The preceding numbers the representations consist of the ID number and the representation number.

**The tests of soundness used by Limehouse are as follows:-**

1. It has not been prepared in accordance with the authority's Local Development Scheme (LDS).
2A. It has not been prepared in compliance with the Statement of Community involvement (SCI).
2B. Where no SCI exists, it has not been prepared in accordance with the minimum requirements of the Town and Country (Local Development) (England) Regulations 2004.
3. The plan and its policies have not been subject to sustainability appraisal.
4A. It is not a spatial plan, or it has not properly had regard to any other relevant plans, policies and strategies relating to the area or to adjoining areas.
4B. It is inconsistent with national planning policy.
4C. It is not in general conformity with the regional spatial strategy (or spatial development strategy in London).
5. It does not have regard to the authority's community strategy.
6. The strategies/policies/allocations in the plan are not coherent and consistent within and between Development Plan Documents (DPDs) prepared by the authority and by neighbouring authorities, where cross boundary issues are relevant.
7. The strategies/policies/allocations fail to represent the most appropriate in all the circumstances, having considered the relevant alternatives, and they are not founded on a robust and credible evidence base.
8. There are no clear mechanisms for implementation and monitoring.
9. The plan is not reasonably flexible to enable it to deal with changing circumstances.

### WASTE DPD REPRESENTATIONS: IN REPRESENTATION ORDER

**Representation:** We may have missed an opportunity to improve waste disposal for visiting yachts. Resident yachts can be expected to take their waste home, and facilities exist at marinas. However, an afloat facility for those in transit, as is provided in Torbay, might be useful. As the issue has not been discussed during earlier versions of this plan, the omission could not count as making the plan "unsound." But it may be worth considering for the next iteration, when detailed work on the scale of the problem, whether it is one which needs to be addressed, and what the options are, could be undertaken.
Representation: Comments on landfill requirements The Waste DPD and supporting evidence (PCC Waste LDF: Future Waste Management Requirements) state the need for landfill capacity outside the city between now and 2026. However further clarification would be useful on the amount of waste requiring disposal outside the City. Technical Note: Future Waste Management Requirements (Jan 07), para 3.2 Industrial & Commercial Waste Data is given in the para headed 'Disposal to Landfill' about the amount of waste likely to require disposal on an annual basis by 2026. However it is not clear how much waste (or the range of tonnages) is likely to require disposal each year between now and 2026. In particular no estimate appears to be given for the years up to 2016. As Cornwall is likely to be a recipient of waste for disposal it would be useful if the Technical Note could indicate the cumulative total of waste requiring disposal between now and 2026 and an estimation of the voidspace likely to be required to accommodate this waste. Technical Note: Future Waste Management Requirements, para 3.1 - Municipal Solid Waste It would be useful if an indication could be given about the total tonnage of MSW likely to require disposal between now and the end of the plan period and the voidspace require to accommodate this material. Ideally this should include a broad estimate of the waste generated by a future recovery process as has been done for commercial and industrial waste. Waste DPD document. Chapter 4 MSW, para 4.13. In would be useful if an indication were given in this para about the total amount of waste likely to require disposal over the plan period. Industrial and commercial waste para 4.15. It would be useful if an indication were given in the para about the total amount of waste likely to require disposal over the plan period.

Representation: We wish to support the inclusion of ‘Proposal W1, Coypool China Clay Works’, within the submitted Waste Development Plan Document. The waste allocation represents an appropriate choice of site having considered all the relevant alternatives. The previously developed, brown field site at Coypool is sensitively located and positioned to provide development that would have a limited impact upon surrounding land uses, with no direct flood risk apparent. The remainder of the Coypool / Marsh Mills Dryers site may also be capable of providing an array of mixed use developments that would not conflict with the waste allocation and may assist to facilitate infrastructure improvements. We feel that the overall proposal to include the site in the Waste Development Plan Document is founded on a robust and credible evidence base and is thus sound.

