



Proposed Anaerobic Digestion Facility at Winwick, Warrington

Planning Statement

Prepared for



Severn Trent Green Power

June 2025 (Revised July 2025)
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Document Control

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1.0 INTRODUCTION

1.1 Introduction

- 1.1.1 This Planning Statement ('PS') has been prepared by Axis on behalf of Severn Trent Green Power ('STGP' or 'the Applicant') in support of a full planning application for the construction and operation of an Anaerobic Digestion ('AD') facility, including amended access, landscaping, parking and other ancillary works ('the Proposed Development') on land to the east of Winwick Link Road, Warrington ('the Site'). The location of the Site is shown on Figure 1.

1.2 Scheme Overview

- 1.2.1 STGP is proposing to construct and operate a 75,000 tonnes per annum ('tpa') AD facility on the Site. The facility would process municipal and commercial food waste to produce biogas, which would be used to generate low carbon energy on-site and for injection directly into the national gas and electricity grids; and digestate, a valuable bio-fertiliser. Carbon dioxide produced through the AD process would also be captured and exported from the Site for use in industry and other applications. The facility would promote sustainable waste management and contribute to the UK's transition to a low-carbon economy.
- 1.2.2 The Proposed Development would include amended vehicular access; an efficient network of internal roads and loading / unloading areas; and associated staff / visitor parking. A comprehensive landscaping scheme is also proposed, including substantial vegetation screening around the perimeter of the Site.

1.3 The Applicant

- 1.3.1 STGP, a subsidiary company of Severn Trent Plc, is the largest producer of renewable energy from food waste in England and Wales. Collectively, their ten food waste AD facilities and three green waste composting sites recycle around half-a-million tonnes of organic waste each year. Their AD facilities produce circa. 279GWh of green energy and 400,000 litres of bio-fertiliser per year.



- 1.3.2 STGP provides high-quality sustainable food waste recycling services to food waste producers and local authorities; and currently have contracts with more than 65 local authorities and numerous waste collection businesses, catering outlets, food manufacturers and retailers. In total, a quarter of England and Wales' separately collected household food waste and 12.5% of commercial food waste is sent to a STGP AD facility.
- 1.3.3 The company is looking to expand and deliver new facilities in areas which currently lack sufficient AD capacity or coverage. This is particularly important given the new 'simpler recycling' regulations, introducing legal requirements for most businesses that generate food waste to separate food waste for recycling from 31 March 2025; and local authorities to offer a weekly separate food waste collection by 31 March 2026.

1.4 Environmental Impact Assessment

- 1.4.1 The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (EIA Regulations) define EIA development as development which is either Schedule 1 development (mandatory EIA), or Schedule 2 development that would be likely to give rise to significant effects on the environment by virtue of factors such as its nature, size or location.
- 1.4.2 The Proposed Development does not fall within Schedule 1 of the EIA Regulations. Although AD is not technically 'disposal', it is likely the Proposed Development would be considered under Schedule 2, Paragraph 11(b) – *other projects – installations for the disposal of waste* – where the area of the development exceeds 0.5 ha.
- 1.4.3 Having considered Schedule 3 of the EIA Regulations and the EIA Regulations Screening Matrix, the Proposed Development would not give rise to any significant environmental effects. Resultantly, it is considered **the Proposed Development is non-EIA.**



1.5 Design and Access Statement

- 1.5.1 The legal requirement to provide a Design and Access Statement is set out in Article 9 of the Town and Country Planning (Development Management Procedure) (England) Order 2015 (as amended). This is hereafter referred to as the DMPO.
- 1.5.2 A Design and Access Statement is required for development which is classified as 'major development' but does not apply to waste development. Whilst a Design and Access Statement is not required, the requirements of Paragraph 2 of Article 9 are addressed through the Statement of Community Involvement at Section 4.0; the assessment of the development against local planning policy in Section 5.0; and the other assessments found in Section 7.0.
- 1.5.3 Paragraph 2 of Article 9 requires that a Design and Access Statement must include details of:
- (a) the design principles and concepts that have been applied to the development;*
 - and*
 - (b) how issues relating to access to the development have been dealt with.*
- 1.5.4 In achieving this, Paragraph 3 of Article 9 requires that a Design and Access Statement must:
- (a) explain the design principles and concepts that have been applied to the development;*
 - (b) demonstrate the steps taken to appraise the context of the development and how the design of the development takes that context into account;*
 - (c) explain the policy adopted as to access, and how policies relating to access in relevant local development documents have been taken into account;*
 - (d) state what, if any, consultation has been undertaken on issues relating to access to the development and what account has been taken of the outcome of any such consultation; and*
 - (e) explain how any specific issues which might affect access to the development have been addressed.*



1.6 Environmental Permit

- 1.6.1 In addition to the planning permission sought through this application, the Proposed Development will need to be supported by an Environmental Permit ('EP'). A brief summary of EPs and their relationship to planning is provided below.
- 1.6.2 EPs are issued through a separate regime to planning by the Environment Agency ('EA') and are lawfully required in support of developments that include certain activities / operations, including waste operations. The primary purpose of Environmental Permits is to ensure that the operations of a facility are carried out in a manner that protects human health and the environment, through the minimisation and avoidance of pollution.
- 1.6.3 Planning and permitting decisions are separate but closely linked. Whereas planning permission determines whether a development is an acceptable use of land, EPs determine whether a facility can be appropriately managed to prevent or minimise pollution. In this context, planning permission will consider a broader range of topics at a higher level to establish whether the principle of development is acceptable; and permitting focuses on potential pollution in greater detail. Topics covered by an EP are likely to include air quality (emissions, odour, dust, etc.), noise, water pollution and ground pollution.
- 1.6.4 Guidance sets out that duplication across the two regimes should be avoided. In this context, planning applications should not focus on how pollution can be controlled where this would be controlled by an EP. However, planning applications should still include sufficient consideration of pollution to enable the decision maker to confidently determine whether or not there would be unacceptable risk from pollution.
- 1.6.5 As mentioned, the Proposed Development would be supported by an appropriate EP, which STGP intends to apply for if planning permission is secured. This would include additional detailed assessment of the pollution risks associated with the Proposed Development, which would be used to inform any design or management measures necessary to avoid and / or minimise risk of pollution. The Proposed Development would not operate until an EP has been issued by the Environment Agency and the required measures have been put in place. Once operational, the facility would be operated and monitored in accordance with the EP to ensure that



there is no unacceptable risk from the facility to nearby residents or the local environment.

1.7 Scope of this Statement

1.7.1 This PS comprises nine chapters, which will provide details of the Proposed Development; assess the development against relevant planning policy; and provide a summary of the anticipated environmental effects. These chapters are:

- **1.0 Introduction (this chapter)** – which sets out the nature of the development and the contents of this statement.
- **2.0 Site Context and Surroundings** – which provides an overview of the Site and the surrounding area, identifying key features and constraints.
- **3.0 The Proposed Development** – which provides a detailed summary of the Proposed Development and the AD process.
- **4.0 Statement of Community Involvement** – which details the consultation that has been undertaken by STGP to inform this planning application, including any relevant feedback from stakeholders.
- **5.0 Planning Policy and Guidance** – which sets out the applicable planning policy and guidance and provides an assessment of the Proposed Development against relevant policies.
- **6.0 Green Belt Assessment** – which assesses the anticipated level of harm on the Green Belt as a result of the Proposed Development and sets out the ‘very special circumstances’ that justify the development on the Site. The ‘other harm’ section of this chapter also provides a summary of the environmental considerations, as considered through the various technical assessments submitted as part of this planning application.
- **7.0 Other Assessments** – which includes an Energy and Sustainability Assessment and a Crime Impact Assessment.



- **8.0 Summary and Conclusions** – which provides a summary of the Proposed Development and the findings of the statement; and draws together overall conclusions.

1.7.2 As mentioned above, this PS is supported by several technical assessments covering various topics. Copies of these assessments can be found in the appendices to this statement.



2.0 SITE CONTEXT AND SURROUNDINGS

2.1 Introduction

- 2.1.1 This section of the PS sets out the context of the Site and the surrounding area, including an overview of the planning history of the Site.

2.2 Site and Surroundings

- 2.2.1 The Site, which measures approximately 8.5ha, is located to the south-east of the junction between Highfield Lane and Winwick Link Road (A49/A572). It lies circa. 200m to the north-east of the easternmost properties on the outskirts of Winwick, to the north of the town of Warrington. The Site is located within a roughly triangular area, defined by the M6 to the north-east; the M62 to the south; and Winwick Link Road to the west.
- 2.2.2 The Site comprises agricultural land with a small agricultural building and lay-down area in the north-western corner. The boundary of the Site comprises a mix of fencing, hedgerows and scattered trees. The Site is intersected by a high-voltage electricity line, which runs roughly east-westwards close to the centre of the Site; and a buried sewer main, which runs in a straight line from roughly the centre of the western boundary to roughly the centre of the southern boundary. A buried Scheduled Monument, a neolithic bowl barrow, is also found in the south-eastern corner of the Site.
- 2.2.3 Access to the Site is taken from two locations along Highfield Lane, one along the northern boundary, close to the junction with Winwick Link Road; and the other along the eastern boundary. The junction with Winwick Link Road is a left-in / left-out junction. Highfield Lane also connects to Myddleton Lane to the south-east, via an all-movement junction.
- 2.2.4 The surrounding area is predominantly rural in nature, with agricultural fields and scattered buildings to the north, east, south and west. The area of Winwick is located to the south-west of the Site; and Warrington is located to the south, beyond the M62. There are clear urbanising features in the area, namely the motorways and the nearby settlements.



2.2.5 The Site is located within the Green Belt. It also falls within the Greater Manchester Nature Improvement Area.

2.2.6 The Site is wholly located within Flood Zone 1 (low probability of flooding), with a low to medium risk of surface water flooding in parts of the Site. The nearest residential property is Highfield Farm, approximately 75m to the west of the Site boundary, on the opposite side of Winwick Link Road. Residential properties are also found circa. 90m to the south of the Site boundary (280m from the main development area), along the northern side of Myddleton Lane.

2.3 Planning History

2.3.1 A review of WBC's online planning records has revealed two planning applications on the Site, namely:

- Planning application ref. 97/35951 for a natural gas cross-country pipeline, which was approved in February 1997; and
- Prior notification application ref. 2022/41894 for a barn for the storage of hay along the northern boundary of the Site; the proposal was found to not require prior approval in August 2022.

2.3.2 The Site has limited planning history and predominantly comprises undeveloped 'greenfield land'. The cross-country pipeline is not understood to have been delivered on the Site, as confirmed by a utilities survey commissioned by the Applicant.



3.0 THE PROPOSED DEVELOPMENT

3.1 Introduction

- 3.1.1 This section of the PS provides a summary of the AD process followed by details of the Proposed Development.

3.2 The Anaerobic Digestion Process

- 3.2.1 The AD process turns separately collected municipal and commercial food waste into biomethane, digestate and other byproducts. This process is detailed below.
- 3.2.2 Food waste would be imported to the AD facility by a range of waste collection transfer vehicles. The vehicles would deposit the waste in the reception building, which will include sunken waste reception bunkers into which the waste will be tipped by the incoming vehicles. The waste passes through a de-packing system, which would separate the food waste from plastic bin liners. The bin liners (which cannot be broken down in the AD process) would be exported from the Site to an appropriate facility for further processing.
- 3.2.3 The separated food waste is then transferred into the mixer. Here the food waste is macerated and liquid (water or other waste liquids such as milk, brewery waste, etc.) is added. The food waste mixture is then piped into the digestion tanks, where it is stored in an anaerobic (oxygen absent) environment. Enzymes in the mixture break down the waste, which produces biogas that rises to the top of the digester tanks for collection. This process is monitored by staff and additional solids or liquids can be added remotely from the control centre within the reception building. Should additional liquid be required, this can be pumped into the digester from liquid storage tanks. If additional solids are required, silage from the on-site storage area is fed into the solids feeder and injected into the digesters.
- 3.2.4 As the digestion process progresses, the amount of biogas produced will steadily decrease, meaning the level of biogas production provides an indication of how far along the digestion process the waste mixture in each tank is. Once digestion is complete, and all of the potential biogas has been extracted and collected, the digestate (a nutrient-rich liquid fertiliser) is pasteurised before being exported from



the Site by road tanker. It is unlikely that the mixture will be held in one tank for the whole process, instead operational staff will likely pipe waste mixture between digestion tanks as the process progresses, with the finished digestate being in one tank ahead of export. The process is a 'closed' system, with any such movements controlled remotely via the control centre.

3.2.5 The biogas is collected throughout the digestion process and sent to either the Combined Heat and Power ('CHP') unit or the Gas-to-Grid ('GtG') unit. The CHP unit would combust the gas to produce low carbon electricity and heat, which would be used to power / heat the facility and exported to the national electricity grid. The GtG plant would refine the biogas to create pure biomethane, which would be injected into the national gas grid for use by domestic properties, businesses and energy plants connected to the grid.

3.2.6 A carbon capture and storage ('CCS') unit would also collect the carbon dioxide stripped from the biogas by the GtG plant. The CCS would store the captured carbon dioxide, before it is collected by road tanker and exported from the Site for use in various industry and other applications.

3.3 Proposed Facility

3.3.1 The proposed facility would be capable of accepting up to 75,000 tpa of food waste. The facility would be capable of converting this into:

- Up to 7MWth of biomethane; plus
- Up to 1MWe of low carbon electricity; and
- Up to 70,000 tonnes / litres of digestate.

3.3.2 The facility would be located in the northern part of the Site, wholly to the north of the high-voltage powerlines. The southern area would include a water storage / drainage lagoon and landscaping / biodiversity enhancement area only.

3.3.3 Access to the Site would be taken from the existing access to the north off Highfield Lane, through an improved access junction. All waste and product export vehicles would enter and exit the Site via the Winwick Link Road / Highfield Lane junction. An eight-space car park, cycle parking, motorcycle parking, office and workshop would



- be located in the north-western corner of the Site, close to the access. The office and workshop would both be single storey buildings. The car park would also include 2 no. electric vehicle ('EV') parking spaces.
- 3.3.4 The reception building would be located to the south of the parking and office area, with an underground mixer tank along the northern elevation. This building would comprise a split roof design, with roof mounted solar panels on both levels and a maximum height of circa 12.4m. Two high-speed roller doors would be located along the northern elevation, with another two along the southern elevation, enabling waste delivery vehicles to enter the building to deposit their load and then exit the building using a one-way system. This building would contain the waste reception hoppers; the de-packing equipment; above and underground liquid storage tanks; pasteurisation equipment; and a control room.
- 3.3.5 The reception building would be slightly negatively pressured which, along with the high-speed roller shutters, would limit odour egress from the building. All air collected from the reception building would pass through the water scrubber and biofilter, located to the east of the reception building, which would minimise the odour of the air exhausted from the facility.
- 3.3.6 To the north and north-east of the reception building would be the weighbridges, which would measure the weight of waste vehicles on entry and exit from the Site; the CHP unit; a boiler house; a flare, which would burn off excess gas; a standby generator; and a transformer.
- 3.3.7 The 5no. process tanks would be located in the north-eastern portion of the Site within a bunded area. These tanks would measure approximately 32.5m in diameter and 13.5m in height. These tanks would be used to store the waste mixture during the digestion process and the digestate ahead of export from the Site.
- 3.3.8 The digestate collection point would be located just to the west of the bunded area, here road tankers will connect to the system and the digestate would be pumped into the tanker. To the south of the bunded area would be the silage clamp and solids feeder, here the silage (solid matter added to the digestion tanks as required) would be stored and fed into the tanks by a skid steer loader (or similar) via the solids feeder.



- 3.3.9 Lightning protection in the form of 20 no. slender 22m tall lightning masts would be provided as part of the Proposed Development. Four masts would surround each of the digestate tanks, these would be interconnected with ground laid wires, earth collection bars and earth rods, which would safely direct lightning strikes into the ground and away from the digestate tanks. The lightning protection arrangement has been designed to very high standards, with considerable headroom above the minimum operational requirement for a facility of this nature. In designing the protection with excess capacity and coverage, the Proposed Development will minimise the risk of combustion of the digestate tanks in the event of a lightning strike.
- 3.3.10 In the south-western corner of the facility would be the GtG plant, with associated Grid Entry Unit (GEU); the CCS, with associated loading area; and propane storage tanks. Carbon dioxide tankers would reverse into the area to the west of the CCS, where they would connect to the carbon dioxide storage tanks and take liquid carbon dioxide for transportation off the site.
- 3.3.11 Landscaping would be provided across the whole site, with substantial screen planting (in the form of native woodland) along the site boundaries. With the exception of some hedgerows close to the access point, the existing boundary planting would be retained, and new planting would be delivered along the development side of the boundaries. To the south of the high-voltage pylons would be a large area of species-rich grassland; a 3m-high screening bund with additional woodland planting; and an attenuation basin.
- 3.3.12 Surface water from across the Site would be collected for use in the AD process. Within the bunded area and silage clamp, surface water would be collected and sent directly to the underground liquid storage tanks for use in the AD process. Surface water run-off from all other impermeable areas of the Site would drain to the attenuation basin in the southern part of the Site, where it would be stored for later use in the AD process. During normal weather conditions and operations, it is expected that all of the surface water would be used in the AD process, being pumped back to the facility as required. In the event of heavy rainfall or a plant shutdown, excess surface water would be appropriately discharged once the attenuation basin reaches a certain level. No liquid that has entered the AD process



(i.e. the storage tanks and beyond) would (re)enter the 'clean' surface water drainage system.

3.4 Benefits of the Proposed Development

3.4.1 The Proposed Development would deliver several significant local and national benefits. The benefits are discussed in further detail at Section 6.5 of this PS and comprise:

- Sustainable Waste Management – delivery of new sustainable waste management capacity and improved coverage for separate food waste recycling across Warrington and the surrounding areas, which is vitally important given the introduction of the new 'simpler recycling' regulations and the lack of existing food waste recycling capacity.
- Biomethane and Renewable Energy Production - the production of renewable biomethane and energy, which significantly supports local and national sustainability and net zero targets; and contributes towards achieving energy security at a local and national level.
- Job Creation - up to five full time jobs will be provided during the operational phase, with numerous more jobs during the construction phase; in addition, the facility would support other local jobs e.g. in landscaping / maintenance and other support functions required throughout its lifetime.
- Digestate Production – the production of a sustainable fertiliser for use on local agricultural land, which helps to reduce costs and the associated carbon footprint of agriculture.
- Carbon Capture and Storage – technology to reduce emissions and provide a sustainable source of carbon dioxide for use in industry.
- Habitat and Biodiversity Creation - the delivery of substantial new on-site habitats and significant biodiversity net gains, which would offer increased opportunity for wildlife.



- Benefits to the Scheduled Monument – the removal of the Scheduled Monument and surrounding area from active farming, protecting it for future generations.

