



Valencia Waste Management Ltd

Pilsworth Landfill Site

Planning Supporting Statement

Erection and operation of Material Recycling Facility ('MRF').

FINAL Rev: -1

October 2024

Prepared for
Valencia Waste Management Ltd

Prepared by
Egniol Planning Ltd

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Appendix 1: Design and Access Statement

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Drawings

Plan	Author	Ref.
Building Elevations	Egniol Consulting Ltd	ECL.9595.D0.004 rev C
MRF Location Plan	Egniol Consulting Ltd	ECL.9595.D01.002 rev C
Proposed Drainage Plan	Egniol Consulting Ltd	ECL.9595.D01.005 rev C
Proposed Section Plan	Egniol Consulting Ltd	ECL.9595.D01.008 rev B
Parking Plan	Egniol Consulting Ltd	ECL.9595.D01.007 rev B
Concrete Slab Construction Details	Egniol Consulting Ltd	ECL.9595.D01.006
Floor Plan	Egniol Consulting Ltd	ECL.9595.D01.009
Roof Plan	Egniol Consulting Ltd	ECL.9595.D01.010

1. Introduction

1.1 This Supporting Planning Statement (“SPS”) has been prepared by Egniol Planning Ltd in support of a full planning application submitted on behalf of Valencia Waste Management Ltd (“the Applicant”) to Bury Council. The SPS sets out the details of the applicant’s planning application, for the erection and operation of Material Recycling Facility (‘MRF’) at Pilsworth Landfill, Pilsworth Road, Bury.

1.2 This application seeks to regularise planning approval for a MRF that is currently under construction. A MRF was recently approved in a similar location under planning ref 69956 dated 21/12/23. However, it is deemed that there are material differences between the MRF that is under construction and the approved MRF and therefore a full planning application is required to regularise the situation. These differences are shown in the table below:

	Approved MRF	MRF under construction
Location	As approved	Circa 15m to the south-east
Configuration	Facing south/south-west	90 degree rotation, facing south-east
Height	9m (height to eaves), 12.5m (height to ridge)	11.1m (height to eaves), 13.3m (height to ridges)
Length	Measured 72m	80.7m
Width	Measured 49m	60.6m
Roof Design	Single pitched roof	Double Pitched Roof
Throughput	150,000tpa	250,000tpa
North Elevation	Blank Façade	Introduction of 3no door openings
South Elevation	2 no door openings and quarantine bay	3 no door openings and personnel door
East Elevation	Blank façade	Introduction of personnel door
West Elevation	1 no door opening	2 no door openings

Quarantine Bay	External	Internal
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- 1.3 Therefore this SPS supports a planning application to regularise a revised MRF albeit in the knowledge that a similar MRF recently gained planning approval in a very proximate location.

