Development of an In-Vessel Composting Facility, Former Befesa Salt Slags Site, Fenns Bank, Wrexham – Fenn's Bank IVC

Alternative Site Assessment

Prepared for

Veolia ES (Shropshire) Ltd

September 2025
5039-01-ASA-01

Document Control

Revision	Date	Prepared By	Reviewed / Approved By
5039-01-ASA-01	17/09/2025	JB	DA

© AXIS P.E.D. Ltd 2023. All rights reserved.

This document and its accompanying documents contain information which is confidential and is intended only for the use of the client. If you are not one of the intended recipients any disclosure, copying, distribution or action taken in reliance on the contents of the information is strictly prohibited.

Unless expressly agreed, any reproduction of material from this document must be requested and authorised in writing from AXIS P.E.D. Ltd. Authorised reproduction of material must include all copyright and proprietary notices in the same form and manner as the original and must not be modified in any way. Acknowledgement of the source of the material must also be included in all references.

Well House Barns, Chester Road, Bretton, Chester, CH4 0DH

Camelia House, 76 Water Lane, Wilmslow, Cheshire, SK9 5BB

T: 0344 8700 007
enquiries@axis.co.uk
www.axis.co.uk

CONTENTS

1.0 INTRODUCTION, BACKGROUND & SCOPE OF APPLICATION 1

1.1 Introduction 1
1.2 Background 1
1.3 Structure of the Document 2

2.0 PLANNING POLICY CONTEXT 3

2.1 Introduction 3
2.2 Shropshire 3
2.3 Wrexham 7

3.0 KEY ASA VARIABLES AND METHODOLOGY 12

3.2 Key Variables 12
3.3 Methodology 15

4.0 STAGE ONE – SITE IDENTIFICATION 19

4.1 Introduction 19
4.2 Initial long list 19

5.0 STAGE TWO – INITIAL SITE APPRAISALS 27

5.1 Introduction 27
5.2 Sites excluded as developed since allocation 27
5.3 Sites excluded due to proximity to residential development 27
5.4 Sites excluded due to clash with policy 28
5.5 Stage Two Summary 29

6.0 STAGE THREE – FULL ASSESSMENT OF REMAINING SITES 30

6.2 Summary of Findings 30

7.0 SUMMARY AND CONCLUSION 32

7.1 Introduction 32
7.2 Stage One 32
7.3 Stage Two 32
7.4 Stage Three 33
7.5 Conclusion 33

TABLES

Table 3.1 – Long list of Sites 19
Table 5.1 – Sites developed since allocation 27
Table 5.2 – Sites unacceptably close to residential development 28
Table 5.3 – Sites excluded due to policy clash 28
Table 6.1 – Summary of Stage Three Findings 30

APPENDICES

Appendix A – Search area
Appendix B – Stage Three Site Assessments

1.0 INTRODUCTION, BACKGROUND & SCOPE OF APPLICATION

1.1 Introduction

1.1.1 This Alternative Site Assessment ('ASA') has been prepared in support of an application for full (detailed) planning permission submitted to Wrexham County Borough Council (the Council or WCBC) as Local Planning Authority (LPA) by Veolia ES (Shropshire) Ltd (VES or the applicant). The application is for the development and operation of an In-Vessel Composting Facility (IVC) with a processing capacity of circa 50,000 tonnes per annum (tpa) of green and/or co-mingled food waste (the Proposed Development). The Proposed Development ("Fenn's Bank IVC") would utilise existing buildings on site that are in an excellent state of repair and can be converted from their former use, and added to, in order to make them fit-for-purpose. The application site (the Site) is located at the former Befesa Salt Slags Site, Fenns Bank, Near Whitchurch, Wrexham, and has historically been utilised for the smelting and recycling of aluminium waste.

1.1.2 The Site is previously developed but is not subject to any designation within either the Wrexham Unitary Development Plan or the unadopted Wrexham Local Development Plan. Both plans direct waste development to allocated sites, but allow for development of other sites where it is demonstrated that the allocated sites are not suitable. The ASA has been expanded to Shropshire as the Proposed Development will primarily treat waste arising from that Local Authority. The Local Development Framework takes the same approach as that in Wrexham.

1.2 Background

1.2.1 The application site is circa 5 hectares of land located within the administrative boundary of WCBC. The site comprises the former Befesa Salt Slags Facility located at Fenn's Bank, near Whitchurch, Wrexham. The County boundary between Wrexham and Shropshire, which also forms the national boundary between Wales and England, is located 500 metres to the west of the site.s

1.2.2 The development represents a facility that would accept a mixture of both green garden waste arising from municipal household collections, and from commercial grass and hedgerow collection operations in proximity to the site; along with co-mingled food waste from source-separated local authority contracts, and other trade sources (hotels, restaurants etc).

1.2.3 The Proposed Development would comprise a bespoke in-vessel composting facility that would operate across several distinct but inter-related sections that collectively receive, treat, process, mature and refine a mixture of green and food waste material to form a compost product that could be used for a variety of purposes. On completion of processing, the matured compost would be exported off-site for sale as restoration material and/or soil improver.

1.2.4 Shropshire Council presently lacks capacity to process green and food waste arising from the northern half of the County, and the Proposed Development would address that need in a location set only a short distance from the boundary of the Authority. It would also have additional capacity to accept green and food waste material from Wrexham, Shropshire, Flintshire, and CWACC that is managed within adjoining authority areas, or transport longer distances before being processed.

1.2.5 The AD facility would promote social, economic and environmental sustainability by providing additional sustainable waste management capacity and coverage; producing sustainable fertiliser material; and, creating new habitat and delivering biodiversity net gain.

1.2.6 Further details on the Site and the Proposed Development, including the substantial benefits of the proposal, can be found in the accompanying Planning, Design and Access Statement ('PDAS').

1.3 Structure of the Document

1.3.1 This document sets out the Planning Policy Context in which the ASA has been prepared in Section 2.0; followed by the methodology for the Alternative Site Assessment (ASA) (Section 3.0); before detailing the findings of the assessment in Sections 4.0; 5.0; and 6.0. A summary of the assessment and final conclusions are found in Section 7.0.

2.0 PLANNING POLICY CONTEXT

2.1 Introduction

2.1.1 It is proposed that the facility would accept around 50,000tpa of green and food waste. For any project such as this where the CAPEX needed to deliver the project is significant, a minimum load of source material needs to be guaranteed to the Site. Without that guarantee, funding is unlikely to be secured. In this case Veolia ES (Shropshire) Ltd. has secured a contract with Shropshire Council to manage and process their domestic green and food waste collections. Circa 30,000tpa of the 50,000tpa anticipated to be processed at the site would be guaranteed through the contract. The remaining circa 20,000tpa would be sourced from the commercial and industrial sector in and around the local area (Wrexham, South Flintshire, West Denbighshire, North Shropshire and South Cheshire).

2.1.2 As the Site is within WCBC this ASA must consider policy within the adopted development Plan for the LPA, but as the Proposed Development will source the majority of its feedstock from Shropshire Council (SC) it is considered that the ASA must also identify if alternative sites are available within the SC area as well as examining it against the alternative sites within the WCBC area.

2.2 Shropshire

2.2.1 The Local Development Framework (LDF) in Shropshire comprises two key documents which are:

- Core Strategy DPD - adopted 24 February 2011
- Site Allocations and Management of Development Adopted Plan – adopted 17 December 2015

2.2.2 The LPA had begun work on preparing a replacement Shropshire Local Plan (the Draft Shropshire Local Plan [2016 – 2038]), with examination begun in November 2021. However, the examination library confirms that has LPA withdrawn[1] the Local

[1] *Per Shropshire Council letter dated 25/07/2025 – available at https://next.shropshire.gov.uk/media/rjflz5jw/qc58-withdrawal-of-shropshire-local-plan-from-examination.pdf*

Plan from examination. Thus, the Draft Shropshire Local Plan (2016 – 2038) is not examined further in this report.

