Plymouth City Council

Local Development Framework
Plymouth Waste Development Plan Document 2006-2021

The Environmental Assessment of Plans and Programmes
Regulations 2004

Environmental Statement

Introduction
Plymouth City Council adopted the Waste Development Plan Document on 21st April 2008. As part of the adoption procedures under the Environmental Assessment of Plans and Programmes Regulations 2004, Regulation 16 (3) and (4) requires a Statement to be produced on the adoption of any plan or programme to which the regulations apply. This statement explains how environmental considerations have been integrated into the plan or programme; how the environmental report has been taken into account; how public consultation responses have been taken into account; and how the significant environmental effects of implementing the plan or programme will be monitored. Through this statement it will be demonstrated that the plan adopted is the most sustainable, rather than other options considered.

Key Environmental Bodies
Throughout the process of carrying out the Strategic Environmental Assessment / Sustainability Appraisal (SEA/SA) of the Waste Development Plan Document, three key bodies are required to be consulted – the Environment Agency, English Heritage and Natural England (formerly English Nature and the Countryside Agency). During the SEA/SA, comments from these bodies in particular have shaped the Appraisal and have been fed into the initial SEA/SA Scoping Report, the assessment of Issues and Options, Preferred Options, and the formulation of the Waste Development Plan Document up to and including submission.

Integrating Environmental Considerations into the Waste Development Plan Document
In the course of its preparation, the Waste Development Plan Document has been subject to a four-stage SEA/SA. The first three stages were completed independently by Land Use Consultants. The final stage was completed in-house by Plymouth City Council. The appraisal began with a Scoping Report in November 2004 (revised March 2005) following new statutory requirements, including the Planning and Compulsory Purchase Act 2004. Preliminary SEA/SA was then undertaken of the Waste Development Plan Document Issues and Options, followed by Appraisal of the Preferred Options in July 2005, and finally the Submission Draft in July 2007. At all times the SEA/SA was carried out in accordance with the requirements of Strategic
Environmental Assessment and Appraisal set out in European and UK legislation.

Taking the Environmental Report into Account
Issues & Options
The Issues and Options document outlined the waste issues facing the city:
- the role that could be played by waste minimisation and reuse
- how the city could meet recycling and recovery targets and where such facilities might be located
- the possible locations for new landfill facilities
- to what extent the city could comply with the proximity principle, i.e. that the city’s waste should be managed as close to production as possible
- how Plymouth could deal with its waste in the short-term - between the closure of the current landfill site and the establishment of new landfill/recovery facilities.

It set out the various options to achieve each of these and put forward a series of potential sites for longer-term waste management facilities.

In relation to this Issues and Options document, the SEA/SA said that the issue of waste emerges as one of the most pressing areas of concern. Plymouth is rapidly running out of space to landfill domestic waste and greater urgency needs to be given to the reduction of the amount of waste arising - and to recycling and reuse, as well as working out a longer term strategy for the disposal of unavoidable residual wastes. The SEA/SA also expressed concern over the possible increase in fly-tipping and illegal dumping associated with the reduction in facilities for the disposal of waste. It recommended a "clean" approach to recycling, to reduce possible contamination. It also suggested that careful consideration be given to the possible impact on the environment and the quality of life of those living close to new waste sites. Finally it suggested that opportunities for the transport of waste, other than by road, be explored.

Preferred Options
In July 2005, the Council produced its Preferred Options version of the Waste DPD. The preferred strategy identified the need for additional recycling and composting infrastructure in the short term, together with the maximisation of opportunities for waste treatment within the city in the long term. A series of policies established a framework for the consideration of waste proposals, and potential waste management sites were identified at:
- Coypool
- Chelson Meadow
- Prince Rock
- Moorcroft Quarry, and at
- Ernesettle, if other sites cannot be brought forward for development

As part of the production of this document a second and more detailed SEA/SA was carried out to examine the various options being pursued. The SEA/SA acknowledged that there was clear evidence in the waste plan that
the City Council was embarking on a number of positive policies to bring waste management under effective control. It did sound a note of caution, however, over short term options for managing Plymouth’s waste, which involved transferring waste to other areas. As this was inevitable, due to the lead-in times required for new facilities, the Preferred Options document made allowance for additional recycling and composting capacity in the short term.

The SEA/SA also commented:
A series of strategic options have been presented, representing a continuum from the present restricted approach to waste minimisation and recovery through enhanced treatment to avoidance of waste, through positive recycling. Success in developing these strategies will depend upon several key factors. Firstly, the City Council will need to invest heavily and promote waste management on sites that may prove to be locally contentious. Secondly, it will need to persuade the communities, commercial and business interests to take waste management and waste minimisation seriously. In this respect, Plymouth is not alone since the problem of inadequate public awareness is commonplace. Nevertheless, if Plymouth is to achieve its aspirations and vision, it is essential that waste management is given very high priority.

The SEA/SA confirmed the direction of the strategy, stating that: ‘business as usual’ was not an option, enhanced and preferably maximised treatment facilities were necessary, waste is a resource as well as a challenge and minimisation at source was a priority to the delivery of the strategy. It strongly endorsed the emerging Policies of the Preferred Options document. It identified the critical issues as being: concerns about the impact of transport movements associated with the movement of waste, the need to rigorously pursue and implement the policies on the ground, and the need to carefully balance competing interests when making decisions. In terms of specific sites it noted:

- **Coypool** – was favourably located, providing water, air and noise pollution were minimised
- **Chelson Meadow** – it was logical to continue its use as a residual facility, subject to the longer-term rehabilitation of the site
- **Prince Rock** – had issues concerning the proximity of other land uses and the consequent need for high quality site management and hygiene
- **Moorcroft Quarry** – was well located and well concealed
- **Ernesettle Lane** – was visible from the adjacent AONB and had potentially negative impacts on biodiversity, landscape, use of land resources, local distinctiveness and alternative leisure uses.

