Waste Development Plan Document

Summary Report of Preferred Options Consultation in July 2005

1. Introduction

1.1. This summary report brings together the responses made during the preferred option consultation. It provides both a quantitative and qualitative summary of the main issues raised. In total, 66 responses were received from organisations and individuals, of which 54 answered all or part of the questionnaire. The results of the questionnaire responses are shown in the graph below and in the following table. The questionnaire results and the written comments show a very high level of public support for the proposals set out in this document. In all, 6 people are supportive of the proposals for every 1 person who disagrees. Some concerns and comments were expressed, however, and these are summarised in this report.
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<thead>
<tr>
<th>Question No.</th>
<th>Statement</th>
<th>Total Representations Received = 66</th>
<th>Number of Responses</th>
<th>% Responses</th>
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<tr>
<td></td>
<td></td>
<td>Strongly Agree</td>
<td>Agree</td>
<td>Nil response or no opinion</td>
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<tr>
<td><strong>Question No. 1</strong>: Policy which follows best practice?</td>
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2. The Preferred Vision

The City Council’s preferred vision for waste is as follows: In 2016 Plymouth will be a city with a socially, environmentally and economically responsible approach to waste management, where everyone can play a role in delivering long term sustainable waste management, which will show a positive trend in waste minimisation, significant increases in recycling, composting and energy recovery and a dramatic decrease in the amount of waste being sent to landfill. Facilities for waste management will be provided in accordance with the proximity principle, enabling Plymouth to be as self sufficient as possible in terms of managing its waste.

2.1. Two comments relate to the Preferred Vision, both of which are supportive. Support was given in particular to increased recycling, composting and the recognition of the need for energy recovery. Support was also given to the long term vision, the close proximity and self sufficiency principles. The waste hierarchy and the consideration of commercial and industrial waste was also supported.

3. The Preferred Strategy

The City Council’s preferred strategy for spatial waste planning is summarised as follows:
1. First, a short-term option that centres upon the baseline option (Option 1) and recognises the immediate need for new recycling and composting infrastructure, together with the imminent closure of Chelson Meadow landfill;
2. Second, the preferred long-term option that will guide the WDPD, which is Option 3 that seeks to maximise opportunities for treatment within the Plan area thus offering maximum flexibility in delivering sustainable waste management.

3.1. Eight written comments were received which generally supported this part of the Waste Development Plan Document.

3.2. Provision of a range of facilities is welcome, however care should be taken to ensure that these do not have an adverse impact on investment in adjoining or nearby bodies of land. Particular support was given by one respondent to the waste hierarchy, the vision and strategy, and the inclusion of commercial and industrial waste.

3.3. One respondent suggested the overall waste development policy should be reformulated so that it encourages local self-sufficiency i.e. communities taking responsibility for their waste and providing facilities in the urban area, in line with PPS10.
3.4. A number of comments related to the different options for waste management based on different scenarios. Lack of clarity on the preferred growth scenario was highlighted. Option 1 should refer to the expected closure date of Chelson Meadow in mid 2007. Paragraph 8.2 of option 1 was considered to conflict with PPS10.3 and RPG10 RE5. Development of sites should not be left to chance. The absence of quantification for streams/treatment made it difficult to distinguish difference between option 1 and 2. Option 3 should be the aim of the plan. It was suggested that the close proximity principle should be applied to the whole urban area rather than just within the City boundary, however this must not give the impression of transporting waste outside of the city. It was also suggested that the timescales of ‘short term and ‘long term’ should be clarified.

4. Preferred Option 1

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<td>A policy which provides for sustainable waste management consistent with the proximity principle, self-sufficiency and the waste hierarchy.</td>
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Question 1 - 45 respondents agreed with the need for a policy which follows best practice to provide sustainable, self-sufficient waste management, close to the source of creation while only 3 disagreed.

4.1. The public response to question 1 shows a high level of public support for this preferred option.

4.2. Twelve written comments were also received, the majority of which are supportive.

4.3. One respondent suggested that manufacturers/suppliers of reusable waste should be involved in the recovery of such waste.

4.4. Concern was raised about the lack of support for the preferred option in the SEA. There was also concern that it would reduce efficiency and produce negative impacts on a wider range of sites. It was also commented that it was confusing that question 1 was worded differently from PO1.
5. Preferred Option 2

A policy which provides for strategic waste management facilities in sustainable locations.

