacts on communities in the vicinities of such plants. He has investigated the toxicology of nanoparticles, which is of considerable importance to understanding the hazards associated with waste incineration, and co-edited a book entitled *Particulate Matter: Properties and Effects upon Health*. He also appeared in the 2012 film *Trashed*, presented by Jeremy Irons.

Presentation summary

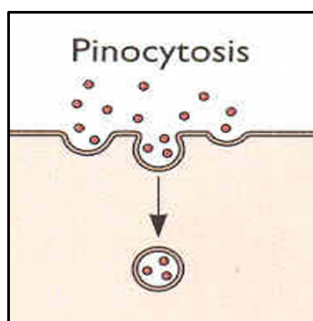
Weight vs. number. The regulatory metric that is currently used to set standards for particles is based on their weight or mass, which is not a very useful metric. The number of very small particles is much more important as health effects are based on their number rather than their mass. **By far the majority of particles are ultrafine particles** or nanoparticles (PM_{0.1}), but they weigh very little.

Particle size and reactive nature. Toxicologists study the interaction of human wet biochemistry with the surface chemistry associated with particles. What particles are made of is of less importance than their size, the latter being the most the critical factor. Very small particles – ones that are less than 100 nanometres (a nanometre is one-millionth of a millimetre) – become very reactive; that is how catalysts are made. In addition, because the formation of the particles has come about through the process of incineration of a heterogenous waste stream, toxic substances, such as dioxins, form on the particles as the gases cool, and the **particles are a major way by which dioxins get out of incinerators**. It is possible to measure the number of ultrafine particles, but all studies published to date cut off at about three nanometres. From a technical perspective, it is more difficult to measure particles below that size.

No safe level of particulate exposure. Scientists cannot detect a safe level of exposure to particles. Any level of exposure has an effect. Science accepts that particles are deleterious to health, and there is no debate about the fact that long-term exposure to very small particles is bad for human health.

Unknown toxicity. The toxicity of effluvia coming out of incinerator chimneys has never been measured, although it could be. Based on what goes into incinerators – radioactive materials, heavy metals, chlorinated plastics – one would predict, a priori, that the effluvia would be more toxic than, say, diesel exhaust, and this has indeed been demonstrated by scientists in China.

Particles in the human body. Nanoparticles spread throughout the human body – the brain, the heart, the kidneys – but how do they make their way there? When a person breathes in nanoparticles, they go down into the upper airways – the trachea and the bronchi. Then they go down into the lower airways. If they land on what is known as the mucociliary carpet, they are removed, but if they get down beyond it, then they enter the alveolar air space. Nanoparticles preferentially get right the way down to the bottom of the lung. When they get to what are called alveolar epithelial cells, they have reached a junction to the blood, as those surface membranes are only 200 nanometres thick. Through a continuous process of invagination called pinocytosis (see the image), the membrane takes in the particles, which can then get into the blood and get distributed around the body. This is one way that viruses, which are of a very similar size, get around in the body. Thus, **we are wide open to nanoparticles.**



Penetration of waste incinerator filters. The protection of people's health is totally reliant upon an engineering fix, predominantly through bag filters. The mesh in bag filters is designed to let gas through and to stop particles. Really small particles are the most energetic and damaging to biological systems; they are the ones that most easily get into people's bodies. These particles act like gas molecules, meaning that the claim that they get stopped by bag filters defies the laws of physics. **They get through, virtually unabated**, and an aerosol of very fine nanoparticles emerges from these point sources. People's protection in the local community is totally dependent on an engineering solution working flawlessly, to the extent that it can provide protection. Even if a waste incinerator is equipped with an electrostatic precipitator, efficiency drops for the particles with the smallest mass. A scrubbing apparatus does not address de novo synthesis. After the gases have left that smokestack, de novo synthesis of particles can take place in the cooling gases.