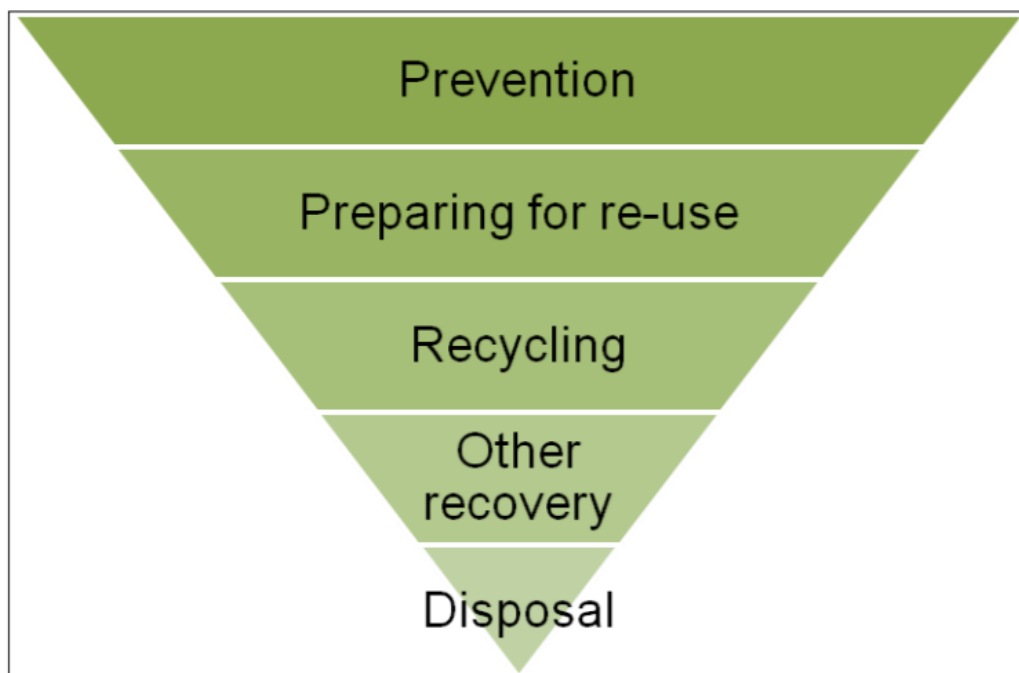
Benefits of the Development

- 1.4 The purpose of the facility is to intercept and extract recyclable materials from the commercial and industrial waste that is heading for landfill, which would then be removed from site for recycling/re-use/recovery by third parties elsewhere. Any domestic/putrescible waste would by-pass the facility to landfill as per current arrangements. The proposed development could also attract third-party construction/demolition/excavation waste and much of this material will be segregated into recyclables and soils/rubble that can be used as engineering materials and daily cover on the landfill. Any putrescible waste within this waste stream will again bypass the facility and be directly landfilled.
- 1.5 To this end the proposed development will ensure that only non-recyclable waste will be landfilled and every opportunity to extract recyclable materials is taken. This fully conforms to the principles of the Waste Hierarchy as established by various policies and legislation.
- 1.6 The various stages of the waste hierarchy are:
1. **Prevention:** The most effective environmental solution is often to reduce the generation of waste, including the re-use of products.
 2. **Preparing for re-use:** Products that have become waste can be checked, cleaned or repaired so that they can be re-used
 3. **Recycling:** Waste materials can be reprocessed into products, materials, or substances.
 4. **Other recovery:** Waste can serve a useful purpose by replacing other

materials that would otherwise have been used.

5. **Disposal:** The least desirable solution where none of the above options is appropriate.

- 1.7 As demonstrated in the graphic below the aim of the hierarchy is to ensure that waste is managed as high up the waste management process as possible.



- 1.8 In this instance the proposed MRF will lift the recyclable waste two stages up from 'disposal' to 'recycling'.

- 1.9 There are also specific on-site benefits that would accrue:

- a) Wastes delivered to the site will be delivered to the MRF rather than to an external tipping pad – this will reduce the amount of windblown litter.
- b) Delivering to the MRF shall also reduce the amount of road deliveries that tip directly onto the landfill – which will reduce the amount of mud and detritus collected on the delivery vehicles tyres.
- c) The treatment of wastes will produced a more homogenous material for deposition which will help reduce tong term settlement differentials on the landfill.

Pre-Application Advice

- 1.10 Pre-application advice was sought prior to the submission of the application for the previous MRF. This pre-application took place with Dave Marno and involved discussions around the necessary supporting information. Full consultation was undertaken as part of the determination of the approved MRF.

Structure of the Planning Statement

- 1.11 This Planning Statement presents the following information;
- An introduction to the project and the planning application;
 - Benefits of the development;
 - A description of the site and surrounding area;
 - A description of the development;
 - Need and Benefits
 - Potential environmental effects and summary of mitigation measures;
 - A review of planning policy;
 - Planning considerations; and
 - Conclusions.

Planning Application Documents

- 1.12 The Planning Application comprises the following documents:
- Covering letter
 - Planning Application Forms and Certificates
 - Planning Application drawings
 - Planning Statement (this document)
 - Appendix 1: Design and Access Statement
 - Appendix 2: EIA Screening
 - Appendix 3: Waste management Statement
 - Appendix 4: Economic Statement
 - Appendix 5: Statement of Community Involvement
 - Appendix 6: Crime Impact Statement

Standalone Documents

- Preliminary Ecological Appraisal – Prepared by EBS

- Flood Risk Assessment ('FRA') - Prepared by Egniol Consulting
- Landscape and Visual Impact Assessment ('LVIA') - Prepared by Awscape
- Ground Investigation and Contaminated Land Assessment (Phase 1 and Phase 2) – Prepared Wardell Armstrong
- Noise Assessment – Prepared by NVC
- Travel Plan
- Coal Mining Risk Assessment
- Dust Management Plan
- Crime Impact Assessment
- Green Belt Justification Document
- Climate Change Assessment
- Construction Environmental Management Plan

And the following drawings:

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2. Background to the Site

Site Location

- 2.1 Pilsworth South Landfill lies wholly within the Borough of Bury to the east of Junction 3 of the M66. Bury town centre lies 2.5km to the north west, whilst Heywood, in the neighbouring Borough of Rochdale lies about 3km to the north east. The site lies within the north Manchester Green Belt.
- 2.2 The proposed development lies within the existing redline planning boundary of the Pilsworth South site, which covers approximately 72.6 hectares.
- 2.3 The site lies within the setting of various industrial estates and retail parks. The M66 passes in a north-south direction immediately adjacent to the western boundary of the site. Pilsworth Road runs across the northern boundary and separates the site from Pilsworth North, a former landfill and quarry which is currently undergoing restoration. Moss Hall Road, a local B-road, runs along the eastern site boundary whilst Brightley Brook (designated as a main river) follows a course running parallel to the southern boundary at a distance of approximately 100m. A belt of undulating agricultural land used for stock grazing lies to the east and south of the site and to the south there are a number of reservoirs currently used for fishing and recreation.
- 2.4 Pilsworth South Landfill is surrounded by a small number of sporadic residential receptors. The nearest residential property to the landfill operations is Jackson Fold Farm some 60m to the north of the existing landfill boundary on the opposite side of Pilsworth Road. The Three Arrows Inn and a set of three cottages (The Boskins/Whippletree Cottage/Coal Pits Farm) lie 235m and 400m east of the proposed landfill boundary respectively. Four dwellings known as Pilsworth Cottages abut the Pilsworth South Landscape Buffer Zone (LBZ) some 320m south of the consented landfill boundary. Further south of the site, and beyond the deeply incised valley of Brightley Brook, there are a number of scattered dwellings; all of these are over 500m from the Landscape Buffer Zone. A group of dwellings known as Hollins Estate lies further afield over 600m from the proposed development site on the opposite side of the M66.