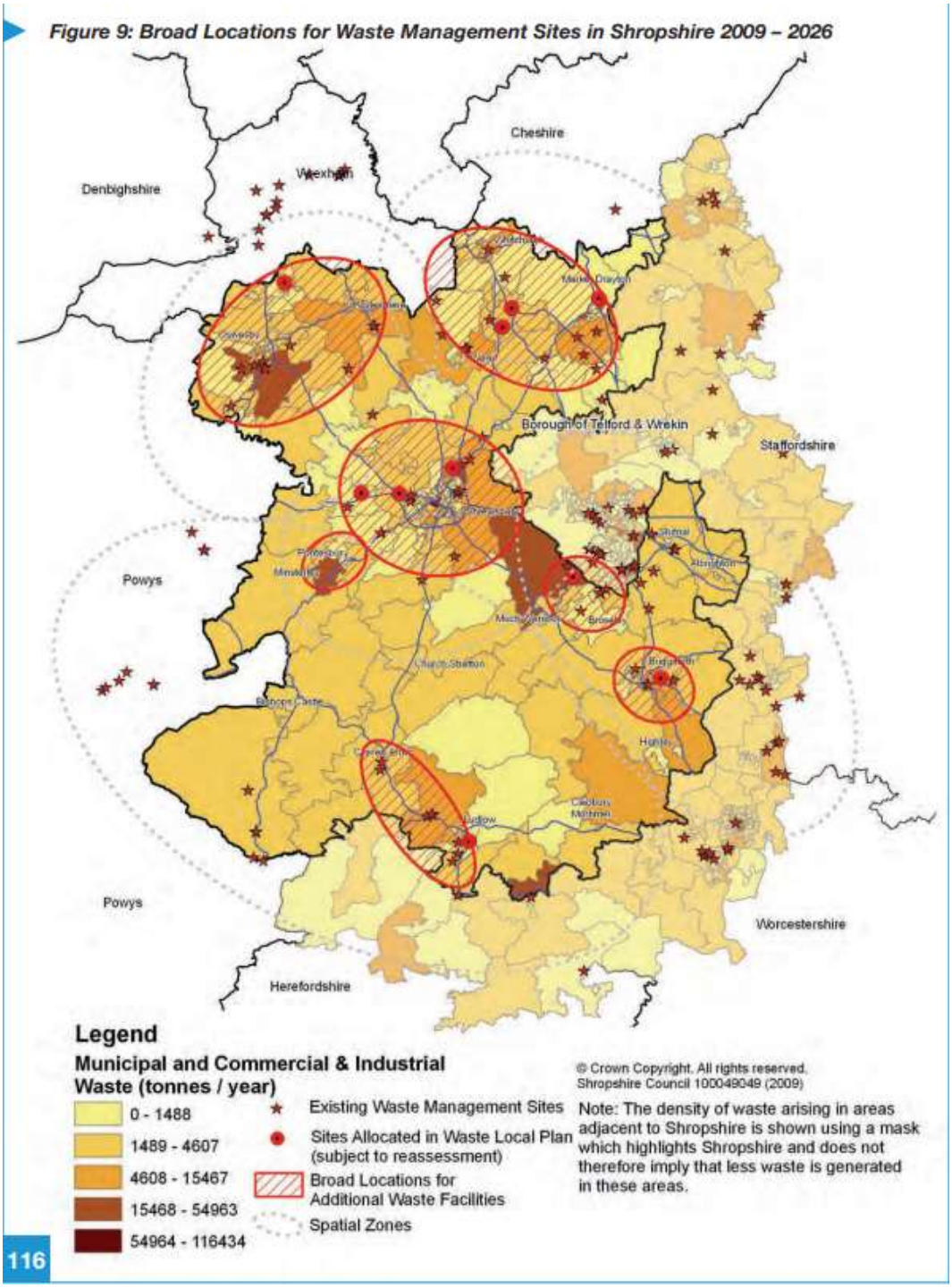
SC Core Strategy 2006-2026

2.2.3 The key Planning Policy within the Shropshire Council (SC) Core Strategy (SCCS) that pertains to the ASA is CS19, which sets out the following approach to the selection of sites for waste management facilities:

"Identifying specific sites to deliver additional waste transfer, recycling and recovery facilities to address the capacity gap of about 150,000 tonnes/year identified in RSS. Sites will be allocated as part of the SAMDev DPD in accessible locations close to the main urban areas within the broad locations identified in Figure 9. Outside these broad locations, Shropshire Council will support applications for smaller scale waste facilities capable of meeting local needs in locations which are consistent with the principles and site identification criteria set out in national and regional policy"

2.2.4 The figure referred to is provided below:

Figure 1 – Extract from SC Core Strategy – Figure 9



2.2.5 A total of 10 sites were allocated in the then 'saved' Shropshire Waste Local Plan, with these forming the preferred location for waste management development, with other sites within the broad locations for additional waste facilities defined in figure 9 then potentially suitable if those sites are not available, deliverable, appropriate, and suitable.

2.2.6 Since the adoption of the SCCS the Shropshire Council Site Allocations and Management of Development Plan (SAMDev) has been adopted with that document replacing the Shropshire Waste Local Plan.

SC Site Allocations and Management of Development Plan (SAMDev) 2006-2026

2.2.7 The key Planning Policies within the Shropshire Council (SC) Site Allocations and Management of Development Plan (SAMDev) that pertain to the ASA are MD4, MD9, and MD14, which set out the approach to managing employment development and assessing applications for Waste Management Facilities. Dealing with each in turn:

2.2.8 Policy MD4 seeks to address the requirements of the spatial strategy for employment development in the SCCS, including the approach set out in policy CS19 and states:

"Employment development will be managed in accordance with spatial strategies CS1 – CS5 and economic and employment strategy CS13. As part of the management of a portfolio of employment land and premises (CS14 and CS19) and to maintain a reservoir of available sites:

1. Employment land and development will be delivered by permitting proposals that are sustainable development and:

i. are on committed or allocated sites (portfolio sites) identified in Policies S1 – S18 and on the Policies Map; or

ii. are other suitable development sites; and

iii. comprise Class B or sui generis uses which include industrial or commercial employment opportunities;

iv. are operations which are compatible with adjoining uses;

v. satisfy the relevant settlement policy and accompanying development guidelines…"

2.2.9 This is expanded upon in explanatory paragraph 3.33 which notes that there is a *"special presumption for recycling and environmental industries* " alongside Class B uses, with policies S1-S18 (that set out the specific polices and allocations for each settlement within the plan area) *"including specified presumptions for recycling and*

environmental industries and conditional permissions for committed employment sites".

2.2.10 Policy MD9 accompanies policy MD4 and protects existing employment areas through allocations on the Policies Map that accompanies the SAMDev. These are classified according to their significance per table MD9.1 from Regional and Sub-Regional Sites (where new waste development will only be allowed where there are opportunities for co-location with existing waste management operations) down to mixed commercial sites (where waste management facilities can be supported where they deliver regeneration opportunities which support the physical and economic improvement of the area).

2.2.11 Policy MD14 then sets out the relevant detailed criteria for assessing applications for Waste Management Facilities, with explanatory paragraph 3.143 noting that *"specific sites which may be suitable for waste management facilities are identified as part of the schedules showing employment site commitments and allocations in the relevant settlement strategies"*.

2.2.12 For the purposes of this ASA it is clear that the sites allocated for employment uses, including waste development, within the SAMDev must be assessed to establish if sequentially preferrable alternative site is available. Thereafter, the suitability of any site would fall to detailed consideration under policy MD14 of SAMDev and CS19 SCCS, where such a site would be considered on its merits.

2.3 Wrexham

Status of the Development Plan for Decision making

2.3.1 At the point of drafting, the status of the Development Plan in Wrexham has been through significant turmoil. The **Wrexham Local Development Plan (2013 – 2028) (LDP)** was initially adopted by Full Council on the 20 December 2023 and consequently formed part of the Development Plan for the Authority Area. However, the role and position of the plan has been subject to legal review which as fundamentally altered its status.

2.3.2 The LDP proposed 3,100 new homes fundamentally impacting on the road and service infrastructure in Wrexham and altering the context of the authority as a largely rural area. Consequently, the LDP was rejected by the Council Members initially in April, and then again in June 2003. This resulted in a Judicial Review (JR)

brought against the Council by a consortium of housing developers that sought to force through the plan to provide a framework against which applications for housing could be granted. This JR concluded with a High Court Judge ruling that the Council were compelled (i.e. *must*) adopt the plan, and failure to do so would leave it, and its members, potentially liable to consequential costs. With the risk of both administrative and personal liability hanging over them, the Members of the Council adopted the LDP, based on the Judgement of the High Court.

2.3.3 Following the adoption of the LDP, a further challenge was made to the Court of Appeal (by a Plaid Cymru Wrexham councillor) against the decision of the High Court, seeking both clarification and a ruling that would overturn of the judgement that the plan *had* be adopted.

2.3.4 Following a hearing into the case, on the 20 December 2024 the High Court, ruled in favour of the claimant, effectively stating that the Planning and Compulsory Purchase Act 2004 as relevant legislation, did not place mandatory (or statutory) duty on WCBC to adopt the LDP, and that Councillors could exercise their discretion in deciding whether or not to do so. The ruling effectively gave councillors more autonomy in determining applications against the policies of the plan, simply because the validity of the LDP as part of the process that led to the plan being adopted had been called into question.

2.3.5 Following a challenge brought under section 113 of the 2004 Act, the High Court issued an Order on 12 June 2025. The effect of the Order is that the vote by Full Council on the 20 December 2023 that adopted the LDP was quashed. This meant that the LDP was returned back to the status of an unadopted plan.

2.3.6 Whilst the LDP has not been formally withdrawn, and the result of the High Court decision did not affect the conclusions of the Examination Inspectors that the LDP was 'sound', it no longer has the status of a development plan for the purposes of Section 38(6) of the 2004 Act.