Question 3 - 41 respondents agreed with the need for a policy to provide long term strategic (large scale) waste management facilities in sustainable locations while only 3 disagreed.

5.1. The public response to question 3 shows a high level of public support for this preferred option.

5.2. Eleven comments were also received, most of which are supportive.

5.3. It was suggested that site specific proposals should indicate the types of facility envisaged (PPS10). There should also be more emphasis on delivery. Targets should be put in upper case to reinforce their importance. The importance of where facilities are located was emphasised. Another comment is that facilities should be on brownfield land not Greenfield.

5.4. One comment is that the document should provide more information about the general scale of new infrastructure anticipated in order to confirm the soundness of the number and size of the proposed allocations. The disaggregation of statistics in the regional waste strategy by population proportions will allow an appropriate reconciliation between identified need and provision within the city. Statistics should address all generic waste streams, principally municipal, commercial and industrial wastes with commentary on construction and demolition waste as well as hazardous/clinical wastes.

5.5. One respondent questioned whether the facilities would be long term or short term. The Plan should also aim to minimise transport of waste, and be clear on accessibility (for public access facilities), as well as avoiding harm to local amenity.

5.6. One suggestion was to ship waste out on via water transport.

5.7. It was commented that the criteria for assessment of a "strategic waste management facility" is unclear. This will allow the location of large facilities to be dealt with through the allocation of strategic sites, but smaller sites will still be able to be brought forward if alternative locations are identified to be suitable.
6. **Preferred Option 3**

**A policy which provides for sites suitable for local waste management facilities in sustainable locations.**

Question 5 – 43 respondents agreed with the need for a policy to provide sites for suitable local waste management facilities in sustainable locations while only 1 disagreed.

6.1. The public response to question 5 shows a high level of public support for this preferred option.

6.2. Twelve written comments were also received also expressing general support for this preferred option, but there were some concerns. It was felt that the provision of such sites is an important element of sustainable waste management. To have them located in association with other facilities used by the public, like super markets, was a good idea. It was commented that there is an urgent need to increase the number of these types of sites.

6.3. There were concerns raised, specifically that these types of site could be used for other purposes and that this policy could well be a repetition of Preferred Option 1.

7. **Preferred Option 4**

**A policy which provides for an interim solution for waste management that recognises the lack of landfill options in the City and the lead times to develop new waste infrastructure.**

Question 7 – 33 respondents agreed with the need for a policy to provide an interim solution for waste management, recognising the lack of landfill options in the city and the lead time to develop new waste disposal options while 8 disagreed.

7.1. The public response to question 7 shows general public support for this preferred option but also some concerns.

7.2. Twelve written comments were also received also expressing general support for this preferred option, but with some concerns. One commented that this option had several advantages over option 3, including being lower risk, cheaper and better integrating with regeneration proposals. Anther supported this option as it would prevent opting for hasty solutions. There was support for use of Chelson Meadow as only a temporary site, before being integrated with
the development of Plymstock Quarry. Another commented that they looked forward to the identification of interim sites.

7.3. There were concerns expressed that this option risked stifling more rapid progress towards achieving long term waste management solutions and that interim solutions might not be sustainable. There was concern that this was a time wasting option and how long 'interim' was?. This option could blight land which could be put to better use. There was concern about the principle of landfill as an interim solution, as we need a long term solution and we have to cut down on the creation of waste. There was concern as to why it had been left until now and not resolved sooner.

8. Preferred Option 5

A policy which sets out the requirement for the City Council to work with neighbouring authorities and the South West Regional Assembly through the Regional Spatial Strategy to ensure that appropriate waste management solutions are found for wastes that need to be managed outside the City.

Question 9 – 36 respondents agreed with the need for a policy requiring partnership working with other authorities to ensure appropriate waste management solutions are found outside the city when necessary while 6 disagreed.

8.1. The public response to question 9 shows general public support for this preferred option.

8.2. Twenty two comments were received also expressing support for this preferred option, however there were also concerns. It was accepted that the City was very unlikely to be self-sufficient in landfill capacity in the future, and there was support for the interim proposal to dispose of waste which could not be recycled outside the City until a long term solution was put in place. A land fill site at Lean Quarry in Cornwall was suggested as a potential interim location for waste disposal. It was also suggested that abandoned quarries inside and outside the City could be used for treating waste in. It was suggested that a site at Broadmoor Farm, in Saltash would be suitable for development of waste treatment facilities which to serve waste from Plymouth.