High-quality scientific studies. Prof. Howard cited relevant research findings (see the endnote).⁷

TECHNICAL NOTE

Our Ref: J10-14990A-10-R03-D01

28 January 2025

For: Environment Agency National Permitting Team

Permitting Support Centre
Environment Agency
Quadrant 2
99 Parkway Avenue
Parkway Business Park
Sheffield
S9 4WF

SUBJECT: RESPONSE TO SCHEDULE 5 NOTICE FOR INFORMATION FOR THE CANFORD ENERGY FROM WASTE COMBINED HEAT AND POWER FACILITY (APPLICATION REF. EPR/SP3127SF/A001)

1 Introduction

An application for an environmental permit to operate the Canford Energy from Waste Combined Heat and Power Facility (the 'EfW CHP Facility') was submitted by MVV Environment Limited ("MVV") to the Environment Agency ('EA') on 3 June 2024. As part of the determination of this application, the EA has requested further information in a notice under Schedule 5 of the Environmental Permitting (England and Wales) Regulations 2016, dated 13 January 2025. This note has been prepared to provide a response to the Schedule 5 further information request from the EA.

Within this response, the original request from the EA is provided in bold italic text, with the response provided in normal body text.

2 Response

2.1 Energy generation

1. Provide a justification for the proposed steam conditions of 380°C and 45 Bar. Note: The BAT conclusions state high steam conditions are above 400°C and 45 Bar.

Response: MVV's long term experience in energy from waste boilers indicates that, generally, there is a direct correlation between higher steam conditions and boiler corrosion. Consequently, to ensure high availability and minimise maintenance downtime, MVV's initial technical specifications were based on conservative steam conditions of 380°C and 45 Bar.

However, being aware of the efficiency improvements possible with higher steam parameters, MVV has been in detailed discussions with technology suppliers to find technical solutions that will minimise these boiler corrosion risks. As a result, the final design parameters for the boiler have been revised to 420°C and 63.5 bara.

2. The CHP assessment considered opportunities within 1.5 km of the proposed installation rather than 15 km. Please provide extra explanation for considering opportunities within 1.5 km to include:

a) Confirm how much heat could be supplied to heat loads within 1.5 km. Note: The CHP report states 'One of the potential main users is Magna Business Park which is located 0.6 km south-east of the EfW CHP Facility Site and the Proposed Development includes a CHP Connection to this business park. On this basis the assessment has been based on the supply of heat to this potential user which has an average annual heat demand of 4.4MWth' but the report also states 'The peak heat demand of Magna Business Park is estimated to 532kWth, with an estimated annual heat demand of 807 MWh per annum'



Response: We can clarify the estimated heat demand of Magna Business Park is 532 kWth, whereas the stated heat demand of 4.4 MWth relates to the combined demand of the Magna Business Park and all other heat consumers within 1.5 km based on the outputs of the THERMOS software.

The initial design of the EfW CHP Facility allows for up to 5 MWth export of hot water, which includes additional allowance/contingency for potential further increase in demand in the future. It would not currently be feasible/applicable to increase export beyond 5 MWth as this would exceed the available demand and assumed contingency. However, as explained in the application documents, the EfW CHP Facility does have the capability to export significantly more than 5 MWth and MVV will continuously review developments in this area to identify whether a future heat consumer would make export above 5 MWth more viable.

b) The CBA showed that supply of 5 MWth would not be economically viable but supply of 25 MWth would be. Provide information as to whether supply of 25 MWth could be achieved within the 1.5 km search radius. [Note :The CHP ready assessment states that the plant has capacity to supply more than 5 MW of heat and could be economically viable if 25 MW was supplied].

Response: As identified above, the estimated maximum heat demand within 1.5 km is 4.4 MWth, so export of 25 MWth within 1.5 km is not viable as there is no demand for this level of heat export.

c) If 25 MWth cannot be supplied within 1.5 km justify whether it would be economically viable or feasible to supply heat to other users beyond 1.5 km and within 15 km of the installation. Note The CHP report states 'Appendix B and paragraph 5.1.2 show there is a potential heat demand substantially exceeding 25MWth within a wider 15 km area in line with the Energy Efficiency Directive guidance'. However Appendix B does not appear to show data beyond 1.5 km.

Response: The table below presents the outputs of the BEIS UK CHP Development Map¹ for heat consumers within 15 km from the centre of the EfW CHP Facility.