2.3.7 The quashing of the LDP means that the **Wrexham Unitary Development Plan (1999 – 2011) (UDP)**, is returned to the status of 'adopted development plan' and becomes the starting point for determining planning applications.

2.3.8 The UDP was adopted back in February 2005 and was produced to cover the relevant policies for the area until 2011. Consequently, the plan is out of date being

underpinned by an evidence base that is over 20 years old. This has been confirmed by appeals allowed for development that are not consistent with the UDP policies, but where material considerations, including evidence prepared to underpin the now unadopted LDP, have been considered to carry sufficient weight to justify a departure from some of the UDP policies. Importantly, the UDP pre-dates **Future Wales: The National Plan 2040** and consequently makes no provision to deliver its key principles and objectives. In light of the above, the weight that the decision maker (be that officer, member, or inspector) gives to the policies of the adopted UDP needs careful consideration.

2.3.9 In considering the weight to be afforded to the policies of the adopted UDP and the unadopted LDP, it is necessary to consider the underlying evidence and background to the respective policies. The evidence that underpins the LDP is, in every respect more up to date than the evidence which underpins the UDP. Furthermore, the unadopted LDP provides a planning framework for 2013-2028, as opposed to the UDP which was prepared as a plan for 1996-2011. The soundness of the LDP has been examined against the prevailing national policy which forms part of the development plan, the UDP has not.

2.3.10 Whilst many of the policies within the UDP and LDP will be consistent, where conflict between the policies of the two plans does exist, given the age and consistency of the LDP with prevailing national development plan policy, it is considered that the weight afforded to the relevant policies of the LDP may be afforded greater weight than those of the UDP, irrespective of the fact the UDP now forms part of the development plan, which the LDP does not.

WCBC Unitary Development Plan 1996-2001

2.3.11 The key Planning Policy within the WCBC Unitary Development Plan (WUDP) that pertains to the ASA is MW12, which sets out the following approach to the selection of sites for waste management facilities:

"Waste management facilities will be located having regard to:-

a) the best practicable environmental option;

b) the waste hierarchy;

c) the proximity principle.

d) regional self-sufficiency.

With the exception of landfilling, windrow composting or small-scale collection and recycling points, facilities for sorting, transferring and processing of waste will be permitted within sites on general industrial estates."

2.3.12 The policy thus sets a clear preference for the use of sites set within 'general industrial estates', with explanatory paragraph 11.15 clarifying that this means *"industrial estates which are suitable for general employment development. These locations would include the sites allocated for employment purposes under Policy E1 but exclude those safeguarded for high quality employment under Policy E2".*

2.3.13 However, it does not preclude use of non allocated sites. For the purposes of this ASA it is clear that allocated sites within the WUDP must be excluded first. Thereafter the key requirement in the policy is to guide the location of sites based on application of the 4 criteria listed within it.

WCBC Local Development Plan 2013-2028

2.3.14 Whilst the Wrexham Local Development Plan (WLDP) is no longer an adopted plan it is a material consideration due to the advanced stage of preparation reached, the confirmation of its 'soundness' following the conclusion of the examination process, and as the evidence underpinning the WLDP is more up to date than that for the WUDP, and its closer alignment to Future Wales, PPW Ed. 12, and current TANs. Therefore, it is relevant to this ASA and is examined below.

2.3.15 The key Planning Policy within the WLDP that pertains to the ASA is MW6: Waste Management Facilities, which sets out the following approach to the selection of sites for waste management facilities:

"Proposals for the management of waste will generally be supported on existing or allocated employment sites for B2 uses subject to meeting the criteria below. Sites which are considered suitable for waste management uses include:

2.3.16 A list of 10 'preferred sites' is then set out with these all set on Industrial Estates that are within the urban corridor running along the A483 and in proximity to Wrexham and its neighbouring settlements.

2.3.17 For waste development proposed outside of these specified areas, Policy MW6 states that development proposals *"may be supported provided:"*

i. The proposed development cannot be located on land allocated for employment uses or within development boundaries due to the scale or nature of the proposed development; or

ii. The proposal is intended to manage wastes arising entirely on site; or

iii. There is a demonstrable need for the waste management facility type concerned and there are no allocated sites within a reasonable distance, taking into account the catchment of the waste;

and

iv. The site is outside the AONB; and

v. There is provision for restoration upon cessation of the approved use."

2.3.18 Thus, the Policy sets a clear preference for the use of specific allocated sites, and only allows consideration of sites outside of those locations when certain criteria are met.

2.3.19 For the purposes of this ASA the 10 sites considered suitable for waste development within the WLDP must be assessed to establish if a sequentially preferrable alternative site is available. Thereafter the suitability of this Site falls to detailed consideration under the remaining criteria of policy MW6.

2.3.20 Further consideration of planning policy is provided in Chapter 4.0 of the PDAS submitted as part of this planning application.

3.0 KEY ASA VARIABLES AND METHODOLOGY

3.1.1 This section sets out the key variables that have been considered and the assessment methodology that has been applied to produce the ASA.

3.1.2 The key variables applied as part of this ASA are fixed by the operational and site requirements of the Proposed Development. Specifically, these include:

i) Location in relation to the sources of waste – the facility aims to add new capacity to serve the towns of Shrewsbury, Oswestry, Whitchurch, and Market Drayton, so must be situated close to this area.
ii) Buildable area – sites must be of an appropriate size to accommodate the facility.
iii) Accessibility – sites must offer transport connections to major roads and the strategic highway network which would enable waste and digestate to be transported to and from the facility with minimal use of local roads.
iv) Other variables – sites must be free from constraints that would prohibit development or where the Proposed Development would give rise to unacceptable impacts on residents or the environment.

3.1.3 The variables listed above are discussed in greater detail below.

3.2 Key Variables

Location

3.2.1 The Proposed Development would provide capacity to process green and co-mingled food waste the majority of which would be sourced from the four towns of Shrewsbury, Oswestry, Whitchurch, and Market Drayton.

3.2.2 In this context, an area of search / catchment area for the facility has been generated for the purposes of this ASA. This is informed by the location of the four towns which the proposed AD facility intends to serve. The area of search has been generated by running a 35-minute drive-time from the centre of the four towns. The area where these drive-times intersect is the optimal area for the Proposed Development and forms the area of search for the ASA. A map showing the generated search area can be found at Appendix A

3.2.3 The rationale behind this approach, which is informed by the prospective applicant's significant experience in the industry, is to ensure that the IVC facility is sustainably located in relation to the potential sources of the majority of the waste that would be managed at the facility. The 35-minute drive-time ensures that the vehicles transporting the waste to the facility are not traveling an unacceptable distance to and from the site, both in terms of economic viability and environmental impact from vehicle emissions[2]. Consequently this promotes more sustainable practices.

3.2.4 The search area not only covers land falling within WBC, but also land within SC. Land falling within Cheshire East Council, Cheshire West and Chester Council, Telford and Wrekin Council, Staffordshire County Council, Denbighshire County Council, and Powys County Council falls within the 35 minute drive radius of some but not all of the towns and so is not considered as part of this ASA.

Buildable Area

3.2.5 As outlined previously, the applicant is seeking to deliver an IVC facility, which would process green and food waste. In order to deliver the intended operational scale, prospective sites must be of sufficient size and include a suitable buildable area to accommodate the facility.

3.2.6 Any potential site must be of a sufficient size to accommodate all of the key elements of an IVC facility, laid out in an appropriate configuration. These key elements include a suitably sized reception building; a tipping hall; a shredding room; IVC tunnels; biofilters and a stack; maturation pad; refining plant; offices, staff welfare and maintenance facilities; weighbridge; and internal access roads, loading / unloading areas and car parking. Sites that do not offer a sufficient area to accommodate these requirements are considered unsuitable for the Proposed Development.

3.2.7 In the above context, a buildable site area has been set for the purposes of this ASA, to ensure that the alternative sites identified as part of the assessment are of a realistic size to accommodate the facility. This minimum threshold reflects the need for space to accommodate all of the features required to ensure the facility can operate efficiently and effectively. Alternative sites must also be a suitable shape to

[2] *GOV.UK Greenhouse Gas Reporting: Conversion Factor 2022 confirms an average ladened HGV emits 0.89kg of CO^2 equivalent per km travelled. A rigid RCV (7.5-17t) emits 0.61kg of CO^2 equivalent per km travelled.*

accommodate the Proposed Development; whilst a site may exceed the minimum size threshold the buildable area available may not enable the Proposed Development to be delivered in an appropriate layout.

3.2.8 For the purposes of this assessment areas for landscaping, habitat creation or other non-operational areas that may be required have not been included in the minimum site area, as the quantum of area required will be dependent on the existing context of the identified site. Consideration has been given to land required for landscaping / BNG, where relevant, in the assessment of the suitability of the sites.