Environmental Context

Landscape and Visual

- 2.5 The site is located within the statutory landscape/planning designation of Green Belt. It is also located in a non-statutory landscape designation within the UDP of a Special Landscape Area. (SLA). However, there is no longer any evidence or detail to justify the SLA. It is uncertain as to whether this designation has any value.

Heritage

- 2.7 There are no listed buildings within 1km of the Site.
- 2.8 The site does not lie within a Conservation Area.
- 2.9 A number of listed buildings are located beyond 1km from the Site boundary as shown on the DEFRA MAGIC Map below.

Ecology

- 2.10 The application site is not covered by any statutory ecological designations.
- 2.11 There is a Site of Biological Importance (Pilsworth SBI) to the southern boundary of the Pilsworth South Landfill, and Railway Cutting at Heywood SBI to the north of Pilsworth North, with Hollins Vale SBI and Local Nature Reserve (LNR) to the west of the M66, south west of the site. There are other landscape designations further than 1km from the boundary of the site.

Flood Risk

- 2.12 The site already benefits from a surface water drainage system that ensures that there is no surface water pooling above the landfill cap and that surface water discharges are adequately attenuated prior to discharge off-site. The site surface water management plan highlights the presence of an existing surface water drainage system within the area of the proposed development. Overland runoff is directed to the attenuation lagoon directly north of the application site area.

Site Background and Planning History

- 2.13 The planning history of the site comprises:

54563 – 25/01/12 – Scrap metal and aggregate/soils recycling facility – updated 14/02/12
54012 – 09/08/11 – Waste Reception, Transfer, Recycling and Pre Treatment facility – updated 25/08/11
45528 – 01/03/06 – Extraction of Sand and Gravel from extension area prior to creation of approved landscape buffer zone including in part backfilling and restoration with controlled waste
47617 – 21/05/07 – Waste Reception, Transfer Recycling and pre-treatment facility
49899 – 19/06/08 – Retention of existing modular type building that is used as an Environmental Education Centre
51132 – 13/05/2009 – Green waste reception and shredding facility for a period of 27 months
53453 – 09/05/12 Vertical and lateral extension, re-phasing and enhanced restoration and ecological scheme within the consented site boundary – implemented
59691 – 08/08/16 Erection of leachate storage tanks and associated works – not yet implemented
62626 – Non-material amendment following grant of planning permission 59691 for change to the layout of the proposed leachate tanks and a reduction in the height of the proposed tanks – not yet implemented
69956 - 21/12/23 Erection and operation of a Material Recycling Facility and associated works

3. Description of the Development

3.1 The proposed development is defined on the planning application forms as:

‘Erection and operation of Material Recycling Facility.’

3.2 Table 3.1 below includes the list of drawings that have been prepared and are submitted for approval with the planning application and have been used within the assessment of environmental effects. A description of the proposals is presented below which should be read alongside the drawings detailed in the Table 3.1.

Table 3.1 Drawings submitted for Approval:

Plan	Author	Ref.
Building Elevations	Egniol Consulting Ltd	ECL.9595.D0.004 rev C
MRF Location Plan	Egniol Consulting Ltd	ECL.9595.D01.002 rev C
Proposed Drainage Plan	Egniol Consulting Ltd	ECL.9595.D01.005 rev C
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3.3 The drawings of the proposed development and its location on site are shown on the attached plans. The building will measure 80.7m by 60.6m with an eaves height of approximately 11.10m and a ridge height of circa 13.3m. The building will be steel portal frame on breeze block with internal breeze-block push walls.

3.4 The plant/equipment will extract recyclables and inert materials. A combination of Shredder, Long-Part Separator (removes long items from the process), Incline Magnet (removes ferrous metals), Combi Screen (removes fines), Eddy Separator (removes non-ferrous metals and Picking lines (to remove wood and plastics) will

typically sort the inputs into composition (% by weight) of:

- Hardcore 30% - to be used on site for engineering, daily cover and capping
- Fines 15% - to be landfilled or recovered as an RDF elsewhere
- Wood 10% - to be recycled
- Metals 5% - to be recycled
- Plastics 5% - to be recycled
- Residue 10% - to be landfilled
- Lights 25% - to be landfilled or recovered

The process is likely to employ up to 12 FTE's.

Construction

- 3.5 This application is made in retrospect. The site clearance, footings and external building works have been carried out. Further works will include the installation of machinery and external hardstanding.

Lighting

- 3.6 No lighting is currently proposed.

Drainage

- 3.7 As discussed in Chapter 5 the site already benefits from a surface water drainage system that ensures that there is no pooling above the landfill cap and that surface water discharges are adequately attenuated prior to discharge off-site. Overland runoff is directed to the two soakaway lagoons present, one directly north of the application site area and the other to the south.