3.5 Rationale for Site Selection

3.5.1 The Site to the north-east of Winwick has been identified as the most appropriate location for the Proposed Development for several reasons, namely:

- **Service area** – The proposed AD facility seeks to address an identified shortfall in food waste-fed AD coverage and capacity in Warrington and the surrounding area, to ensure that food waste in this part of Northwest England can be managed sustainably and in accordance with new legislation. Winwick is well located within the intended service / catchment area, ensuring that waste can be efficiently and sustainably delivered to the facility without excessive road miles.
- **Grid Connections** – as outlined above, the proposed facility would export electricity and gas directly into the relevant distribution networks, meaning that the ability to connect to both the gas grid and electricity grid is essential to ensure that the facility is as effective as possible. Securing a viable gas and electricity connection is not always possible, due to a lack of appropriate network infrastructure, distance to the substation or connection to the grid and a lack of available capacity. The Winwick site has been confirmed to have viable points of connection to both the electricity and gas networks.
- **Accessibility** – the site at Winwick is well placed in relation to the strategic highways network, located just off the M6 and M62. This location means that waste, digestate and CO₂ can be efficiently transported to and from the Site with minimal use of the local highway network. This would allow the facility to sustainably serve the intended service / catchment area.
- **Limited Constraints** – there are no significant constraints that would prevent development of the Site (e.g. ecological assets, flood risk, etc.). There is also sufficient site area to deliver the development in an appropriate layout and provide new habitats to meet and exceed the statutory BNG requirement.



- 3.5.2 In addition to the above reasons for the selection of the Site at Winwick, the ASA provided at **Appendix B** demonstrates that there are no other suitable or available sites within the intended service / catchment area.



4.0 STATEMENT OF COMMUNITY INVOLVEMENT

4.1 Introduction

- 4.1.1 This section of the PS provides a summary of the consultation undertaken by the applicant with WBC officers, Councillors, the Parish Council and local residents.

4.2 Approach to Public Engagement

Pre-application Consultation

- 4.2.1 A pre-application request was submitted to WBC officers on 15 January 2024. STGP also entered into a pre-application Planning Performance Agreement ('PPA') with WBC. Pre-application meetings were held between STGP, Axis and WBC officers on 28 February 2024 and 9 May 2024. A written response was received on 16 April 2024, a copy of which is provided at **Appendix A**.

- 4.2.2 The comments received are summarised below:

- **Principle of Development:**

- Green Belt - the pre-application advice, which was issued prior to updates to the National Planning Policy Framework ('NPPF'), set out that at the time of the advice the Proposed Development would represent 'inappropriate development' in the Green Belt and 'very special circumstances' would need to be demonstrated to outweigh any harm to the Green Belt in line with the adopted policy at the time. The Green Belt Assessment, which assesses the proposed development in relation to the latest Green Belt policy, can be found at Section 6.0 of this PS.
- Waste Development – WBC confirmed that the Site does not comprise a preferable location for waste development, in line with Policy ENV1. In this context, robust justification for the location and an assessment of preferable sites is required. An Alternative Site Assessment ('ASA') is found at **Appendix B** and justification for the Proposed Development is provided throughout this report.



- Renewable and low carbon energy development – the response confirms that renewable energy developments, such as the Proposed Development, are supported by Policy ENV7, provided they conform with other policies and would not result in unacceptable harm to the environment.
- **Highways** – the pre-application response sets out the highway matters expected to be considered under Policy INF1. It highlights that the planning application should be accompanied by a Transport Assessment, which considers movement numbers; access arrangements / improvements; the implications of and measures to control vehicle movements along Highfield Lane; and pedestrian / cycle improvements. The Applicant's team consider that a proportionate Transport Statement is appropriate in this case. In this context, a Transport Statement informed by scoping with WBC, is submitted as part of this planning application.
- **Environmental Protection** – the response confirms that environmental risk should be assessed and addressed in line with Policy ENV8. It confirms that assessment of contaminated land is not required, but that the impact on air quality and noise should be assessed. A lighting scheme is also confirmed to be required, which demonstrates that the LUX levels at neighbouring residential properties will be acceptable. The response also confirms that commentary on lightning protection should be provided. This application is supported by an air quality assessment, noise impact assessment and lighting scheme; and commentary on the lightning protection is provided throughout this PS.
- **Ecology** – WBC confirmed that ecology should be conserved, restored and enhanced and that the statutory 10% BNG must be delivered, in line with Policy DC4. The boundary planting is acknowledged as the most valuable habitat on the Site, which WBC expect to be protected. The pre-application response also sets out that ecological enhancements and BNG should be delivered. An ecological assessment is submitted as part of this application. The Proposed Development also includes a comprehensive scheme of



landscape planting, which retains the majority of the existing boundary planting and delivers new habitats and significant biodiversity net gains.

- **Layout and Landscape** – in line with Policy DC6, the pre-application response confirms that the facility should incorporate good design and avoid unacceptable impact on the landscape. The response also sets out that a Landscape and Visual Impact Assessment (LVIA), assessing the impact on landscape and setting out mitigation measures, is required in support of the application. This planning application is supported by a Landscape and Visual Appraisal ('LVA'), which assesses the impact on the landscape and the mitigation measures proposed. The mitigation includes significant vegetation planting, for visual screening. The submission of an LVA in place of an LVIA was verbally discussed with WBC officers ahead of submission. WBC do not have a dedicated landscape officer, nevertheless planning officers confirmed that an LVA should be suitable, provided that it was proportionate to the development.
- **Heritage** – the pre-application response acknowledges the presence of a Scheduled monument on the Site and expects this to be protected, enhanced and proactively managed, in line with Policy DC2. The pre-application response confirms that appropriate desk-based assessment and, where appropriate, field evaluation is required. A built heritage assessment and archaeological assessment, informed by a geophysical survey of the entire Site, has been included as part of this planning application.

4.2.3 Flood risk was expected to be unlikely to raise an issue at the application stage. Notwithstanding this, WBC have requested a Flood Risk Assessment and Drainage Strategy, due to the nature of the Proposed Development. This application is supported by a Flood Risk and Drainage Assessment.

Committee Members Briefing

4.2.4 The Proposed Development was presented to WBC Planning Committee Members virtually on Wednesday 30 October 2024. This comprised a 15-minute presentation by the Applicant; and provided opportunity for Members to ask questions ahead of



the submission of the planning application. The principal matters raised by committee members are summarised below.

- Green Belt, Very Special Circumstances and the location of the Proposed Development;
- Traffic impacts; and
- Impact on neighbouring users.

4.2.5 All the matters raised at the Members briefing have been assessed and addressed as part of this planning application; and are discussed within this PS.

Consultation with the Parish Council and Local Residents

4.2.6 A comprehensive pre-application consultation with the local community has been undertaken. This involved the following:

- Distribution of over 700 leaflets to local residents in and around Winwick and Croft, inviting them to attend an in-person consultation event and / or provide any comments via post / email;
- A project website, providing further information and details of how comments can be submitted via email or post; and
- An in-person consultation event at Winwick Leisure Centre, which took place between 14:00 and 19:00 on Monday 27 January 2025.

4.2.7 A copy of the leaflet can be found at **Appendix C**; screenshots of the consultation website can be found at **Appendix D**; and copies of the information boards presented at the event can be found at **Appendix E**.

4.2.8 The public consultation event was very well attended, with members of the public, members from the Parish Council and Councillor Mann (the Ward Councillor) all in attendance.



4.2.9 During consultation with the public several concerns with the development were raised. The concerns raised are presented below, along with a summary of how the Applicant has looked to address the comments.

- Residents questioned why the site was selected and whether there were alternative sites. As outlined in Section 3.0, there are several reasons for selecting the Site. It has also been demonstrated that there are no suitable or available alternative sites through the ASA, provided at **Appendix B**.
- Concerns were raised over the traffic impacts on the Winwick Link Road (A49). This planning application is supported by a Transport Statement which assesses the transport impacts of the Proposed Development. It is concluded that there would be no unacceptable impacts on the local highway network as a result of the Proposed Development. STGP is also volunteering a traffic routing agreement, which would effectively introduce a one-way system, with all Site traffic accessing the Site via J22 of the M6 to the north; and exiting via Junction 9 of the M62 to the south.
- The potential for odour and air emissions was also raised as an issue by residents. The Air Quality Assessment submitted in support of this planning application demonstrates that there would be no unacceptable impacts from odour or emissions. Odour would be limited by trapping any smells inside the main reception building and using the air scrubber and biofilter to remove odour before air is exhausted. Meanwhile, the facility has been designed to avoid adverse effects from emissions on residents and the environment; and would be operated under an Environmental Permit (EP) which would ensure that there are no unacceptable effects from emissions.
- Local residents raised concerns over an increase in flies and vermin as a result of the development. Waste handling practices, including the storage of all waste within the reception building, would minimise the potential for flies and vermin. Furthermore, the Site's EP would have specific conditions to be complied with which would further reduce the risk of flies and vermin occurring. Should any issues with flies or vermin arise during operation of the



facility, appropriate action would be taken by operations staff to resolve the issue quickly and effectively.

- Residents expressed concerns about a decrease in house prices. The applicant cannot comment on this, nor is it a material consideration for planning. Nevertheless, STGP would highlight that assessments undertaken as part of this planning application demonstrate that the impact on local residents would not be unacceptable.
- At the event residents also raised concerns over the impact on the Scheduled Monument. No development is proposed within the area occupied by the scheduled monument. As highlighted in the supporting Heritage Assessment, the Proposed Development would benefit the Scheduled Monument by taking it out of active ploughing.
- The perceived risk of explosion was also raised during consultation. The Proposed Development includes extensive lightning protection equipment, which would significantly reduce the likelihood of biogas ignition in the event of a direct lightning strike to the facility. In the very unlikely event of biogas ignition, it is anticipated that damage would be limited to plastic sheet roofs of the digester tanks; and there would be no damage to the wider facility or neighbouring property.
- Several residents raised general health concerns relating to the development. As mentioned and set out in the supporting assessments, there would be no unacceptable impact on residents, including on their health, from noise, traffic or emissions.
- The visual impact of the development was also raised during consultation. As confirmed by the Landscape and Visual Appraisal, the facility would have an initial visual impact, which would be softened over time by the significant planting proposed. The visual effect of the development would be localised in any case and would not impact on important views. In response to feedback received, the Applicant has added two 3m high landscaped bunds



in the southern part of the Site, which will further reduce the visual impact of the Proposed Development.

- 4.2.10 Overall, it is clear that residents have concerns about the Proposed Development. However, as demonstrated through this planning application, the concerns raised have been addressed and the assessments undertaken demonstrate there would be no unacceptable adverse impacts on local residents.

Visits to a Similar Facility

- 4.2.11 In response to the comments raised during the consultation, STGP organised for several residents, Parish Councillors and Charlotte Nichols (the MP for Warrington North) to visit STGP's North London facility:

- Six residents and Charlotte Nichols visited the facility on Thursday 10 April 2025; and
- Three Councillors visited the facility on Tuesday 15 April 2025.

- 4.2.12 STGP's North London facility was selected on the basis that it is most similar to the facility proposed at Winwick, given that it is a stand-alone facility (i.e. not attached to a sewage treatment plant); is located within the Green Belt and in a less built up location than other facilities; has a similar layout to the Proposed Development; and the nearest residential property is located closer to the facility than at Winwick. This was therefore considered to give the residents and Councillors the most accurate impression of what the Proposed Development would look like and how it would operate; and an understanding of the proximity of the Proposed Development to the nearest residential properties.

- 4.2.13 The visits involved a roughly 2-hour tour of the facility and the surrounding area. Those in attendance were able to see how the AD process works and get a better understanding of the likely effects (e.g. visual impacts, noise, odour, traffic, etc.) of the Proposed Development. Travel to and from the facility, and a packed lunch, was provided by STGP.

- 4.2.14 Following the visit, feedback was received from residents who commented that the tour helped to increase their understanding of how an AD plant works. Residents



acknowledged that the facility was well run, however concerns remain over proximity to properties.

- 4.2.15 The Parish Council also posted an update on their website. This update confirmed that the Parish Council still oppose the Proposed Development on noise, traffic and visual impact / landscape grounds. However, the update did acknowledge that odour from the plant was “generally not too strong”, suggesting that their position on that element has softened.



5.0 PLANNING POLICY AND GUIDANCE

5.1 Introduction

- 5.1.1 Section 38(6) of the Planning and Compulsory Purchase Act (September 2004) requires that applications for planning permission should be determined in accordance with the Development Plan unless material considerations indicate otherwise.
- 5.1.2 This section of the Planning Statement sets out the relevant planning policies and assesses the Proposed Development against them.

5.2 Local Planning Policy

- 5.2.1 The local development plan for WBC comprises the Warrington Local Plan 2023 (adopted December 2023). The Site is not allocated for development within the Local Plan; however, it is designated as part of the Green Belt.
- 5.2.2 The following policies, contained within the Warrington Local Plan 2023 ('the Local Plan'), are considered relevant to the Proposed Development.
- Policy GB1 – Green Belt
 - Policy INF1 – Sustainable Travel and Transport
 - Policy DC2 – Historic Environment
 - Policy DC4 – Ecological Network
 - Policy DC6 – Quality of Place
 - Policy ENV1 – Waste Management
 - Policy ENV2 – Flood Risk and Water Management
 - Policy ENV7 – Renewable and Low Carbon Energy Development
 - Policy ENV8 – Environmental and Amenity Protection
- 5.2.3 An assessment of the Proposed Development against the policies outlined above is presented below.



Principle of Development

Green Belt

- 5.2.4 Policy GB1 sets out (*inter alia*) that development proposals for inappropriate development within the Green Belt will only be permitted in 'very special circumstances', in accordance with national planning policy. Furthermore, the policy expects such development proposals to deliver a scheme of compensatory improvements to the environmental quality and accessibility of Green Belt land. Financial contributions may also be accepted, where it would help to maximise the benefits of the compensation through provision in the most appropriate location.
- 5.2.5 It is important to note that reforms to the NPPF were introduced on 12 December 2024; and included changes to national Green Belt policy and the introduction of 'grey belt'. The changes to the NPPF are not reflected in the Local Plan, as the plan was adopted prior to the latest version of the NPPF. A full assessment of the Proposed Development in relation to Green Belt policy is provided at Section 6.0 of the PS.

Waste Development

- 5.2.6 Policy ENV1 of the Local Plan promotes sustainable waste management, which accords with the Waste Hierarchy. The policy seeks to reduce waste across Warrington and treat waste at the highest level of the Waste Hierarchy as possible. To achieve this, WBC will (*inter alia*) provide appropriate and sustainable sites and areas for waste management. The policy seeks to direct waste development to the following preferred locations:
- a. *on redundant farmland (in the case of green waste and/or biological waste); or*
 - b. *on demolition and construction sites, where the inert waste materials are to be used on the construction project on that site; or*
 - c. *at existing permitted waste management sites or co-located with other waste management development; or*
 - d. *adjacent to or within the curtilages of Waste Water Treatment Works (in the case of biological waste); or*



- e. at mineral and landfill sites where waste material is used in conjunction with restoration or proposed waste operations are temporary and linked to the completion of the mineral/landfill operation; or*
- f. on areas of Previously Developed Land; or*
- g. in employment areas that are existing or allocated in the Local Plan for general industry (B2) and storage and distribution (B8) uses.*

5.2.7 Policy ENV1 confirms that proposals falling outside of the locations identified above will be considered less favourably and be assessed on their merits, based on the other policies in the Local Plan. The policy also states that built facilities should be focused on industrial estates and employment areas, and are expected to:

- a. Demonstrate the need for the facility, if there is clear conflict with other policies of the Local Plan;*
- b. All waste processes and operations must be contained and managed within buildings unless there are acceptable operational reasons why these processes cannot be contained within buildings;*
- c. Proposals must accord with all other policies of the Local Plan in relation to the protection of the environment, public amenity and sustainable transport.*

5.2.8 Policy ENV1 also expects appropriate mitigation measures to be implemented as required, to ensure that negative impacts are minimised to an acceptable level. Similarly, waste management developments will be granted where cumulative impacts would not result in significant adverse impacts on the environment or local amenity.

5.2.9 The Site does not represent one of the preferred locations set out through Policy ENV1. Nevertheless, it is clear that waste management development in such locations can be deemed acceptable, provided that the merits of the development outweigh its location outside of a preferred location and any conflict with other policies within the Local Plan.

5.2.10 As explored in Section 3.0, the Proposed Development would deliver clear and substantial benefits. Moreover, the Site offers significant benefit over certain alternative locations due to the ability to feasibly deliver a connection to both the gas and electricity networks. The ability to connect to both the gas and electricity network



will enable the benefits of the Proposed Development to be best realised. Furthermore, the location of the Site in relation to the strategic highways network enables waste and products to be efficiently and sustainably imported and exported from the Site, with minimal impact on residents.

5.2.11 This planning application is also supported by an ASA, which can be found at **Appendix B**. This demonstrates that there are no suitable or available sites within the preferred locations identified in ENV1. This assessment also includes assessments of sites within a reasonable catchment area outside of the administrative area of WBC.

5.2.12 It is clear that there are no suitable or available alternative sites within the preferred locations, which could feasibly accommodate the Proposed Development. As discussed below and at Section 6.0, the Proposed Development accords with other local plan policies and would not result in unacceptable impacts. In this context, it is considered that the principle of the Proposed Development is supported by Policy ENV1, as the merits of the proposal clearly outweigh any conflict with other policies.

Renewable Energy Development

5.2.13 Policy ENV7 of the Local Plan sets out (*inter alia*) that proposals for the production, storage and/or distribution of low carbon or renewable energy will be supported, provided that they satisfy the requirements of other Local Plan policies and do not result in unacceptable harm to the local environment.

5.2.14 As outlined above, as well as providing sustainable waste management, the Proposed Development would produce renewable energy and low carbon natural gas. This electricity and gas would be distributed into the relevant network and used to sustainably power local homes and businesses.

5.2.15 Policy ENV7 also requires new development to minimise emissions and incorporate sustainability into design and operation. Major developments in all locations outside of strategic allocations are required to meet at least 10% of their energy needs from renewable and/or other low carbon energy sources.



- 5.2.16 One of the key elements of the Proposed Development is the production of renewable energy from organic waste. The amount of renewable energy produced by the AD facility would significantly exceed the energy needs of the facility, meaning that the development would be a net exporter of renewable energy.
- 5.2.17 Given that the facility would generate and utilise renewable and low carbon energy, Policy ENV7 supports the Proposed Development, provided that it can be demonstrated that the development accords with other policies and doesn't give rise to unacceptable impacts. As discussed below and at Section 6.0, the Proposed Development accords with other local plan policies and would not result in unacceptable impacts.