3.2.9 For the purposes of the ASA, **only sites exceeding 2.4 hectares have been assessed**, which reflects the absolute minimum area required to accommodate all of the proposed areas / equipment (excluding areas for landscaping, habitat creation, etc.) in an appropriate configuration. Further consideration of the nature of the buildable area (shape, topography, constraints, non-operational land take requirements, etc.) has been undertaken, where appropriate.

Accessibility

3.2.10 Road represents the most feasible form of access to the Proposed Development, on the basis that it is not of a strategic scale and the materials are transported to and from the facility to/from various different locations in the locality, making transport via rail or water unviable. The Proposed Development would be accessed by several types of road vehicle, including kerbside waste collection vehicles; bulked waste transportation vehicles; HGVs exporting compost or those associated with maintenance, carbon deliveries, export of leachate or other contaminated materials, with silage trailers.

3.2.11 In the above context, it is critical that the Proposed Development is well connected to major roads, ideally the strategic road network (motorways and major A-roads). This will ensure that the facility can be safely and conveniently accessed, without impacting on local roads. Sites with no nearby connection to a major road and those that would need to be accessed via long stretches of local roads (particularly those with routes that pass through residential areas) or country roads have not been considered acceptable on accessibility grounds.

3.2.12 In this context, **sites have only been considered suitable where they have nearby connections to major roads and don't require routing of vehicles via long stretches of local roads**.

Other Variables

3.2.13 There are several other variables that have been considered as part of this ASA exercise. This includes consideration of physical constraints, such as ecological designations, flood risk areas and proximity to sensitive receptors. These considerations are summarised in the table below.

Table 2.1 – Other Variables and Considerations

Variable	Considerations
Flood Risk	Alternative sites should be located on land with a lower risk of flooding (statutory sequential assessment requirement).
Planning Policy Position	The development of a waste management facility on or close to some land use allocations would not be considered appropriate. For example, siting of proposed development adjacent to land allocated for residential development would not be considered appropriate.
Impact on People	Sites bordering sensitive receptors (residential uses, schools and hospitals) are considered unacceptable, due to potential impacts on local amenity.
Impact on Ecology	The proposed use on or close to international, national and local ecology / wildlife sites are not considered acceptable, due to potential impacts on ecological assets.

3.2.14 Sites that are subject to highly restrictive or several constraints are unlikely to be an acceptable location for the Proposed Development.

3.3 Methodology

3.3.1 The approach to the assessment can be split into three distinct stages, which are set out below: -

- Stage One – Site Identification
- Stage Two – Initial Site Appraisal; and
- Stage Three – Full Assessment.

3.3.2 The suitability and availability of the sites has been assessed through stages two and three.

Stage One - Site Identification

3.3.3 The initial stage of the ASA involved a review of the identified area, which focussed upon the Sites identified as suitable for Employment Use within the SamDEV as well as those identified for waste development within the WCBCUDP & WCBCLDP, as these are the preferred locations for such facilities in each Local Plan. Beyond these Sites the relevant planning policy for WCBC simply requires that site subject of applications are appropriately located and meet set requirements within policy, with a similar approach within the SCCS/SamDEV, which fall outside the scope of this ASA.

3.3.4 Axis has undertaken a review of the following information to identify potential alternative sites:

- Shropshire Local Development Framework, Wrexham Local Development Plan, Wrexham Unitary Development Plan documents – to identify allocated sites.

3.3.5 For completeness, no consideration of the nature of the allocation for development was given to the identified sites at this stage beyond ensuring that, where relevant, it was allocated for an employment use and/or a waste management use or allowed such a use in line with the policies within the relevant plan. The compatibility of the Proposed Development with the allocated use was considered at Stage Two of the assessment.

3.3.6 This search was used to produce a long list of a range of alternative sites, which formed the basis of this ASA. These were then subject to initial screening to remove sites set outside of the search area or that were too small to accommodate the proposed development.

Stage Two – Initial Site Appraisal

3.3.7 The second stage of the ASA comprised a high-level review of the potential alternative sites, looking at the characteristics of the sites to assess their suitability for an IVC facility. Specifically, this stage considered:

- The allocation of the site;
- The status of the site; and
- Constraints that would clearly prohibit development.

3.3.8 The Proposed Development is not considered appropriate on sites allocated for certain uses. Most notably, waste development, such as that proposed, would not be an appropriate use on a site allocated for high quality employment uses where the proposed development would clash with such an allocation.

3.3.9 Sites which are in active use (or could feasibly be brought back into active use with minimal development), have recently been developed or are in the process of being developed are also not considered to be appropriate locations for the Proposed Development. The demolition of existing structures would impact on the feasibility of the Proposed Development; and may represent an unsustainable use of land and resources where there is a reasonable prospect of the existing structures being (re)used.

3.3.10 Constraints which would clearly make a site unsuitable at this stage of the ASA include (*inter alia*) very close proximity to residential properties; a location within Flood Zones 2 and 3; and poor connection to major roads / the strategic highways network.

Stage Three – Full Assessment of Remaining Sites

3.3.11 Any remaining potential alternative sites were then subject to an in-depth assessment, which considered a full range of variables in detail to determine whether the sites would be suitable for the proposed IVC development.

3.3.12 The Stage Three assessment involved detailed consideration of the following elements:

a) The site context – including any characteristics of the site that may make it unsuitable for the proposed development.

b) Site constraints – including Flood Risk, heritage assets, Conservation Areas, Tree Preservation Orders and ecological designations.

c) Planning policy position – considering the intended land use for the site and the allowances/restrictions implemented by the relevant policy.

d) Planning history – whether there are any historic, extant or 'live' applications on the site that may preclude the alternative development.

e) Availability – including whether marketing material provides details regarding the delivery of development on the site.

3.3.13 Having outlined the above points, each of the full site assessments provides a conclusion as to whether the site is considered to be potentially suitable for the proposed IVC facility.

3.3.14 In addition, the Applicant has also undertaken an extensive search and enquiries of available Sites which includes those that made it through to Stage Three, to establish whether the sites are feasibly available for the Proposed Development. This information was then fed into the overall conclusions for each of the potential alternative sites identified.

4.0 STAGE ONE – SITE IDENTIFICATION

4.1 Introduction

4.1.1 This stage of the ASA involved the identification of potential alternative sites which comprise allocated land.

4.2 Initial long list

4.2.1 For completeness the initial long list of allocated sites deemed potentially suitable for waste management facilities drawn from WCBCLDP & WCBCUDP, and employment sites from SamDEV is set out at table 3.1 below. This results in a total of 84 sites listed.

4.2.2 The reasons for their exclusion are provided where relevant:

Table 3.1 – Long list of Sites

Ref.	Site Description	Adopted Allocation	Emerging Allocation	Site Area (ha)	Excluded?	Reason
Wrexham – LDP Sites						
WR1	Wrexham Industrial Estate (WLDP Ref 1)	Employment - inc. Waste	Employment - inc. Waste	30.17	Y	Dismiss on location
WR2	Llay Industrial Estate (WLDP Ref 2)	Employment - inc. Waste	Employment - inc. Waste	82.7	Y	Dismiss on location
WR3	Chirk Industrial Estate, Chirk & Canal Wood Industrial Estate, Chirk (WLDP Ref 3)	No matching allocation	Employment - inc. Waste	66.87	Y	Dismiss on location
WR4	Vauxhall Industrial Estate, Johnstown & Gardden Industrial Estate, Ruabon (WLDP Ref 4)	Employment - inc. Waste	Employment - inc. Waste	30.1	Y	Dismiss on location
WR5	Croesfoel Industrial Estate, Rhostyllen (WLDP Ref 5)	No matching allocation	Employment - inc. Waste	c.8.5	Y	Dismiss on location
WR6	Bersham Enterprise Centre, Rhostyllen (WLDP Ref 5)	No matching allocation	Employment - inc. Waste	c.8.5	Y	Dismiss on location
WR7	Gresford Industrial Estate, Wrexham City (WLDP Ref 6)	Employment - inc. Waste	Employment - inc. Waste	1.1	Y	Dismiss on location & size
WR8	Wynnstay Technology Park, Cefn/Acrefair (WDLP Ref 7)	Employment - inc. Waste	Employment - inc. Waste	0.43	Y	Dismiss on location & size
WR9	Five Crosses Industrial Estate, Coedpoeth (WLDP Ref 10)	No matching allocation	Employment - inc. Waste	0.28	Y	Dismiss on location & size
WR10	Rhosddu Industrial Estate, Wrexham City (WLDP Ref 11)	Employment - inc. Waste	Employment - inc. Waste	12.9	Y	Dismiss on location