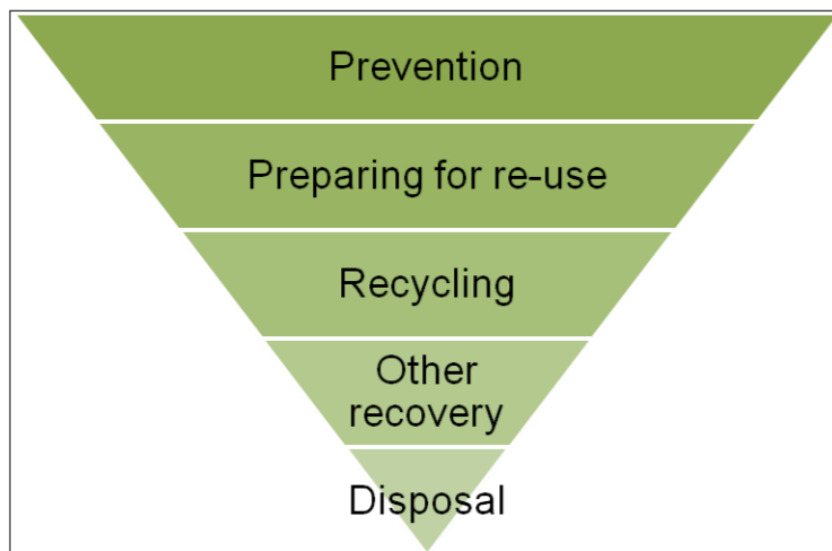
Post – operation

- 3.8 The site will be cleared and restore as part of wider landfill restoration.

4. Need and Benefits

4.1 National Planning Policy for Waste (NPPW) was published on 16 October 2014 and sets out the government's ambition to work towards a more sustainable and efficient approach to resource use and management.

4.2 Appendix A of the NPPW sets out the principles of the waste hierarchy. The waste hierarchy provides a sequential preference as to how waste should be prevented and treated.



4.3 The various stages of the hierarchy are:

- **Prevention:** The most effective environmental solution is often to reduce the generation of waste, including the re-use of products.
- **Preparing for re-use:** Products that have become waste can be checked, cleaned or repaired so that they can be re-used
- **Recycling:** Waste materials can be reprocessed into products, materials, or substances.
- **Other recovery:** Waste can serve a useful purpose by replacing other materials that would otherwise have been used.
- **Disposal:** The least desirable solution where none of the above options is appropriate.

4.4 Clearly the higher up the hierarchy the greater the preference.

- 4.5 Also, two key planks of the NPPW are:
'helping to secure the re-use, recovery or disposal of waste without endangering human health and without harming the environment'.

And

'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'.

- 4.6 The proposed development will look to extract recyclable material out of waste streams heading for disposal and making them available for recycling thus pushing waste inputs up the waste hierarchy and providing a more sustainable waste treatment option.

Circular Economy Package policy statement - published 30 July 2020

- 4.7 The UK is committed to moving towards a more circular economy which will see us keeping resources in use as long as possible, extracting maximum value from them, minimising waste and promoting resource efficiency. The [Circular Economy Package \(CEP\)](#) introduces a revised legislative framework, identifying steps for the reduction of waste and establishing an ambitious and credible long-term path for waste management and recycling.

- 4.8 This 25 Year Environment Plan sets out government action to help the natural world regain and retain good health. The ambitious proposals will tackle the growing problems (such as) waste. Its that that:

'Our 25-year goals By adopting this Plan we will achieve: (inter alia)

5. Using resources from nature more sustainably and efficiently.

- 4.9 In addition, we will manage pressures on the environment by: (inter alia)

8. Minimising waste.'

- 4.10 Chapter 4: Increasing resource efficiency and reducing pollution and waste

1. Maximising resource efficiency and minimising environmental impacts at end of life.

iv. Improving management of residual waste

4.11 We want to make sure that materials ending up in the residual waste stream are managed so that their full value as a resource is maximised and the impact on the environment of treating them is minimised.

4.12 It also states that, We will:

- Make sure that resources are used more efficiently and kept in use for longer to minimise waste and reduce its environmental impacts by promoting reuse, remanufacturing and recycling.
- Work towards eliminating all avoidable waste by 2050 and all avoidable plastic waste by end of 2042

4.13 Sustainable growth can go hand in hand with less waste and a smarter use of resources. We know that well-designed and delivered regulation, taxes and charges contribute to cleaner growth: the landfill tax has been instrumental in reducing the amount of waste dumped in the ground by 44% since 2000. The aggregates levy has hugely incentivised use of recycled aggregate'

The Clean Growth Strategy 'Leading the way to a low carbon future'

4.14 This states that 'Clean growth means growing our national income while cutting greenhouse gas emissions. Achieving clean growth, while ensuring an affordable energy supply for businesses and consumers, is at the heart of the UK's Industrial Strategy'. With regard to waste it states that '.....Innovative techniques are also needed to reduce the impact of landfills at the end of their use'.

Resources and waste strategy for England 'OUR WASTE, OUR RESOURCES: A STRATEGY FOR ENGLAND' 2018

4.15 This strategy sets out how the UK will preserve material resources by minimising waste, promoting resource efficiency and moving towards a circular economy in England.