Environmental Policies

Transport

- 5.2.18 Policy INF1 seeks to improve the safety and efficiency of the transport network across Warrington, alleviate congestion, reduce carbon emissions and improve air quality. To achieve this, development is expected to:
- a. Be located in sustainable and accessible locations, or in locations that can be made sustainable and accessible;*
 - b. Ensure priority is given to walking, cycling and public transport within its design, and reducing the need to travel by private car;*
 - c. Provide infrastructure for the charging of plug-in and other ultra-low emission vehicles, in line with the Council's Parking Standards SPD (2015);*
 - d. Support proposals that reduce the level of trips made by single occupancy cars;*
 - e. Consider demand management measures including the effective allocation of road space in favour of public transport, pedestrians and cyclists;*
 - f. Mitigate its impact(s) or improve the performance of Warrington's Transport Network, including the Strategic Road Network, by delivering site specific infrastructure which will support the proposed level of development;*
 - g. Ensure traffic generated by development is appropriate to the type and nature of the routes available and that there is no adverse impact on the local community;*

- h. Improve and develop appropriate road, rail and water freight transport routes and associated multimodal freight transport facilities in order to assist in the sustainable and efficient movement of goods, in accordance with other relevant Local Plan policies;*
- i. Consider the impacts on the wider region's Strategic Road Network and work with adjoining local planning authorities and wider stakeholders to assess the impacts of transport initiatives outside of the Borough, where impacts have been identified and need to be mitigated; and*
- j. Consider how development can be futureproofed, through the provision of measures to support new and emerging technologies, such as Autonomous Vehicles.*

- 5.2.19 Additionally, the policy sets out that mineral and waste development should encourage transport of materials via the most sustainable mode (i.e. rail or water), where practicable. Where the use of such modes is not feasible, proposals are expected to demonstrate that the use of more sustainable modes is not practicable; and that access arrangements would be safe and appropriate and would avoid unacceptable detrimental impact on the transport network.
- 5.2.20 The location of the Site in relation to the strategic highway network would ensure that the proposed development can be sustainably accessed; and would not impact on local communities. Appropriate access arrangements are proposed, which would avoid unacceptable adverse impact on the highways network. The Proposed Development would also include EV charging, cycle parking and motorcycle spaces, promoting more sustainable transport choices.
- 5.2.21 In relation to the mineral and waste specific criteria, transportation by rail and water is not considered practicable. Waste inputs will predominantly be from the local area (Warrington and neighbouring authorities), through roadside collection vehicles and HGVs transporting waste from nearby waste transfer facilities. In this context, waste entering the facility would be from multiple origins and no strategic-scale movements would occur, meaning that transportation via rail or water would be impractical and unfeasible. Similarly, exports from the Site would be to multiple locations locally, often in smaller loads, again making rail and water transportation unfeasible. Further



to this, the Site does not offer any opportunity to connect to existing railways of waterways.

- 5.2.22 In the above context, the Proposed Development would accord with Policy INF1. Further analysis is provided in the 'other harm' portion of Section 6.0 and in the Transport Statement submitted in support of this planning application, which can be found at **Appendix F**.

Landscape and Design

- 5.2.23 Policy DC6 confirms that good design principles should be at the core of all development proposals. To achieve this, the policy expects development to (*inter alia*):

- Be designed and laid out in a manner which respects, sustains and makes a positive contribution to local character and the landscape setting; introduce new landscaping, which enhances biodiversity and assists with visual integration; ensure that there is no unacceptable impact on visual amenity; encourage crime prevention; provide appropriate access; and encourage water efficiency.
- Use an appropriate pallet of high-quality materials, which are appropriate to the character of the locality.
- Deliver sustainable and safe access, including for active travel and public transport.
- Be designed to promote environmental sustainability, promoting energy and water efficiency; and delivering low carbon / renewable technology.
- Incorporate Secured by Design principles, to minimise the incidents and fear of crime, with natural surveillance and other security measures (CCTV, lighting, physical protection, etc.).

- 5.2.24 The Proposed Development has been located and designed to promote efficient operations whilst minimising the visual impact on the surrounding area. Significant landscaping is proposed, to ensure that the development is better integrated into the



landscape and the visual impact is minimised as far as possible. The materials proposed are also appropriate, with a colour pallet which will assist in ensuring that the Proposed Development is more effectively integrated into the landscape. This planning application is supported by a LVA, which is found at **Appendix G** and summarised in the 'other harm' section of Section 6.0. The LVA demonstrates that the Proposed Development would not have unacceptable impacts on visual amenity, views or the character of the surrounding area.

- 5.2.25 The layout of the AD facility would facilitate safe and efficient access, with several dedicated routes for the various types of vehicles, which would ensure that movements are efficient and there is minimal conflict. A car park, with EV charging provision, would provide suitable parking arrangements for staff and visitors. Motorcycle parking and cycle parking would also be delivered, facilitating access by other means. Footpaths and crossing points would be delivered within the Site to ensure that staff and visitors can safely move around the Site on foot.
- 5.2.26 As outlined previously, the fundamental purpose of the facility is to deliver sustainable waste management and produce renewable energy. In addition to these core functions, the facility would include roof mounted solar panels, which would deliver additional renewable energy. The facility would also be highly water efficient, collecting as much rainwater as possible for use in the AD process, which would limit surface water runoff and mains water usage.
- 5.2.27 Various security measures would be delivered on site, including fencing / gates, CCTV and appropriate lighting. This would ensure that the safety and security of the facility is maintained at all times.
- 5.2.28 Based on the above, it is clear that the Proposed Development would not result in unacceptable adverse impacts on the landscape or the character of the area. Appropriate access, sustainability features and security measures are also proposed. Resultantly, the Proposed Development would accord with Policy DC6 of the Local Plan.



Ecology and Biodiversity

- 5.2.29 Policy DC4 of the Local Plan asserts that the Council will work to protect, conserve and restore biodiversity, securing a measurable net gain and enhancing public access to nature across the borough. The policy sets out that development affecting sites of regional or local importance, protected habitats or priority species, will only be permitted where the reasons for the development clearly outweigh the need to retain the ecological assets; and that biodiversity mitigation or compensation would be delivered.
- 5.2.30 Where biodiversity or ecological assets would be lost or impacted, Policy DC4 expects mitigation or compensation to be delivered. A measurable biodiversity net gain, in line with the DEFRA Metric is also expected to be secured. An appropriate ecological assessment is also required in support of planning applications which have the potential to impact on ecological assets.
- 5.2.31 An Ecological Assessment Report ('EAR') and BNG Assessment, which can be found at **Appendix H** and **Appendix I**, respectively, are submitted as part of this planning application. The EAR concludes that there would be no unacceptable impact on protected habitats or priority species as a result of the Proposed Development. Meanwhile, the BNG Assessment demonstrates that the landscaping proposed as part of this planning application would deliver significant BNG, with over 70% net gain in area habitat; and over 10% net gain in linear habitat. Further consideration of ecology and biodiversity can be found in the 'other harm' section of Chapter 6.0.
- 5.2.32 Given the above, it is clear that any ecological harm as a result of the Proposed Development would be minimal and would be substantially outweighed by the significant ecological / biodiversity benefits proposed. In the above context, the Proposed Development is fully compliant with Policy DC4.

Environment, Health and Amenity

- 5.2.33 Policy ENV8 requires all development to be located and designed to avoid harmful or cumulative impact on the natural and built environments, including amenity. The policy expects development proposals to demonstrate that environmental effects



- have been assessed and mitigated, where necessary, to minimise the risk of adverse impacts on air, land and water quality; and demonstrate that vibration, noise and light levels are acceptable during construction and operation.
- 5.2.34 In relation to Air Quality, Policy ENV8 expects development to avoid unacceptable negative impact on air quality; avoid exacerbating air quality in the designated Air Quality Management Areas ('AQMA'); or give rise to potential for additional AQMAs to be designated. The policy also requires development to consider air quality impacts on Manchester Mosses Special Area of Conservation ('SAC') and, where the development would result in additional traffic flow¹ along the M62 past the SAC, provide proportionate contributions to the SAC's restoration.
- 5.2.35 This planning application is supported by an air quality assessment, which can be found at **Appendix J** and is summarised in the 'other harm' section of Chapter 6.0. The assessment highlights that the facility would include in-built mitigation measures; and that the facility would be designed and operated under an Environmental Permit, in accordance with Best Available Techniques applicable to biowaste treatment facilities. The facility would therefore not pose unacceptable risk to the health and amenity of the local population; and would not result in any significant impacts at nearby receptors. The air quality assessment also finds that the Proposed Development would not result in significant adverse impacts on air quality at any of the nearby receptors as a result of vehicle movements associated with the development.
- 5.2.36 Policy ENV8 also requires that development proposals are situated on suitably stable and uncontaminated land; and that the development proposals consider and avoid adverse effects on health, the natural environment and amenity from pollution. The policy also expects development proposals to demonstrate that the loss of the best and most versatile agricultural land would be minimised.
- 5.2.37 The Site is not known or expected to be contaminated, nor are there any stability issues with the land. As such, it is considered to be a suitable location for the Proposed Development from a contamination and stability perspective.

¹ More than 100 vehicles per day or 20 HGVs



- 5.2.38 The Site comprises an area of agricultural land, which is classified as Grade 3 (good to moderate land). An Agricultural Land Assessment was not requested as part of the pre-application and has therefore not been undertaken. As such, it has not been confirmed whether the Site comprises Grade 3a or 3b agricultural land. In this context, it cannot be determined whether or not the Site comprises a parcel of Grade 3a 'best and most versatile agricultural land'.
- 5.2.39 In any case, the Proposed Development would only result in the removal of a small area (8.5ha) of agricultural land. The Site has not been utilised for high-value crops in recent years, with the most recent harvest being a potato crop, suggesting that its removal from agricultural purposes would not have a significant impact on crop production or availability of high-quality agricultural land in the area. In this context, it is considered that the Proposed Development would not result in unacceptable loss of agricultural land.
- 5.2.40 Given the significant benefits of the Proposed Development, it is clear that the loss of the small area of agricultural land proposed would be outweighed. In this context, the Proposed Development is considered acceptable in terms of agricultural land.
- 5.2.41 Policy ENV8 also sets out that development proposals will not be permitted where they would have an adverse impact on the quality or availability of groundwater resources, watercourses or waterbodies. It also highlights that new development within Groundwater Source Protection Zones ('SPZ') must accord with central government guidance. New development in SPZs is also required to mitigate the risk of groundwater pollution; include a risk assessment and mitigation strategy relating to groundwater protection; and consider and mitigate against potential impacts on groundwater, public water supply and surface water during construction, through a Construction Management Plan.
- 5.2.42 The flood risk and drainage assessment submitted as part of this planning application can be found at **Appendix K**. This demonstrates that surface water from the impermeable areas will be captured and used in the AD process. Any clean water that cannot be used will be appropriately discharged; and foul water drainage will be suitably discharged through a separate system. Appropriate mitigation to minimise the risk of groundwater pollution, or pollution of any other waterbodies, will be



- implemented ensuring that the Proposed Development will accord with Policy ENV8 and central government guidance.
- 5.2.43 In relation to noise, Policy ENV8 encourages the consideration of noise and acoustic mitigation at an early stage of design. New noise generating development will not be permitted where they are likely to create significant adverse impacts on health and amenity, which cannot be mitigated.
- 5.2.44 A noise impact assessment is submitted as part of this planning application and can be found at **Appendix L**. The assessment confirms that, at worst, noise and vibration levels from the operation of the facility would result in a low impact on nearby noise sensitive receptors. During construction, the impact would be negligible. Given this, it is clear that the Proposed Development would not give rise to unacceptable adverse impacts from a noise perspective, and therefore accords with Policy ENV8 in this regard.
- 5.2.45 Policy EVN8 confirms that, where development is considered acceptable in relation to the environment, health and amenity, but there are still expected to be impacts, appropriate conditions or planning obligations may be used. The policy also confirms that the Council will consider other impacts, including (*inter alia*): odour, fumes, refuse collection and storage, light pollution, privacy, outlook, traffic and highway safety. The Council expect appropriate assessments of any factors which may impact on the environment or amenity to be submitted as part of planning applications.
- 5.2.46 Lighting will be delivered as part of the Proposed Development, the layout and spill levels of which are shown on the lighting details at **Appendix M**. The proposed lighting would be modest and highly directional, focusing light towards the facility and away from the boundaries of the Site. It would avoid unacceptable levels of light pollution, whilst ensuring that there is sufficient provision to allow safe working during mornings and evening in winter months and ensure that security is maintained. The lighting would also be set on timers and include sensors, which would ensure that the lighting is only switched on when required.
- 5.2.47 Based on the findings of the assessments undertaken in support of this planning application, it is clear that there would be no unacceptable adverse impact on



amenity as a result of the Proposed Development. As such, the Proposed Development would accord with Policy ENV8 of the Local Plan.

Flood Risk and Drainage

5.2.48 Policy ENV2 of the Local Plan sets out that development should be focused towards the areas of lowest flood risk from all sources; incorporate sustainable water management measures; avoid increasing flood risk or cause drainage problems; and be directed away from locations within 8m of watercourses. The policy also sets out the need for the assessment of flood risk (through a Flood Risk Assessment, where appropriate) and the implementation of flood risk measures. It also sets out the need to apply the sequential and exception tests, where appropriate. Policy ENV2 also expects development proposals to (*inter alia*):

- a. provide safe and clear access and egress routes in the event of a flood;*
- b. manage surface water runoff to ensure that flood risk is not increased;*
- c. use Sustainable Drainage Systems that reflect the principles set out in the adopted Warrington Sustainable Drainage Systems (SuDS) Design and Technical Guidance, unless it can be demonstrated that such techniques are impractical or would present an unacceptable pollution risk;*
- e. ensure that the layout and design of a site is considered to provide the opportunity to provide flood resilience measures and reduce flood risk within the development;*
- f. apply a sequential approach at a site level to minimise risk by directing the most vulnerable development to areas of lowest risk;*
- h. ensure that appropriate mitigation is included within the design of the development to make it safe for the future users of the site without adversely affecting others;*
- i. ensure that developers have considered the impacts of climate change to ensure that the future users of the development are not put at additional danger of flooding, which may be exacerbated by climate change over the lifetime of the development. Climate Change allowances should be in accordance with the latest Government guidance.*



5.2.49 Sites at risk of surface water flooding with an area exceeding 0.5ha are also expected to be supported by a Flood Risk Assessment, which considers Warrington's Flood Risk Assessments; and demonstrates that the development is not at risk of surface water flooding and makes a positive contribution to flood risk mitigation and flood conditions. The policy also expects surface water to be managed in accordance with the following hierarchy:

- a. An adequate soakaway or some other form of infiltration system.*
- b. An attenuated discharge to surface water body.*
- c. An attenuated discharge to public surface water sewer, highway drain or another drainage system.*
- d. An attenuated discharge to public combined sewer.*

The policy also confirms that development on greenfield sites should at least mimic undeveloped greenfield rates. Development is also expected to include sustainable drainage systems, which prioritise infiltration. Where such an approach is not possible, applicants are expected to provide clear evidence. The policy also outlines that applicants should consider their landscaping scheme to maximise its contribution to reducing surface water drainage. Details of how surface water drainage systems will be managed is also expected in support of development proposals.

This planning application is supported by a flood risk and drainage assessment, in accordance with Policy ENV2, and can be found at **Appendix K**. The assessment sets out that the Proposed Development would be at low / negligible risk of flooding, with some shallow pluvial flooding possible in the northern part of the Site. It also sets out the sustainable approach that will be taken to the drainage of the Site. A more detailed summary can be found in the 'other harm' portion of Section 6.0.

In the above context, the Proposed Development clearly avoids subjecting development to or increasing flood risk on- or off-site; and incorporates sustainable drainage, which would see the majority of the surface water collected on the Site used in the AD process. As such, the Proposed Development is wholly compliant with Policy ENV2.



Heritage and Archaeology

- 5.2.50 Policy DC2 seeks to conserve and enhance the historic environment of Warrington, giving consideration to designated and non-designated heritage assets.
- 5.2.51 When assessing development proposals, the policy confirms that developments which would cause substantial harm to or loss of significance of designated heritage assets (including archaeology) will be refused, unless it can be demonstrated that the loss is necessary to achieve substantial public benefit. Where a development would lead to less than substantial harm, applicants are expected to demonstrate that the benefits outweigh the harm. The policy also expects all applications which affect heritage assets to be supported by a Statement of Significance, as part of a Design and Access Statement or Heritage Statement.
- 5.2.52 This planning application is supported by a Heritage Impact Assessment and Archaeological Assessment, informed by a geophysical survey of the Site, which can be found at **Appendix N** and **Appendix O** respectively. These assessments identify and consider the Scheduled Monument found on the Site; the potential for undiscovered archaeological remains; and numerous off-site heritage assets within 2km of the Site.
- 5.2.53 The Heritage and Archaeological Assessments confirm that the Proposed Development would not result in substantial harm to any heritage assets. Further, a beneficial impact on the Scheduled Monument found within the Site is expected. With this in mind, the Proposed Development would be in accordance with Policy DC2 of the Local Plan.

5.3 National Planning Policy

National Planning Policy Framework

- 5.3.1 The latest revision of the NPPF was published on 12 December 2024. This version of the NPPF included several reforms to national planning policy, including changes to Green Belt policy and the introduction of 'grey belt'.
- 5.3.2 The central vision of the NPPF is to ensure that the planning system promotes sustainable development, which at a high level is defined as '*meeting the needs of*



the present without compromising the ability of future generations to meet their own needs’. The NPPF breaks this down into three overarching objectives:

- ***An economic objective*** - *to help build a strong, responsive and competitive economy [...];*
- ***A social objective*** – *to support strong, vibrant and healthy communities [...]; and*
- ***An environmental objective*** – *to protect and enhance our natural, built and historic environment [...].*

5.3.3 In seeking to achieve sustainable development through the planning system, the NPPF applies a presumption in favour of sustainable development. Paragraph 11 sets out that for decision making this means:

- c) *approving development proposals that accord with an up-to-date development plan without delay; or*
- d) *where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:*
 - i. *the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for refusing the development proposed; or*
 - ii. *any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole, having particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes, individually or in combination.*

5.3.4 Section 9 of the NPPF (promoting sustainable transport) outlines the importance of assessing transport issues at the earliest stages of development proposals, to ensure that the impacts of development on transport can be addressed; appropriate



infrastructure delivered; opportunity to promote more sustainable travel realised; environmental impacts of transport avoided and mitigated against; and patterns of movement considered. Paragraph 110 sets out that the planning system should actively manage patterns of growth and focus significant development to locations which are or can be made sustainable from a transport perspective.

- 5.3.5 Paragraph 115 seeks to ensure that sustainable transport modes are prioritised; safe and suitable access can be achieved; the design of streets, parking and other elements reflects national guidance; and any significant impacts on the transport network can be appropriately mitigated. Further to this, Paragraph 116 of the NPPF sets out that development proposals *“should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network, following mitigation, would be severe, taking into account all reasonable future scenarios.”*
- 5.3.6 Section 12 of the NPPF (achieving well-designed and beautiful places) expects development to create high-quality, beautiful and sustainable buildings and places. The design and layout of development is expected to consider long-term sustainability; visual attractiveness; local character and heritage; the street scene; the use of land; accessibility; and security. Paragraph 139 highlights that development that is not well designed should be refused.
- 5.3.7 Section 13 of the NPPF (protecting Green Belt land) sets out (*inter alia*) the purpose of the Green Belt and the national approach to development within the Green Belt. Paragraph 143 of the NPPF sets out the five purposes of the Green Belt, which are:
- a) *to check the unrestricted sprawl of large built-up areas;*
 - b) *to prevent neighbouring towns merging into one another;*
 - c) *to assist in safeguarding the countryside from encroachment;*
 - d) *to preserve the setting and special character of historic towns; and*
 - e) *to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.*



5.3.8 In relation to the determination of planning applications affecting the Green Belt, Paragraph 153 confirms that substantial weight should be given to any harm to the Green Belt; sets out that *“inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances”*, and asserts that *“very special circumstances will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations”*.

