Plymouth Waste 004 : Ernesettle

1. **Issue to be Examined**

The Inspector has identified the following issue to be examined:

- Is Policy / Proposal W2 the most appropriate in all circumstances, bearing in mind the sites proximity to the Tamar estuary, nearby residents and the likely traffic generation?

This statement focuses upon these issues by: firstly looking at the policy context for the provision of waste management sites; outlining the site search work that was undertaken to identify potential sites, noting the sites that were chosen and included in the waste DPD; and finally looking at the particular issues relating to the Ernesettle proposal.

Paragraph 18 of PPS10 provides the key context stating that *Waste planning authorities should....be able to demonstrate how capacity equivalent to at least ten years of the annual rates set out in the RSS could be provided.*

The Submission Waste DPD aims to provide new waste management capacity distributed according to clear policy objectives based upon a robust analysis of available data and an appraisal of options. This includes policy objectives set out particularly in PPS10 that are geared towards the achievement of sustainable waste management.

2. **The Council’s Approach**

Paragraph 3.4 of the submitted Waste DPD sets out the Council’s approach to the provision of waste management facilities. In broad terms, provision is made for recycling and composting infrastructure in the short term, together with the operation of a waste transfer facility (which will be operational in March 2008) at the Chelson Meadow landfill site for residual waste that will be taken out of the area for further treatment or disposal. In the medium to longer term significant new waste recovery infrastructure is required to ensure that the city is as self sufficient as possible in meeting its waste management obligations.

To identify land to meet these requirements, the Council undertook a thorough and comprehensive site search exercise. Strategic sites were identified within the Core Strategy and paragraph 5.4 of the submission DPD restates these as being at Coypool, the existing Chelson Meadow waste management facility; Moorcroft Quarry; Prince Rock; and land west of Ernesettle. Opportunities for local waste facilities were also identified. The site assessment process found no sites suitable to provide new landfill or landraise capacity.

3. **The Site Search Exercise**

3.1 **Planning Guidance**

This exercise (Evidence Ref) was undertaken in July 2005. The extant guidance was provided by PPG10. Paragraph A51 of Annex 1 provided some guidance on the potential siting of waste
management facilities suggesting that preferred locations included: industrial areas; degraded, contaminated or derelict land; existing and former quarries; existing landfill sites; existing or redundant sites or buildings; sites previously occupied by other types of waste management facilities as well as other suitable sites such as those located close to railways or water transport wharves, or major junctions in the road network. The exercise was also informed by the draft PPS10 which indicated that waste planning authorities should consider: first, site management of the waste where it arises; and then industrial sites, looking for opportunities to co-locate facilities together. It was indicated that priority should be given to the re-use of previously-developed land and also, in rural areas, redundant farm buildings and their curtilages, before greenfield sites. This was broadly unchanged when PPS10 was published in November 2005.

The approach of the site search exercise, prioritising brownfield sites in a range of suitable locations across the city meets the requirements of PPS10.

3.2 Site Identification

Drawing upon the guidance provided by PPG10 and the draft PPS10, sites were identified from a number of sources. These were principally drawn from the City Council’s digital returns in respect of the National Land Use Database. Additional sites were identified from Environment Agency sources (utilising the 1999 Strategic Waste Management Assessment and the Environment Agency’s website) other published sources (the Site File Digest), the City Council’s planning register and employment land monitoring report as well as through primary desk (map and aerial photographs) and site work. There were extensive consultations also within the Council’s planning and economic development departments.

Although these sources inevitably ‘overlapped’ to some degree, the exercise identified in excess of 300 distinct and individual sites to be assessed.

4. Establishing Site Options

4.1 Specification of Site Size

The study then sought to specify a site size threshold to discount those sites that were likely to be too small to usefully accommodate a new facility. Although at this stage, a threshold of 1 hectare was adopted, it was acknowledged that a strategic facility would require at least 2 hectares and this criterion was explicitly adopted in respect of the strategic sites for waste recovery.

The application of this criterion reduced the number of sites under consideration to 85 sites. These, and those discounted, are identified on Figure 5.1 of the Entec Report.