8.3. There was support for the need for the different waste planning and management authorities in the Plymouth Sub-region to work together to find sustainable waste management solutions suitable for both
Plymouth and the areas around it. It was accepted that this could include the provision of waste management/disposal sites outside the City boundary, as long as the sites/s were close to the City. It was also suggested that if a large waste management site was established inside the City that it should be designed to have capacity to treat waste from outside the City.

8.4. There is concern about the potential impacts of transporting large volumes of waste outside the City on the road network and the ability to identify a satisfactory short term solution which did not have significant environmental impact. There is a concern that the interim solution may conflict with the proximity distance limits suggested in the Regional Waste Strategy, and that more effort should be made to manage waste as close as possible to its point of production and educate people to reduce the amount of waste they produce.

8.5. There was concern that Plymstock and Plympton had been identified as locations for main sites for management of the City's waste, and that the city should explore mutual co-operation with South Hams because they are putting their developments (with all the consequent problems) close to the City boundary; e.g. the power station at Langage and the Sherford.

8.6. It was suggested that there was a better alternative, being that each authority should be responsible for its own waste, including finding sites in our own area, and we should control our own waste and not go 'begging' to other authorities for expensive dumping facilities.

8.7. It was suggested that this does not appear to be a substantive spatial policy. However, it is a key point about the process that should be followed, as such, it could be presented as part of the delivery of Preferred Options 1-4.
9. Preferred Option 6

A policy which sets out development control criteria for new waste management facilities.

PO6 - Question 11 - 41 respondents agreed with the need for a policy which sets out development control criteria for new waste management facilities while only 2 disagreed.

9.1. The public response to question 11 shows a high level of public support for this preferred option.

9.2. Seven written comments were also received some of which expressed support for this proposal, however there were also concerns. There support for the need to have such a policy to control the size, location and sustainability of such development.

9.3. There is concern that some of the proposed policy criteria are inappropriate, in that: applicants should not have to demonstrate need for waste management facilities; some of the criteria suggested were vague; the policy should not delegate decisions or needs assessment to other policy documents; some environmental issues had been omitted e.g. water quality and habitats; it should not be assumed that waste management uses have a negative impact on public health.

9.4. There were also concerns about the scope of the suggested criteria and the that there were some important issues had been omitted from the suggested criteria. It was suggested that the proposal omitted: the need to consider the impact of traffic associated with any waste management facility; the need consider health impact assessment of waste developments; the need for the policy to require the identification of the likely risks from waste management facilities that would need to be controlled.
10. Preferred Option 7

A policy which sets out environmental objectives with regard to the provision of new waste infrastructure.

PO7 - Question 13 – 40 respondents agreed with the need for environmental objectives to be included in a policy about the provision of new waste facilities while only 4 disagreed.

10.1. The public response to question 13 shows general public support for this preferred option.

10.2. Four written comments were also received. These are generally supportive of this preferred option. One suggests that greater emphasis be placed on the high level environmental benefits that can be achieved by moving waste management up the waste hierarchy. Another suggests that this is a matter for the Environment Agency. Finally, the view is expressed that there is no need for this DPD to duplicate general policies protecting the environment which are stated in other DPDs, but should be limited to controlling effects peculiar to waste development. It is recommended that this preferred option be amalgamated under PO6 point 4.

11. Preferred Option 8

A policy which sets out transport objectives with regard to the provision of new waste infrastructure.

PO8 - Question 14 - 36 respondents agreed with the need for transport objectives to be included in a policy about the provision of new waste facilities while only 1 disagreed.

11.1. The public response to question 14 shows general public support for this preferred option.

11.2. Six written comments were also received which are mainly supportive of this preferred option. One suggestion is to locate new waste infrastructure near to either rail or sea transport to reduce the need for road transport. Another suggests using existing rail and road access.

11.3. There is concern that transport matters should be integrated into PO2 and PO3 rather than placed in a separate preferred option. It is also suggested that transport should be included as a criteria in PO6.
12. Preferred Option 9

A policy which provides a framework to raise public awareness of waste issues, promote the view of waste as a resource opportunity and to work with the local business community and other public bodies and neighbouring authorities in seeking waste minimisation.

PO9 - Question 16 – 44 respondents agreed with the need for a policy to raise public awareness of waste issues, promoting waste as a resource opportunity and seeking waste minimisation while no-one disagreed.