5.3.9 Paragraphs 154 and 155 set out several types of development which are not considered to be inappropriate development within the Green Belt. Paragraph 155 confirms that residential, commercial and other development should not be regarded as inappropriate where:

- a. *The development would utilise grey belt land and would not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan;*
- b. *There is a demonstrable unmet need for the type of development proposed;*
- c. *The development would be in a sustainable location, with particular reference to paragraphs 110 and 115 of this Framework; and*
- d. *Where applicable the development proposed meets the ‘Golden Rules’ requirements set out in paragraphs 156-157 below.”*

5.3.10 Grey belt, as referred to in Paragraph 155, is defined within the glossary of the NPPF. The definition of grey belt is:

“land in the Green Belt comprising previously developed land and/or any other land that, in either case, does not strongly contribute to any of purposes (a), (b), or (d) in paragraph 143. ‘grey belt’ excludes land where the application of the policies relating to the areas or assets in footnote 7² (other than Green Belt) would provide a strong reason for refusing or restricting development.”

² *“The policies referred to are those in this Framework (rather than those in development plans) relating to: habitats sites (and those sites listed in paragraph 189) and/or designated as Sites of Special Scientific Interest; land designated as Green Belt, Local Green Space, a National Landscape, a National Park (or within the Broads Authority) or defined as Heritage*



- 5.3.11 It is clear from Section 13 of the NPPF that certain forms of development are not considered inappropriate in the Green Belt, including those which occupy grey belt land. Meanwhile, inappropriate development (i.e. those types of development not explicitly identified at paragraphs 154 and 155) may be considered acceptable in the Green Belt, provided that very special circumstances ('VSC') can be demonstrated to clearly outweigh any harm to the Green Belt.
- 5.3.12 Paragraph 160 of the NPPF also confirms that *"when located in the Green Belt, elements of many renewable energy projects will comprise inappropriate development. In such cases developers will need to demonstrate very special circumstances if projects are to proceed. Such very special circumstances may include the wider environmental benefits associated with increased production of energy from renewable sources."*
- 5.3.13 Section 14 of the NPPF (meeting the challenge of climate change, flooding and coastal change) sets out that the planning system should support the transition to net zero by 2050 and take full account of climate change impacts. In doing so, it should (*inter alia*) support radical reductions in greenhouse gas emissions; encourage the reuse of existing resources; and promote renewable and low carbon energy.
- 5.3.14 Paragraph 168 confirms that *"when determining planning applications for all forms of renewable and low carbon energy developments and their associated infrastructure, local planning authorities should"* (*inter alia*):
- a) *not require applicants to demonstrate the overall need for renewable or low carbon energy, and give significant weight to the benefits associated with renewable and low carbon energy generation and the proposal's contribution to a net zero future;*
 - b) *recognise that small-scale and community-led projects provide a valuable contribution to cutting greenhouse gas emissions; [...]*

Coast; irreplaceable habitats; designated heritage assets (and other heritage assets of archaeological interest referred to in footnote 75); and areas at risk of flooding or coastal change." - NPPF



- 5.3.15 Paragraph 170 asserts that inappropriate development in areas of flood risk should be avoided by directing such development away from areas at high risk from flooding. To ensure this, plan allocations and development proposals are expected to apply the sequential test and/or exceptions test, as appropriate. Development is also expected to ensure that flood risk is not increased elsewhere; and demonstrate this through a flood risk assessment, where appropriate.
- 5.3.16 Section 15 (conserving and enhancing the natural environment) expects planning policies and decisions to contribute to and enhance the natural and local environment. This includes (*inter alia*) protecting landscapes, biodiversity and geology; recognising the intrinsic character and beauty of the countryside, including economic and other benefits; minimising impacts on and delivering net biodiversity gains; and preventing unacceptable harm from pollution or land instability.
- 5.3.17 Section 16 (conserving and enhancing the historic environment) expects (*inter alia*) development proposals to define and assess the importance of and impacts on heritage assets and their setting.

National Planning Policy for Waste

- 5.3.18 Section 1 of the National Planning Policy for Waste ('NPPW') sets out that "*positive planning pays a pivotal role in delivering the country's waste ambitions through:*
- *delivery of sustainable development and resource efficiency, including provision of modern infrastructure, local employment opportunities and wider climate change benefits, by driving waste management up the waste hierarchy;*
 - *ensuring that waste management is considered alongside other spatial planning concerns, such as housing and transport, recognising the positive contribution that waste management can make to the development of sustainable communities;*
 - *providing a framework in which communities and businesses are engaged with and take more responsibility for their own waste, including by enabling*

waste to be disposed of or, in the case of mixed municipal waste from households, recovered, in line with the proximity principle;

- *helping to secure the re-use, recovery or disposal of waste without endangering human health and without harming the environment; and*
- *ensuring the design and layout of new residential and commercial development and other infrastructure (such as safe and reliable transport links) complements sustainable waste management, including the provision of appropriate storage and segregation facilities to facilitate high quality collections of waste.”*

5.3.19 Section 5 of the NPPW relates to the determination of waste planning applications and confirms that waste planning authorities should (*inter alia*):

- *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;*
- *consider the likely impact on the local environment and on amenity against the criteria set out in Appendix B and the locational implications of any advice on health from the relevant health bodies; and*
- *ensure that waste management facilities in themselves are well-designed, so that they contribute positively to the character and quality of the area in which they are located.*

5.3.20 The waste hierarchy is presented at Appendix A of the NPPW. This sets out the preferred approach to waste management in England, with prevention as the most desirable outcome for (potential) waste; and disposal the least desirable management technique.

5.3.21 In addition, Appendix B sets out the locational criteria, which should be used to test the suitability of sites and areas proposed for waste development. The locational



criteria, along with a short summary of the Proposed Development in relation to each of the criteria, is presented below:

- **Flood risk management and the protection of water quality and resources** - the Proposed Development would result in no adverse environmental effects from a flood risk perspective, and would incorporate highly sustainable drainage arrangements.
- **Land instability** – the Site is not known to have any issues with instability nor would the Proposed Development cause or exacerbate instability issues.
- **Landscape and visual impacts** - the visual effects of the Proposed Development would be localised; would improve over time; views across the landscape would remain open and agricultural in nature; and the implications on the perceived openness of the Green Belt would be very limited.
- **Nature conservation** - there would be no unacceptable adverse impacts on existing habitats or species (including designated sites) and a substantial net ecological / biodiversity benefit would be delivered through the Proposed Development.
- **Conserving the historic environment** - this planning application is supported by a Heritage Assessment and Archaeological Assessment. These reports demonstrate that there would be no unacceptable adverse impact on designated heritage assets; in fact, the Proposed Development would deliver benefits for the Scheduled Monument found within the boundary of the Site by removing it from active ploughing.
- **Traffic and access** - there would be no unacceptable impact on traffic as a result of the Proposed Development and appropriate access is proposed.
- **Air emissions, including dust** - with in-design and Environmental Permit mitigation measures, the Site represents an appropriate location for the Proposed Development, which would not result in significant adverse impact on nearby receptors.



- **Odours** – the proposed AD facility would manage waste internally, within a closed system. In-design mitigation measures would limit odour emissions resulting in no significant adverse impacts on nearby receptors.
- **Vermin and birds** – the Proposed Development is a closed facility, which will offer limited opportunity for vermin and birds to prosper. Any vermin or bird issues, should they arise, will be identified and appropriately managed.
- **Noise, light and vibration** - with appropriate mitigation, the Proposed Development would be compliant with relevant noise standards and guidance and would not result in significant adverse impacts on nearby receptors. The proposed lighting would be sensitively designed, to minimise impacts on receptors.
- **Litter** – the Proposed Development is a closed facility, which would limit the opportunity for litter to be generated and distributed from the Site. Vehicles entering and exiting the site will include appropriate mitigation (closed waste hoppers, covers, etc.) to avoid dropping litter in the locality.
- **Potential land use conflict** – the separation distance from Winwick will minimise any conflict between the development, residents and businesses in the locality.

5.4 Other Material Considerations

- 5.4.1 There is no strict definition of what constitutes a ‘material consideration’ in planning legislation, although case law indicates that any consideration, which relates to the use or development of land, is capable of being a material consideration in the determination of a planning application.
- 5.4.2 Other material considerations therefore include National Planning Practice Guidance (‘PPG’) chapters, legislation, guidance and strategy documents. Those considered to be of most relevance / importance to the Proposed Development are summarised below.



Planning Practice Guidance

- 5.4.3 There are several PPG chapters, covering a range of topics. Of most relevance to the Proposed Development is the Green Belt chapter, which was most recently updated to provide critical guidance on how grey belt should be assessed and the relevant policy applied in February 2025.
- 5.4.4 The PPG confirms that authorities will be required to identify grey belt land when drafting policy and when considering planning applications. Paragraph 005 (Reference ID: 64-005-20250225) also sets out illustrative criteria for assessing the level of contribution to the purposes (a), (b) and (d) of the Green Belt. It confirms that parcels of Green Belt are only likely to strongly contribute to the purposes where:
- **For Purpose (a)** – they are free from existing development and lack physical features in close proximity that could restrict / contain development; and are adjacent to or near a large built-up area.
 - **For Purpose (b)** – they are free from existing development; form a substantial part of a gap between towns; and if developed would likely result in the loss of visual separation between towns.
 - **For Purpose (d)** - they are free from existing development; form part of the setting of a historic town; and make a considerable contribution to the special character of a historic town.
- 5.4.5 In relation to development proposals, the PPG confirms that an assessment of the Green Belt (alongside other considerations) should be used to determine whether the proposal would utilise grey belt land and whether the purposes of the remaining Green Belt would be fundamentally altered. Where there is no existing assessment of grey belt, authorities are expected to consider evidence on:
- *whether the site strongly contributes to the Green Belt purposes a, b or d; and*
 - *whether the application of policies to areas and assets of particular importance identified in footnote 7 to the NPPF (other than Green Belt) provide a strong reason to restrict development; and*
-

- *whether development of the site would fundamentally undermine the purposes of the remaining Green Belt across the plan area, as set out in national policy and this guidance.*

5.4.6 The PPG confirms even where the above conditions are met, wider considerations are still relevant, including whether the development would not represent inappropriate development under Paragraph 155 of the NPPF. The PPG further highlights that demonstrating that a development is not inappropriate does not remove it from the Green Belt; and that other policies and considerations still apply.

Waste Management Guidance and Strategy

A Green Future: Our 25 Year Plan to Improve the Environment (2018)

5.4.7 The 25-year Environment Plan (2018) sets out the Government action plan to help the natural world regain and retain good health. With regards to waste management, Page 90 of the Plan sets out that: *“Recycling food waste is also a key priority. We will work towards no food waste entering landfill by 2030. Many local authorities have introduced separate collection of food waste, and we will work to support an increase in numbers so that the amount of food waste sent to landfill continues to decline.”*

Our Waste, Our Resources: A Strategy for England (2018)

5.4.8 Our Waste, Our Resources: A strategy for England sets out five strategic ambitions, including to work towards eliminating food waste to landfill by 2030.

5.4.9 Chapter 3 of the Strategy relates to resource recovery and waste management and sets out Government’s aim to reduce greenhouse gas emissions from landfill by ensuring that every householder and appropriate business have a weekly separate food waste collection. Pages 70-71 highlight that *“UK households produce around 7 million tonnes of food waste each year, [...] Whilst some local authorities in England operate food waste recycling schemes, the majority of food waste ends up as residual waste. Extending separate food waste collections to more households should increase recycling and composting rates by about 5 percentage points over current levels and divert waste from incineration or landfill [...]”*



5.4.10 The Strategy confirms, at Page 71, that *“Anaerobic Digestion represents the best environmental outcome for food waste that cannot be prevented or be redistributed to others or, if this is not possible, used as animal feed. It provides both low carbon renewable energy and digestate, which can be used as fertiliser, compost, or soil improver.”*

The Environment Act 2021

5.4.11 The Environment Act 2021 introduced new legislation covering a range of environmental topics. In relation to waste, the Act introduces the following requirements for both domestic and relevant non-domestic waste:

- Recyclable household waste (including food waste) must be collected separately from other household waste;
- Recyclable household waste must be collected for recycling or composting;
- (Domestic properties only) recyclable household waste which is food waste must be collected at least once a week; and
- Food waste and garden waste must be collected separately from other recyclable waste streams.

5.4.12 The Environment Act 2021 (Commencement No. 9 and Transitional Provisions) Regulations 2024 confirms (*inter alia*) that:

- Separate food waste collection from relevant non-domestic properties must be introduced by **31 March 2025**; and
- Separate weekly food waste collection for domestic properties must be introduced by **31 March 2026**.

5.4.13 Based on the above it is clear that the separate collection of food waste is already a legal requirement for some non-domestic properties; and will become a legal requirement across England within the next year. Such separately collected waste must be sent for appropriate recycling or composting; and, as set out elsewhere in



national guidance, AD represents the Governments preferred management approach for separately collected food waste.

[Waste Management Plan for England \(2021\)](#)

- 5.4.14 The Waste Management Plan for England ('WMPE') provides an overview of how waste is managed in England to fulfil the requirements of the Waste Regulations. It includes commentary on how different waste streams are managed in accordance with the waste hierarchy and the measures proposed to further enhance the sustainable management of waste in England.
- 5.4.15 The AD of food waste is described under the heading of 'Recycling', recognising the status of AD within the waste hierarchy as effectively sitting above other recovery and disposal. In relation to AD it states: *"The government continues to support AD as the most effective way to treat separately collected food waste to produce energy and valuable bio-fertiliser. This ensures that food waste is diverted from landfill and reduces greenhouse gas emissions. The government is committed to increasing the energy from waste produced through AD and in February 2019 published a consultation on measures to increase recycling, including measures to increase the amount of separately collected food waste from households and businesses. These measures would support further growth in AD. We have also committed in the Resources and Waste Strategy to reduce the air quality impacts arising from digestate and levels of plastic contamination to improve the quality of end products."*
- 5.4.16 In relation to food waste collections the WMPE states that: *"Following on from the commitment in the Resources and Waste Strategy and our consultation on consistency in Spring 2019, we are legislating through the Environment Bill, to require weekly separate food waste collection from households in England."*
- 5.4.17 The WMPE makes reference to guidance relating to a food and drink waste hierarchy which sets out the Government's intention to stop surplus food from becoming waste. The hierarchy is as follows and identifies AD as sitting above all other waste treatment methods:
1. Prevent surplus and waste in your business.
 2. Redistribute surplus food.

3. Make animal feed from former food.
4. Recycle your food waste - anaerobic digestion.
5. Recycle your food waste - composting.
6. Recycle your food waste – land spreading.
7. Incinerate to generate energy.
8. Incinerate without generating energy.
9. Send to landfill or sewer.

Energy and Climate Change Guidance and Strategy

Climate Change Act 2008 (2050 Target Amendment) Order 2019

- 5.4.18 The Climate Change Act 2008 set a legally binding target for the UK to achieve an 80% reduction in greenhouse gas emissions by 2050, from the 1990 baseline. However, the UK Government decided that this legally binding target was not ambitious enough to mitigate the nation's activities on climate change. In 2019 the UK Government became the first major economy in the world to pass laws to end its contribution to global warming by 2050, compared to the 1990 baseline.
- 5.4.19 On 12 June 2019, the Government laid the draft Climate Change Act 2008 (2050 Target Amendment) Order 2019 to amend the Climate Change Act 2008 by introducing a target for at least a 100% reduction of greenhouse gas emissions (compared to 1990 levels) in the UK by 2050. This is otherwise known as the net zero target. The draft order amended the 2050 greenhouse gas emissions reduction target in the Climate Change Act from at least 80% to at least 100%, thereby constituting a legally binding commitment to end the UK's contribution to climate change.
- 5.4.20 On 20 April 2021, the UK government announced that it would set in law a more ambitious target of cutting carbon emissions by 78% by 2035 compared to 1990 levels. This would be in response to the UK's sixth Carbon Budget from the Climate Change Committee (see below) and signals the Government's acceptance of the recommendations and commitment to carbon emission reductions.
- 5.4.21 It is clear from the Government's legally binding commitment to net zero by 2050 that significant new investment in renewable and low carbon energy projects of all scales



is required across the UK. This requires a significant increase in renewable energy, development of carbon capture and storage technology, construction of new nuclear generation, and a transition to hydrogen and electric for heating and transport.

- 5.4.22 The Proposed Development would contribute to the delivery of the Government's legally binding net zero target and would support the green economy, through the sustainable production of renewable energy from food waste. This should be given considerable weight in the planning balance when considering this planning application.

The Sixth Carbon Budget (2020)

- 5.4.23 The Sixth Carbon Budget ('the Carbon Budget'), which was required under the Climate Change Act, was published in December 2020. Subsequently, on 20 April 2021, the UK Government announced that it would adopt the recommendations of the Carbon Budget and enshrine them in law. The legislation was then set out in parliament on 21 April 2021.
- 5.4.24 The Carbon Budget provided advice on the volume of greenhouse gas ('GHG') emissions that the UK can emit between 2033 and 2037. To achieve the GHG emission volume prescribed by the Carbon Budget, an ambitious 78% reduction (on 1990 levels) is required by 2035. One of the four key steps to achieving this target is the expansion of low-carbon energy supplies (such as the Proposed Development), to ensure that the energy production in the UK achieves zero carbon emissions by 2035. This is a dramatic step-change and will logically require more emphasis on renewable energy as part of a suite of measures to achieve this target.

Net Zero Strategy: Build Back Greener (2021)

- 5.4.25 The Government published the 'Net-Zero Strategy: Build Back Greener' in October 2021. The Strategy sets out policies and proposals for decarbonising all sectors of the UK economy to meet the net-zero target and keep us on track for future carbon budgets.
- 5.4.26 Chapter 2 'The Journey to Net Zero' highlights biomethane in the gas grid as one of the key approaches to decarbonising heating. This is expected to include the



injection of biomethane from anaerobic digestion, which is anticipated to deliver 2.8TWh of renewable heat per year by 2030/31.

- 5.4.27 Chapter 3i 'Reducing Emissions across the Economy - Power' sets out on pages 94 and 95 that, subject to security of supply, Government's commitment to a fully decarbonised power system will be brought forward to 2035. It also seeks to accelerate deployment of low-cost renewable generation and ensure that the planning system supports the deployment of low carbon energy infrastructure. Chapter 3i also acknowledges the need to move away from the use of oil and gas to avoid exposure to volatile prices. It confirms the role of low carbon technologies that can replicate the role of unabated gas in the electricity system, including Carbon Capture, Utilisation and Storage ('CCUS') enabled energy generation and Bioenergy with Carbon Capture and Storage ('BECCS').
- 5.4.28 Chapter 3ii 'Fuel Supply and Hydrogen' sets out the Government's ambitions to decarbonise the UK's fuel supply. This includes the pivoting from oil and gas to the use of (*inter alia*) CCUS and low carbon fuel switching. Biomass is sighted as one of the potential low carbon fuels, with the use of biogas at BECCS facilities sighted as having the potential to deliver vital negative emissions.
- 5.4.29 Chapter 3vi 'Natural Resources, Waste and F-Gases' reasserts the role of biomass in reducing carbon emissions; and seeks to ensure that no more than 10% of biodegradable waste is sent to landfill by 2035. It also acknowledges the carbon savings created through AD, through the use of food waste and promotion of the circular economy.
- 5.4.30 The Net Zero Strategy offers clear support for the delivery of new renewable energy generation, with specific reference to BECCS, CCUS and AD as desirable means to decarbonise the economy. This offers additional weight to the benefits of the Proposed Development and the contribution that it would make to the net zero targets.