Representation: Policy W1 - Coypool China Clay Works The allocation of Coypool China Clay works as a strategic integrated waste management site is supported. However, whilst it is understood that there is a wish to ensure that any facility is constructed to the highest environmental standards, the requirement (j) to achieve a BREEAM excellent standard is of considerable concern. Whilst BREEAM assessments have been tailored to cover a range of building types, the most relevant assessment, the Industrial BREEAM assessment, only appears applicable to light industrial units, warehouses and workshops. It is therefore very unlikely that the assessment would take into account the specific characteristics of waste related infrastructure. It may not therefore be technically possible for some of the facilities considered acceptable for the
site to score the highest possible standard currently required by the policy. The requirement is also inconsistent with Policy W8, which does not require buildings on alternative or unallocated sites to reach the BREEAM excellence standard. Criterion J should therefore be deleted or alternatively replaced with buildings that incorporate measures consistent with the principles of sustainable design and construction.'

**38475/23 Viridor Waste Management**

**Policy W9 Applications for Development Affecting Existing, Proposed or Allocated Waste Management Facilities**

**Unsound**

**Test of Soundness:** 6 and 7

**Written Representation**

**Representation:** Policy W9 - Applications for development affecting existing, proposed or allocated waste management facilities. The principle of the policy is supported. However, although the policy description refers to allocated waste management facilities, no such reference is included within the text. In order to ensure that waste sites are fully protected, it is important to ensure that over time such sites do not suffer from development creep, whereby the site becomes surrounded by incompatible development, and the operation is forced to relocate as a result. The revised policy should be worded as follows; "Development proposals on or adjacent to existing, proposed or allocated waste management facilities will be permitted provided that 1 The operation of the waste management facility is not restricted or unduly constrained; or 2 The development proposal would not suffer unacceptable adverse impacts as a result of the operation of the waste facility; or 3 The waste management facility, allocated, proposed or existing, is no longer required or is not suitably"

**38477/24 Mr M Gimblett**

**Policy W8 Considerations for Waste Development Proposals**

**Unsound**

**Test of Soundness:** 7

**Written Representation**

**Representation:** 1, 2, 3 - The use of Ernesettle Lane by 400+ heavy goods vehicles per week (Council estimated figure) plus if public recycling facilities are provided, and whatever waste from other councils is processed this figure will certainly increase. How is it thought that this increase in traffic through a residential area cannot but have an unacceptable environmental, health or social impact, whether through noise or diesel fumes is beyond belief. Whilst you might be able to minimise noise/emissions from the waste facility, you cannot do this with traffic to and from the facility. 6 - Traffic Access/Congestion: There is already traffic congestion at the junction of Ernesettle Lane, Crownhill Road, Victoria Road and the A38 slip road from Saltash. Even if the junction was re-designed you cannot reduce the number of vehicles using these roads. The number of extra vehicles using Ernesettle Lane will only make things worse. Any hold-ups/lane closures on the Tamar Bridge and west bound holiday traffic causes long tail backs on the A38 Parkway and the slip roads adjoining it. This is the only major route/road serving Ernesettle Lane.

**38477/25 Mr M Gimblett**

**Proposal W2 Land West of Ernesettle Lane**

**Unsound**

**Test of Soundness:** 7

**Written Representation**

**Representation:** Para 5.17 - Traffic Access/Congestion: There is already traffic congestion at the junction of Ernesettle Lane, Crownhill Road, Victoria Road and the A38 slip road from Saltash. Even if the junction was re-designed you cannot reduce the number of vehicles using these roads. The number of extra vehicles using Ernesettle Lane will only make things worse. Any hold-ups/lane closures on the Tamar Bridge and west bound holiday traffic cause long tail backs on the A38 Parkway and the slip roads adjoining it. This is the only major route/road serving Ernesettle Lane. 2(g) The rail link to Ernesettle is only of any benefit for removal of waste to other parts of the country. The only suitable freight loading facility for bringing waste to the site is at Marsh Mills,
which is where the rail link to Coypool connects. It does not make any sense to load waste at Marsh Mills and bring it to Ernesettle, when it could be taken straight to Coypool. 

2(d) As stated in reply to policy W8, the increases in traffic, noise and exhaust emissions are bound to have an adverse effect on the amenity/ health/ social well-being of the local residents, and is not controllable to any great extent. 5.14 The loss of a greenfield site and the sporting facilities at a time when the health authorities are telling us we are overweight and need more sport/exercise, is unacceptable. The council should retain this site for use of sporting activities. 5.16 Over 50% of the site is greenfield. It is incorrect to say its character is influenced by the sewage works/ industrial buildings, as these are only at the north end of the site. The proposed site is situated in a river valley, with at times slow moving/ poor air circulation and mist which will lead to the retention of odours, etc. Also surrounding areas are much higher, ie Saltash, Crownhill, Whitleigh, Higher St Budeaux. Unless a very high chimney (with a large visual impact) is used, the emissions from the facility will blow into these populated areas. 