4.2 Screening of Sites

To assist in establishing the suitability of sites to accommodate waste uses, a desk-based evaluation was undertaken to identify those areas of the City that are ‘in principle’ unsuitable for development. These are referred to as exclusionary criteria and detailed in section 2.2.4 of the report. The majority of this data was available through with the City Council. Other data was obtained from English Nature (now Natural England) and the Environment Agency. The application of this data reduced the number of sites under consideration to 54.
4.3 Assessment and Consultation

To establish the relative attributes of each of the 54 sites under consideration, further assessment and consultation was undertaken. This included a further desk-based evaluation against discretionary criteria and these are detailed in section 2.2.5 of the report. By their nature, these criteria do not prevent a site from being considered. They are therefore considered ‘in the round’, along with other technical and locational considerations, such as accessibility, alternative uses, availability, amenity of neighbouring land users and other environmental assets. Each site was subjected to further assessment through consultations with the Environment Agency, the Land Registry and Plymouth Airport. Council Officers provided support on matters such as availability and inputted to the constraints assessment. The number of sites under consideration for strategic and local waste management facilities were reduced to 13 sites (with a further three identified as having some potential subject to master-planning activity).

5. Strategic Sites

Five of these 13 sites (including Ernesettle) were identified as having some potential to accommodate a strategic facility. These were derived through application of a site assessment pro-forma was used during detailed assessments that sought to interrogate the attributes of each site and ultimately to identify the types of use that could be appropriate. This was again undertaken in consultation with officers of the City Council. Of particular interest were those sites that held greatest potential for the co-location of facilities. Aside from Ernesettle, which was identified as a site of potential strategic importance for waste management including recovery, four other sites were identified for inclusion within the Council’s Core Strategy for this purpose.

- Chelson Meadow was discarded on the basis that the majority of the site, comprising the capped landfill, would not be developable. A comparatively small area (about 1 ha) comprising a recycling centre is available to accommodate a complementary local facility;
- Princes Rock Depot was identified as a location for recycling only. The site was discarded as a strategic location primarily due to proximity of residential uses (almost directly abutting the site) and the requirement for the current depot operations to remain;
- Coypool was retained as a site of potential strategic importance for waste management including recovery;
- Moorcroft Quarry was discarded as it is an operational quarry but inert recycling was considered to be appropriate and complementary to existing uses.

6. The Ernesettle Site

Site Identification

The site was initially identified as having potential as it offered the potential for alternative transport and parts of the site were previously developed. The northern part of the site contains buildings, access road and areas of hard standing. To the south of the RNAD access road lies an area of former playing fields evident from aerial photographs. Adjacent non-sensitive land uses include a waste water treatment works and the naval ordnance depot.

Residential properties are located around 150 m to the east and 200 m to the south.
Site Assessment

Protection of Water Resources
In common with much of Plymouth, the Ernesettle site is located over an important aquifer. As a consequence the DPD does not identify the site as being suitable to accommodate landfill or landraise uses. The site is not identified by the Environment Agency as being located within an area at risk of flooding. The River Tamar lies around 450 m to the west of the site.

Nature Conservation
The site is not protected under any International or National designations. The site was included in the potential County Wildlife Site survey work conducted in 2007; however the County panel determined that the site did not meet the criteria which would permit its designation.

The area to the west of the site has been designated as a County Wildlife Site (Ernesettle Complex CWS). The proposal site has been identified as a biodiversity network feature for its role as a buffer for the CWS and the retention of an on-site functioning buffer will be a requirement of the development proposals. Any site specific nature conservation issues will also need to be addressed in the development proposals.

The DPD also recognises the presence of the International or National designations along the River Tamar / Tavy. The potential for off-site effects, particularly as a result of any changes in air or water quality, would need to be considered in the site design to ensure that these and associated habitats are not compromised. It is therefore suggested that the following changes to the DPD are considered:

- A further criteria in W2:l. – Protection and enhancement of the natural features of the site and its fringes and mitigation for any necessary removal of valuable natural features. The site should retain its function as a buffer for the adjacent County Wildlife Site (CWS);
- To avoid the confusion between landscape and nature conservation interests, amend criteria c. to read: - Mitigation measures as necessary to protect the internationally and nationally important nature conservation and landscape designations of the Tamar/Tavy.

Visual Intrusion
The DPD acknowledges the landscape and visual sensitivities within both the DPD and its accompanying sustainability appraisal. These emphasise that the final location and design of any development (including any landscaping requirements) will need to be of the highest standard, considering potential visual impacts from areas to the west of the Tamar, the AONB, Ernesettle itself, and for users of the river. The nearest residential properties are around 150 m to the east but these are well screened by topography and vegetation. Residential properties to the south are at a higher level and around 200 m from the boundary.