[Powering Up Britain: Energy Security Plan \(2023\)](#)

- 5.4.31 The Energy Security Plan sets out the Government's strategy to ensure that the UK is more energy independent, secure and resilient, in light of the impacts of the war in Ukraine and the need to decarbonise the energy sector.
- 5.4.32 Chapter 2 of the Plan sets out how gas supply will be secured in the UK going forward. Pages 19 – 20 focus on long term decarbonisation and gas security, highlighting that the Government will support an increase in the volume of biomethane produced and injected into the gas grid through the Green Gas Support Scheme ('GGSS'), which offers financial incentive for eligible anaerobic digestion biomethane installations. The GGSS aims to deliver enough biomethane to heat around 200,000 homes per year at peak production, which will reduce carbon emissions, decrease reliance on natural gas and provide diversity in gas supply. This section also confirms the need to ensure that consumers can still rely on a secure gas supply during the transition to more sustainable alternatives.
- 5.4.33 Chapter 4 reiterates the Government's commitment to a move away from fossil fuels to home-grown energy, which is clean, secure and low cost; and its commitment to fully decarbonising the energy network by 2035. Page 28 sets out (*inter alia*) that unabated gas generation will be used less frequently in the future, as low-carbon alternatives that can fully replace its role are developed and deployed. Bioenergy is highlighted as a key source to decarbonise and secure the UK's energy supply at page 39, where it is highlighted that it offers both baseload and seasonal dispatchable renewable electricity supply, which when combined with carbon capture and storage can deliver negative emissions.

[Biomass Strategy 2023](#)

- 5.4.34 The Biomass Strategy sets out the role that biomass can play in reaching net zero, what the Government is doing to enable that objective and where further action is needed. It considers the sustainability, availability and priority use of biomass; the use of BECCS; and other uses across the economy, including the production and use of biomethane.



- 5.4.35 Chapter 4 'Biomass Availability: sustainable resources from international and domestic sources' highlights that the Environmental Protection Act 1990 (as amended by the Environmental Act 2021) requires the separate collection of food waste for recycling. It is confirmed on page 78 that *"the government's preference is for food waste to be collected for treatment by anaerobic digestion (AD), which produces biogas (which can be upgraded to biomethane) and by-products, such as digestate. In addition to generating renewable energy, AD is recognised as a form of recycling activity where it recycles nutrients, and the resulting digestate can be spread to land creating a more circular economy. The use of food waste as a feedstock delivers significant carbon savings over sending food waste to landfill."*
- 5.4.36 Chapter 5 'Priority Use of Biomass' sets out that priority should be given to the best use of the various forms of biomass. It is also highlighted that the use of biogenic wastes (such as food waste) as biomass feedstock is already considered to follow the principle of priority use through the application of the Waste Hierarchy and the promotion of a circular economy. Chapter 5 also includes reference to UK TIMES future energy scenarios, which highlights the role of AD with BECCS up to 2050.
- 5.4.37 Chapter 6 'Biomass with Carbon Capture and Storage' defines BECCS as technology that captures and stores CO₂ from biomass while producing low carbon energy, which includes AD which captures CO₂. It highlights that well-regulated BECCS can deliver genuine negative emissions, with the additional decarbonisation benefit of producing valuable energy products (electricity, heat or renewable fuels).
- 5.4.38 The Biomass Strategy clearly sets out that AD, with Carbon Capture and Storage capability, will play a key role in decarbonising the economy and represents a priority use of biogenic waste. This offers further weight in favour of the development of sustainable AD facilities across the UK.

[Warrington Borough Council Climate Emergency Action Plan \(2023\)](#)

- 5.4.39 WBC declared a climate emergency in 2019; building on this they published their Climate Emergency Action Plan in 2023. This sets out how the Council aims to reduce greenhouse gas pollution from their own activities; adapt their operations and services so they are more resilient; and use their roles and influences to help the borough as a whole to cut pollution, adapt to climate change and help nature recover.



- 5.4.40 As part of the Action Plan, the Council aims to utilise their position to influence transport, energy, resource efficiency and nature. Key to this is promoting the rollout of electric buses; the delivery of new infrastructure (such as renewable energy generation projects and EV charging); greater reuse and recycling; and the delivery of more habitats to assist nature recovery.

Clean Power 2030 Action Plan (2024)

- 5.4.41 The Clean Power Plan sets out the Government's ambition to successfully deliver rapid deployment of new clean energy capacity across the whole of the UK. This will include investment to protect consumers from volatile gas prices and decarbonise the wider economy. The plan sets out what the UK energy system may look like in by 2030 as well as the Government's approach to achieving this through the removal of road blocks to development and deployment; reforms to planning and consenting; and support for the delivery of renewable and nuclear energy.

5.5 Planning Policy Conclusions

- 5.5.1 It has been demonstrated within this policy appraisal that, subject to demonstrating very special circumstances and that the Site represents an appropriate location, the Proposed Development accords with the Warrington Local Plan 2023. Furthermore, the technical assessments submitted as part of this planning application demonstrate that the Proposed Development would not give rise to any unacceptable adverse impacts, meaning that the development accords with the relevant development management policies set out within the Local Plan.
- 5.5.2 In addition, it is clear that there is significant national support for the delivery of additional AD capacity across the UK, as a means of sustainable waste management and renewable energy generation. Substantial weight should be given to the need for and wider environmental benefits of the Proposed Development, including:
- The need to deliver additional waste management capacity to account for existing and emerging separately collected food waste volumes. AD is recognised as the most sustainable and preferred method for the management of this waste by the UK Government; and



- The need to decarbonise the UK energy network and deliver a sustainable supply of biomethane, to ensure that net zero targets can be met and UK energy security can be maintained.

5.5.3 An assessment of relevant material considerations has not revealed any justification for determining the application other than in accordance with the statutory Development Plan.

5.5.4 In this context, the Proposed Development can be approved without delay by WBC.



6.0 GREEN BELT ASSESSMENT

6.1 Introduction

- 6.1.1 The Site falls within the designated Green Belt. Accordingly, this section of the PS provides an assessment of the Proposed Development against relevant Green Belt policy.
- 6.1.2 Policy GB1 of the Warrington Local Plan sets out (*inter alia*) that inappropriate development within the Green Belt will not be permitted, except in very special circumstances, in line with national planning policy. It also confirms that other forms of development defined in national planning policy to be exceptions to inappropriate development will be supported, subject to meeting other relevant Local Plan policies.
- 6.1.3 Paragraph 153 of the NPPF sets out that *“inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.”* It goes on to confirm that *“‘very special circumstances’ will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations.”*
- 6.1.4 Development within the Green Belt is defined as ‘inappropriate’, unless it falls under the exemptions defined by Paragraphs 154 and 155 of the NPPF. Paragraph 155 sets out that homes, commercial and other development may not be deemed inappropriate development in the Green Belt, where certain criteria are met.
- 6.1.5 In the above context, the following section provides an assessment of the Site and Proposed Development against the exception set out at Paragraph 155 of the NPPF. This is followed by consideration of the level of harm to the Green Belt and very special circumstances, for completeness.

6.2 Grey Belt Assessment

- 6.2.1 As outlined above, the NPPF sets out several instances where development in the Green Belt is not considered inappropriate. Paragraph 155 sets out that *“homes, commercial and other development in the Green Belt”* is not considered inappropriate where the following criteria is met:



- a. *The development would utilise grey belt land and would not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan;*
- b. *There is a demonstrable unmet need for the type of development proposed;*
- c. *The development would be in a sustainable location, with particular reference to paragraphs 110 and 115 of this Framework; and*
- d. *Where applicable the development proposed meets the ‘Golden Rules’ requirements set out in paragraphs 156-157 below.”*

6.2.2 It is clear from the use of “*other development in the Green Belt*” that Paragraph 155 applies to a broad range of development types, including the Proposed Development. In this context, each of the above criteria is assessed in turn below.

The development would utilise grey belt land and would not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan

6.2.3 To meet criteria ‘a’ it is firstly necessary to demonstrate that the Site comprises ‘grey belt’ land. The NPPF defines grey belt as:

“Land in the Green Belt comprising previously developed land and/or any other land that, in either case, does not strongly contribute to any of purposes (a), (b), or (d) in paragraph 143. ‘Grey belt’ excludes land where the application of the policies relating to the areas or assets in footnote 7 (other than Green Belt) would provide a strong reason for refusing or restricting development.” (Emphasis added)

6.2.4 The relevant purposes of the Green Belt, as defined by paragraph 143 of the NPPF, are:

- a) *to check the unrestricted sprawl of large built-up areas;*
- b) *to prevent neighbouring towns merging into one another; and*
- d) *to preserve the setting and special character of historic towns.*

6.2.5 To assess the Site’s contribution to these purposes, consideration has been given to Warrington’s latest Green Belt Assessment, which was published in October 2016



and forms part of the evidence base for the adopted Local Plan. Areas were broken down into identifiable strategic parcels and each of the parcels was assessed in terms of its contribution to the Green Belt purposes. Appendix F to Warrington's Green Belt Assessment shows the Site to fall within strategic parcel WI9. Table 6.1 below provides an extract of the assessment of the parcel against the purposes of the Green Belt, as presented at Appendix G of the Green Belt Assessment.

Table 6.1: Assessment of Parcel WI9 Against Green Belt Purposes (taken from Warrington Borough Council Green Belt Assessment – Appendix G, October 2016)

Green Belt Purpose	Assessment	Contribution to purpose of Green Belt
<u>(a) To check the unrestricted sprawl of large built-up areas</u>	<u>The parcel is not adjacent to the Warrington urban area and therefore does not contribute to this purpose</u>	<u>No Contribution</u>
<u>(b) To prevent neighbouring towns from merging into one another</u>	<u>The parcel forms a less essential gap between the Warrington urban area and Newton-le-Willows whereby development of the parcel would reduce the actual gap but not the perceived gap between the towns. Overall, the parcel makes a weak contribution to preventing towns from merging.</u>	<u>Weak</u>
(c) To assist in safeguarding the countryside from encroachment	The parcel only has a very limited connection to the settlement across the Winwick Link Road (A49) which is a durable boundary that would prevent encroachment. The boundaries between the parcel and the countryside are durable and consist of Highfield Lane to the north and east and Southworth Lane to the south. These are durable boundaries that would prevent encroachment beyond the parcel if the parcel were developed. The existing land use is open countryside in agricultural use with some residential development to the south eastern corner of the parcel. The parcel is very well connected to the countryside along three boundaries. The parcel is flat, with less than 10% built form, minimal vegetation and open long line views and thus it supports a strong degree of openness. Overall, the parcel makes a moderate contribution to protecting the countryside from encroachment due to its durable boundaries between the parcel and the settlement and the parcel and the countryside.	Moderate
<u>(d) To preserve the setting and special character of historic towns</u>	<u>The parcel is not adjacent to a historic town. The parcel does not cross an important viewpoint of the Parish Church</u>	<u>No Contribution</u>

Green Belt Purpose	Assessment	Contribution to purpose of Green Belt
(e) To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.	<i>The Mid Mersey Housing Market Area has 2.08% brownfield urban capacity for potential development, therefore the parcel makes a moderate contribution to this purpose.</i>	Moderate

6.2.6 As demonstrated above, Parcel WI9 was assessed to have no strong contribution to any of the five Green Belt purposes by WBC, with no contribution whatsoever to two of the purposes. Resultantly, the Green Belt Assessment concludes that the parcel performs a weak contribution to the five purposes of the Green Belt overall.

6.2.7 In relation to the definition of grey belt, the findings of the Council's Green Belt Assessment clearly demonstrate that the Site does not strongly contribute to purposes (a), (b) or (d) of the Green Belt.

6.2.8 It is acknowledged that the Council's Green Belt Assessment was introduced prior to the introduction of grey belt, so does not include this as a consideration. However, when assessed against the illustrative features set out at Paragraph 005 of the PPG, it is clear that the conclusions of the Green Belt Assessment are that the Site does not perform a strong contribution to purposes (a), (b) or (d) on the basis that:

- In relation to purpose (a), the Site is physically contained by Winwick Link Road and Highfield Lane; and the Site is not adjacent or near to a large built-up area (villages are not considered as large built-up areas).
- In relation to purpose (b), the Site does not form a substantial part of a gap between town; and there would be no loss of visual separation between towns as a result of development on the Site.
- In relation to purpose (d), there are no historic towns in close proximity to the Site.

6.2.9 Based on the above, it is clear that Site has no strong contribution to purposes (a), (b) and (d) of the Green Belt and therefore meets the first part of the definition.



- 6.2.10 It is acknowledged that the Site contains a Scheduled Monument, which constitutes one of the uses listed at footnote 7 of the NPPF. However, the Heritage Assessment submitted as part of this planning application confirms that the Proposed Development would result in “*less than substantial harm*’ at the lower end of the scale to the setting of the Scheduled Monument”, which would be outweighed by the benefit of removing the monument from active ploughing. As such, the Proposed Development would be compliant with heritage policy and there is no strong reason for refusing or restricting development in relation to a footnote 7 asset, meaning that the second half of the grey belt definition is also met.
- 6.2.11 It is also necessary to demonstrate that the development “*would not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan*”. Table 6.2, below, provides an assessment of the effects of the Proposed Development on the five purposes of the Green Belt.

Table 6.2: Effect of the Proposed Development on purposes of the Green Belt

Green Belt Purpose	Assessment
(a) To check the unrestricted sprawl of large built-up areas	As set out in the Warrington Green Belt Assessment (2016), the Green Belt Parcel is severed from Winwick by Winwick Link Road (A49). This physical barrier clearly separates the Site from the settlement, meaning that the Proposed Development would not represent an extension to this area. Moreover, the Site is also separated from the large built up area of Warrington, located to the south of the Site, by fields and the M62. Furthermore, the type of development proposed does not represent a land use which is typically associated with the concept of urban sprawl. Rather, it is a stand-alone use, which is unlikely to encourage additional development in the vicinity. In the above context, <u>the proposed development would not cause harm to this purpose.</u>
(b) To prevent neighbouring towns from merging into one another	The Site does not directly adjoin any towns. The closest areas of settlement are Winwick to the south-west and Warrington to the South. Both settlements are separated from the Site by major roads and open fields. An open gap between the settlements and farms would remain. Development of the Site would not result in the merging of towns or areas of settlement. As a result of the above, <u>there would be a no harm to this purpose as a result of the Proposed Development.</u>

Green Belt Purpose	Assessment
(c) To assist in safeguarding the countryside from encroachment	As outlined in Warrington's Green Belt Assessment, the site is clearly defined by durable boundaries, which <i>"would prevent encroachment beyond the parcel were the site developed"</i>. Resultantly, the development of this parcel would not undermine this Green Belt purpose. Significant boundary planting is proposed that would screen the development from view and limit the visual impact of the development on the countryside. The roughly triangular parcel of countryside in which the Site is situated is bound by significant urbanising factors (motorways / A-roads, Winwick and Warrington). These established 'urban' features would mean that the visual and physical effects of the Proposed Development on the countryside would be reduced and contained. Resultantly, <u>the harm to the Green Belt caused by the Proposed Development due to encroachment on the countryside would be low.</u>
(d) To preserve the setting and special character of historic towns	There are no historic towns nearby to the Site, meaning that <u>the Proposed Development would have no impact on historic towns.</u>
(e) To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.	The ASA, submitted as part of this planning application, demonstrates that there are no suitable or available alternative locations for the Proposed Development within defined urban areas. Resultantly, there is no opportunity to utilise an urban location and assist urban regeneration. As such, <u>the Proposed Development would neither support nor prejudice this Green Belt purpose.</u>

6.2.12 Based on the above, the Proposed Development would have minimal impact on the five purposes of the Green Belt in this area; and any effects would be highly localised. It is clear, therefore, that the development would not fundamentally undermine to the purposes of the Green Belt; and the second part of criterion 'a' is met.

6.2.13 Based on the above, it is clear that the Site meets the definition of grey belt land; and that the development would not fundamentally undermine the purposes of the Green Belt. As such, the proposal meets criterion 'a' of Paragraph 155.

There is a demonstrable unmet need for the type of development proposed

6.2.14 As set out at Section 5.4 of this PS, there is a clear need for new AD capacity across the UK to ensure that food waste can be dealt with sustainably; and to provide



additional renewable energy and a more sustainable gas supply, to meet both local and national net zero targets.

- 6.2.15 The 25-year Environment Plan (2018) sets out that *“recycling food waste is a key priority”*. The Environmental Plan and Our Waste, Our Resources: A Strategy for England (2018) both set out the Government’s aim to eliminate food waste to landfill by 2030. Our Waste, Our Resources also highlights that *“extending separate food waste collections to more households should increase recycling and composting [...] and divert waste from incineration or landfill”*.
- 6.2.16 It is clear from national guidance, strategy and legislation that AD is the preferred waste management technique for separately collected food waste. This is confirmed through Our Waste, Our Resources, which states that *“Anaerobic Digestion represents the best environmental outcome for food waste that cannot be prevented or be redistributed to others or, if this is not possible, used as animal feed”*. Meanwhile, the WMPE sets out that *“the government continues to support AD as the most effective way to treat separately collected food waste to produce energy and valuable bio-fertiliser”*. The WMPE also sets out a hierarchy as to how food waste should be avoided, reused and managed, with AD listed as the highest waste management technique.
- 6.2.17 In this context, it is clear the management of food waste through AD should be prioritised wherever possible. To ensure that food waste is managed in the most sustainable way, it is essential that sufficient AD capacity and coverage is available for all areas of England. This is made more critical by the introduction of mandatory separate food waste collection, through the Environmental Act 2021, which will increase the volume of food waste and the demand for AD capacity.

Waste Capacity Need

- 6.2.18 The Applicant has undertaken a high-level quantitative assessment of need for additional AD capacity in the Northwest. This comprised estimating the likely separately collected domestic and commercial food waste arisings and the existing food waste management arrangements across 25 local authority areas.



6.2.19 Table 6.3, below, provides an estimate of the domestic food waste arisings in this area; and confirms what the current food waste collection arrangements are understood to be for each local authority area.

Table 6.3: Estimated Northwest Food Waste Arisings

Local Authority Area	Separate food waste collection currently in place?	Estimated Number of Households ³	Estimated Food Waste Arisings (tpa) ⁴
Liverpool City Council	No	207,491	16,184
Sefton MBC	No	123,073	9,600
Knowsley MBC	No	66,073	5,154
Wirral MBC	No	143,252	11,174
St Helens MBC	Yes - Separate	81,011	6,319
Halton BC	No	55,951	4,364
Warrington BC	No	90,538	7,062
Wigan MBC	Yes - Mixed	143,105	11,162
Bolton MBC	Yes - Mixed	118,790	9,266
Bury MBC	Yes - Mixed	80,696	6,294
Rochdale MBC	Yes - Mixed	90,223	7,037
Oldham MBC	Yes - Mixed	93,140	7,265
Manchester City Council	Yes - Mixed	214,732	16,749
Salford City Council	Yes - Mixed	115,116	8,979
Trafford MBC	Yes - Mixed	96,269	7,509
Tameside MBC	Yes - Mixed	99,527	7,763
Stockport MBC	Yes - Mixed	126,648	9,879
Cheshire East Council	Yes - Mixed	174,856	13,639
Cheshire West and Chester Council	Yes - Separate	155,156	12,102
Blackburn and Darwin BC	No	58,767	4,584
West Lancashire DC	No	48,533	3,786
Chorley BC	No	50,132	3,910
South Ribble BC	No	48,586	3,790
Preston City Council	No	59,607	4,649
Hyndburn BC	No	34,790	2,714
Total Arisings			200,933
Total Arisings not Currently Collected Separately			182,512

6.2.20 Only two authorities currently offer separate food waste collection, 11 authorities currently offer a mixed collection (with garden waste) and 12 authorities have no

³ 2021 census data.