- 4.16 This strategy sets out how UK plans to double resource productivity and eliminate avoidable waste of all kinds (including plastic waste) by 2050.
- 4.17 Our strategy sets out how the UK will (inter alia):
- *preserve our stock of material resources by minimising waste, promoting resource efficiency and moving towards a circular economy*
 - *minimise the damage caused to our natural environment by reducing and managing waste safely and carefully*
- 4.18 The strategy aims to improve recycling rates by ensuring a consistent set of dry recyclable materials is collected from all households and businesses. It highlights that recycling makes the material content of products that can no longer be repaired or reused available to be used in new products. It spares the environment the carbon impacts of extracting and processing virgin materials, and of managing wastes through energy recovery or landfill.

Analysis

- 4.19 The proposed development will meet the criteria of what is considered sustainable development as set out in the NPPF and therefore there is a presumption in favour of the development in this instance. The facility will also meet the requirements of driving waste up Waste Hierarchy by maximise recycling, making disposal a last resort. This also adheres to the government's 25 year Environment Plan and Waste Strategy. It is clear that supportive policy considerations should be given significant weight when considering the merits of this proposed development.

5. Potential Environmental Effects and Summary of Mitigation

5.1 This section of the Planning Statement summarises the environmental effects identified in other supporting documents and provides a summary of the main mitigation measures identified to avoid, offset or reduce any significant adverse effects of the development.

Traffic and Transport

5.2 The proposed development provides a pre-treatment process for waste arisings already destined for the site.

5.3 Therefore the proposed development will not significantly increase traffic. The MRF would have a maximum capacity of 250,000tpa. The proposed development will not increase inputs to the site. However, the proposed development will now result in a number of vehicles leaving the site with recyclable material. The manufacturer specifies that, depending on likely inputs, the recyclable content will be:

- 10% Wood
- 5% Glass
- 5% Plastic

Based on a typical month input of 20,833 tonnes per month would equates to the recycling of:

- 2083 tonnes of wood
- 1041.5 tonnes of plastic
- 1041.5 tonnes of glass

The material would be removed from site by 20t bulkers but assuming 18.6t is removed per trip equates to:

	2-way movements per month	2-way movements per week	2-way movements per day
Wood	112	26	5
Plastic	66	13	2.5

Glass	66	13	2.5
<u>Total</u>	224	52	10

Proposed Traffic Mitigation Measures

5.4 The potential transport related impacts associated with the proposed development have been considered. The analysis above concludes that the volume and composition of the proposed development traffic would have no significant impact on the operation and safety of the local road network, and the amenity of local residents. Notwithstanding this mitigation measures will include:

- Wheel-washing facilities will be provided on-site, therefore construction vehicles exiting the site will not take mud or debris onto the adjacent highway.
- All delivery and construction vehicles that regularly access and egress the site to be required to park in pre-designated 'clean areas' to avoid the carrying of debris and mud onto the adjacent highway network.
- Requirement for all engines to be switched off when not in use;
- Spraying of areas with water as and when conditions dictate;
- The adopted public highway within the vicinity of the site will be swept within an agreed time frame as and when reasonably requested by any officer of the Highway Authority;
- Vehicles carrying waste material off-site will be sheeted; and
- Any damage to the adjacent highway will be reported and repaired in a timely manner at the expense of the developer

Noise

Potential Environmental Effects

- 5.5 An Environmental Noise Impact Assessment relating to Proposed Materials Recycling Facility was produced by NVC Consultants Ltd in July 2023 in accordance with BS4142: 2014+A1:2019. NVC Consultants have confirmed that in view of the slight change in size, the separation distance to receptors and the concluded margin below background sound levels established, they do not predict any significant change to predicted noise levels [i.e. <1dB(A)] and conclusions would therefore remain as previous.

Findings of the Noise Assessment

- 5.6 Predicted noise levels from the operation of the MRF, HGV movement and mobile plant operation, show that the site rating noise level would be well below representative background sound levels and would therefore result in a **low impact** according to BS4142: 2014+A1:2019. The noise level from site would also be **well below appropriate design levels** within living rooms according to BS8233: 2014 for internal levels within sensitive rooms of dwellings assuming an open or closed window. The results of noise calculations (in accordance with BS5228-1: 2009+A1:2014) of the highest likely noise levels generated during the construction phase show that, during peak noise generated periods, noise levels are unlikely to exceed typical residual noise levels and would be well below threshold guidance levels at residential NSR and best practice would be applied to control and minimise noise. The assessment concludes that the proposed operation of the Site would generate noise levels well within relevant noise standards and guidelines at nearest sensitive receptors and therefore noise would be **not significant**.

Landscape and Visual

Potential Environmental Effects

- 5.7 An updated Landscape and Visual Impact Assessment (LVIA), has been produced by Awscape Ltd, has been provided as part of this planning application.
- 5.8 The main objectives of the LVIA are as follows:

1. To identify and assess the magnitude and effects of change that may arise from the proposed development on the Landscape character (landscape effects), and
2. To identify and assess the magnitude and effects of change that may arise from the proposed development on people's views and visual amenity (visual effects).

