

- Six Local Wildlife Sites
- Green Belt
- Countryside
- Ancient Woodland
- Archaeological Interest site
- Protected Species
- Groundwater Protection Zone.

This council submits that the inclusion of Star Works within Policy W4 does not accord with the National Planning Policy for Waste (NPPW) as detailed below:

- i) The cumulative impact of the existing and potential waste facility would be detrimental to the well-being of the local community including environmental quality contrary to paragraph 5.
- ii) The site does not support the sustainable movement of waste by use modes other than road transport.
- iii) Any expansion of the site would be inappropriate development in the Green Belt contrary to paragraph 6.
- iv) Expanded operations at this site would conflict with the locational criteria of Appendix B (paragraph d – nature conservation) including a site with a nationally recognised designation and protected species.
- v) Noise and vibration from goods vehicle traffic movements to and from the site, Appendix B (paragraph j – noise light and vibration).

Additional adverse considerations in relation to the NPPW are:

- air emissions and the close proximity of sensitive receptors (humans);
- the reliance on local roads for access;
- odours and the close proximity of sensitive receptors

The potential intensification of waste activity suggested for Star Works represents a significant increase over current levels. This upsurge is far greater still when taken in the context of the current baseline including a substantial level being attributable to the site's landfill restorative works which are due to conclude soon. Based upon cumulative policy decisions, the impacted local community and environment has held a predictable expectation of reduction not exacerbation.

This Green Belt site has been the subject of extensive scrutiny in terms of its landfill and waste operation both at Local and Central Government levels which resulted in a definitive conclusion. Therefore, planning conditions relating to the restoration of the site are consistent with the national guidance (NPPW para 7) and should be robustly applied without exception.

In conclusion, the operational contribution that the Star Works site has provided to the waste strategy for the area is 21 years with a preceding mineral extraction dating back to 1947. It is considered that this site has served its purpose and more than adequately made its contribution as a waste and minerals facility to an area much wider than the locality in which it is situated. For this, and the reasons stated above, its allocation within W4 of the Waste & Minerals Strategy should be removed.

Policies DM3 – DM12 are supported.

*Note: It is suggested that the inappropriate inclusion of Star Works within W4 robustly conflicts with the majority of the Development Management Policies due to the reasons stated above.*