These comments were reflected in the final text of the Preferred Options document.

**Submission**
In July 2007 a draft Submission version of the Waste DPD was subject to a third SEA/SA. The development of the submission version of the plan followed adoption of the Plymouth Municipal Waste Management Strategy, which itself
was subject to sustainability appraisal. The submission version of the plan builds on the Preferred Options version and is based around the strategic objectives identified in the adopted Core Strategy (which was also subject to SA at both preferred options and submission stages). The waste plan supports the overall aim of achieving a major step-change in the way the city’s waste is managed. It does this by identifying the locations where waste management facilities should be provided, and establishing a framework for considering waste management proposals.

Sites at Coypool and Ernesettle are identified as being suitable for a range of strategic waste management facilities. Moorcroft Quarry is identified as suitable for recycling, construction and demolition wastes and the Waste Management Centre at Chelson Meadow is identified as a location for new or extended waste management facilities. Recycling centres are proposed for the northern area of the city, and at Weston Mill (extension of the existing Civic Amenity site). A framework for managing development contains policies relating to unallocated sites, a consideration of all waste management proposals, and an approach to other proposals that might affect a waste management site.

The SEA/SA of the plan concluded:
The recognition by the Council of the need for a clear vision and the establishment of a robust plan was welcomed. The overall philosophy of waste reduction, recycling and re-use (especially of building materials) was strongly supported. A hierarchy of waste management and waste transfer facilities was established – maximising the locational effectiveness of the sites, whilst minimising their environmental and social impacts.

Of the primary waste management sites discussed during the process:
- Coypool - was endorsed, subject to safeguarding and mitigating measures raised by the SEA/SA. The area proposed for the facility was reduced, in part to manage the environmental and traffic impacts.
- Ernesettle Lane - was accepted, albeit with the acknowledgement that the site would represent a significant challenge. A series of caveats raised by the SEA/SA, to reduce the visual impact and to protect the social, commercial and military amenity of the location were taken on board. Part of the original area, closest to existing houses, was excluded from the proposal.
- Moorcroft Quarry – was allocated, again on a reduced footprint from that shown in the Preferred Options document, subject to its availability in the longer term. However, the SEA/SA noted the need to manage noise, dust and water pollution, and this was incorporated into the site constraints in the Submitted Version.
- Chelson Meadow – continuing use was approved as part of the mix of facilities, again subject to the need for mitigating measures and civic amenity protection raised in the SEA/SA.
- Prince Rock - was discounted, in part following concerns raised by the SEA/SA.
Smaller scale sites at Weston Mill and at an unidentified site in the Northern Area were supported, subject to strict environmental guidelines and the consideration of waste transport implications.

The SEA/SA supported the redrafting of Policies, originally set out in the Preferred Options document, relating to:
- Unallocated sites
- Consideration of other sites
- Applications affecting existing, proposed or allocated sites.

In recognition of the concerns that exist relating to potential health and waste issues, the SEA/SA drew upon work completed by the Plymouth Health Development Unit.

**Conclusions**
In summary, over the course of preparation of the waste plan, the SEA/SA has helped to:
- improve the overall strategy, enhancing the emphasis on waste minimisation, and the need for additional recycling, composting and treatment facilities
- refine the list of proposed sites and the area that they cover, taking into account impacts on the environment and the quality of life
- improve the lists of criteria to be taken into account when considering proposals on the allocated sites
- heighten the emphasis on transport impacts and the need for alternatives to road transport
- enhance the development management policies
- develop a partnership with Plymouth Health Development Unit to assist with the appraisal of health risks, and to clarify the nature of those risks

**Plymouth Waste Development Plan Document Public Examination**
The Inspector was satisfied that the SEA/SA and the assessment undertaken under the Habitats Directive were sufficient to comply with the relevant tests of soundness.

**Public Consultation**
The consultations for the plan itself and the SEA/SA were conducted in parallel. The process completed was as follows. The Plymouth Waste Development Plan Document has been prepared in accordance with the Town and Country Planning (Local Development) (England) Regulations 2004, which require that a Development Plan Document is accompanied by a Statement of Community Involvement (SCI). Plymouth’s SCI was adopted in July 2006 and the Plymouth Waste Development Plan Document meets all of its requirements. The Plan has been through two major stages of consultation – Issues and Options in March/April 2005, and Preferred Options in July 2005. A full statement of the Council’s pre-submission consultation on the Plymouth Waste Development Plan Document (Regulation 28 Statement) is available from the Council.
The Council has considered all the representations received. The Preferred Options and Submission stage representations were summarised individually and responses are included within the Schedules of Representations. None of them related substantially to the SEA/SA process.

Monitoring

The Local Development Framework for Plymouth is to be kept under continuous review. In order for this to happen, an Annual Monitoring Report is required to be submitted to Government Office. The Annual Monitoring Report makes provision for monitoring the sustainability of the Plymouth Waste Development Plan Document as it is implemented during the period of the Local Development Framework up to 2021. In addition to an extensive monitoring framework included in the Development Plan Document itself, the SEA/SA includes a framework for monitoring a number of key effects of the Local Development Framework.