

MATERIAL CONSIDERATIONS FOR PLANNING APPLICATIONS

- Government Policy (National Planning Policy Framework)
- Local Policies (The current Local Plan is the Poole Local Plan of 2018)
- Noise
- Disturbance, such as from an increase in traffic
- Highway safety for road users and pedestrians
- Effect on Amenity (visual amenity, social amenity)
- Effect on listed building or conservation area
- Scale, mass and height of building
- Design, Appearance and Materials of new buildings
- Nature Conservation

(Although the law requires that all material considerations must be considered, it is for the decision maker to decide what weight to attach to them.)

For an idea of what are the relevant materials in the case of the MVV Incinerator Appeal, it might be useful to look at the Briefing Note which Magwatch sent to members of the BCP Western Planning Committee in the week before they sat to decide (and refuse) MVV's application. *See Below.*



The Proposed Development

The Canford site was originally allocated in the *BCP & Dorset Waste Plan* of 2019, an allocation which had validity only if there was 'a need for the development that cannot be met by alternative suitable non-Green Belt sites' (Policy 21, BCPD WP). Since the WP was published, Powerfuel's application to build an incinerator on non-Green Belt land at Portland has been approved.

The allocation was for 'circa 25,000tpa of additional capacity for residual waste management'. However, what MVV are actually proposing is an over-capacity Energy from Waste Combined Heat and Power Facility, able to process up to 260,000 tonnes p.a. of residual waste. This is more than 10 times what was allocated in the Waste Plan and more than double the annual incinerable waste that BCP & Dorset are likely to be producing in coming years.

As we show in later sections of this briefing paper, the latest data indicate that, over the last 12 months up to March 2025, BCP & Dorset combined produced only 139,000tpa of residual waste that went to either RDF or EfW, well below the capacity of the proposed Canford EfW, and before the instant 6% recycling boost next year¹ when Poole starts mandatory waste food collections. As other legislated recycling initiatives come in to play, BCP & D will be unlikely ever to generate even 50% of 260,000t – even if BCPD meet full house building quotas.

Q: Ask the Case Officer for the latest residual waste figures for BCP and Dorset, and revised expectations in the light of the many changes since the 2018 figures were produced.

The Applicant

MVV Environment Ltd is a German company. As European countries see the downsides of incineration (CO₂ production, health issues, discouragement of sensible recycling policy), MVV are building fewer EfW plants and have publically stated that they are pivoting towards solar, geothermal and wind generation in Europe. Meanwhile they are expanding as quickly as possible in the UK, dumping old tech knowledge here while investing in new tech in Germany. They have three facilities in the UK (one at Devonport) and are applying to build one at Wisbech. And, of course, they are hoping for your approval to build one on the edge of Canford Heath.

MVV's hope of the Canford EfW being carbon neutral by 2035 is a pipe dream, as we show later when we analyse the claim that the EfW will be 'carbon capture retrofit ready'.

Q: Ask the Case Officer about the new emphases in government thinking about waste incineration, particularly the Emissions Trading Scheme (ETS), unmentioned in report.

The Location

The proposed incinerator will be sited on the edge of Canford Heath, a Site of Special Scientific Interest (SSSI). Because of its size, the EFw will extend beyond the current brown field site into Green Belt land. Note also that the site extends beyond the land identified in the Waste Plan allocation.

It will be approached by Magna Road, an already busy road, with two recent housing developments and with junctions at either end – Bear Cross roundabout and Gravel Hill traffic lights – which are already over-capacity.

Q: Are you happy with the siting of the EfW, close to an SSSI and extending into Green Belt land? Can the junctions at each end of Magna Rd cope with significantly increased traffic?