Ref.	Site Description	Adopted Allocation	Emerging Allocation	Site Area (ha)	Excluded?	Reason
WR11	Advance Park Industrial Estate, Rhosymedre, Cefn/Acrefair (WLDP Ref 12)	Employment - inc. Waste	Employment - inc. Waste	6.1	Y	Dismiss on location
Wrexham – UDP Sites						
WR12	Wrexham Industrial Estate (WUDP Ref 1-21)	Employment - inc. Waste	Employment - inc. Waste	65.4	Y	Dismiss on location
WR13	Acrefair: Wynnstay Industrial Estate (WUDP Ref 22)	Employment - inc. Waste	Employment - inc. Waste	1.4	Y	Dismiss on location & size
WR14	Gresford: Industrial Estate (WUDP Ref 23)	Employment - inc. Waste	Employment - inc. Waste	1.1	Y	Dismiss on location & size
WR15	Johnstown: Vauxhall Industrial Estate (WUDP Ref 24)	Employment - inc. Waste	Employment - inc. Waste	2.5	Y	Dismiss on location & size (composed of several smaller plots)
WR16	Llay: Industrial Estate (WUDP Ref 25-31)	Employment - inc. Waste	Employment - inc. Waste	17.5	Y	Dismiss on location
WR17	Rhosllannerchrugog: Coppi Industrial Estate, Hall Lane (WUDP Ref 32)	Employment - inc. Waste	Employment - not inc. waste	0.4	Y	Dismiss on location & size
WR18	Rhostyllen : Croesfoel Industrial Estate (WUDP Ref 33)	Employment - inc. Waste	No matching allocation	1.3	Y	Dismiss on location & size
WR19	Rhosymedre: Plas Kynaston (WUDP Ref 34)	Employment - inc. Waste	Employment - inc. Waste	0.6	Y	Dismiss on location & size
WR20	Wrexham: Pandy Industrial Estate (WUDP Ref 35)	Employment - inc. Waste	Employment - not inc. waste	1.1	Y	Dismiss on location & size
WR21	Wrexham: Queensway Industrial Estate (WUDP Ref 36)	Employment - inc. Waste	Employment - not inc. waste	0.5	Y	Dismiss on location & size
WR22	Wrexham: Rhosddu Industrial Estate (WUDP Ref 37)	Employment - inc. Waste	Employment - inc. Waste	1.7	Y	Dismiss on location & size
WR23	Wrexham: Technology Park (WUDP Ref 38)	Employment - inc. Waste	Employment - not inc. waste	5.3	Y	Dismiss on location
WR24	Wrexham: Ruthin Road Development Area (WUDP Ref 39)	Employment - inc. Waste	Employment - not inc. waste	15.2	Y	Dismiss on location
Shropshire – SAMDev Sites						
SH1	Land at Bishops Castle Business Park, Phase 2	Employment - not inc. waste	N/A	2.8	Y	Dismiss on location Developed for smaller units
SH2	Schedule S2.1c: Committed urban employment sites - Bishops Castle	Employment - not inc. waste	N/A	Varies	Y	Dismiss on location & size

Ref.	Site Description	Adopted Allocation	Emerging Allocation	Site Area (ha)	Excluded?	Reason
SH3	Timber Yard / Station Yard, Bucknell	Employment - not inc. waste	N/A	1.4	Y	Dismiss on location & size
SH4	Land at Tasley south of the A458 bypass, Bridgnorth (ELR011/a)	Employment - not inc. waste	N/A	6.7	Y	Dismiss on location
SH5	Land at Tasley south of A458 at Tasley, Bridgnorth (ELR011/b)	Employment - not inc. waste	N/A	6.6	Y	Dismiss on location & size
SH6	Land at Old Worcester Road, Bridgnorth (W039)	Employment - inc. Waste	N/A	1.5	Y	Dismiss on location & size
SH7	Schedule S3.1c: Committed Urban Employment Sites, Bridgnorth	Employment - not inc. waste	N/A	Various	Y	Dismiss on location
SH8	Schedule S3.1d: Committed Rural Employment Sites, Bridgnorth Area	Employment - not inc. waste	N/A	Various	Y	Dismiss on location & size
SH9	Land south of Avenue Road, Broseley ELR017	Employment - not inc. waste	N/A	1.3	Y	Dismiss on location & size
SH10	Springbank Farm, Church Stretton (ELR078)	Employment - not inc. waste	N/A	1.27	Y	Dismiss on location & size
SH11	Land adjacent to Cleobury Mortimer Industrial Estate, New House Farm, Cleobury Mortimer (ELR068CM)	Employment - not inc. waste	N/A	0.7	Y	Dismiss on location & size Developed - Employment but for small units
SH12	Land adjacent to adjacent to Old Station Business Park (ELR071)	Employment - not inc. waste	N/A	0.3	Y	Dismiss on location & size
SH13	Land at Newington Farm, Craven Arms (ELR053)	Employment - not inc. waste	N/A	8	Y	Dismiss on location & size Policy - allocated solely for abattoir and food processing plant
SH14	Land west of A49, Craven Arms (ELR055)	Employment - not inc. waste	N/A	2.5	Y	Dismiss on location
SH15	Land North of Long Lane, Craven Arms Area	Employment - inc. Waste	N/A	3.5	Y	Dismiss on location

Ref.	Site Description	Adopted Allocation	Emerging Allocation	Site Area (ha)	Excluded?	Reason
SH16	Schedule S7.1c: Committed Urban Employment Sites: Remaining allocations, Craven Arms Area	Employment - not inc. waste	N/A	Various	Y	Dismiss on location
SH17	Britpart Ltd , The Grove, Craven Arms Area	Employment - not inc. waste	N/A	2.3	Y	Dismiss on location
SH18	Land off Grange Road, Ellesmere (ELR075)	Employment - inc. Waste	N/A	3.0	N	Advance to stage 2
SH19	Ellesmere Business Park, Phase 2 , Ellesmere (ELR074)	Employment - inc. Waste	N/A	6.2	N	Advance to stage 2
SH20	New Warehouse, Ellesmere Business Park Phase 1, Plots 2 & 3, Ellesmere (ELR076)	Employment - not inc. waste	N/A	0.4	Y	Dismiss on location & size Developed - Employment but for small units
SH21	Land at Netherton Workshops, Highley	Employment - not inc. waste	N/A	0.6	Y	Dismiss on location & size
SH22	Land east of Eco Park, Ludlow (ELR059)	Employment - not inc. waste	N/A	2.5	Y	Dismiss on location Developed - Housing and substation
SH23	Land south of Sheet Road, Ludlow (ELR058)	Employment - not inc. waste	N/A	3.5	Y	Dismiss on location
SH24	S10.1c: Committed Urban Employment Sites, Ludlow	Employment - not inc. waste	N/A	Various	Y	Dismiss on location & size (largest plot 1.0ha)
SH25	Sych Farm (Phase 2), Market Drayton ELR023/ELR024	Employment - inc. Waste	N/A	16.0	Y	Dismiss on location
SH26	Committed urban emp sites S11.1c, Market Drayton	Employment - not inc. waste	N/A	Various	Y	Dismiss on location
SH27	Schedule S11.1d: Committed Rural Employment Sites, Market Drayton Area	Employment - not inc. waste	N/A	Various	Y	Dismiss on location & size (largest plot 0.6ha)
SH28	Minsterley MIN002/MIN015	Employment - not inc. waste	N/A	1.2	Y	Dismiss on location & size Policy - Mixed use allocations, preclude waste Developed - Housing

Ref.	Site Description	Adopted Allocation	Emerging Allocation	Site Area (ha)	Excluded?	Reason
SH29	Minsterley MIN007	Employment - not inc. waste	N/A	1.91	Y	Dismiss on location & size Policy - Mixed use allocations, preclude waste Developed - Housing
SH30	Pontesbury PBY018/29	Employment - not inc. waste	N/A	4.92	Y	Dismiss on location Policy - Mixed use allocations, preclude waste Developed - Housing
SH31	Former Bus Depot, Station Road - Minsterley/Pontesbury Area	Employment - not inc. waste	N/A	0.3	Y	Dismiss on location & size
SH32	Much Wenlock	Employment - not inc. waste	N/A	-	Y	Dismiss on location
SH33	Land north of Whittington Road, Oswestry (ELR042)	Employment - not inc. waste	N/A	2	Y	Dismiss on location
SH34	Land south of Whittington Road, Oswestry (ELR043)	Employment - not inc. waste	N/A	14	Y	Dismiss on location
SH35	Land at Mile End East, Oswestry (ELR072)	Employment - not inc. waste	N/A	23	Y	Dismiss on location
SH36	S14.1c: Committed Urban Employment Sites, Oswestry	Employment - not inc. waste	N/A	Various	Y	Dismiss on location & size (largest plot 2.1ha)
SH37	The Lees, Site B, Rednal, Oswestry Area	Employment - not inc. waste	N/A	2.3	Y	Dismiss on location & size
SH38	Schedule S14.1d: Committed Rural Employment Sites: Remaining sites - Oswestry Area	Employment - not inc. waste	N/A	Various	Y	Dismiss on location & size (largest plot 1.8ha)
SH39	Land between Lawton Road and Lamledge Lane, Shifnal (SHI004/c)	Employment - not inc. waste	N/A	2	Y	Dismiss on location & size Policy - Allocation does not include waste