Areas to the west of the Tamar, and the AONB will of course experience relatively distant views of the facility, and these will be seen against an urban backdrop. The AONB at Landulph is 1.6km away and Saltash is 1.4km, at their nearest points. It is considered that landscape and visual impacts can be adequately mitigated through on-site design and landscaping.

The Council is committed to ensuring that development is of exceptional quality that respects its location and landscape context and has therefore commissioned further work to establish the design principles that will guide the development of both the Ernesettle and Coypool sites.
Development in the urban fringe

Plymouth City Council is committed to the protection and appropriate use of the urban fringe and this will be a consideration in site design. In 2005, it worked with a number of partners including the Countryside Agency, the Tamar Valley AONB Service and Caradon District Council to publish the Charter for the Countryside and Seas around Plymouth. This was subsequently adopted as policy by the City Council. The Charter sought to improve the planning and management of the Plymouth urban/rural fringe, thus protecting its important qualities and making the most of its potential. Its important role in providing for the waste management and energy needs of the adjacent urban population was recognised.

The Charter developed the general themes put forward in the Countryside Agency publication The Countryside in and Around Towns, issued in January 2005. The CA report acknowledges that “The countryside in and around towns is recognised as playing an important part in the sustainable management of the waste, water and pollution generated in urban areas.”

Air Quality, Pollution and Health Issues

PPS10 states that modern, appropriately located, well run, and well regulated waste management facilities operated in line with current pollution control techniques and standards should pose little risk to human health. Health however can be material to decisions about the location of such facilities.

DEFRA in its review of Waste Management and its effects on health and the environment concluded from the weight of evidence that current practice for managing municipal waste (including incineration) has at most only a minor effect on human health and the environment. The Health Protection Agency states that on balance energy from waste through incineration is not harmful to physical health.

The SEA of the Waste DPD was augmented with input from the Plymouth Health Development Unit and the Plymouth Teaching PCT. The SEA concludes that there does not seem to be evidence that a new incinerator would cause significant harm to general wellbeing.

Consistent with earlier work undertaken at Coypool, and again primarily to inform the waste procurement process, the Council commissioned an assessment of the impact of potential emissions from a potential facility, considering Air Quality Objectives, a range of stack heights and also a range of tonnages. Three stack heights (50m, 70m and 90m for a 80,000 tonnes per annum (tpa) facility; and 80, 100 and 120m for a 180,000 tpa facility) were considered. The dispersion modelling predicts that maximum environmental concentrations of all pollutants comfortably satisfy the appropriate Air Quality Objective, with the vast majority of pollutant concentrations less than 50% of the objectives, when combined with background levels.

In respect of composting, the site search report incorporates consideration of the EAs Technical Guidance on Composting Operations (Version 3.0). Where composting facilities are proposed within 250 m buffer of nearby houses or other human receptors, a bio aerosol risk assessment in accordance to Appendix J to the guidance must be provided.

Pollution control is largely the province of the Environment Agency. It will ensure that waste management facilities are designed and operated to meet stringent controls. The Agency will not issue a pollution control permit for any industrial site, including incinerators if it considers that significant pollution will result. When the Agency receives an application for a pollution control permit to operate a facility it consults members of the local community, the local
authority, and health professionals in the PCTs for their views of the potential effect on the environment including health.

**Other Amenity Issues**
Other amenity issues such as potential odours may be dealt with during detailed design. Dust would arise mainly during construction and it is considered that standard mitigation measures should be able to keep emissions within acceptable levels.

**Land Instability**
The site has not been identified by officers of the City Council as being located within an area of land instability.

**Historic Environment and Built Heritage**
Ernesettle Battery lies to the south of the site and is designated as a Scheduled Ancient Monument (SAM). Development on the site is not likely to have any direct adverse effects on the SAM. Consideration would need to be given to any effects the development may have on the setting of the SAM and this again would be important in site design and landscaping.

**Traffic and Access**
The site is safely accessible from Ernesettle Lane which is used by HGVs associated with RNAD, the WWTW and other local employers including a haulage yard. The traffic likely to be associated with proposed waste development could be accommodated within the local highway network. Traffic surveys have indicated that the junction with the A38(T) to the north (the Victoria interchange) is not currently at capacity and recent work undertaken by the Council’s consultants Pell Frischmann predicts that a potential facility could generate a two way flow of 80 vehicles per hour (80 trips in total). This would increase traffic by 4.6% in the morning peak hour and 3.8% in the evening peak hour. This level of increase would not materially affect the capacity at this junction.