¹ According to BCP Councillor Tony Hadley



Advantages vs Disadvantages

- Co-location with existing complementary waste activities at the integrated CRP is a claimed advantage. However an over-large site is proposed, which will spill over into Green Belt land.
- Whilst the application purports to avoid exporting waste from the site to landfill and EfW facilities further away, this supposed advantage is lost: the over-capacity of EfW will require feedstock to be brought in from beyond the borders of Dorset and probably from Europe..
- The energy is not really 'renewable' and certainly not green. According to a BBC research project of 2024, the proportion of plastic burned these days makes the production of energy as dirty as that produced by a coal-fired power station. EfW is not classed as clean energy by the government, under the recent *Clean Power Action Plan 2030*.
- The heat network that MVV hope to develop will not be 'low carbon'. The EfW will be pumping out approximately 1 tonne of CO₂ for every tonne of residual waste burnt.
- The construction jobs – likely never more than 150 at a time – will be temporary and most will probably not be locally sourced by the Swiss company who would build the plant.
- MVV's initial investment of around £290m will involve 'no public money'. However, it will involve public inconvenience and harm, public health issues and loss of public amenities on a diminished Canford Heath.
- Balanced against MVV's promise of around £1m annually in local business rates, you need to offset the increased expense of waste incineration that BCP will be liable to after the introduction of the Emissions Trading Scheme (ETS), which will be introduced in 2028. The cost will be borne by MVV and passed on to its customers (i.e. BCP).
- The 25% Biodiversity Net Gain promised by MVV is compensation for the damage that will be done to Canford Heath by the construction and operation of the EfW. The quality of the net gain has been questioned.
- The claim that the project will be 'Future proofed to become carbon positive with space for future carbon capture infrastructure' is dishonest. The technology does not exist at the moment and even if it did, the area of land available for the infrastructure is, according to the Planning Inspectorate², less than a third of what would be required. [See later section]

Q: Are you prepared to support a dirty CO₂ producing and increasingly expensive facility rather than preferable cleaner, more environmentally friendly recycling strategies?

Local and National Policies, Guidance and Legislation

MVV base the justification of their siting Canford incinerator on *BCP & Dorset Waste Plan*. However, as stated above, the application is for a site 10 times larger than the allocation. Feedstock for the proposed EfW will need to be brought in from far afield, thus running counter to the Spatial Strategy and Proximity Principle promoted by the Waste Plan.

Significantly, the approval of the Portland application for an EfW constitutes a viable and suitable alternative site outside the Green Belt to fulfil the Waste Plan's requirements. Therefore the 'very special circumstances' – as defined by NPPF³ Paragraph 153 and required by BCPD WP Policy 21 – no longer exist and approval of the MVV application is non-compliant with the Waste Plan. [See later section]

² Planning Inspector Paul Griffiths, who reported to the Secretary of State for Housing, Communities and Local Government reported on 24 June 2024.

³ *National Planning Policy Framework*, December 2024



Did the Applicant undertake pre-application consultation with the local community?

Three local public exhibitions were advertised and held in January 2023, attended by over 200 people. Some of these attendees recall being told that the chimney would emit only water vapour and no toxins. Surprisingly, none of the representatives of MVV at these meeting were aware of the huge fire that took place at Canford Resource Park in the summer of 2018, requiring the attendance of 10 fire crews.

What are the main issues raised in local representations?

The most common issues raised by local representations were:

1. **Air quality and health** – Harmful emissions will affect the health and wellbeing of the local community and ecology. Inadequacy of the Applicant's assessments and ignoring academic research. No arrangements for ongoing monitoring and reporting of emissions;
2. **Traffic** – additional traffic, number of and routes to be taken by HGVs, the date and location of traffic surveys and whether or not cumulative developments, such as new housing developments, have been suitably considered within the assessments;
3. **Visual** – the Proposed Development will be an eyesore, is too tall and not sympathetic to the surrounding landscape or its green belt location; and
4. **Residential amenity** – noise impacts during construction and operation and odour generated by existing activities at CRP.

A full analysis of these issues, and others, can be found in [Magwatch's Summary Objection](#), which we urge you to download.

Main Local Issues: Air quality: human health

The overwhelming height of the chimney (with a requirement to raise it from the originally planned 90m to 110m) is a real giveaway. It is because of the EfW's emissions, which MVV admit will include (but are not limited to) particulate matter (PM) PM₁₀ and PM_{2.5}, nitrogen dioxide (NO₂), sulphur dioxide (SO₂), ammonia (NH₃), dioxins/furans, polycyclic aromatic hydrocarbons (PAH) and heavy metals, such as lead (Pb) and mercury (Hg).

However, it is not human health concerns which dictated the height of the chimney, but the needs of the adjacent heathland with its various protective designations.