CHANGES TO MAKE THE PLAN SOUND: The proposal to use Ernesettle should be abandoned. COYPOOL has all the infrastructure to support the waste processing facility. It already has a rail link, and is already used by heavy goods vehicles to transport clay products. It is already an industrial site, and is well screened and far away from residential areas. Also it is much better served by major roads which lead to and from all areas of the city. This would allow alternative routes to be used if for some reason a route is closed/ reduced by accident/ repairs. This site is also big enough to allow future expansion. If agreement to purchase this site cannot be agreed with Imerys, the council should look at a compulsory purchase order.

38477/26 Mr M Gimblett

Considerations in response to alternative site suggestions

Unsound Test of Soundness: 7 Written Representation

Representation: Alternative Site - Langage: Although not accepted, this should be reconsidered. 1. The facility could complement the new power station. This would give easy access to the electricity grid for any electricity generated. 2. Any hot water/steam generated could be used to heat homes when Sherford is built (a 5,500 home development). 3. Langage has easy access to all major routes. 4. This is the direction in which new housing etc is expanding.

38453/27 Ernesettle Crescent Residents

Proposal Map W2 - Land West of Ernesettle Lane

Unsound Test of Soundness: 2A Written Representation

Representation: A number of residents identified the area concerned as that marked on the west of the plan, as the key is unclear. People I have spoken to hear were alarmed to hear that it is in fact the area closer to their homes. The document "Technical Note on Ernesettle July 2007" has space for a location plan and photographs which have not been inserted. Proper consultation should have ensured that those people most directly affected had access to full and accurate information about the location and plans.

38453/28 Ernesettle Crescent Residents

Introduction

Unsound Test of Soundness: 2A

Representation: At the initial discussions in 2005, Ernesettle was referred to only as a reserve site and the advice given by council officers at the time was that this would be extremely unlikely to be taken further because of the environmental sensitivity of the site. We had received no further information until immediately before the drop-in surgery at Ernesettle on 1st October 2007. CHANGES: Plymouth City Council's Sustainable Community Strategy section 3 states that "residents have the right to
influence the future of their area" and "We will also keep our communities informed about our progress". There was no extant consultation in the period leading up to the submission and residents did not learn of the change of status of the Ernesettle site until immediately prior to the meeting on 1st October 2007. Notice of this meeting was given in the form of a small advert 90x99 mm in one local newspaper on 28th August 2007. Reference has also been made to announcements on radio and TV but these are not evidenced and none of our neighbours are aware of such announcements. This view is also supported by a report in the Western Morning News on 6th October which reported Saltash Council’s anger that they also had been unaware of these proposed developments. The situation is worsened further by poor availability of information provided through the consultation meeting held on a weekday 2-5.30, when many people were at work, in a library open only on a part-time basis a very difficult to find. Information was also reported to be available for inspection at local libraries but staff at St Budeaux were not able to find this easily, nor was it complete. Information on the council's website (for those residents who use the internet) is at best obscure and difficult to track. Opportunity for residents to respond after this was brief 10 days only and curtailed significantly by an extended postal strike. On this basis, the consultation process is flawed; the change required to remedy this is to halt the decision process until an adequate consultation has been achieved.