Findings of the Landscape and Visual Impact Assessment

- 5.9 The site is located within the statutory landscape/planning designation of Green Belt. It is also located in a non-statutory landscape designation within the UDP of a Special Landscape Area (SLA). However, there is no longer any evidence or detail to justify the SLA. It is uncertain as to whether this designation has any value.
- 5.10 The Landscape Character Type of Reclaimed Land/Wetlands is identified in the Greater Manchester Landscape Character and Sensitivity Report of August 2018 to be of Moderate Sensitivity to commercial development. The reason for its classification is mainly due to:
- its physical character of undulating landform, and locally distinctive artificial landforms, medium scale field patterns and small scale landscape features such as drainage ditches, hedgerows and woodland.
 - its natural character of land use which is largely mixed farmland, lowland wetland habitats, water bodies, woodland and SSSIs.
 - Its access and recreation with a network of public footpaths including long distance paths following canals and former railway lines, some open access land, and Country Parks acting as destinations for the local community..
- 5.11 The site is located within an area of an active landfill and has limited landscape qualities.
- 5.12 The susceptibility of the landscape to change has been assessed as **negligible to**

- low.** The over landscape value has been assessed as **low**.
- 5.13 The magnitude of landscape effects during construction has been deemed as **low (medium) adverse**. The magnitude of landscape effects following completion has been assessed as **low adverse**.
- 5.14 Significance of effect on the landscape during construction has been assessed as **slight (moderate) adverse**. Significance of effect on the landscape on completion has been assessed as **slight adverse**.
- 5.15 The assessment of visual effects of the proposed development would be minimal within a 2km radius. These are mainly from a small number of roads, residential dwellings and PROW. Beyond 1.3km the visual effects are negligible.
- 5.16 Effect on Green Belt Openness has determined that the proposals will generally not be visible from most receptors due to existing intervening vegetation. The development proposals are temporary and reversible and will only be present for the lifetime of Pilsworth Landfill. The openness of a small part the Green Belt, already under development) will have a minor change through this small section of access along Pilsworth Road. The remainder of the Green Belt will not be affected by the development proposals on the rest of the local area and remaining receptors due to intervening topography and vegetation.

Proposed Landscape Impact and Visual Mitigation Measures

- 5.17 The site was assessed on the effect on the openness of the Green Belt and was found to have a highly localised minor effect at the access to Pilsworth Landfill. The remaining area of Green Belt would not be affected due to intervening topography and vegetation limiting views across the landscape. As the site remains well hidden, is contextual with its working landfill setting, and is temporary and reversible. To this end no further mitigation measures have been considered necessary.

Ecology

Potential Environmental Effects

- 5.18 Existing ecological value of the site is low.

Findings of the Ecology Assessment

- 5.19 A Preliminary Ecological Appraisal Report has been submitted in support of the planning application. No update to this report is required from the previous application as the redline remains the same. This report concludes that:

'A desk-based study and a field study were conducted in order to identify habitats and determine the suitability for any 'protected and notable' species to occur on site. The site consists of a hard standing area used for heavy plant and machinery storage. There is no vegetation present. The area is not suitable to support Protected Species'.

Proposed Ecology Mitigation Measures

- 5.20 A number of mitigation measures are proposed to reduce the impacts on surrounding ecological assets. Suggestions for biodiversity enhancement include the provision of bat and bird nesting boxes (if possible), and the creation of habitats through planting of native trees and hedgerows.
- 5.21 All construction activities should comply with general environmental best practice measures including,
- the measures set out in the Environment Agency's Pollution Prevention Guidelines;
 - excavations should be sealed overnight or should have at least one shallow sloping side allowing animals to escape should they fall in;
 - an ecologist should be contacted for advice should any protected species be discovered during construction;
 - appropriate measures to suppress dust should be put in place during hot, dry, or windy weather.

Water Resources and Flood Risk

Potential Environmental Effects

- 5.22 The National Planning Policy Framework (NPPF) sets out the Government's national policies on different aspects of land use planning in England in relation to flood risk. The NPPF states that a site-specific Flood Risk Assessment will be required for

proposals:

- a) that are greater than 1 hectare in area within Flood Zone 1
- b) for all proposals for new development (including minor development and change of use) in Flood Zones 2 and 3
- c) in an area within Flood Zone 1 which has critical drainage problems; and where proposed development or a change of use to a more vulnerable class may be subject to other sources of flooding
- d) in an area within Flood Zone 1 identified in a Strategic Flood Risk Assessment as being at increased flood risk in the future
- e) in an area in Flood Zone 1 that may be subject to other sources of flooding, where its development would introduce a more vulnerable use

5.23 The submitted FRA considered the risks of all types of flooding to the site including tidal, fluvial, surface water, groundwater, sewer and artificial sources and provides mitigation measures to ensure that the flood risk to the site is minimised and that flood risk off-site is not increased.

Findings of the Water Resources and Flood Risk Assessment

5.24 Current existing drainage network expands to the southern side of the proposed building location within the offices of the site. The drainage network outfalls to the lagoon, where a bypass interceptor is specified. Further down to the south four existing lagoons are present, which have flow control outlets and an HDPE pipe to outfall.

5.25 As the proposed building is located within a much larger site, the proposed drainage strategy has been developed in accordance with the existing drainage infrastructure. Finished floor level for the building was estimated at approximately 101 mAOD from the current ground levels shown in the plans. Surface water manholes are proposed at the western and eastern corners of the building connecting towards the southern side of the structure and then discharging into existing drainage network surface water manhole 6 depicted on a plan 'Site Services' with existing invert level of 96.742 mAOD. Further surface water network drains to the south east and discharges to a series of lagoons.