Even then, the height is not necessarily what is best for Canford Heath, but what is deemed safest for aircraft in their landing approach to Bournemouth Airport. Therefore the extraordinarily tall chimney will result only in a reduction of harmful emission rather than an elimination of them. As MVV say in their *Ecology and Nature Environmental Statement* (8.4.3), 'The increased height of the chimney (110m) allows greater dispersion of the emission gasses, thereby *reducing* the concentration of *pollutant* deposition on habitats.' The only conclusion one can reach is that both obligations cannot be fully met without compromise, and therefore environmental health is being sacrificed for commercial air safety.

Regarding possible impacts on human health, MVV quote UK Health Security Agency (UKHSA), who say, 'while it is not possible to rule out adverse health effects from these incinerators completely, any potential effect for people living close by is likely to be very small.' It should perhaps be remembered that tobacco smoke and asbestos lining were once considered safe, before being recognised as the killers that they are.

The mental health impacts of incineration plants are touched on tangentially by MVV in *Population and Health Baseline Report Environmental Statement* (Appendix 14.1) where they



acknowledge that 'Mental health indicators show Bearwood and Merley to be below the regional and national averages, with more hospital stays for self-harm and a higher suicide rate. On this basis, individuals could be more vulnerable to changes to the environment and so this *should be taken into consideration* with the proposed development.' Yet no such consideration has been made by the applicant to prove that there would be no harm to public health. Projections show that the development could lead to up to 14 addition suicides and up to 40 serious self-harm incidents over its operational life-span. Details of sources for these statistics can be found in our downloadable [Mental Health Assessment](#).

Q: Are you comfortable with this level of projected harm?

Main Local Issues: Air quality: ecological well-being.

In the planning balance, according to NPPF 193b, if the marginal benefits of the EfW are outweighed by the harm that will be done to an SSSI, then development 'should not normally be permitted'. There is no mitigation for the habitat fragmentation, and the air pollution of Canford Heath can only be *lessened* rather than *eliminated* by the height of the chimney stack, which is limited by considerations of aircraft safety.

However, it is clear from the imposition of a S106 that adjacent SSSI heathland is going to suffer some harm. MVV's pledge to create a Biodiversity Net Gain elsewhere seems poor compensation for the damage that is going to be done to the existing Canford Heath.

The benefits of the proposed development are few and it is clear that allowing damage to the heath it is not a sacrifice worth making.

Q: Are you happy to ignore the risks – even if deemed quite small – to human health and to the ecological well-being of internationally known Canford Heath?

Main Local Issues: Traffic

MVV's claim that 'there will be no significant residual effects resulting from the increase in HGV traffic, including cumulative impacts', is difficult to believe. They make a misleading claim that a considerable amount of the 260,000tpa of residual waste will not all be additional traffic because a quantity of waste currently transported to CRP which will be incinerated instead of being shipped on. New Earth Solutions have stated that they will *not* use the Canford incinerator and will continue to ship on their waste for MBT (125,000tpa), and Canford Recycling have promised only 30,000t of their 175,000tpa to MVV.

A glance at the table below confirms the burden that HGV traffic to and from Canford Resource Park is likely to have on the already congested Magna Road. In the worst case scenario, which is what MVV agreed in scoping with BCP, an HGV would during weekdays arrive at or depart from CRP *every 73 seconds*.

Vehicle Type	Movement Type	Scenario 1 (Daily)	Scenario 1 (Annual)
HGV	Delivery of Waste and consumables and collection of residuals	543	197,320
Car/LGV	Staff/Ancillary	143	52,290
Total		686	249,610