Table 1: Heat consumers within 15 km of the EfW CHP Facility

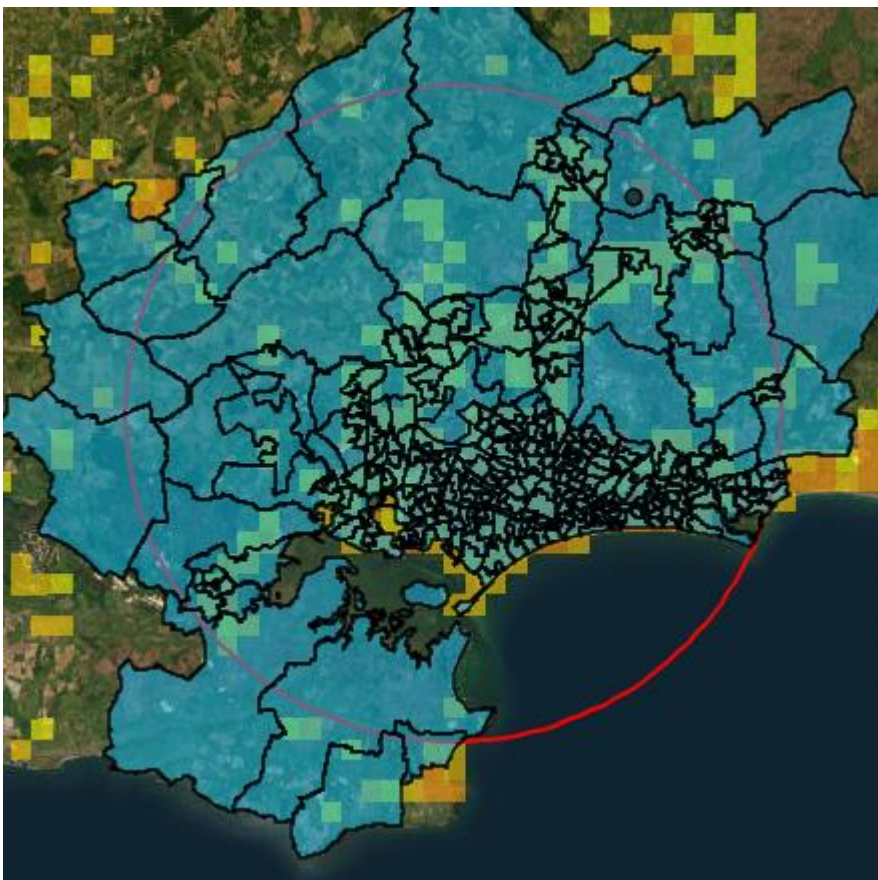
Sector	Share of total demand	Demand (MWh)
Communications and Transport	0.14%	3,586
Commercial Offices	0.75%	19,877
Domestic	86.37%	2,285,964
Education	1.83%	48,338
Government Buildings	0.22%	5,728
Hotels	0.79%	20,898
Large Industrial	2.03%	53,635
Health	0.32%	8,385
Other	0.18%	4,783
Small Industrial	5.97%	157,870
Prisons	0%	0
Retail	0.83%	22,037
Sport and Leisure	0.33%	8,846
Warehouses	0.25%	6,663

¹ <https://chptools.decc.gov.uk/developmentmap>

Sector	Share of total demand	Demand (MWh)
District Heating	0%	0

Table 1 demonstrates that the estimated total heat demand within 15 km is ~302 MWth. However, it is evident from this table and the subsequent map (Figure 1) that the majority of this demand is accounted for by a large number of small loads dispersed across a wide area, with more than 86% of the total demand accounted for by individual domestic properties. It is not technically nor commercially viable to establish such a large geographic network for multiple consumers for the level of available heat produced by the EfW CHP Facility.

Figure 1: Heat demand within 15 km



Large point source heat load consumers are generally more viable as it allows a single length of pipe work and trenching to be installed between the producer and consumer. However, Figure 1 demonstrates that there is only a single large heat load within 15 km (dark green dot). This is located approximately 14 km to the north-east of the EfW CHP Facility and is described by the BEIS CHP tool as an “Unknown Operator” with an estimated heat demand of ~6 MWth.

Further inspection of this location indicates it may relate to Veolia’s Chatsworth Blue Haze Landfill. It is unclear why a landfill would require a heat demand of 6 MWth. Veolia recently submitted an application to introduce a temporary incinerator bottom ash (IBA) processing facility at this location but, again, it is unclear whether an IBA processing facility would have a heat demand of 6 MWth.

Notwithstanding the above, installation of a heat network to provide 6 MWth of heat at a distance of 14 km would not be economically viable. The cost-benefit analysis supporting the CHP-R assessment submitted with the application