⁴ based off an assumed capture rate of 1.5kg/hh/wk.

- arrangements in place. In this context it is anticipated that circa. 180,000 tpa of separately collected municipal food waste will enter the market in the coming years.
- 6.2.21 It should also be noted that STGP currently holds the contract for some two thirds of the food waste produced in Cheshire West and Chester, meaning that circa. 8,000 tpa of municipal food waste produced in this area would be directed to the Winwick site, if approved. This reduces the available capacity of the Proposed Development from 75,000 tpa to 67,000 tpa.
- 6.2.22 The volume of separately collected commercial food waste is also expected to rise in the coming years. It is difficult to provide an exact figure for the commercial waste arising across the area, due to the differences in the nature and size of commercial premises across the local authority areas. However, STGP's commercial team, who has extensive market experience in the sector, conservatively estimate an additional 50,000 – 60,000 tpa of food waste will be collected from commercial premises as a result of new regulations and simplified recycling.
- 6.2.23 In the above context, it is estimated that sufficient capacity will be required to manage an additional 230,000 to 240,000 tpa of separately collected food waste, on top of existing arisings currently managed by existing AD facilities.
- 6.2.24 The food waste arisings should be managed at the most sustainable facility in the most sustainable location. It is clear from the forgoing commentary that sustainably located AD facilities across the Northwest represent the most appropriate option for the waste arisings in question. In this context, there is a clear need to ensure that sufficient AD capacity and coverage is provided across the area.
- 6.2.25 The Anaerobic Digestion and Biogas Association (ADBA) database indicates that there are currently three food waste AD facilities in the Northwest area capable of accepting separately collected food waste for recycling. Following further investigation into these facilities, and as demonstrated in Table 6.4 below, the Refood facility in Widnes was identified as the only existing facility in the area that could accept the arisings identified in Table 6.3. The Olleco facility is understood to accept food oils only; and the Biogroup facility appears to no longer be operational.



Table 6.4: Existing Anaerobic Digestion Capacity

Facility	Local Authority Area	Total Capacity	Comments
Olleco Liverpool	Liverpool	11,038	Facility only accepts waste food oils.
Refood Widnes	Halton	160,000	
Biogroup Bredbury	Greater Manchester (Stockport)	25,000	Not understood to be operational.

6.2.26 In addition to the existing capacity, there is also understood to be emerging capacity across the Northwest, namely:

- Lancashire County Council are upgrading Farrington Waste Recovery Park to include capacity for up to 40,000 tpa of separately collected food waste across Lancashire⁵ (including the six local authority areas not included at table 6.3); and
- Suez was granted permission (ref. 10/22/1006) for a 100,000 tpa AD facility in Darwen on 3 March 2023.

6.2.27 Based on the above, it appears that the 23,000 tpa for Lancashire authority areas, identified at Table 6.3, will be managed through the Farrington Waste Recovery Park upgrade. This leaves an estimated 207,000 - 217,000 tonnes of additional separately collected food waste that needs to be appropriately managed.

6.2.28 Whilst the ADBA database indicates the Refood facility could accept up to 160,000 tpa and the Suez facility could accept up to 100,000 tpa, within this would be a proportion of liquid waste which is required for the AD process (approximately one third of the total capacity). Thus, the actual amount of solid food waste the plants would be likely to receive could be in the region of 105,000 tpa and 65,000 tpa respectively.

6.2.29 According to the Environmental Agency's Waste Data Interrogator 2023 ('WDI 2023'), the Refood facility accepted just under 75,000 tonnes of waste in 2023, suggesting that the facility could potentially accept up to around 50,000 more tonnes of solid food waste. Together with the Suez facility, it is estimated that these two plants could potentially manage up to half of the additional separated food waste that

⁵ <https://news.lancashire.gov.uk/news/lancshires-waste-recycling-set-to-be-revolutionised>

needs to be managed. This would leave a shortfall of circa 100,000 tpa in food waste management capacity across the area.

6.2.30 In addition to the additional anticipated food waste arisings, the WDI 2023 indicates that just over 57,000 tonnes of waste originating in the 25 authority areas identified at Table 6.3 was received by AD facilities outside of the Northwest. This suggests that there is opportunity to capture existing food waste arisings that are currently leaving the Northwest, increasing sustainability by reducing the distance that waste travels.

6.2.31 In the above context, there is a clear quantitative need to deliver additional AD capacity within the area, to meet future arisings and ensure that waste is managed sustainably and as locally as possible. The Proposed Development would help to meet this need providing additional capacity in a highly accessible location in the heart of the area.

Energy Sustainability and Security Need

6.2.32 In addition to promoting sustainable food waste management, AD has an important role in decarbonising the energy sector and helping the UK meet the legally binding target to reach net zero emissions by 2050.

6.2.33 The Government's Net-Zero Strategy (2021) highlights the roles of renewable energy generation, biomethane in the gas grid and biomass / BECCS technology in decarbonising energy across the UK. The Energy Security Plan (2023) sets out the need to increase the volume of biomethane produced and injected into the gas grid, to reduce emissions and decrease reliance on natural gas. The Security Plan also confirms that bioenergy represents a key energy source to decarbonise and secure UK's energy supply, which offers both baseload and seasonal dispatchable renewable electricity.

6.2.34 Based on the above, it is clear that there is a demonstrable need for additional AD capacity across England and in the locality, meaning that criterion 'b' of Paragraph 155 is met.



The development would be in a sustainable location, with particular reference to paragraphs 110 and 115 of this Framework

- 6.2.35 As set out at Section 3.5, there are several factors that make the Site a sustainable location for the Proposed Development, namely:
- The location of the site within the intended service / catchment area;
 - Viable points of connection to both the electricity and gas grids; and
 - Accessibility in relation to the strategic highways network.
- 6.2.36 Further to this, the technical assessments prepared in support of this planning application demonstrate that the Proposed Development would not result in any unacceptable adverse impacts on local residents or the environment. This further supports the Site representing a sustainable location for the Proposed Development.
- 6.2.37 In relation to Paragraph 110 of the NPPF, the Transport Statement submitted as part of this planning application confirms that the majority of the trips associated with the development would be waste vehicles and digestate tankers. Such trips can only feasibly be made by road; and the limited number of staff trips represent the only opportunity to promote sustainable travel habits and alternative transport modes. The Proposed Development includes secure cycle parking spaces, motorcycle spaces and electric vehicle changing spaces, to promote more sustainable staff movements, which would address the requirements of Paragraph 110.
- 6.2.38 The Proposed Development would also meet the requirements of Paragraph 115 of the NPPF. As mentioned, measures to promote sustainable travel (cycle spaces, motorcycle spaces and EV chargers) proportionate to a development of this scale and nature have been provided. The Transport Statement demonstrates that the upgraded access arrangements, improvements to the Winwick Link Road / Highfield Lane junction and the proposed car park would provide safe and suitable access, which meets current standards. The Transport Statement also confirms that the Applicant proposes to volunteer a routing strategy; and demonstrates that the development would not result in unacceptable adverse impacts on highway safety or efficiency. Given this, the Proposed Development meets the requirements of Paragraph 115 of the NPPF.



- 6.2.39 It is clear that the development would be in a sustainable location, including from a transport perspective, meaning that criterion ‘c’ of Paragraph 155 is suitably addressed by the Proposed Development.

Where applicable the development proposed meets the ‘Golden Rules’ requirements set out in paragraphs 156-157 below

- 6.2.40 The ‘Golden Rules’ set out at Paragraph 156 and 157 of the NPPF specifically relate to major housing developments. As this planning application is not for a residential development, the Golden Rules are not considered applicable, meaning that criterion ‘d’ is not relevant to the Proposed Development.
- 6.2.41 Based on the above, it is clear that the Proposed Development would meet the relevant criteria set out at Paragraph 155 of the NPPF. As such, the Proposed Development would not represent inappropriate development in the Green Belt, rather it would make appropriate use of grey belt land. Given this, it is not necessary to demonstrate very special circumstances in this case.

6.3 Alternative Site Assessment Summary

- 6.3.1 As outlined above, the Site does not represent inappropriate development in the Green Belt, as it meets the criteria set out at Paragraph 155. Nevertheless, an ASA has been undertaken for completeness and to meet the NPPF requirement to undertake a sequential test for flooding⁶. The ASA sought to establish whether there were any available, suitable and deliverable sites for the proposed development outside of the Green Belt; on previously developed / allocated sites within the Green Belt and/or within the preferred locations identified through Policy ENV1 of the Warrington Local Plan, that should be considered before progressing with the Proposed Development.
- 6.3.2 The ASA was separated into three stages, which are summarised below:

⁶ The site is subject to a localised area of surface water flooding, which would be addressed through the proposed drainage strategy. However, Paragraph 173 of the NPPF highlights that the sequential test should be applied to development proposals on sites known to be at risk of **any** form of flooding. In this context, the sequential test must be applied, even though the Proposed Development would seek to remove the risk of flooding.



- Stage One (Site Identification) - identified a total of 57 potential alternative sites, within the defined search area.
- Stage Two (Initial Assessment) – found that 45 of the sites to be unsuitable due to incompatible allocations (such as residential) and/or clear constraints that would preclude an AD development of the nature proposed.
- Stage Three (Full Assessment of Remaining Sites) – fully assessed the remaining 12 sites and found that none were suitable or available for the proposed AD development.

6.3.3 The ASA concluded that there are no other suitable, available or deliverable sites which could satisfactorily accommodate the Proposed Development. It is therefore considered that the proposed Site represents a suitable location for the proposed development. The full ASA can be found at **Appendix B**.

6.4 Assessment of Harm

6.4.1 As outlined above, the Proposed Development does not represent inappropriate development in the Green Belt, under the exemption set out at Paragraph 155 of the NPPF. Notwithstanding this, an assessment of harm to the Green Belt has been undertaken, for completeness. This assessment of harm also serves to demonstrate that the Proposed Development would not result in unacceptable environmental effects.

6.4.2 As set out at Paragraph 142 of the NPPF, the fundamental aim of Green Belt policy is to prevent urban sprawl and keep the land permanently open. The Green Belt also serves the five purposes set out at Paragraph 143. The below assessment of harm therefore considers the impact of the development on openness and the five purposes of the Green Belt, as well as any other harm to the Green Belt.

Openness

6.4.3 In determining what factors can be considered when assessing the impact of a proposal on openness of the Green Belt, Planning Practice Guidance states that this: *“...requires a judgment based on the circumstances of the case. By way of example*



the courts have identified a number of matters which may need to be taken into account in making the assessment. These include, but are not limited to:

- i) openness is capable of having both spatial and visual aspects – in other words, the visual impact of the proposal may be relevant, as could its volume;*
- ii) the duration of the development, and its remediability – taking into account any provisions to return land to its original state or to an equivalent (or improved) state of openness; and*
- iii) the degree of activity likely to be generated, such as traffic generation.”*

6.4.4 Although the NPPF refers to the ‘openness’ of the Green Belt, it does not provide a specific definition. As a result, there have been several court decisions on the proper interpretation of the Green Belt provisions within the NPPF, including in respect of openness. One of the main topics has been the correlation between the concepts of ‘openness’ and ‘visual impact’. More recent judgements have determined that there are two distinct concepts to the assessment of a development’s impact upon the openness of the Green Belt. They comprise:

- i) Impact on ‘actual’ openness – the concept that openness relates to the absence of buildings and any ‘inappropriate’ built development in the Green Belt would therefore impact upon openness;
- ii) Impact on ‘perceived’ openness – would the presence of the development alter the overall perception of openness within the Green Belt.

6.4.5 Considering the above, the following paragraphs consider the matter in the context of both points.

6.4.6 On the basis that the concept of openness relates to the absence of built form, it is the case that the Proposed Development would result in an impact upon the ‘actual’ openness of the Green Belt. However, it should be reiterated that the Proposed Development does not represent ‘inappropriate’ built development in the Green Belt, as it meets the requirements of Paragraph 155.

6.4.7 The harm to openness is proposed to be moderated through the introduction of the 3m-high planted bund and significant woodland / hedgerow planting, which would perform a screening role. This means that despite the volumetric increase in



- development, as a result of the new built development in the Green Belt, the proposed facility would be screened and impact on 'perceived' openness minimised.
- 6.4.8 When considering the 'perceived' impact on Green Belt openness, it is also important to acknowledge the nature of the Site and the surroundings. As set out in Warrington's Green Belt Assessment (2016) the Site is clearly defined by Winwick Link Road and Highfield Lane. If the Site were developed, these defensible boundaries would mitigate the potential for further encroachment into the countryside. It should also be noted that the Site does not fall within an area of sprawling open countryside, instead it lies within a roughly triangular area defined by the M6 to the north; the M62 and the town of Warrington to the south; and Winwick to the south-east. These urbanising features mean that 'perceived' openness is already reduced in this location.
- 6.4.9 The ZTV submitted with the LVA (Figure 1 of the LVA) demonstrates that visibility of the Proposed Development would be strongly influenced by vegetation cover and landform in the surrounding area, such that overall visibility would be relatively limited within the Study Area.
- 6.4.10 As set out in the LVA, the introduction of the Proposed Development into the view would result in some localised reduction in the perception of openness of the Green Belt. However, the visibility of the facility would reduce over time, as the developed Site becomes increasingly well enclosed by vegetation. As such, any perceived reduction in openness would also reduce. The Green Belt within the Study Area would remain predominantly open and agricultural in character regardless of the presence or absence of the Proposed Development. In this context it can be concluded that the implications of the Proposed Development for the perceived openness of the Green Belt would be very limited.
- 6.4.11 The waste management process would be contained within the proposed structures, meaning that operations associated with the AD process itself would be limited. The primary additional operations with the potential to impact on 'perceived' openness would be from traffic movements. However, the area already includes several major roads (M6, M62 and Winwick Link Road), with established traffic flows. In this context, the additional vehicle movements associated with the Proposed



Development are not expected to result in a notable increase in vehicle activity in the area.

6.4.12 In assessing the harm to openness, it is also necessary to consider the impact on the five purposes of the Green Belt. As confirmed through Tables 6.1 and 6.2 in the preceding sub-section, it is clear that:

1. The Site has a weak contribution to the five purposes of the Green Belt, with no strong contribution to any of the purposes; and
2. The harm to the five purposes as a result of the Proposed Development would be low (at worst).

Permanence

6.4.13 As identified at paragraph 142 of the NPPF, one of the essential characteristics of the Green Belt is its 'permanence'. This means maintaining the openness and the five purposes of the Green Belt indefinitely.

6.4.14 The Proposed Development would not cause direct or indirect harm to the permanence of Green Belt, including the wider area. The development would be stand-alone and would not encourage or set a precedent for further development in the area, which may erode the permanence of the Green Belt.

6.4.15 Similarly, the Proposed Development would not provide justification for the Green Belt designation of the Site to be removed. Unlike other development, such as an urban extension into the Green Belt, there is no justification for the release of Green Belt in response to the development. Rather, the development would represent a stand-alone development, which would be 'washed over' by the Green Belt.

6.4.16 Ultimately, whilst the Proposed Development is for a permanent construction within the Green Belt, it would not undermine the permanence of the Green Belt which would continue to function indefinitely with or without the development. As acknowledged above, the Proposed Development would have limited harm on the openness of the Green Belt and the five functions of the Green Belt.



- 6.4.17 Based on the above, it is clear that the Green Belt would continue to function as intended despite of the development, meaning that the Green Belt's permanence would be maintained.

Conclusions on Openness, Permanence, and the Purposes of the Green Belt

- 6.4.18 As highlighted at Section 6.2 above, the Proposed Development does **not** represent inappropriate development in the Green Belt, under the provisions of Paragraph 155 of the NPPF. Notwithstanding this, the preceding assessment demonstrates that:

3. Harm to the 'actual' openness of the Green Belt would be caused by virtue of construction of new buildings in the Green Belt;
4. Harm to the 'perceived' openness of the Green Belt would be limited, due to the existing topography, vegetation and proposed screening planting;
5. The Site has been determined to perform a 'weak contribution' to the five purposes of the Green Belt;
6. The Proposed Development would cause very low harm to the five functions of the Green Belt; and
7. There would be no impact to the permanence of the Green Belt, which would continue to function as intended indefinitely, regardless of the Proposed Development.

Other Harm

- 6.4.19 In assessing Green Belt harm, it is also necessary to consider other harm, beyond the harm to openness. Accordingly, this planning application includes consideration of all relevant environmental matters; and is supported by appropriate technical assessments. A summary of the assessments and conclusions in respect of associated harm are provided below.

Transport and Access

- 6.4.20 A Transport Statement, informed by pre-application discussions with WBC, is provided at **Appendix F**. The report provides an assessment of the existing



highways conditions and forecasts the anticipated effects of the Proposed Development.

- 6.4.21 The assessment was undertaken in the context that the Proposed Development will accept up to 75,000 tonnes of waste per year; employ five members of staff; and include two EV charging bays, four cycle parking spaces and two motorcycle parking spaces. Access to the facility would be provided through an amended access off Highfield Lane, in the same location as the existing access point. Swept path analysis of the access and internal arrangement of the facility demonstrate that vehicles can be safely and efficiently accommodated through the proposal.
- 6.4.22 Following a review of the appropriate highway safety data record obtained from WBC, it is clear that there are no existing highway safety issues on the local highway network that could be worsened by the Proposed Development.
- 6.4.23 Traffic counts along Highfield Lane and at the Highfield Lane / Winwick Link Road / Waterworks Lane junction were undertaken in support of this planning application. ATCs along Highfield Lane also captured speed data on either side of the proposed access location. This data was used to establish a baseline for the traffic movements on the local highway network.
- 6.4.24 The traffic-generating potential of the Proposed Development has been compared to the baseline traffic flows, to establish a 'worst-case' scenario for both operation and construction periods. This comparison found that, in absolute terms, the proposal would result in a low impact on the local highway network, with flows falling largely within the expected day-to-day fluctuations of traffic.
- 6.4.25 The development-related traffic was found to result in acceptable Institute of Environmental Management and Assessment ('IEMA') percentage impact thresholds on all links with the exception of Highfield Lane, where there was forecast to be an HGV impact greater than the higher IEMA 30% threshold. However, the traffic generation must be viewed in the context of low baseline HGV flows along Highfield Lane (as a result of weight restrictions). In practice, HGV flows associated with the proposed development are only expected along a very short stretch of Highfield Lane, between the Highfield Lane / Winwick Link Road / Waterworks Lane junction



and the proposed Site access. There is no indication that Highfield Lane cannot safely and efficiently accommodate these vehicle movements.