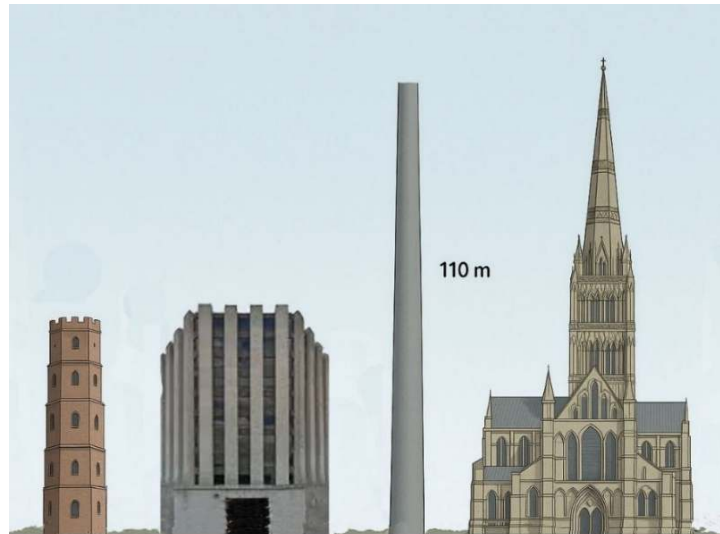
The total traffic movement at CRP (all vehicle types) and including Carbon Capture traffic movements.

Q: Ask people who daily use Magna Road (and the Bear Cross roundabout and Gravel Hill junction) what the traffic is like at the moment. Do you really think that the additional HGVs per weekday will have no significant residual effects?

Main Local Issues: Visual Amenity

The scale of the proposed building (161.5 metres long, 60.4 metres wide and 50 metres in maximum height plus a chimney stack 110 metres high) give it a bulk and intrusiveness that will significantly and negatively change the open character of the surrounding Green Belt area; and it runs counter to NPPF 153. Its scale would be unprecedented: it would be the largest structure in BCP, either current, consented or proposed, and it would be the tallest EfW chimney Stack in the UK. MVV's own landscape consultants (Laird Bailey) identify seven of fourteen visual receptors where there will be significant visual implications.

Whilst the chimney will be painted in 'mitigating' colours to disguise it by day, by night it will be lit up like a Christmas tree. A strange (but necessary) contradiction.



Horton Tower (43 m), Barclay's House (46 m), the proposed Canford EfW chimney (110 m) and Salisbury Cathedral (123 m)



Viewpoint 10 – View north east from Bridleway 23 within Open Access Land at Canford Heath

It will also impact negatively on neighbouring heritage assets of Canford Magna, which contains a number of Grade 1 listed buildings. BCP's Senior Conservation Officer suggests that the proposed incinerator will be an alien structure quite out of place in the natural surroundings. She agrees with Historic England that it would result in harm to what Historic England describes as 'heritage assets of the very highest significance'. These include Canford School (formerly Canford Manor), Nineveh Porch, the medieval John of Gaunt's building and Canford Magna Church. NPPF paras 208 and 212-216 require LPA's to balance the benefit of any proposed development against the harms to heritage assets and their settings.

Q: Is the planning balance really tilted towards the building of an over-sized and unnecessary incinerator rather than protection of the internationally known Canford Heath and the precious heritage assets of Canford Magna? Why has Reporting Officer downplayed the submissions of BCP's Heritage, Biodiversity and Design officers?



Aircraft Safety

Following publication of the applicant's Environmental Impact Assessment Scoping Report, BCP made a request to the applicant for an Instrument Flight Procedure (IFP) assessment.

This request originated with Bournemouth Airport's consultants because the application site 'makes significant penetration of the Airport's "Type A" surface". A 'Type A' surface describes parameters which enable an aircraft operators to comply with the relevant International Civil Aviation Organisation (ICAO) limitations. The issue relates to safety protocols in the event of engine failure or other unforeseen emergencies. [Download [Magwatch Aircraft Safeguarding](#)]

There is no evidence in any of MVV's or Bournemouth Airport's documentation on BCP's planning portal that an Instrument Flight Procedure assessment has been conducted.

On 9th May, 2025 Bournemouth Airport reaffirmed that their Holding Objection to the application still stood, after two years of unresolved discussions.

Q: Are you absolutely confident that full and proper aviation safeguarding assessments have been undertaken to ensure that the 110m chimney is safe in all eventualities for aircraft using Bournemouth Airport? Are you prepared to grant approval without those safeguarding assessments?

Main Local Issues: Noise and Odour

MVV 's desk exercise into noise and vibration effects at their monitoring locations concludes that 'no significant noise and vibration effects are predicted' at any of the identified sensitive receptors. This is not strictly true. There will be increased noise impacts at Receptors 11, 12 and 13 (all in Arrowsmith Rd) when the EfW is in 'turbine bypass mode', according to MVV.