Ref.	Site Description	Adopted Allocation	Emerging Allocation	Site Area (ha)	Excluded?	Reason
SH40	Land at J.N. Bentley Ltd off Lamledge Lane, Shifnal (ELR021)	Employment - not inc. waste	N/A	2	Y	Dismiss on location & size Policy - Allocation does not include waste
SH41	Shrewsbury South Sustainable Urban Extension (SHREW028, 029, 075, 107, 114, and 127 – parts)	Employment - inc. Waste	N/A	26	N	Advance to stage 2
SH42	Shrewsbury South Sustainable Urban Extension (SHREW028, 029, 075, 107, 114, and 127 – parts)	Employment - inc. Waste	N/A	26	N	Advance to stage 2
SH43	Shrewsbury West Sustainable Urban Extension (SHREW002, 035, 083, and 128 – parts)	Employment - not inc. waste	N/A	3.35	Y	Dismiss on location. Impacts upon people - Proximity to residential allocations and uses.
SH44	Shrewsbury West Sustainable Urban Extension (SHREW002, 035, 083, and 128 – parts) ELR067SHREW	Employment - not inc. waste	N/A	4.16	N	Advance to stage 2
SH45	Land west of Battlefield Road, Shrewsbury (SHREW095 part/ELR006)	Employment - not inc. waste	N/A	3.14	N	Advance to stage 2
SH46	Land east of Battlefield Road, Shrewsbury (ELR007)	Employment - not inc. waste	N/A	2.13	N	Advance to stage 2
SH47	Battlefield Enterprise Park, Shrewsbury	Employment - not inc. waste	N/A	3.9	N	Advance to stage 2
SH48	Land east of Battlefield Enterprise Park, Shrewsbury	Employment - inc. Waste	N/A	7.9	N	Advance to stage 2

Ref.	Site Description	Adopted Allocation	Emerging Allocation	Site Area (ha)	Excluded?	Reason
SH49	Land east of Battlefield, Shrewsbury	Employment - not inc. waste	N/A	2.3	N	Advance to stage 2
SH50	Shrewsbury Business Park, Phase 2 & Plot 10	Employment - not inc. waste	N/A	5.2	N	Advance to stage 2
SH51	Schedule S16.1d: Committed Urban Employment Sites: Remaining sites - Shrewsbury	Employment - not inc. waste	N/A	Various	Y	Dismiss on size
SH52	Land adjoining Poultry Unit, Ford - Shrewsbury Area	Employment - inc. Waste	N/A	5.8	Y	Dismiss on location
SH53	Station Road, Dorrington - Shrewsbury Area	Employment - not inc. waste	N/A	0.2	Y	Dismiss on location
SH54	Land adjacent to Shawbury Rd, Wem (ELR031)	Employment - inc. Waste	N/A	4.0	N	Advance to stage 2
SH55	Wem Industrial Estate, Soulton Road	Employment - not inc. waste	N/A	2.1	Y	Dismiss on size
SH56	Former Timber Yard, Aston Road, Wem	Employment - not inc. waste	N/A	2.5	N	Advance to stage 2
SH57	Land at the Oaklands Farm, Whitchurch (ELR033)	Employment - inc. Waste	N/A	8.5	N	Advance to stage 2
SH58	Land at Heath Road, Whitchurch (ELR035)	Employment - not inc. waste	N/A	11	N	Advance to stage 2
SH59	South of Civic Park, Whitchurch	Employment - not inc. waste	N/A	4.3ha	Y	Dismiss on size (Less than 2.2ha remains)
SH60	Schedule S18.1c: Committed Urban Employment Sites: Remaining sites - Whitchurch Area	Employment - not inc. waste	N/A	Varies	Y	Dismiss on size (largest site 1.3ha)

4.2.3 Sites excluded at long list stage either fall outside of the search area, or they are smaller than the minimum area required. Where there were other relevant factors that would have led Sites to be dismissed at stage 2 these are also listed for completeness.

5.0 STAGE TWO – INITIAL SITE APPRAISALS

5.1 Introduction

5.1.1 At this stage of the ASA a high-level assessment of each of the identified sites not screened out at Stage One was undertaken to identify any allocations, characteristics or constraints that would clearly prohibit the delivery of the Proposed Development on the site. This stage sought to remove any sites that are clearly unsuitable and produce a short list of sites to be taken forward to Stage Three. The result of this stage of the assessment is summarised below.

5.2 Sites excluded as developed since allocation

5.2.1 Table 5.1 below list four of the Sites identified at Stage One that have been developed since the adoption of the Local Plan or are Protected Employment Sites that are wholly or largely developed. Thus, they are not available for development as they are occupied by other uses.

Table 5.1 – Sites developed since allocation

Ref.	Site Description	Adopted Allocation	Emerging Allocation
SH46	Land east of Battlefield Road, Shrewsbury (ELR007)	Employment - not inc. waste	N/A
SH47	Battlefield Enterprise Park, Shrewsbury	Employment - not inc. waste	N/A
SH49	Land east of Battlefield, Shrewsbury	Employment - not inc. waste	N/A
SH56	Former Timber Yard, Aston Road, Wem	Employment - not inc. waste	N/A

5.3 Sites excluded due to proximity to residential development

5.3.1 Table 5.2 below list seven of the Sites identified at Stage One that are set in close proximity to substantial residential development. Whilst they may be potentially suitable for some other types of waste uses (e.g. local household recycling centres) the Proposed Development would not be considered compatible with residential development that is set in very close proximity to it..

5.3.2 Sites SH41, SH42, and SH50 (highlighted in red text) are prime employment land in central Shrewsbury, the County Town and Sub-Regional Centre. Shrewsbury is a focus of commercial and retail development in the county, and consequently the cost per square metre of land is forced up due to high demand and high financial return. Waste development is unable to compete with traditional commercial and retail

sectors, making sites marketed towards them being unviable for the waste sector. Furthermore, leases within areas that are marketed towards commercial and retail sectors will often preclude waste and related uses due to historical concerns over bad neighbour uses.

5.3.3 Finally, for SH50 the remaining land on this allocation has plot sizes below the area required to the deliver the Proposed Development.

Table 5.2 – Sites unacceptably close to residential development

Ref.	Site Description	Adopted Allocation	Emerging Allocation
SH18	Land off Grange Road, Ellesmere (ELR075)	Employment - inc. Waste	N/A
SH19	Ellesmere Business Park, Phase 2 , Ellesmere (ELR074)	Employment - inc. Waste	N/A
SH41	Shrewsbury South Sustainable Urban Extension (SHREW028, 029, 075, 107, 114, and 127 – parts)	Employment - inc. Waste	N/A
SH42	Shrewsbury South Sustainable Urban Extension (SHREW028, 029, 075, 107, 114, and 127 – parts)	Employment - inc. Waste	N/A
SH44	Shrewsbury West Sustainable Urban Extension (SHREW002, 035, 083, and 128 – parts) ELR067SHREW	Employment - not inc. waste	N/A
SH45	Land west of Battlefield Road, Shrewsbury (SHREW095 part/ELR006)	Employment - not inc. waste	N/A
SH50	Shrewsbury Business Park, Phase 2 & Plot 10	Employment - not inc. waste	N/A

5.4 Sites excluded due to clash with policy

5.4.1 Table 5.3 below lists the single site identified at Stage One that has been excluded based on a clash with policy. This is site SH58 which is allocated as a new gateway business park for Whitchurch in SAMDev. The development guidelines for the site in Schedule S18.1b on the SAMDev state that the site is to be developed for *"a suitable range of B1 employment and ancillary uses"*. The policy ambitions for the Site would preclude the siting of the Proposed Development on it, and thus it has been dismissed at this stage.

Table 5.3 – Sites excluded due to policy clash

Ref.	Site Description	Adopted Allocation	Emerging Allocation
SH58	Land at Heath Road, Whitchurch (ELR035)	Employment - not inc. waste	N/A

5.5 Stage Two Summary

5.5.1 Based on the tables above, the majority (12 of 15) of the potential alternative sites identified for further assessment at Stage One are clearly not suitable for the proposed development, due to either their constraints or their allocation. A total of 3 potential alternative sites were deemed to require further assessment. This is presented in the section below.

6.0 STAGE THREE – FULL ASSESSMENT OF REMAINING SITES

6.1.1 The three sites not dismissed at Stage Two have been subject to a full assessment to assess their suitability and availability. As outlined in the methodology section the Stage Three assessments involved consideration of the following elements in detail:

a) The site context
b) Site constraints
c) Planning policy position
d) Planning history
e) Availability

6.1.2 Following an assessment of the above elements, conclusions are drawn as to whether the site is a suitable alternative for the proposed AD facility. The full assessments of the sites can be found at **Appendix B**.