Proposed Water Resources and Flood Risk Mitigation Measures

- 5.26 The proposed SWD will feed into the existing drainage system and therefore no further mitigation measures are required.

6. Review of Planning Policy

Overview

- 6.1 The Planning and Compulsory Purchase Act 2004 confers a presumption in favour of development proposals which accord with the Development Plan, unless material considerations indicate otherwise. Sub Section 5 of Section 38 of the 2004 Act also states that, *"if to any extent a policy contained in a development plan for an area conflict with another policy in the development plan the conflict must be resolved in favour of the policy which is contained in the last document to be adopted, approved or published (as the case may be)"*
- 6.2 This principle has been developed and clarified by subsequent case law, which has confirmed that a particular proposal does not need to accord with each and every policy in a development plan; the key issue is that it accords with the overall thrust of Development Plan policies taken as a whole. Accordingly, policy and plans play an important role in determining any planning application.
- 6.3 This section sets out the local and national planning policies as well as material considerations which are relevant, both to the application site, and the type of development proposed.
- 6.4 The Development Plan comprises of:
- **Places for Everyone (PfE) 2024**
 - **Bury Unitary Development Plan (UDP) 1997**
- 6.5 At the national level, planning policy is set out in National Planning Policy Framework (NPPF 2023). The NPPF considers;
- Achieving sustainable development;
 - Promoting sustainable transport;
 - Meeting the challenge of climate change, flooding and coastal change;
 - Conserving and enhancing the natural environment; and
 - Conserving and enhancing the historic environment.

- 6.6 The NPPF forms a material consideration in the determination of the planning application.
- 6.7 The NPPF consists of 3 dimensions to a 'sustainable development' i.e. economic, social and environmental.
- Economic Role – provision of infrastructure.
 - Social Role – access to local services which reflect the community needs.
 - Environment – contribution to protecting and enhancing the natural, built and historic environment.
- 6.8 The NPPF is clear that to achieve sustainable development economic, social and environmental gains should be sought jointly through the planning system.
- 6.9 The proposed development, on landfill, meets the economic and social requirements of a sustainable development.

Meeting the Challenge of Climate Change and Flooding

- 6.10 In regard to climate change the proposed development incorporates appropriate sustainable drainage systems to ensure it minimises vulnerability and provides resilience to the impacts of climate change.
- 6.11 Following the completion of the development, surface runoff is likely be unaffected due the existing impermeable area remaining unaltered and existing attenuation ensuring that flood risk within the surrounding river system is not increased.

Conserving and Enhancing the Natural Environment

- 6.12 The NPPF seeks to protect and enhance valued landscapes, recognise the wider benefits of ecosystem services, minimise impacts on biodiversity and to provide biodiversity gains where possible.
- 6.13 The design process has incorporated inputs from ecological and landscape specialists to ensure the proposed development minimises its impact on the local landscape character and provides biodiversity enhancements in the longer term. The submitted Landscape and Ecological Assessments demonstrate how the proposed

landscaping and biodiversity enhancements will be delivered.

- 6.14 The proposed development is therefore considered to have a very limited impact on landscape related designations and will deliver biodiversity net gains sought by the NPPF.

Conserving and Enhancing the Historic Environment

- 6.15 The NPPF advises that when considering the impact of a proposed development on the significance of a designated heritage asset, the asset conservation is of great importance.
- 6.16 The proposed development will not have any direct impacts on designated heritage assets as the development is limited to the existing landfill.

Summary

- 6.17 The proposed development is considered to be a sustainable development and therefore benefits from the presumption in favour. The NPPF goes on to advise that proposed development that accords with an up-to-date Development Plan (which is considered to be the case here) should be approved without delay.

Table 6.1 Relevant PfE and UDP Policies Table

Places for Everyone	Summary of Policy Requirement	How the proposed development meets the requirement of the policy
JP-S2: Carbon and Energy	Aim of delivering a carbon neutral Greater Manchester no later than 2038. Supported through a range of measures including (applicable to this development): • Development should comply with the 2022 part L Building Regulations • Development proposals should set out how they intend to minimise energy demand and maximise energy efficiency unless it can be demonstrated that it is not practicable or financially viable.	The proposed development will comply with the 2022 part L building regulations. The proposed MRF building will not be heated but energy will be required to power the recycling equipment within the building and for lighting. The adjacent landfill site generates power through the gas utilisation plant which is exported to the grid. The site is therefore a net producer of energy. Solar panels will be installed on the roof of the MRF building.
JP-S3: Heat and Energy Networks	Within identified Heat and Energy network opportunity areas a heat and energy assessment is required as part of the Energy Statement to demonstrate compliance with policy	The site is not with the identified heat and energy network opportunity area. The building will not be heated so this is not applicable to this development.
JP-C2: Digital Connectivity	All new development to have full fibre to premises unless technically infeasible or unviable	The area does not yet have full fibre available. Once available the site will be connected.

