

# Veolia Written Statement

Fareham Borough Council Local Plan Examination

Matters 6.3 and 6.8 (Housing Allocations HA4 and HA56)

## Introduction

Veolia objects to the inclusion of proposed housing allocations HA4 and HA56. Veolia has existing waste operations on land known as Downend Quarry and the proposed allocations are adjacent, at varying distances, to the Downend Quarry site to the south, east and west. Veolia has planning permission at Downend Quarry (a former chalk pit) for a range of waste management uses but predominantly waste wood sorting, processing, shredding and transfer.

In accordance with the adopted policies of the Hampshire Minerals and Waste Plan the site is a protected waste management site for such activities. Whilst there is currently a small scatter of housing within the vicinity of our site these are to the west and generally more protected by the intervening topography from activities on site. Any new housing constructed to the West, South and particularly the East would potentially be closer and more exposed to the operations on site.

## Residential Encroachment (Agent of Change Principle)

The 2018 National Planning Policy Framework (NPPF) amendments included a more prominent recognition of the 'agent of change principle' which encapsulates the position that a person or business (i.e. the agent) introducing a new land use is responsible for managing the impact of that change.

There is limited commentary or policy direction referenced in the proposed plan, in respect of the impact of residential encroachment on existing waste uses. Encroachment by sensitive development such as housing, for example, has the potential to create real issues for the ongoing operations on our existing waste sites (Veolia also has its Warren Farm site to the north of the M27).

While our waste facility has its own environmental controls it is for new applicants, bringing new uses into the immediate area, to establish and provide sufficient evidence there will be no significant issues arising post development (Agent of Change). Veolia can not retrospectively change our operations, or have any future site amendments or improvements compromised, to accommodate newly introduced sensitive development nor are we required to. We would like this to be acknowledged in the Fareham Borough Council Local Plan with regard to proximity to developments such as ours and preferably more formally included by way of a direct policy or policy subtext. The Agent of Change principle could also be defined in the glossary.

To confirm, while we appreciate that it is for individual applications to provide assessment of site specific environmental issues and make appropriate inclusions where ongoing safeguards are needed (such as a clause or clauses in a S106), we object to residential encroachment at our site boundaries for these reasons, especially where the local plan provides no policy or subtext reassurance. We would therefore ask for a more clear and direct reference and/or policy in the Fareham Borough Council Local Plan which could then be referenced as part of individual application discussions and decisions.

Simon McKee  
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