Additionally, the increase in HGV traffic to Canford Resource Park will inevitably affect residential amenity, adding to noise levels and polluting diesel fumes on Magna Road.

Moreover, the Environment Agency noise audit disagreed with MVV's consultant and raised the impact severity ratings for operational and HGV noise levels. [Link to EA draft decision.](#)

Residents in Arrowsmith Rd and Canford Paddock report existing noise disturbance from CRP and this is unlikely to change significantly.

Capacity; Need; Recycling

Capacity

The DEFRA's recent modelling suggests the UK is approaching a point where national residual waste treatment capacity is sufficient to manage municipal residual wastes. There are regional variations and in the South West of England there is *over-capacity*.

INCINERATOR CAPACITY	Capacity tonnage in South West England (tonnes)	South West England Incinerable Waste 2023/4
Currently Operating	1,493,100	
Under Construction	110,700	
Approved	262,000	
TOTAL	1,865,800	1,263,626 tonnes
OVER-CAPACITY: Now	229,474	
In future	602,174	



It is worth noting that Scotland and Wales have both banned the building of new incinerators and that Denmark, an early leader in the field, has ordered a significant reduction (30%) in their incineration capacity so that they can meet their carbon reduction targets.

Need

Recent Local Authority data, obtained by a Freedom of Information request, indicates that BCP and Dorset's combined annual total of residual combustible waste (LACW) was 139,994 tonnes (only 53.8% of the Canford EfW's capacity). This figure will reduce as new government initiatives on residual waste management come into play. These include:

Extended Producer Responsibility (EPR) (Jan 2025), which reduce the amount of packaging used by producers and facilitate more effective recycling.

The Deposit Return Scheme (DRS) (Oct 2027), designed to increase the recycling rate of the 31 billion single-use drinks containers discarded each year.

Simpler Recycling (1st March 2025), which will facilitate householders in recycling as much waste as possible. It will include *Mandatory waste food collections*: From 31st March 2026, waste collection authorities must provide weekly food waste collections from all households.

UK Emissions Trading Scheme (ETS) (2028) which will put a cap and a cost on incinerated waste which, according the Local Government Associate is s likely to 'load billions of unavoidable costs on councils over the next decade'.

Even if one factors in the building 60,000 new homes over the next 15 years, *existing* capacity will be able to cope. 60,000 new homes would represent a 17.48% increase in households across BCP and Dorset, which equates to an additional 13,389t of waste. Added to the 99,473t expected residual waste, this represents 112,862tpa of total residual waste (taking into account that further reductions will occur year on year in-line with national measures)

Recycling

DEFRA's recent *Capacity Note*⁴ set a criterion that recycling rates must not be harmed. BCP currently recycle 52.7% of their collected waste (compared to a national average of 42.3%). Building a new, unneeded waste incinerator within BCP would discourage recycling – this has been evidenced in areas where new EfW plants have opened.

Instead of taking the step towards incineration by approving the Canford EfW, BCP should be actively encouraging wiser and more eco-friendly alternatives to EfW and Landfill. The first priority, in line with government policy, is to reduce the amount of waste we produce. Then we should examine more closely what materials, currently in the waste stream, can be recycled or put to some other use. For example,

- Roughly a third of incinerator feedstock is organic waste such as food which can be composted or sent to anaerobic digestion.
- Paper and card can often be recycled; even what is contaminated can still often be composted.
- Most plastics can either be recycled or be downcycled into, for example, garden furniture.
- Textiles can go to textile banks or charity shops to be re-used, or made into new products like rugs.
- Wood can be used to make new wood panelling.

⁴ *Residual Waste Infrastructure Capacity Note* (DEFRA, December 2024)



- Glass obviously can be recycled.
- Metals can be extracted using magnets and eddy currents to create new metal.

Q: If you agree that higher rates of recycling are preferable to a pollutant and CO2 emitting incinerator, then wouldn't you agree that the application should be refused?