12.1. The public response to question 16 shows a high level of public support for this preferred option.

12.2. Ten written comments were also received. There is support for raising public awareness about waste management, about the opportunities that exist to recover additional value from waste, including energy from waste, and about the need for waste minimisation and recycling. It is noted that the Greenhouse Visitor Centre offered a great facility for this. One comment asks that this approach be given priority over the need to find new waste facilities. However, it is noted that it will take a long time to change people's attitudes.

12.3. There is a comment requesting that manufacturers/suppliers of reusable waste (e.g. tin, paper, cardboard boxes) should be involved in the recovery of such waste. It is suggested that manufacturers must be made aware of the need to conserve energy and to reduce packaging.

12.4. There is a concern that this preferred option does not appear to be a substantive spatial policy, and might be better placed as a higher level objective in the Vision and/or strategy.
13. **Preferred Option 10**

A policy which provides a framework to ensure that new developments consider waste minimisation and incorporate waste recovery facilities as appropriate.

**PO10 - Question 18** - 41 respondents agreed with the need for a policy to ensure that new developments consider waste minimisation/recovery facilities while only 1 disagreed.

13.1. The public response to question 18 shows a high level of public support for this preferred option.

13.2. Seven written comments were also received which are generally supportive. However, it is suggested that this preferred option should include more detail about the waste management facilities envisaged for each type of development, as advised by by PPS10 paragraph 18 (2nd bullet point). Another comment notes that this preferred option might be better located in other DPDs.

14. **Preferred Option 11 - China Clay Works, Coypool**

The City Council’s preferred option is to allocate the China Clay works site at Coypool for the development of a range of waste management facilities. Not all the site is required and it would be appropriate to include other development on this site, but which is compatible and would not conflict with waste management uses.

**Question 20** – 36 respondents agreed with the proposal to develop a range of waste management facilities and other compatible developments at the China Clay works, Coypool while 12 disagreed.

14.1. The public response to question 20 shows public support for this preferred option but also some concerns.

**Question 21** – 29 respondents agreed that Coypool should be a strategic waste management facility while 11 disagreed.

14.2. The public response to question 20 shows public support for this preferred option but also some concerns.

14.3. Twenty two written comments were also received, which generally supported the proposal, but there were some concerns.
14.4. There was concern about its impact on residential and agricultural areas in terms of pollution and traffic (including noise). One respondent commented that the site is less contaminated than other sites and so should be prioritised for housing and commercial uses. Other concerns are that it is not easily accessed by HGVs and would cause bird nuisance. One respondent objected to the proposal until its impact upon the trunk road network had been fully identified. Another felt that the Council should focus on waste minimisation first.

14.5. There were, however, comments in support of the preferred option. A few commented that this was the best site and had potential for rail links and that the road network is suitable. One respondent suggested the entrance and exit of the site would not interfere with local residential traffic. It was suggested that the site should contain an incinerator, and waste from energy should be a long term option. It was also suggested other forms of development could be accommodated on the site in conjunction with the waste use. The importance of rail and road access was asserted.

14.6. A number of comments were supportive but suggested only part of the site should be for waste use. One respondent advised that waste use should be restricted to a maximum of 10 hectares and that a design brief should be prepared for the site including alternative forms of development. A landowner

14.7. Concern was raised about the deliverability of the proposal, given that the current occupier has not made a formal decision to relocate to Lee Moor. The text should be amended accordingly to reflect this. Another comment is that the site will take several years to vacate and develop as intended, if it is indeed to be made available by the landowner. This underpins the requirement for short term alternative sites to be brought into use expeditiously.
15. **Preferred Option 12 – Chelson Meadow**

The City Council’s preferred option is to safeguard the use of and existing facilities in the southwestern corner of Chelson Meadow as an existing waste management centre and to provide for additional new waste management development.

Question 23 - 41 respondents agreed with the proposal to develop a range of waste management facilities compatible with other developments at Chelson Meadow while 5 disagreed.

15.1. The public response to question 23 shows general public support for this preferred option.

15.2. Seventeen respondents also commented on this preferred option. There were a number of supportive comments. It was suggested that incineration would be appropriate, and also that the site should be extended over Chelson Meadow tip area. The importance of addressing the sensitivity of the site in the context of Saltram House and Park was also highlighted. It was also commented that this option should be on a temporary basis, and that recycling and re-use should come first. Another comment is that environmental constraints indicate the use should be complementary not strategic.