Bury UDP	Summary of Policy Requirement	How the proposed development meets the requirement of the policy
Objective 6:	To encourage waste minimisation, recycling and alternative methods of waste disposal.	The proposed development is looking to bring waste that would otherwise be landfilled (and indeed is destined to be landfilled) further up the waste hierarchy thus fully supporting the principles attached to the waste hierarchy. As a proportion of the waste will still be landfilled or used for landfill engineering and daily cover the proposed development also fully supports the proximity principle and is ideally co-located at the landfill.
MW3/2 -	Waste Recycling and Bulk Reduction. The Council will, without prejudice to other policies and proposals of the UDP, give favourable consideration to proposals which facilitate the economic recycling and reclamation of waste	The proposed development would utilise the existing contracts for commercial wastes but will also attract local construction, demolition, excavation wastes – thus catering for the needs of the local area.
OL1 - GREEN BELT	<i>The Council will maintain a Green Belt, ensuring that it fulfils the following strategic purposes:</i> <i>to check the unrestricted sprawl of large built-up areas;</i> <i>to prevent neighbouring towns from merging into one another;</i> <i>to assist in safeguarding the countryside from further encroachment;</i> <i>to preserve the setting and special character of historic towns;</i> <i>to assist in urban regeneration, by encouraging the recycling of derelict and other urban land'.</i>	The permanence of Green Belt also includes it's own policies and that Green Policy has barely altered since PPG2 which was published in 1995. A previous application (47617 dated 21/05/2007) for a virtually identical 'Waste reception, Transfer, Recycling and Pre-treatment facility' was approved with a virtually identical policy background in place and the application was granted for the following reason(s): <i>'Permission should be granted having regard to the policies and proposals listed and the reason(s) for granting permissions can be summarised as follows:-</i> <i>Although the application involves inappropriate development in the Green Belt, it includes a satisfactory case for 'very special circumstances' to justify the development. The visual impact of this temporary development would be mitigated sufficiently by existing</i>

		<i>and additional screen planting and through the design of the building. Given its temporary status, the development would not prevent the restoration of the site to informal recreational uses for the benefit of the wider community in accordance with the approved scheme. There are no other material considerations that outweigh this finding’.</i> <i>And more recently approved 69956 dated 21/12/23</i> The proposed MRF, by its very essence, is located on site to receive wastes that would ordinarily be deposited at the site. Therefore, it is very much ancillary to the current activities on-site. Now whilst ‘ancillary development’ for existing development isn’t necessary considered to be not inappropriate it is clear in this instance the MRF and the landfill are inextricably linked. The linkage between the MRF and the landfill and the overwhelming need to locate the MRF immediately adjacent to landfill can be considered a very special circumstance that would help justify the development. Other very special circumstances include: 1) Pilsworth Landfill is a key strategic waste facility and Greater Manchester residual waste would need to travel long distances if Pilsworth was not available – thus increasing the carbon impact of Greater Manchester’s waste disposal. 2) Greater Manchester’s waste would have to travel even further to find a suitable landfill with front-end recycling facilities which extracts recyclables from the residual waste stream. 3) The proposed development is temporary in nature and therefore does not impact on the permanence of the Green Belt. Prior to the cessation of landfilling the
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		building/machinery will be removed and the land restored to a green-field site. 4) The temporary soil washing facility is required in this location to process the existing stockpiles which are located on site. It would not be economically prudent or environmentally sustainable to remove the stockpiles for processing elsewhere. To this end there is sufficient justification for considering that very special circumstances prevail in this instance and that there have been no changes to Green Belt policy (material or otherwise) that would alter that conclusion when compared with the decision to approve a similar scheme in 2007.
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7. Planning Considerations

- 7.1 The main material planning considerations in the determination of this application are considered below:
- 7.2 Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that planning applications should be determined in accordance with the development plan - unless material considerations indicate otherwise. Paragraph 38 of the NPPF also states that *'Local planning authorities should approach decisions on proposed development in a positive and creative way. They should use the full range of planning tools available, including brownfield registers and permission in principle, and work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area. Decision-makers at every level should seek to approve applications for sustainable development where possible'*.
- 7.3 Consent for a MRF at Pilsworth Landfill has already been established. Following amendments made during the design process this planning statement seeks to regularise the MRF that is currently under construction.
- 7.4 The previous MRF approval confirmed that the proposed development conformed to planning policy and there were no material considerations that would outweigh favourable planning support.
- 7.5 Whilst the proposed amendments to the MRF have been considered to be 'material' and therefore warrant the submission of a full planning application to regularise the situation the supporting information provided concludes that residential amenity will not be unduly impacted. The supporting information provided also concludes that features of landscape, hydrological, or ecological importance will not be affected. It is also concluded that the proposed development will not increase flooding events.

8. Summary and Conclusions

- 8.1 This Planning Statement has been prepared by Egniol in support of the planning application by Valencia Waste Management. The planning application is accompanied supporting environmental assessments and has been prepared in support of an application to regularise the MRF that is currently under construction.
- 8.2 A review of adopted planning policy confirms the policy support for the proposed development.
- 8.3 The supporting environmental reports have considered the proposed development in relation to its potential impact on a range of sensitive receptors and has concluded that the development can take place without significant harm to sensitive receptors.

Appendix 1: DAS

Appendix 2: EIA Screening

Appendix 3: Waste Statement

Appendix 4: Economic Statement

Appendix 5: SCI

Appendix 6: Crime Impact Statement