Carbon Capture

Carbon capture is not a feasible process at the moment. Savills submission (18/11/24), with Kanadevia Inova's single page generalised outline of a CCS facility, is speculative and insubstantial:

**Kanadevia
INOVA**

Dear Mr Knapp

A carbon capture plant could be accommodated on site of the Canford WtE facility under conditions:

- Turbine to be designed for large steam export (2-stage turbine or controlled extraction) as required by typical carbon capture process to avoid the need of an additional back-pressure turbine.
- Electrical supply to consider additional consumers of CC plant.
- Workshop and spare parts warehouse of WtE plant to be sized for both WtE and CC plant.
- Layout to be mildly adapted such that more space is available for the carbon capture plant, e.g., moving the APCR residue silos next the firewater tanks such that trucks can drive around an enlarged area. This change may be retrofitted when constructing the CC plant.
- CEMS to be moved from stack to horizontal duct entering stack such that adding a diversion of flue gas downstream of CEMS is possible.
- Export of CO2 in compressed gas form, not as liquid CO2.
- Effluent permit for treated condensate from cooling of flue gas.

These provisions reduce the additional scope when retrofitting a carbon capture plant to the core carbon capture process. While some components, e.g., the compressor and the columns, shall always be located on ground, other less heavy components may be located on a second or third level. Such layout is feasible on the Canford site.

K. Lieball

Best Regards,
Kai Lieball

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Illustrative components of the Carbon Capture Facility

The diagram illustrates the layout of the carbon capture facility. It features a central blue rectangular area. To the left, a vertical stack of components is labeled: 'Absorber & chimney', 'Stripper', and 'Balance of Plant (BOP) building'. To the right, a vertical stack is labeled: 'Blower', 'Direct Contact Cooler (DCC)', and 'Cooling fans (above)'. Below the central area, there are 'Tanks', 'E-housing', and a 'Compressor building'.

The area proposed is far too small and, in any case, the area is already designated for other uses. Even if it all were dedicated to a CCS, its mere 900 sqm would, according to Planning Inspector Paul Griffiths, be 'a fraction of the space required' because a carbon capture facility incinerating 260,000 tonnes p.a. would require 3,000 - 4,000 sqm.

You should also be aware of some of the practicalities of Carbon Capture systems:

- Liquid Absorption carbon capture technology relies on amine-based solvents, leading to emissions of nitrosamines and nitramines, which are toxic and bio-accumulative. It also increases water demand by up to 50%, straining local water resources.



- Disposal of 260,000 tonnes of mineralised or liquid CO₂ would require an *additional* 13,000 tanker trips per year, totalling an extra 26000 including return trips.
- Savills' suggestion of a pressurised CO₂ pipeline is a pipe dream: the notional pipeline lacks an identified route, terminus, engineering design, funding source, or regulatory approval.

At the end of last year DEFRA (in the *Capacity Note* cited above) stated that applications for EfWs must be able to demonstrate that they can be built carbon capture ready'. Given the lack of space to house a complete CCS system and given that MVV/Kanadevia have no experience of EfW carbon capture and have offered only token details of the 'retrofit' system they would like to build, it seems that there is a very long way to go and little realistic hope of a CC system ever being installed in the future.

The Officer Report (**OR**) seems unconcerned: 'The government's decarbonisation readiness requirements have not come into force yet and as such, the proposal does not require to demonstrate that it can be built carbon capture ready. Notwithstanding, the applicant has provided details to demonstrate that the proposal will be 'carbon capture retrofit ready'. (OR para 6)

The OR dismisses the Portland Inspector's concern that the Canford site lacks adequate space by suggesting that 'he did not have the full technological details of the CC plant that can be utilised at Canford... The details submitted with the application (*See previous page*) demonstrate a conceptual design for the CC plant.' The OR reports Savills' admission 'that the CC plant is not yet sufficiently developed technically or commercially for a planning application for it to be submitted' but continues: 'However, there is a concept technical solution which is why the current application has been considered as carbon capture retrofit ready.' (OR 152) Download [Magwatch's Response to Savills/Kanadevia's 'concept solution](#).

Q: Do you regard the 'conceptual design' on the previous page as 'the full technological details' that can be utilised at Canford? Do you believe the application before you is genuinely 'carbon capture retrofit ready'? Do you think it should be, despite the application falling only a few months short of the new government requirements?

