



The countryside charity
Lancashire, Liverpool City Region
and Greater Manchester

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26th April 2022

Dear Mr Haine,

I am writing on behalf of the Campaign to Protect Rural England, Lancashire, Liverpool City Region and Greater Manchester (CPRE), the Countryside Charity, with a strong objection to planning application: LCC 2022/0003 Waste Incinerator, Simonswood.

The Site is located in an existing industrial estate within a rural part of West Lancashire, which retains a predominately rural landscape character in protected Green Belt, which serves the purpose of keeping land permanently open. In my view the landscape and Green Belt will both be harmed if the development takes place. The area is not as urban in reality as the planning statement suggests. The site and proposed building would be prominent in the flat topography.

When considering the national planning policy and the local plan policies, there is no doubt that the development would be inappropriate development. While some mineral extraction and engineering works may be considered appropriate, CPRE finds that the incinerator would lead to a change in the landscape, and it would harm the spatial and visual openness of the Green Belt and lead to harm in so far as openness and permanence is concerned. There are no exceptional circumstances.

If permitted an additional amount of HGV traffic would be generated on the local road network and there is concern about highway safety.

The land involved in the application is assessed as both grade 1 and grade 2 Best and Most Versatile Land. In the CPRE's view high grade farmland should be retained for future generations and this is also set out in NPPF paragraph 174 (b) and in the local planning policy concerning rural economy.

CPRE observes from the Defra Magic maps that there is ecology of rarity on and near to the site, such as bats, and rare farm bird populations. In reality, the site lies within the Ravenhead Brickworks SSSI Impact Risk Zone.

The Lancashire branch of Campaign to Protect Rural England

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CPRE is concerned about the impact of the different stages of development on the ecology of the area. Noise, dust and emissions, smells, and other pollutants would occur degrading the natural environment at the immediate location and at a distance due to the effects of the wind and the routes used by trucks servicing the site with waste from medical sector to the incinerator.

The carbon impacts of incineration are also a problem in terms of the climate emergency. The Council must be alert to this priority issue and the need for urgent action.

The application is locally opposed with West Lancashire Borough Council strongly objecting due to highway concerns among others. The local Parish Councils are similarly strongly objecting on the grounds of harm to local amenity. We hope Lancashire County Council listens to these local concerns.

CPRE considers that a material consideration is the National Planning Policy Framework and Planning Practice Guidance, particular reference should be given to:

- Section 8: Promoting health and safe communities;
- Section 12: Achieving Well Designed Places; Section;
- 13: Protecting Green Belt Land; and Section; and,
- 15: Conserving the natural environment.

CPRE is concerned that the site is not an allocated waste site in the Local Plan for Minerals and Waste Core Strategy and Development Plan - Managing Waste and Natural Resources of Lancashire County Council and there would be environmental regulation issues to be overcome.

CPRE also believes the site to be contrary to West Lancashire Local Plan 2012-2027 Development Plan Document (DPD):

- GN3 Criteria for Sustainable Development,
- Policy EC1 The Economy and Employment Land - Other Significant Employment Sites - Allocated Waste Sites, and
- Policy EN1 Low Carbon Development and Development Infrastructure.

Summary

Due to the application being contrary to national and local planning policies we respectfully recommend that the application be refused. Our best soils should be protected and enhanced for future generations, Green Belt purpose upheld and the rural character protected for the benefit of everyone in the future.

If you would like to discuss any of the above, please do not hesitate to contact me.

Yours sincerely

Jackie Copley MA, BA, (Hons), PgCert, MRTPI
Planning Manager