6.2 Summary of Findings

6.2.1 The full assessment of each of the Stage Three sites has revealed that none of the sites represent a suitable, viable or reasonably available alternative to the Development Site. The sites assessed at Stage Three are identified in Table 6.1 below, along with a summary of why each site was concluded to be unsuitable.

Table 6.1 – Summary of Stage Three Findings

Ref.	Site Description	Reasons for Unsuitability
SH48	Land east of Battlefield Enterprise Park, Shrewsbury	The developable area of the site that is free from constraints and available for purchase is below that needed to accommodate the Proposed Development; and, Potential ecological / biodiversity constraints and the proximity of the site to residential development would constrain the Proposed Development on the site.
SH54	Land adjacent to Shawbury Rd, Wem (ELR031)	The proximity of the site to residential development would constrain the Proposed Development on the site; and, The site is subject to a 'live' planning application for the allocated employment use, with the approach not favouring the Proposed Development.

Ref.	Site Description	Reasons for Unsuitability
SH57	Land at the Oaklands Farm, Whitchurch (ELR033)	The proximity of the site to residential development would constrain the Proposed Development on the site.

6.2.2 The assessment confirms that development of an IVC facility on each of the sites would not be suitable due to their proximity to residential development. Additionally, the sites are either subject to other constraints which would significantly impact the feasibility of the Proposed Development, are being advanced for other uses that would not align with the Proposed Development, or are constrained such that a plot of a suitable size is not available.

7.0 SUMMARY AND CONCLUSION

7.1 Introduction

7.1.1 This ASA has been prepared in support of a full planning application for the construction and operation of an In-Vessel Composting ('IVC') facility, including other ancillary works at the former Befesa Salt Slags Site, Fenns Bank, Near Whitchurch, Wrexham.

7.1.2 The Site is previously developed but located in the open countryside with no designation in the adopted WUDP or unadopted WLDP. Both the WUDP and WLDP direct waste development to allocated sites but allow for the development of other sites where it is demonstrated that that the allocated sites are not suitable. As the Proposed Development will primarily treat waste arising from Shropshire this assessment also examines sites within Shropshire Local Development Framework (LDF), with the SCCS and SAMDev taking a comparable approach to Wrexham with waste development also directed to sites allocated for employment uses.

7.1.3 This assessment was undertaken to establish whether there were any available, suitable and deliverable sites for the proposed development within the preferred locations identified in in the WUDP, WLDP, and the Shropshire LDF, that should be considered before progressing with the Proposed Development.

7.2 Stage One

7.2.1 The first stage of the assessment identified a total of 84 potential alternative sites, within the Wrexham and Shropshire. This long list was then screened and sites that were outside of the search area or too small removed. The 15 remaining sites were compiled into a short list, which informed the next stages of the ASA.

7.3 Stage Two

7.3.1 The second stage involved an initial assessment of each of the 15 sites identified through Stage One. Those that had been developed since allocation, were unsuitably close to existing residential development, or were subject to incompatible allocations (as a gateway business park) were dismissed at this stage. A total of 12 sites were dismissed at Stage Two.

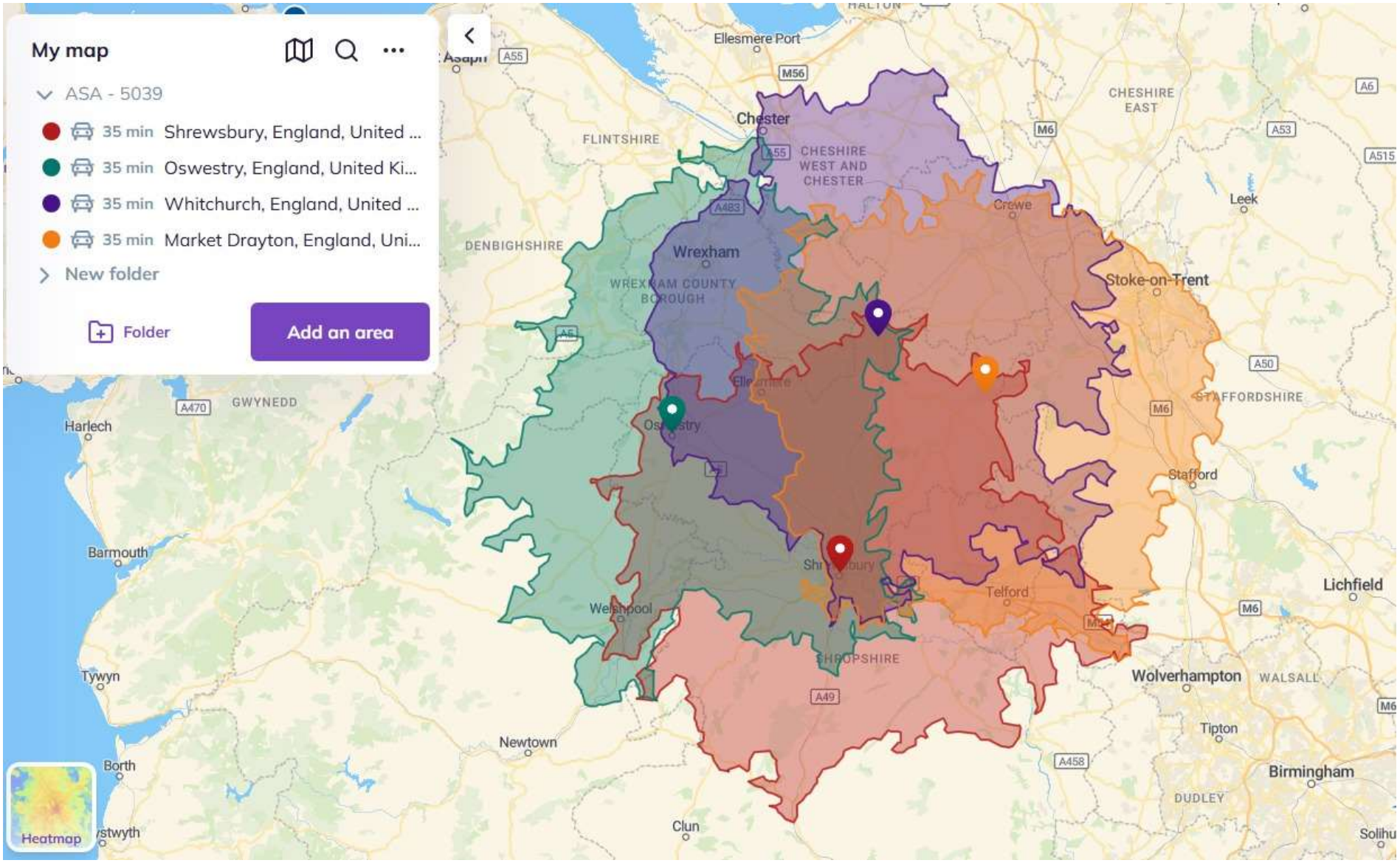
7.4 Stage Three

7.4.1 The remaining 3 sites were then subject to a full desk-based assessment, considering the site context, constraints, planning policy position, planning history and availability. The full assessments revealed that all of the sites were considered to be unsuitable and/or unavailable for the proposed IVC development.

7.5 Conclusion

7.5.1 The ASA has concluded that there are no other allocated sites within the identified search area which could satisfactorily accommodate the Proposed Development. It is therefore considered that the Development Site represents an appropriate location for the proposed development. Further justification for the grant of planning permission for the development in this location is provided in the PDAS.

Appendix A – Search area


My map
ASA - 5039
35 min Shrewsbury, England, United ...
35 min Oswestry, England, United Ki...
35 min Whitchurch, England, United ...
35 min Market Drayton, England, Uni...
New folder
Folder
Add an area
Heatmap
Ellesmere Port
Chester
FLINTSHIRE
CHESHIRE WEST AND CHESTER
CHESHIRE EAST
Crewe
Leek
DENBIGHSHIRE
Wrexham
WREXHAM COUNTY BOROUGH
Stoke-on-Trent
STAFFORDSHIRE
GWYNEDD
Harlech
Barmouth
Tywyn
Borth
Newtown
Welshpool
Telford
Stafford
Lichfield
Wolverhampton
WALSALL
Tipton
Birmingham
DUDLEY
SHROPSHIRE
Clun
A55
M56
M6
A483
A5
A470
A49
A458
A53
A515
A50
A6

Appendix B – Stage Three Site Assessments

SH48 - Land east of Battlefield Enterprise Park, Shrewsbury



Site Context

The site measures approximately 5.37 ha and forms part of Battlefield Enterprise Park. It comprises a parcel of greenfield land with boundary planting dividing the central area of land that forms the heart of the site from the rougher ground set to its eastern and southern sides that abut the railway and contain a watercourse respectively.

Access to the Site is via an estate road, connecting to the A5124 via Vanguard Way and Battlefield Way.

The immediate surroundings comprise a mix of employment uses (industrial, commercial, and waste) to the south and west, a substantial housing development under construction to the east, and open space to the north.