15.3. Concern was raised about the failure to identify mitigation measures for existing unneighbourly uses such as the bottle crushing facility. It was highlighted that this facility is a key constraint to the development of Plymstock Quarry, and therefore mitigation measures should be taken in conjunction with the quarry development.

15.4. One respondent felt unable to comment until forecasts of the traffic generated by this proposal were available, suggesting concern about transporting waste outside of the city.
16. Preferred Option 13 - Prince Rock Depot, Cattedown

The City Council’s preferred option is to allocate the Prince Rock depot for waste recycling and other recovery facilities compatible with nearby residential areas.

Question 25 – 30 respondents agreed with the proposal to allocate the Prince Rock depot for waste recycling and other recovery facilities compatible with nearby residential areas while 8 disagreed.

16.1. The public response to question 25 shows public support for this preferred option but also some concerns.

16.2. Fourteen written comments were also received. One respondent enclosed additional written comments by forty-two local residents. In summary, residents are concerned about increased traffic flow to an already busy traffic hot spot; air quality and how this would affect house prices. They also believe that this would be a waste of regeneration money already spent in the area. They argue that waste management should never come close to a residential area.

16.3. Other respondents raised concern about the scale of the facility, and pollution. One comment considered that the proposal would widen health inequalities. Another is that the site is too small. It was suggested that the Environmental Impact Assessment should cover health, environmental and traffic impact. It was also suggested that any facility is carefully designed and operated. One comment is that the views of local residents and traffic generation must be taken into account. Another is that the site is unacceptable for use as an in-vessel composting facility due to the proximity of sensitive receptors.

16.4. Very few of the written comments expressed support.
17. Preferred Option 14 - Moorcroft Quarry

The City Council’s preferred option is to allocate Moorcroft Quarry for waste development, which could include recycling and other recovery facilities, including potentially management of inert construction and demolition wastes. Not all of the site is required and it would be appropriate to include other development appropriate to this site, which could include employment development.

Question 27 – 34 respondents agreed with the proposal to allocate land inside Moorcroft Quarry for waste development appropriate to this site including employment, recycling, construction and demolition waste while 7 disagreed.

17.1. The public response to question 27 shows general public support for this preferred option.

17.2. Eleven respondents also commented on this preferred option. Concerns raised included: increased traffic, particularly in terms of its potential impact on the A38 given its close proximity; ground water contamination; and whether the site would be developed during the plan period. There was also concern about the suitability of the site as a suitable waste management site.

17.3. A number of respondents commented that the quarry should be for employment use only, while one suggested it should be for housing to save green field land. Priority for park and ride was also suggested, with recycling facilities next.

18. Preferred Option 15 - Land at Ernesettle Lane

The City Council’s preferred option is to safeguard this as a reserve site for waste management uses.

PO15 - Question 29 – 16 respondents agreed with the proposal to safeguard Ernesettle Lane as a reserve site while 24 disagreed.

18.1. The public response to question 29 shows considerable public concern with this preferred option.

18.2. Twenty seven written comments were also received.

18.3. The responses to this preferred option were generally unsupportive. The importance of high quality design and siting was stressed. One
respondent felt the site would affect less people than other sites would. It was also suggested it should become a proposal, not a reserve site, to protect the site. Safeguarding land on any other basis should be specially justified. It could perhaps be part of the short-term option in the preferred strategy. It was also suggested that the site is particularly suited to composting or construction waste management. One comment suggested the type of facility should be specified. Another is that safeguarding the site should be justified in the context of the waste management capacity required.

18.4. There was concern about transport issues. Present congestion problems at the roundabout by Crownhill Road were referred to, and it was feared that the proposal would exacerbate this problem. There was also concern about the impact on the A38.

18.5. Other concerns included loss of greenfield land, noise and odour pollution, and potential conflict with neighbouring residential use. A landowner commented that the proposal was contrary to PPS10, and the site already had consent for employment development. Consolidating or expanding existing sites and using brownfield sites was therefore suggested. Another commentator felt that the site was too small. The corner of the Crescent (allotment site) was suggested as an alternative site.

19. Any other sites

19.1. Other sites suggested were:

- Disused quarry at Brixham
- Langage, in conjunction with the proposed power station. Waste from energy would be appropriate here. It would provide economies of scale.
- The Galileo Close site should be allocated for uses complementary to those currently consented.
- The site of the council allotments and the adjacent fields in Ernesettle Lane. The most probable development of this site is housing.