**Loss of Sports Pitches**
The site at Ernesettle contains 6 disused sports pitches, of which 2 are on part of the site on which the waste facilities may be located; these pitches were last used four years. By 2016, the Plymouth Playing Pitch Strategy (PPPS) identifies a citywide shortfall in provision of pitches, available to the community, of 40 pitches, 8 of which will be in the north of the city. The adopted Core Strategy states:

> “There will be a presumption against any development that involves the loss of sport, recreation or play facility except where it can be demonstrated that there is currently an excess of provision, or where alternative facilities of equal or better quality will be provided as part of the development”.

Since all of the pitches at Ernesettle that will be lost are for sports where a shortage has been identified in the PPPS, then alternative provision will need to be made elsewhere for the development to be acceptable. This can either be in the form of new pitches or enhanced pitches (to increase the capacity of existing pitches).

Identifying alternative provision requires identification of suitable sites that are flat and of a sufficient size. There is also a presumption in the PPPS that where feasible, provision should be made in the sub-area where the deficit exists and that provision should be on multi-pitch locations. A number of potential new sites exist, including new school sites, amalgamated...
school sites, expansion or intensification of existing public and private facilities, and through new development areas such as in the Derriford AAP. Proposal W2 of the DPD already includes reference to the need to mitigate against the loss of pitches.

**Proximity to the Airport**

The site is approximately 140m below the altitude of the runway of Plymouth Airport. Consequently structures on the site will not breach defined obstacle limitation surfaces associated with flight paths. The site is also well away from the zone within which consultation with Plymouth Airport is required for all development however small. This zone is denoted on Figure 5.3 of the site search report.

In respect of Technical Guidance on Aerodrome Bird Control, CAP680, biodegradable waste development has the potential to attract birds. This would require mitigation measures to be included within the detailed design that would, amongst other things, seek to control or minimise any outside storage of waste.

**Strategic Environmental Assessment**

Sustainability Appraisal (SA) is a mandatory requirement of the Planning & Compulsory Purchase Act 2004 for the production of all DPDs & SPDs. This also fulfils the requirement for the DPD to be assessed in line with the Strategic Environmental Assessment (SEA) Directive (2001/42/EC).

Undertaken by Land Use Consultants, it provides an independent view of the sustainability issues and potentially significant environmental impacts of the management of waste. The SEA/SA was a continuous process from the initial Scoping Report through Issues and Options and Preferred Options and finally of the Submission draft. The final report concluded that there are not considered to be any overriding constraints that would prohibit construction and operation of appropriate waste management facilities at Ernesettle but the full environmental impacts could only be assessed once details of the actual development proposals have been prepared as part of a planning application. It identified the key issues to be taken into account in drawing up detailed proposals and these have been reflected within Proposal W2.

### 7. The Ernesettle Allocation

#### 7.1 Change from Preferred Option Report

Allocation of the site at Ernesettle represents a change from its status in the Preferred Options report which then identified Ernesettle as a ‘reserve’ site, recognising that it may be required if others could not be delivered. However, it has since become clear that a two strategic site strategy is essential to ensure the successful delivery of sustainable waste management in the city as:

- The city needs sufficient capacity to meet it’s identified needs and the council believes that two sites may be required to reach this;

- The city needs flexibility to cater for competition and choice of technologies. The city needs to overcome the risks (potential land ownership constraints) associated with achieving delivery through a single site (Coypool). These risks are extremely significant as a failure to deliver capacity when required will have major implications for the environment and economy as well as having social and financial implications; and
• The need to be honest and transparent about where development is likely to take place.

In this respect the Council believes that if Ernesettle is suitable as a reserve site, then it is surely in principle an acceptable site. Indeed, the adopted Core Strategy identifies Ernesettle as an appropriate area of search for a waste management facility.

7.2 The views of the MOD

The Council have met with the MoD on several occasions throughout the preparation of the Waste DPD and have discussed the allocation of the Ernesettle site as strategic waste management site with them.

In particular the MoD has clarified the implications of their Explosive Site license and its associated safeguarding arcs (yellow inner arc and purple outer arc). The MoD have indicated that whilst both the inner and outer arcs have implications in terms of development and occupancy, they have indicated that it is feasible to locate a strategic waste management facility on the allocated land area although due to occupancy constraints it is likely this would need to be outside the inner arc.

8. Summary of Case

The Ernesettle site was identified through the application of a robust site selection exercise as a location suitable for a range of waste uses and a site that would offer an alternative to Coypool. The need assessment indicates that more than one strategic site may be required however and in this context Ernesettle has been included in the Submission Waste DPD.