It surely defies logic to consider the application for the EfW in isolation from a realistic analysis of the practicalities of their associated carbon capture system. MVV would like to kick the can as far down the road as possible. We urge you not to.

Q: Do you really think it's possible to approve the application without *proper* consideration being given to the feasibility of a carbon capture facility?

Green Belt Assessment within the Planning Report

(A fuller account of our concerns, quoting extensively from the planning report, was sent at the weekend to the Chair of the Western Planning Committee, who was invited to share it with you.)

The application for the Canford EfW can only be approved if the BCP & Dorset Waste Plan policies are observed, a key one of which is Policy 21. This policy requires 'very special circumstances', including a need that cannot be met on non-Green Belt land. Since the Portland site was approved, the application does not meet this requirement.

The Reporting Officer (**RO**) attempts to circumvent this requirement by classifying the proposed site as Grey Belt land, arguing that new NPPF changes (Dec. 2024) introduced the



concept of Grey Belt, allowing the proposal to avoid Green Belt restrictions. Particular emphasis was placed on 'Previously Developed Land' (**PDL**), with the claim that the key components of the EfW would be constructed on PDL.

This is not true. If you look at the two Google Earth photos (*overpage*) you will see the hardstanding within the red circle was created in the first half of 2021 (possibly in a pre-emptive attempt to have the land classified as PDL for the purposes of this application). This is where a key component of the facility, the Tipping Hall, will be located.

There is no evidence of planning permission being granted for this hardstanding. It therefore is not PDL and so remains Green Belt land.

The District Network Connection lies outside the BCPDWP allocation on Green Belt land. Dismissing two recent Green Belt reviews by Poole and Dorset, the Planning Officer reclassifies the land as Grey Belt, suggesting – contrary to NPPF definition – it plays no part in Separating Bearwood from Merley.

A submission from planning lawyer David Elvin, KC (23/05/2025) presented a legal opinion that, because parts of the application site are not PDL, Grey Belt status is undermined and Green Belt policies still apply. Therefore, because the Portland EfW meets policy criteria, the Canford proposal becomes redundant.

We therefore question whether the application is truly compliant BCP & Dorset Waste Plan policy and believe that close examination of the relevant sections of the NPPF would suggest a misinterpretation and misapplication of the planning guidelines in the OR.

Q: Has the Planning Officer shared with you the legal advice she has taken to enable her to take the questionable step of reclassifying the entire application site as Grey Belt?

Conclusion

The harms of the proposed development outweigh considerably and in a number of areas the few benefits this unnecessary facility might bring.

We believe and hope that you agree that the application should be refused.

Magwatch

8th June 2025

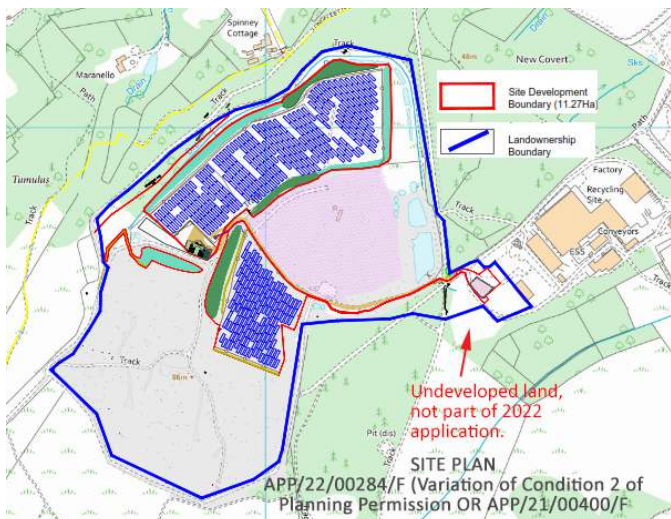
[Magwatch represents residents of the Bearwood and Merley ward in their determination to protect local green spaces. It has a large email membership and a Facebook following of over 1300 members.]

/See image overpage

GOOGLE EARTH MAPS OF THE APPLICATION SITE



The two Google Earth maps above, dated, show clearly the creation in 2021 of hardstanding.



Left: The revised site map below for APP/22/00284/F (PP/2100400/F)

Below: The Site Allocation map from OR



Figure 7: Aerial photo of the Allocated Site – Inset 8