The site falls within the administrative boundary of Shropshire Council. It is set within the development boundary of Shrewsbury and is allocated as a Protected Employment Area within SAMDev as part of the Battlefield Enterprise Park.

Site Constraints

- Circa. 1.8ha of the southern part of the site falls within Flood Zone 3 (high probability of flooding) and Flood Zone 2 (medium probability of flooding).
- Circa. 0.6ha of the northern part of the site falls within a Registered Battlefield.
- A substantial residential development (98 dwellings) is being constructed immediately to the west of the site.
- A Great Crested Newt are present in a pond set on the northern edge of the site.
- The majority of the site appears to be naturally vegetated undeveloped land.

Policy Position

The site is a Committed Urban Employment Site that is protected for employment use in the adopted SAMDev for Shropshire (per Schedule S16.1d). No specific uses are set out for the site, thus the Proposed Development would be considered against Policy MD14 of SAMDev and CS19 of the SCCS as well as wider policy within the Local Development Framework.

Planning History

A review of the Shropshire planning application portal has found that there are several historic planning applications on the site, all for employment (B1, B2 and B8) uses. The most recent of which is detailed below.

20/00385/OUT – *"A hybrid (full and outline) application comprising: Outline application, to include access, for employment development (up to 10,357sqm (111,482sqf), associated landscaping, infrastructure works, car parking, servicing and vehicular, pedestrian circulation; full application (Section 73A, retrospective) relates to associated infrastructure works including electricity sub station and estate roads forming means of access to each plot (amended description)."* – Approved 12th October 2021.

Given the above, there is no extant consent on the site.

Availability

A substantial portion of the site (2.1ha) is currently being marketed as a development opportunity. Details can be found here: https://www.cgpooks.co.uk/property/115813-vanguard-way-battlefield-enterprise-park-shrewsbury/

Given this, the site is understood to be available.

Assessment and Conclusion

There is no barrier to the development of the site for a waste use in either the SCCS or SAMDev, with such uses potentially acceptable on Committed Urban Employment Sites subject to detailed considerations set out in policies MD14 of SAMDev and CS19 of the SCCS as well as wider policy within the Local Development Framework.

The site comprises a large area of naturally vegetated undeveloped land. This area likely comprises various habitats and has the potential to include notable species. Ecological constraints and the requirement to deliver significant biodiversity net gains to offset the loss of established habitat at the site has the potential to impact on the layout and feasibility of the Proposed Development. In particular, assessment work for application ref: 20/00385/OUT found that Great Crested Newts were utilising a pond set in the northern part of the site, this reduces the developable area of the site and reduces it suitability for the Proposed Development against other lower impact employment uses.

A large portion of the site (c. 1.8ha) falls within Flood Zones 2 and 3, reducing the developable area of the Site.

A section of the site (c. 0.6ha) on its north-eastern side falls within a Registered Battlefield, and thus great weight should be given to its conservation as a heritage asset, again reducing the developable area of the Site.

The site is also set a short distance to the east of a substantial residential development currently under construction (c.50m from the edge of the allocation, and c.125m from the land marketed). The close proximity of the site reduces its suitability for the Proposed Development against other lower impact employment uses.

A section of the site (2.1ha) is currently being actively marketed for employment uses, which confirms that the site is available. However, the marketing material advises that only c.1.42ha would be available for development due to environmental constraints. The remaining land is not actively marketed and so is not available.

It is concluded that **the site does not represent a suitable location for the proposed IVC facility**, on the basis that:

- The developable area of the site that is free from constraints and available for purchase is below that needed to accommodate the Proposed Development; and,
- Potential ecological / biodiversity constraints and the proximity of the site to residential development would constrain the Proposed Development on the site.

SH54 – Land adjacent to Shawbury Rd, Wem (ELR031)



Site Context

The site measures approximately 4 ha and comprises undeveloped 'greenfield' land to the south-east of Wem, and is set adjacent to a cluster of light industrial development set off Shawbury Road.

Access to the site is currently taken by a track and a farm access set on Shawbury Road (B5063), any future development would be served by a new access onto that road. This then allows access to the B5476 to the south with the A49 set c. 3.9km to the west.

The immediate surroundings comprise predominantly open land, with residential development set a short distance from the site's western side, and a small cluster of light industrial units to the south.

The site falls within the administrative boundary of Shropshire Council. It is set within the development boundary of Wem and is allocated as Employment Land within SAMDev as site reference ELR031.

Site Constraints

- The site is only a short distance (30m) from an established residential area on its western side, with development continuing to the north and south.
- Site is in Flood Zone 1 (low probability of flooding), though some parts of the southern section are at risk of surface water flooding.
- The majority of the site appears to be naturally vegetated undeveloped land.

Policy Position

The site is allocated for employment use (ELR031) in the adopted SAMDev for Shropshire. The specific uses deemed to be acceptable on the site (per Schedule S17.1b) include *"high quality, high tech business or office units and a full range of Class B uses including resource recovery, recycling and other environmental industries"*.

Planning History

A review of the Shropshire's planning application portal has revealed a single planning applications on the site, which is currently under consideration, the details are:

24/02661/OUT– *Hybrid application for outline permission for Class E commercial, business and service, Class B2 general industrial and Class B8 warehousing uses, together with dedicated emergency vehicular and pedestrian access, drainage infrastructure and landscaping and full permission for hauliers yard with new road junction, access road with footways and drainage infrastructure.* – Awaiting decision

If approved this planning application would provide planning consent for the allocated employment use across the whole site, with substantial areas set aside to accommodate existing green infrastructure and biodiversity net gain requirements. The areas allocated for employment development in the layout are set around a spine road that runs up from the site's southern edge through its centre and to the northern part of western boundary. The largest plot is 1.68ha, with other plots much smaller.

Availability

The site is not currently being marketed.

Assessment and Conclusion

There is no barrier to the development of the site for a waste use in either the SCCS or SAMDev, with such uses potentially acceptable on the allocation subject to detailed considerations set out in policies MD14 of SAMDev and CS19 of the SCCS as well as wider policy within the Local Development Framework.

The Site is set a short distance from an established residential area on its western side, with similar development also set to the north and south. The close proximity of the site to those areas reduces it suitability for the Proposed Development against other lower impact employment uses.

The site is subject to a 'live' planning application to develop the site for its allocated employment use. The application seeks approval for various employment uses which do not include a waste use, and it is clear from the layout submitted with the application that the ambition of the owner is to develop the site for a mix of office (E / B1) industrial (B2) and storage and distribution (B8) uses with the areas designated favouring relatively modest developments. The Proposed Development would clearly not align with the ambitions for the Site, and the largest plot within the site would be below the minimum area required. This also brings into question the availability of the site for the proposed waste use.

It is concluded that **the site does not represent a suitable or available location for the proposed IVC facility**, on the basis that:

- The proximity of the site to residential development would constrain the Proposed Development on the site; and,
- The site is subject to a 'live' planning application for the allocated employment use, with the approach not favouring the Proposed Development.

SH57 – Land at the Oaklands Farm, Whitchurch (ELR033)



Site Context

The site measures approximately 8.5 ha and comprises greenfield land. Access to the site is from the B5398 with a stub access in place to serve the allocation.

The immediate surroundings comprise residential uses to the west, open countryside to the north and east, and commercial and industrial uses to the south.

The site falls within the administrative boundary of Shropshire Council. It is set within the development boundary of Whitchurch and is allocated as Employment Land within SAMDev as site reference ELR031.

Site Constraints

- The site is set only a short distance to the east (30m) from established dwellings, and c. 125m from a development of 53 dwellings in the final stages of construction.
- Site is in Flood Zone 1 (low probability of flooding), though some parts are at risk of surface water flooding.
- The majority of the site appears to be naturally vegetated undeveloped land.

Policy Position

The site is allocated for employment use (ELR033) in the adopted SAMDev for Shropshire. The approach deemed to be acceptable on the site (per Schedule S18.1b) is for *"development to form the employment element of the mixed use scheme to include residential allocation WHIT051 and will be subject to agreed phasing. Suitable for B2 and B8 employment uses including facilities for recycling & environmental industries".*

Planning History

A review of the Shropshire's planning application portal has revealed limited planning history for the site, with the only applications relating to formation of accesses to serve the allocation. Thus, there is no established use on the site.

Availability

The site is not currently being marketed.

Assessment and Conclusion

There is no barrier to the development of the site for a waste use in either SCCS or SAMDev, with such uses potentially acceptable on the allocation subject to detailed considerations set out in policies MD14 of SAMDev and CS19 SCCS as well as wider policy within the Local Development Framework.

The Site is set a short distance from existing properties and a substantial residential development in the final stages of construction, both of which are set close to or adjoining the site's western side. The close proximity of the site to those areas reduces it suitability for the Proposed Development against other lower impact employment uses.

It is concluded that **the site does not represent a suitable or available location for the proposed IVC facility**, on the basis that:

- The proximity of the site to residential development would constrain the Proposed Development on the site.