6.4.26 STGP is also volunteering a routing plan, in response to comments raised during consultation. It is proposed that all operations vehicles (HGV's, Tankers, etc.) would access the Site via J22 of the M6 only and leave the facility via J9 of the M62 only, creating a one-way routing system. This approach would ensure that no facility traffic would pass through or near Winwick (along Newton Road); minimise the use of Winwick Park Roundabout (by ensuring that all traffic uses the first exit of the roundabout); and avoids vehicles doubling back and travelling northbound up Winwick Link Road.

6.4.27 The Transport Statement concludes that there would be no unacceptable impact on transport as a result of the Proposed Development.

Landscape and Visual Amenity

6.4.28 An LVA was undertaken for the Proposed Development. The assessment is provided at **Appendix G** and a summary is provided below.

6.4.29 In accordance with the guidance set out in the Guidelines for Landscape and Visual Impact Assessment (GLVIA), the LVA adopts an approach proportionate to the likely effects of the Proposed Development.

6.4.30 The assessment finds that there would be short-term landscape and visual effects during the construction phase of the Proposed Development, which would extend over a short to medium distance from the Site for a limited time period. Given the localised and temporary nature of these effects, the landscape and visual effects during construction are concluded to be minor adverse, at most.

6.4.31 The assessment highlights that the Site is located within Warrington Landscape Character Area ('LCA') 1.C (Winwick, Culcheth and Rixton). The assessment concludes that the proximity to major road corridors and the screening effect of existing vegetation would limit the influence of the Proposed Development on the LCA and avoid notable changes to the key characteristics.



- 6.4.32 The Proposed Development would be a permanent addition to the landscape and would have localised effects on character. However, the report concludes that the influence of the development on the local character would reduce over time, as the proposed vegetation matures and increases the level of screening; and that the character of the landscape would remain predominantly agricultural in nature. In this context, a moderate impact on the character of the area is expected at first, which would decrease to moderate / minor by year 10.
- 6.4.33 Assessment of nearby viewpoints was also undertaken, which established that existing views towards the Site from the assessed locations are relatively open and the Proposed Development would initially be a conspicuous new presence. However, the proposed 3m-high bund would offer some initial screening and the enclosure offered by the proposed planting would reduce visibility over time. Initially, there would be a moderate to major adverse visual effect, which would reduce to minor to moderate adverse at worst in the longer term.
- 6.4.34 The assessment finds that, elsewhere, the Proposed Development would be better screened by existing vegetation. Despite some of the taller built forms still being visible, this is not expected to result in notable change in view.
- 6.4.35 Overall, the assessment finds that visual effects would be localised and would reduce in time as the proposed planting matures. Views across the landscape would remain predominantly open and the agricultural character of the area would remain, despite the presence of new built form. The implications of the development on the perceived openness of the Green Belt would be very limited.

Ecology and Biodiversity

- 6.4.36 An ecological assessment report is enclosed at **Appendix H**. The report provides the details of a desk study, an extended Phase 1 habitat survey; and the completion of the BNG Metric. A summary of the findings and conclusions on the overall level of ecology related harm are provided below.
- 6.4.37 The ecological assessment finds that there would be no adverse impact on nearby statutory ecological sites (SSSI, SPA, etc.). Similarly, there would be no direct or indirect impact on non-statutory sites as a result of the Proposed Development.



- 6.4.38 There would be a loss of low value grassland and arable land, as well as a small amount of existing hedgerow, as a result of the Proposed Development. However, this would be offset by the introduction of substantial new habitat creation and vegetation planting. The BNG Metric results demonstrate that there would be an 74.13% increase in area habitat biodiversity; a 11.40% increase in linear biodiversity units; and that trading rules would be satisfied.
- 6.4.39 In relation to birds, the assessment finds that the loss of small areas of low value habitat would have no adverse impact on local bird populations; and that new habitat planting and bird boxes, delivered as part of the Proposed Development, would provide a net benefit to birds. With the implementation of standard practice measures, no impact to nesting birds is anticipated.
- 6.4.40 Similarly, bats are not anticipated to be adversely affected by the Proposed Development; and the delivery of new habitats and bat boxes would provide a net benefit. The assessment does highlight that sensitive lighting is required to avoid potential disturbance to the bat population.
- 6.4.41 There was no evidence of badgers on the Site during the survey. This will need to be verified ahead of construction; however, appropriate mitigation and avoidance measures can be taken to ensure that any badgers found on the Site are not harmed as a result of the Proposed Development. The newly created habitats would represent a benefit to badgers.
- 6.4.42 With appropriate reasonable avoidance measures ('RAMs') the assessment anticipates that there would be no adverse effects on amphibians, reptiles or other species. Further, the new habitats put forward as part of the Proposed Development would offer benefits to these species.
- 6.4.43 The ecological assessment clearly demonstrates that there will be minimal impacts on habitats and species, which will be significantly outweighed by the proposed vegetation planting and habitat creation. Given this, it is anticipated that the Proposed Development would result in a benefit to ecology and biodiversity.



Air Quality

- 6.4.44 An air quality assessment was produced in support of this planning application, which can be found at **Appendix J**. The assessment considers the likely effects of the Proposed Development from odour, bioaerosols, gaseous emissions and vehicles; and proposes appropriate mitigation, as required.
- 6.4.45 The assessment highlights that the Proposed Development has been designed and would be operated in accordance with the Best Available Techniques applicable to a biowaste facility of this nature. Furthermore, the Proposed Development would be subject to an appropriate Environmental Permit, which would ensure that the facility does not pose unacceptable risk to the local population or environment. This would include a full assessment of the risk associated with gaseous emissions (e.g. NO_x, SO_x and CO), odours and bioaerosols.
- 6.4.46 It is also highlighted that the Proposed Development would include extensive in-design measures to mitigate the release of gaseous, odours and bioaerosol emissions. A screening assessment undertaken as part of the assessment has found that, with the various in-design measures and operation in line with an Odour Management Plan and Environmental Permit requirements, the facility would not result in significant adverse impact on any nearby receptors as a result of odours or bioaerosols.
- 6.4.47 The assessment also includes modelling of gaseous emissions from the proposed CHP plant and emergency flare. The modelling demonstrates that the Proposed Development would not result in any unacceptable adverse air quality effects on any residential or environmental receptors. It should also be noted that emissions from the stacks would be limited through in-built mitigation and be monitored and restricted by the Environmental Permit.
- 6.4.48 A screening assessment of vehicle emissions associated with the facility has also been undertaken. The assessment finds that the area of the M6 to the north of the Site falls within an Air Quality Management Area ('AQMA'). The potential HGV movements associated with the Proposed Development fall above the screening threshold for the AQMA, however, it is noted that WBC are considering revoking the AQMA as annual mean NO₂ concentrations have been below the Air Quality



Objectives and the properties close to the M6 are set back from the highway. On this basis, it is not considered that the additional HGVs would result in unacceptable adverse impacts at any receptors.

- 6.4.49 The assessment concludes that the location is suitable for the Proposed Development, subject to the implementation of appropriate mitigation measures, which would be imposed by the Environmental Permit. No additional measures are required.

Noise and Vibration

- 6.4.50 A noise impact assessment is submitted as part of this planning application and can be found at **Appendix L**. The assessment is based on baseline sound monitoring to establish the representative background and residual sound level at the nearest noise sensitive receptors ('NSR'); and prediction modelling to establish the highest likely generated noise with all relevant plant operating.
- 6.4.51 Noise monitoring during typical day and night-time conditions was undertaken to establish representative background levels. Operating noise levels have been established based on empirical data obtained from other STGP sites and relevant technical specifications. Where appropriate, plant design noise levels have been lowered to ensure compliance with noise guidance / standards and protect amenity.
- 6.4.52 Noise monitoring indicated that the representative LA90 daytime noise level is 45dB to 48dB during daytime hours; and between 41dB and 44dB LA90 at night. Predictive noise modelling shows the noise levels from the Proposed Development at the nearest noise sensitive receptors to be between 31dB and 43db L_{Aeq1hr} during daytime periods; and between 33db and 44db $L_{Aeq15mins}$ during nighttime periods.
- 6.4.53 The results demonstrate that the noise contribution from maximum site rating noise levels at a NSR would not exceed the established representative background sound level during daytime operating periods. According to BS4142: 2014+A1:2019 the resultant assessment would conclude that noise from the site would result in a low impact. The highest likely rating noise level during night-time periods would also result in a low impact according to BS4142:2014+A1:2019.



- 6.4.54 Conditions can be implemented by the local planning authority to ensure that rating levels do not exceed the established representative background sound level; and noise levels and mitigation measures achieve a reasonable level of amenity in accordance with relevant guidance and standards.
- 6.4.55 The maximum noise levels during the construction phase are expected to result in negligible impacts and neutral level of effect. Similarly, the impacts of additional vehicle movements on the local road network would result in negligible impacts on Winwick Link Road. The short distance travelled by HGVs along Highfield Lane would have negligible impacts on nearby receptors.
- 6.4.56 Based on the above, the Proposed Development would comply with relevant noise standards and guidance and would not result in unacceptable adverse effects on nearby receptors.

Flood Risk and Drainage

- 6.4.57 A Flood Risk and Drainage Assessment is provided at **Appendix K**. This provides an assessment of the risk of flooding posed to the development, as well as the likely impact of the Proposed Development on flooding elsewhere; and presents a sustainable drainage strategy for the Proposed Development.
- 6.4.58 The assessment considers the risk of flooding in relation to the Proposed Development; and sets out the proposed drainage strategy for the development. It confirms that the Site is entirely located within Flood Zone 1, meaning that the risk of flooding from rivers and sea is low / negligible (including consideration of Climate Change impacts). There is a low to high risk from surface water flooding covering a small portion of the Site, however, the assessment confirms that the risk is localised to a small portion of the Site and worst-case flood depths would be low.
- 6.4.59 In the above context, whilst the risk and effects of flooding would be minimal and would be addressed through the drainage strategy proposed as part of the



development, it is necessary for the sequential test to be applied in accordance with the NPPF⁷.

- 6.4.60 The ASA submitted as part of this application includes an assessment of the suitability and availability of alternative sites, which satisfactorily meets the sequential test requirements. Given that the ASA finds that there are no suitable or available alternative sites, the Site at Winwick has been demonstrated to be sequentially preferable from a flood risk perspective and the test is passed.
- 6.4.61 The exception test is not required for 'Less Vulnerable' development in Flood Zone 1, meaning it is not necessary to apply this test as part of this planning application. Nevertheless, the Flood Risk and Drainage Assessment demonstrates that the Proposed Development passes element (b) of the exception test, as it will be safe for its lifetime and will not increase flood risk elsewhere.
- 6.4.62 A surface water drainage strategy has been prepared as part of the Flood Risk and Drainage Assessment, this sets out that priority will be given to the collection of surface water for use in the AD process. Any surface water not used in the process, which is expected to be limited to during facility shut-downs or high-rainfall events, is proposed to be suitably discharged. Some excess surface water that has already entered the AD process, and cannot therefore be guaranteed to be clean, would if required either be tankered off-site for processing in STGP's other AD facilities or may be discharged into mains sewers in exceptional circumstances.
- 6.4.63 The proposed surface water drainage arrangements mean that the Proposed Development is expected to go one step beyond the defined discharge hierarchy, by largely avoiding the discharge of surface water altogether. The runoff rates are therefore likely to be lower than greenfield, which would exceed the requirements of local policy. All impermeable surfaces are necessary to ensure that the facility can operate effectively; notwithstanding this, significant soft landscaping is proposed to promote the natural drainage of surface water.

⁷ Paragraph 173 of the NPPF requires the sequential test is applied for development proposals on sites at risk of any source of flooding, regardless of the magnitude or whether the proposal would address the flood risk.



- 6.4.64 It is clear from the assessment that the Proposed Development is appropriately located in flood risk terms; and that the proposed drainage arrangements would be suitable and sustainable. As such, the Proposed Development would not result in any adverse environmental effects from a flood risk perspective.

Heritage and Archaeology

- 6.4.65 This planning application is supported by a Heritage Impact Assessment and Archaeological Assessment, informed by a geophysical survey of the Site, which can be found at **Appendix N** and **Appendix O**, respectively. The assessments identify and assess the effect on the Scheduled Monument on the Site; potential undiscovered archaeological remains; and off-site heritage assets within 2km of the Site.
- 6.4.66 The Heritage Assessment confirms that no direct adverse impacts on the Scheduled Monument are anticipated. An impact on the setting of the scheduled monument is anticipated, however, this would be significantly reduced by the stand-off between the built area and the Scheduled Monument, and the proposed bund and landscaping. The Proposed Development is not expected to impact on the key elements of the monument's setting. Further to this, it confirms that the development would have a positive effect on the scheduled monument, by removing it from active ploughing and avoiding any further damage to the monument caused by farming.
- 6.4.67 The Heritage Assessment also concludes that the Proposed Development would be outside of the visibility of all designated assets around the Site and would therefore have a neutral impact. It is acknowledged that there is potential for some intervisibility between the Proposed Development and the Battle of Winwick Registered Battlefield, however, intervening topography, vegetation and buildings would result in neutral impacts on this asset.
- 6.4.68 The Archaeological Assessment, which was informed by a geophysical survey of the site, successfully identified the Scheduled Monument and some potential archaeology nearby to it. It also identified a less well-defined circular anomaly of possible archaeological origin in the northern portion of the Site. This feature is similar to the Scheduled Monument and could be of possible archaeological origin. However, the magnetic signature suggests that the feature has been slighted,

disturbed or ploughed out over time or that it was a less distinct feature in the landscape.

- 6.4.69 Several uncertain features have also been identified across the Site, including small circular anomalies in the northern portion of the Site; discrete trends in the north-eastern corner of the Site; and several weakly enhanced linear trends scattered across the Site. A spread of anomalies were also identified, which aligns with a historic field boundary shown on historic OS mapping. Several agricultural and non-archaeological features were also identified by the geophysical survey.
- 6.4.70 Based on the findings of the Archaeological Assessment it is evident that there are no clear archaeological remains of significance within the buildable area. However, the report identifies that additional investigation into the possible archaeological remains is likely to be required, and may be the subject of a condition(s) implemented by the local planning authority.
- 6.4.71 It is clear that, subject to the findings of any additional archaeological investigation, the Proposed Development would not result in unacceptable impacts on heritage assets or archaeological remains. As such, the Proposed Development is considered acceptable from a heritage and archaeological perspective.

Summary of Environmental Effects

- 6.4.72 The above section provides commentary on the environmental effects of the Proposed Development, and the resultant 'other harm' to the Green Belt. Based on the various technical assessments undertaken, the following environmental effects are anticipated:
- Transport – there would be no unacceptable impact / harm as a result of the Proposed Development;
 - Landscape and Visual – the visual effects of the development would be localised; would improve over time; views across the landscape would remain open and agricultural in nature; and the implications on the perceived openness of the Green Belt would be very limited;



- Ecology and Biodiversity – there would be no unacceptable adverse impacts on existing habitats or species (including designated sites) and a net ecological / biodiversity benefit would be delivered through the Proposed Development;
- Air Quality – with in-design and Environmental Permit mitigation measures, the Site represents an appropriate location for the Proposed Development and would not result in unacceptable impact on nearby receptors;
- Noise and Vibration – with appropriate mitigation, the Proposed Development would be compliant with relevant noise standards and guidance and would not result in unacceptable impacts on nearby receptors;
- Flood Risk and Drainage – the Proposed Development would result in no adverse environmental effects from a flood risk perspective, and would incorporate sustainable drainage arrangements;
- Heritage and Archaeology – the Proposed Development is not expected to result in unacceptable impacts on designated heritage assets or archaeological remains.

6.4.73 The technical assessments supporting this planning application clearly demonstrate that there would be no unacceptable environmental impacts as a result of the Proposed Development. Moreover, the level of ‘other harm’ to the Green Belt is concluded to be low.

6.5 Other Considerations Including Benefits

6.5.1 As outlined previously, the Proposed Development does not represent inappropriate development in the Green Belt. As such, it is not necessary to demonstrate very special circumstances. Nonetheless, the key considerations and benefits of the Proposed Development are set out below.

6.5.2 The key considerations in support of the Proposed Development are:



- i) Sustainable waste management - the need to support and deliver sustainable waste management capacity and improve coverage in Warrington and across the wider area;
- ii) Biomethane and Renewable Energy Production - the production of renewable biomethane and energy, which supports sustainability / net zero and energy security targets;
- iii) Job Creation - up to five full time jobs associated with the operation of the facility, along with employment opportunities during the construction period and support jobs (such as landscaping, maintenance, etc.);
- iv) Digestate Production – a sustainable bio-fertiliser which helps support local farming and food security, and reduces the costs and carbon footprint associated with agriculture;
- v) Carbon Capture and Storage – reducing emissions and providing a sustainable source of carbon dioxide for industry;
- vi) Habitat and Biodiversity Creation - the delivery of substantial new on-site habitats and significant biodiversity net gains, resulting in substantial benefits to local wildlife; and
- vii) Benefits to the Scheduled Monument.

Sustainable Waste Management

- 6.5.3 As outlined at Section 5.0 of this PS, delivering sustainable waste management is a key target both nationally and locally. National waste policy and guidance repeatedly sets out the need to promote sustainable waste management and move waste up the Waste Hierarchy. This is reflected at a local level through WBC's Local Plan, which seeks to reduce waste and ensure that any waste produced is managed at the highest level of the Waste Hierarchy as practicable.
- 6.5.4 Legislation to further increase the sustainability of the waste management system in the UK was introduced through the Environment Act 2021. With regards to food waste, the Environment Act introduced the legal requirement for local waste authorities to introduce separate weekly food waste collections by March 2026. Similarly, most businesses generating food waste are legally required to separate this waste for recycling from March 2025. This will require food waste to be managed separately to other waste streams at the most appropriate facility.



- 6.5.5 AD is recognised as the most sustainable waste management approach for unavoidable food waste. This is confirmed by Our Waste, Our Resources: A Strategy for England (2018), which states that AD represents “*the best environmental outcome for food waste that cannot be prevented*”. As such, in order to move food waste to the highest level of the Waste Hierarchy possible, it should be sent to an appropriate AD facility.
- 6.5.6 In this context, it is anticipated that the volume of food waste across the country, including in and around Warrington, is expected to increase as more businesses and local authorities begin to roll out separate food waste collection services.
- 6.5.7 Currently, there are no waste-fed AD facilities within the WBC administrative area; and, as explored above, there is a need for additional AD capacity and coverage across the area. The Proposed Development would deliver the first large-scale waste-fed AD facility within the WBC administrative area. The proposed facility would enable food waste produced in Warrington and neighbouring areas to be more sustainably managed; and improve coverage and capacity across wider area. Ensuring sufficient sustainable food waste management capacity is particularly important, given the anticipated rise in the volumes of food waste as businesses and local waste authorities implement mandatory separate food waste collections in accordance with the relevant deadlines.
- 6.5.8 It is clear that the Proposed Development would offer significant waste management benefits by:
- Delivering Warrington’s first large-scale waste-fed AD facility, which would enable food waste to be managed sustainably at the highest point of the Waste Hierarchy possible; and
 - Ensuring sufficient AD capacity and coverage to meet current and future needs, including the anticipated uplift in food waste volumes as the mandatory separate food waste collections are introduced.



Biomethane and Renewable Energy Production

- 6.5.9 As outlined in Section 5.0, in 2019 the UK Government became the first major economy in the world to commit to a legally binding target to achieve net zero emissions by 2050. The decarbonisation of the energy sector is a key factor in achieving this target and ensuring energy security. This has been reflected by WBC, who declared a climate emergency in 2019; have pledged to make Warrington a net-zero carbon area; and support the implementation of renewable and low carbon energy infrastructure.
- 6.5.10 The proposed facility would be capable of producing renewable biomethane gas and electricity. It is expected that both gas and electricity will be capable of being injected into the national grid, via direct grid connections between the facility and the gas and electricity networks.
- 6.5.11 The Proposed Development would be capable of producing up to 7MWth of pure biomethane. The biomethane would be injected into the gas network, via the dedicated connection, where it would be transported for use in homes, businesses and industry.
- 6.5.12 The Proposed Development also has the potential to produce up to 1MWe of renewable electricity per year. Instead of being injected into the gas network, the biomethane can be sent to the on-site CHP, where it would be used to generate electricity for use at the facility, with the excess exported to the national grid. Roof-mounted solar panels would enhance the amount of renewable electricity generated at the facility. The CHP would also enable the heat produced to be used across the facility and in the AD process.
- 6.5.13 The split between gas injection and electricity generation is expected to vary, based on demand. For example, the demand for gas is likely to be higher in the winter, so the split would lean more towards the injection of gas.
- 6.5.14 In either case, the Proposed Development would offer significant energy sustainability benefits by converting food waste into biomethane and renewable electricity. These outputs would help to decarbonise the energy sector; meet net zero targets; and ensure energy security.



Digestate Production

- 6.5.15 The proposed AD facility would produce valuable nutrient-rich digestate fertiliser, which represents a more sustainable and secure alternative to chemical fertilisers. This represents a 'circular economy', putting food waste to good use and delivering significant benefits to the agricultural industry and the environment.
- 6.5.16 Ensuring a sufficient and cost-effective supply of fertiliser to meet demand has become increasingly challenging, as demand for food production rises with population; and chemical fertiliser supply continues to be impacted by issues such as the ongoing war in Ukraine. The delivery of new sources of fertiliser, such as that produced by the proposed AD facility, would help to sustainably meet fertiliser demand. It is also worth noting that whilst chemical fertilisers utilise virgin non-renewable materials, digestate is produced using waste products which are expected to be available in the long-term. The digestate produced by AD offers significant cost and carbon savings for agriculture, compared with artificially-produced chemical fertilisers.
- 6.5.17 As well as helping to secure a sufficient and cost-effective supply of fertiliser, digestate presents several environmental benefits. Specifically:
- Digestate contains organic material and a more comprehensive range of nutrients than chemical fertilisers, this encourages steady crop growth; improves soil health; and reduces the need for soil amendments. This also reduces costs to farmers and food producers.
 - Digestate generally has a lower carbon footprint than chemical fertilisers, which tend to be produced through a carbon intensive industrial process.
 - Digestate releases nutrients at a slower rate than most chemical fertilisers, this reduces risk of harm to waterbodies as a result of nutrient pollution and algal blooms, due to run-off.
 - Digestate promotes a circular economy approach; by using waste food completes a nutrients cycle by using nutrients from waste food to produce more food.



- 6.5.18 Digestate clearly represents a more economically and environmentally sustainable alternative to chemical fertilisers, which assists in food production.

Carbon Capture and Storage

- 6.5.19 The proposed facility would include a Carbon Capture and Storage ('CCS') unit, which would collect the carbon dioxide stripped from the biogas during the gas upgrade process. The collected carbon dioxide would be liquified by the CCS unit, ready for onward transportation for various uses. There are many possible uses for the captured carbon dioxide, including in the food and beverage industry; metal fabrication; cooling systems; and for fire suppression and extinguishers. It can also be sequestered or stored for long term climate change mitigation.
- 6.5.20 Ultimately, the CCS unit would take carbon dioxide that would typically be exhausted from the facility and prepare it for beneficial use across a range of industries. This would reduce the emissions of the proposed AD facility; maximise the beneficial use of the AD byproducts; and increase overall sustainability.

Habitat and Biodiversity Creation

- 6.5.21 The Proposed Development would include substantial habitat creation, which would deliver significant biodiversity net gain and be of substantial benefit to local animal populations. The large area dedicated to monocrop farming would be replaced with new species diverse habitats.
- 6.5.22 It is proposed that woodland planting would be delivered along the boundaries of the Site alongside the existing boundary planting, which would provide both screening and habitat creation benefits. With the exception of the surface water drainage pond, the section of the Site to the south of the existing electricity pylon would be dedicated to habitat creation, with species-rich grassland and further woodland planting.
- 6.5.23 The proposed landscaping would deliver net gains in both area habitat units and hedgerow habitat units. Specifically, the development would deliver 12.36 new area habitat units, an 74.13% net gain on existing; and one unit of hedgerow habitat, an 11.40% net gain on existing. The Proposed Development would also satisfy BNG trading rules.



- 6.5.24 Clearly, the Proposed Development offers significant habitat and biodiversity enhancements over the continued use for agricultural purposes.

Benefits to the Scheduled Monument

- 6.5.25 The neolithic bowl barrow Scheduled Monument is located in the south-eastern corner of the Site. The monument currently forms part of the actively farmed field, meaning that it is regularly subject to activities that may impact the monument (ploughing, etc.).
- 6.5.26 No development or landscape planting is proposed in the vicinity of the Scheduled Monument, a buffer of at least 20m would be in place around it. The area would be removed from active farming and protected from development, helping to ensure that no additional damage is done to the monument and protecting it for future generations.
- 6.5.27 The landscaping scheme has also been designed sympathetically to the Scheduled Monument, with woodland planting that was intended to follow the boundary of the Site now relocated to the north, away from the monument. This avoids the potential for the monument being damaged by the roots of the new trees to be planted. The area covered by the Scheduled Monument will be planted with species-rich grassland, which would reduce the potential for root structures to damage any artifacts.

6.6 Green Belt Assessment Conclusions

- 6.6.1 The above section demonstrates that the Proposed Development would not represent inappropriate development in the Green Belt, as it meets the criteria set out at Paragraph 155 of the NPPF. As such, there is no requirement to demonstrate very special circumstances that would outweigh harm to the Green Belt. Nevertheless, for completeness, an ASA has been prepared; an assessment of harm to the Green Belt has been undertaken; and the benefits of the Proposed Development have been outlined.



- 6.6.2 The ASA, submitted as part of this application, demonstrates that the Proposed Development cannot feasibly be accommodated elsewhere. Therefore, the Site represents the most appropriate location for the development.
- 6.6.3 The assessment finds that, whilst there would be harm to the 'actual' openness of the Green Belt, there would be minimal and localised harm to perceived openness. The assessment also finds that the Site makes a 'weak contribution' to the five purposes of the Green Belt; and the Proposed Development would result in minimal harm to the five functions. The permanence of the Green Belt would not be impacted.
- 6.6.4 The various assessments submitted in support of this planning application demonstrate that there would be no unacceptable environmental effects from / on transport, landscape, visual amenity, ecology, air quality, noise, vibration, flood risk, drainage, heritage and archaeology. In this context, it has been concluded that the level of other harm to the Green Belt as a result of the Proposed Development would be low.
- 6.6.5 The benefits of the Proposed Development have also been presented, these benefits include:
- The provision of sustainable waste management capacity and coverage;
 - Renewable energy and gas production, which would contribute to sustainability and net zero targets;
 - Job Creation - up to five full time jobs associated with the facility, as well as construction and support opportunities;
 - The production of sustainable digestate bio-fertiliser, which would support farming and contribute to the promotion of food security; and reduce costs and the associated carbon footprint of agriculture;
 - The capture and storage of carbon dioxide – reducing emissions and providing a sustainable source of carbon dioxide for use in industry;
 - Significant habitat creation and biodiversity net gains; and



- Benefits to the Scheduled Monument found on the Site.

6.6.6 In the above context, it is concluded that the Proposed Development is acceptable under Policy GB1 of the Local Plan and Section 13 of the NPPF.



7.0 OTHER ASSESSMENTS

7.1 Introduction

- 7.1.1 In line with the pre-application feedback from WBC, the following section presents an Energy and Sustainability Assessment and a Crime Impact Assessment. This sets out the measures that would be taken to promote sustainability and ensure security and reduce opportunities for crime.

7.2 Energy and Sustainability Assessment

- 7.2.1 Policy ENV7 of the Local Plan sets out that proposals for the production, storage and/or distribution of renewable energy will be supported by the Council, provided that they would not result in unacceptable impact to the local environment. Further to this, the policy expects all new development to minimise carbon emissions; and, for developments outside of strategic allocations, meet at least 10% of their energy need through renewable and other low carbon sources.

Renewable Energy Production and Energy Efficiency

- 7.2.2 As outlined above, the Proposed Development is for an AD facility, which would produce renewable biomethane and electricity from food waste. The AD process is capable of producing up to 7MWth of renewable biomethane, plus up to 1MWe of renewable electricity per year. The split between the electrical and gas outputs in any given year would be determined by demand. The Proposed Development would include roof-mounted solar panels to further increase renewable energy production, which are anticipated to produce an additional 150kW – 180kW of renewable electricity for the facility / for export to the national grid.
- 7.2.3 The energy produced by the facility would far exceed the energy requirements of the facility and the Proposed Development would be a net exporter of renewable energy; this would far exceed the 10% requirement of Policy ENV7. Under normal operation, the energy produced through the AD process and the solar panels will be used to power the facility and excess energy will be exported to the national grid through a direct connection. There are likely to be cases where some electricity is being imported from the grid to power the facility, however, the aim is to keep imported



energy usage to a minimum; and ensure that over the lifetime of the facility energy production would far exceed energy consumption.

- 7.2.4 Measures would be introduced to maximise the energy efficiency and sustainability of the facility. This includes the provision of two EV charging spaces; energy efficient lighting, with timers and sensors; and appropriate insulation to minimise unwanted heat loss across the facility.

Carbon Capture and Storage

- 7.2.5 As well as producing renewable energy and maximising energy efficiency, the Proposed Development includes CCS, which would capture and store carbon dioxide produced through the AD process. This carbon dioxide would then be exported off-site for beneficial use in industry, such as food production and fire suppression systems. This would further increase the sustainability credentials of the Proposed Development.

Water Efficiency

- 7.2.6 Measures are proposed to maximise the water efficiency of the facility. The AD process is liquid intensive, requiring waste liquids and/or water to create the waste mixture used in the process. To minimise water usage, the facility would utilise waste liquids (milk, brewery waste, etc.) and include a drainage system which would prioritise the collection of rainwater and surface water for use in the AD process. The vast majority of the impermeable areas within the Site would drain directly to waste liquid storage tanks, ahead of use in the AD process, or to a surface water storage pond, for later use in the process. This would vastly decrease the water demand of the facility and promote water efficiency.
- 7.2.7 For sanitaryware items (sinks, toilets, showers, etc.) efficient, water saving, technologies will be utilised. This will minimise mains water usage and ensure that the water efficiency is maximised.

Assessment Conclusions

- 7.2.8 Based on the above, it is clear that the Proposed Development would promote renewable energy production, energy efficiency, emissions reduction and water



efficiency. This would be in accordance with Policy ENV7 of the Local Plan and national policy and targets.

7.3 Crime Impact Assessment

7.3.1 Policy DC6 of the Local Plan and the NPPF, require development to incorporate crime prevention measures, through (*inter alia*) site layouts, well-designed security features, boundary treatments and use of appropriate materials. The following section summarises the measures that would be taken to ensure that the security of the development is maintained and the opportunity for crime minimised.

7.3.2 The Proposed Development would include several security features to ensure that the site is kept secure at all times and to reduce opportunities for crime. These features include:

- Security fencing and gates around the perimeter of the Site, minimising opportunity for criminals to access the Site;
- A CCTV system covering the facility, which would discourage criminal activity and assist in responding to criminal activity, should it occur;
- External security lighting, which would include lighting on motion sensors to discourage any trespassers on the Site;
- Physical security measures, such as security doors and windows, limiting opportunity for criminals to enter buildings within the facility; and
- An alarm system, which would alert staff of any intruders and discourage criminal activity on the Site.

7.3.3 Whilst there would be periods where no staff would be present on the Site, the security system would allow for remote monitoring by staff and alert staff of potential security breaches. This would enable appropriate action to be taken, even during periods where the site is unattended.

7.3.4 These measures would ensure that the opportunity for crime at the facility is minimised, by creating a secure facility with several crime deterrents. In this context,



the Proposed Development would be safe and secure and would accord with Policy DC6.



8.0 SUMMARY AND CONCLUSION

8.1 Summary

- 8.1.1 This PS has been prepared in support of a planning application made by STGP for the construction and operation of an Anaerobic Digestion ('AD') facility, including amended access, landscaping, parking and other ancillary works at land to the east of Winwick Link Road, Warrington.
- 8.1.2 The PS has provided details of the Proposed Development and the operation of the AD facility, demonstrating that the development would be highly sustainable and deliver significant environmental, social and economic benefits.
- 8.1.3 It has also been demonstrated that extensive engagement with WBC, the local community and other relevant stakeholders has been undertaken; and the response from this engagement has been taken onboard.
- 8.1.4 An assessment of the Proposed Development against relevant planning policies has been undertaken. A key consideration as part of this application is the Site's location within the Green Belt. The Proposed Development would fall under the exception set out by Paragraph 155 of the NPPF, meaning that it would not represent inappropriate development in the Green Belt. Nonetheless, an assessment of the harm of the development on the Green Belt has been undertaken, which demonstrates that the benefits of the development would clearly outweigh the limited harm. The benefits of the Proposed Development include:
- The provision of sustainable waste management capacity and coverage;
 - Renewable energy and gas production, which would contribute to sustainability / net zero and energy security targets;
 - The production of sustainable digestate bio-fertiliser, which would support local farming and contribute to the promotion of food security; helping to reduce costs and the associated carbon footprint of agriculture;
 - The capture and storage of carbon dioxide – reducing emissions and providing a sustainable source of carbon dioxide for use in industry;



- Significant habitat creation and biodiversity net gains; and
- Benefits to the Scheduled Monument found on the Site.

8.1.5 It has also been demonstrated through the various technical assessments that the Proposed Development would not give rise to any unacceptable adverse impacts on local residents or the environment. As such, the Proposed Development would accord with the relevant development management policies contained within the Local Plan and the provisions of the NPPF. The development would also promote energy efficiency and sustainability; and would include features to ensure that security is maintained and opportunities for crime minimised.

8.2 Conclusion

8.2.1 The Local Plan has been considered to be up-to-date, and the policies of most relevance to the determination of the planning application have been identified. The Proposed Development has then been assessed against those most relevant policies along with all other policies that may be considered of relevance to the planning decision. This assessment has concluded that the Proposed Development complies with the policies of relevance.

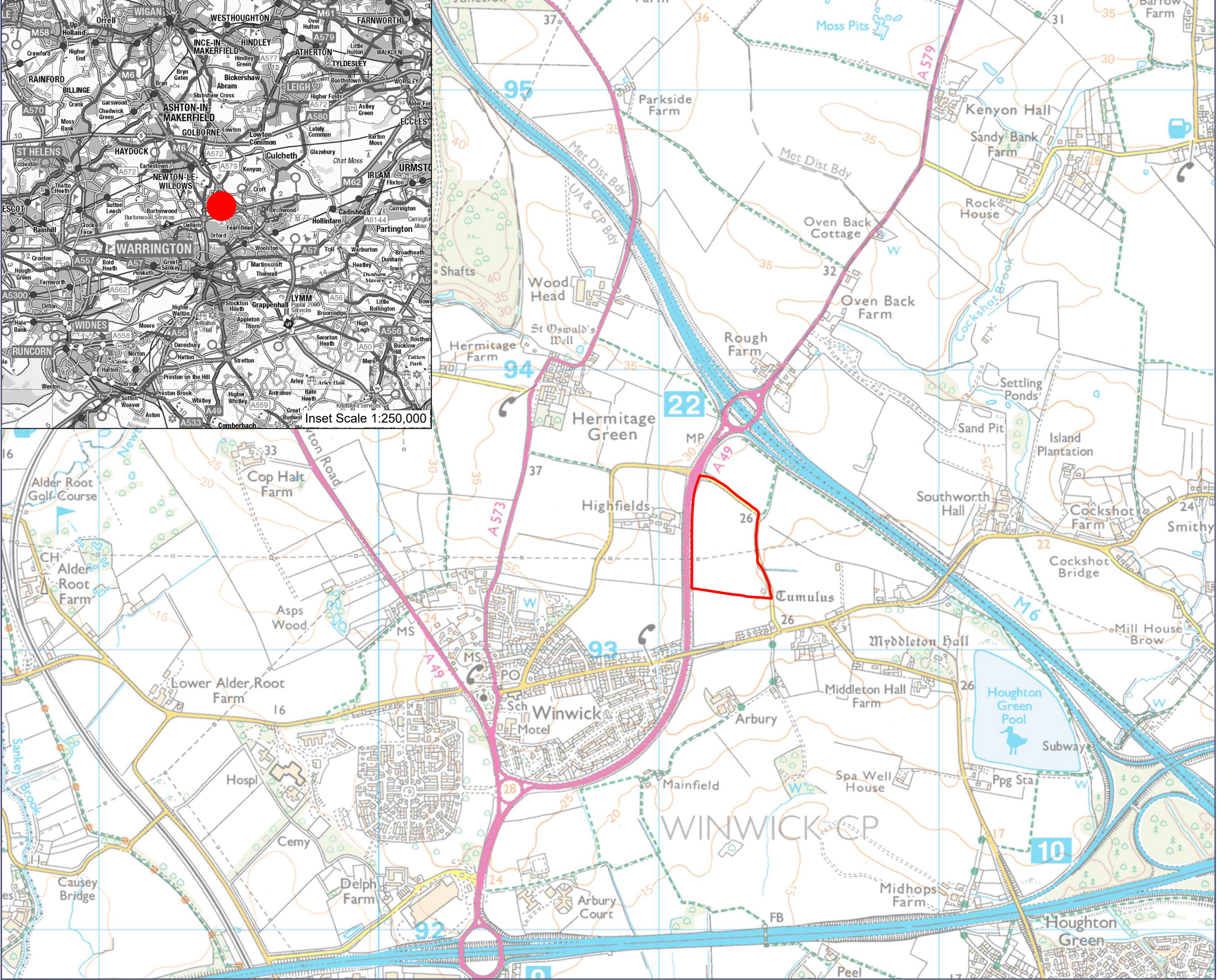
8.2.2 The application has been supported by a number of technical assessments that are appended to this PS. These assessments demonstrate there are no unacceptable effects as a result of the Proposed Development.

8.2.3 On the above basis, it is concluded that the Proposed Development is acceptable and there are no grounds for the development to be refused.



Figures





Inset Scale 1:250,000

Application Boundary

Site Location

0344 8700 007

axis.co.uk

Project

Figure Number

Figure Title

Scale

Date



STGP

Figure 1

Site Location Plan

1:12,500 @A3

June 2025