38453/29 Ernesettle Crescent Residents Proposal W2 Land West of Ernesettle Lane

Unsound Test of Soundness: 3 and 4A Appear

Representation: The site under consideration is described as influenced by the sewerage works, the other industrial buildings and uses to the north and the MOD’s DSDA Ernesettle Depot to the west, but little consideration appears to be given to the true greenspace nature of the site, which has a high biodiversity value and has been reported to contain rare and endangered plant species. CHANGES: The Council's Technical note on the site refers to no public right of way, although a public footpath is clearly indicated on the northern border of the proposed development, allowing access to the Tamar waterfront. There is also a reference to tipping on site; this surely refers to planned site reclamation work carried out by the University of Plymouth to reduce flooding problems on some of the lower parts of the site. These areas fall largely in the designated safety zone for the Armaments Depot, outside the proposed waste area. Furthermore in the Council’s own Local Development Framework Core Strategy document, which was adopted earlier this year, this area is described as part of the Strategic Greenspace Network (Key Strategy diagram following p11) and as such is largely undeveloped, with significant biodiversity value. In 1990 a Provisional Floral and Habitat Atlas of Plymouth, authored by Dr Andy Stevens, who later became the City's Conservation Officer, included an extremely detailed species analysis of this area. It described the area as amenity grassland, identifying almost 600 individual plant species in the relevant tetrad. This included a number of rare and locally scarce species, and also two then Red Data Book endangered higher plant species Prostrate Toadflax (Linaria supina) and Fine-Leaved Sandwort (Minuartia hybrida). The former of these has lately been removed from the at risk list because it has a casual status, but it remains very restricted in national distribution (predominantly in Devon and Cornwall) and has been considered as significant by the City Council; they state in their 2004 Eastern Gateway appraisal: "The most important species is Linaria supina (Prostrate Toadflax), an annual Red Data Book Species whose survival in this country is severely threatened. Up until the late 1980s, populations were on the increase as it spread along the railway network. However, in recent years, its distribution has become more and more restricted until today when the only remaining flourishing populations are found in Plymouth." Elsewhere in the City small populations have become extinct over the last 20 years The Cann Quarry viaduct population by the construction of the Plym Valley Cycle Track, the Crabtree population by vegetational succession and the Priory Railway Station population by a housing development. Every endeavour must be made not to jeopardise the future
of this species in Plymouth further. The Fine-Leaved Sandwort remains listed as an Endangered Species. Detailed studies at the level of the Nature Conservancy report are sadly rare, but more recent discussion with the Devon Biodiversity Records Centre confirms the high floral and faunal diversity of this area. Although the proposal makes reference to appropriate mitigation, there is no indication how this might feasibly be achieved. On this basis the basic designation of the proposed Ernesettle site is inappropriate; moreover the Charter for the Countryside and Seas around Plymouth (2005), to which the City Council has subscribed, states "Finally, we need to ensure the protection and enhancement of the landscape, riverscape, seascape, culture, heritage, settlements and biodiversity so that the unique character of the countryside within Plymouth's urban fringe and centre can continue to be enjoyed by generations to come". The development of this site for waste purposes opposes this principle and the proposal for use of this site is therefore flawed and should be withdrawn.

38453/30 Ernsettle Crescent Residents
Proposal W2 Land West of Ernesettle Lane
Unsound Test of Soundness: 1 and 4A

Representation: The proposed development has a very high visual impact which is not acceptable under the terms of other local plans. This is admitted in the documentation, which rates the site as Poor. Sensitive uses adjacent to site. Some mitigation possible, but there is no indication how such mitigation might feasibly be achieved. CHANGES: The proposed site abuts the Tamar Valley Area of Outstanding Natural Beauty and lies on the banks of Tamar Estuaries Complex Special Protection Area, as described in A Charter for the Countryside and Seas around Plymouth, produced in 2005 and to which the City Council subscribed. The same document reports an aspiration: "To protect outward views from the city into the countryside and coastlines beyond" and "To improve the approach corridors, gateways (both land and sea-based), access routes and views into the city (p3). It is notable that the Ernesettle site is the only current proposal that is highlighted as a Visual link in this context as well as a possible waste site (Local Development Framework - Core Strategy document, Key Strategy diagram following p11). As the site lies within a river valley and is overlooked from the north, west and south it is hard to envisage any mitigation that could obviate the damage caused to views and wider landscape in this area without removing these views entirely. As such development is not supported by the LDF the proposal is flawed and should be withdrawn. Reference is made to the existing visual impact of the sewage works to the north of the site; under the term of the council's own documentation a priority should be to reduce impact of said site, rather than use it as an excuse for further damage.

38478/31 Mrs J Ruffin
Proposal W2 Land West of Ernesettle Lane
Unsound Test of Soundness: 4A and 7

Representation: The Ernesettle Site is 'Greenfield' -It is in close proximity to residential area -The site is very open and the visual impact will be significant -Increased traffic will have huge impact on roadway. The site is on doorstep of an Area of Outstanding Natural Beauty

38453/32 Ernsettle Crescent Residents
Proposal W2 Land West of Ernesettle Lane
Unsound Test of Soundness: 4A and 7

Representation: There is no mention in Proposal W2 of the considerable effect of this proposal on road traffic in Ernesettle Lane. At peak times long queues already build up on Ernesettle Lane, making it very difficult to exit from Ernesettle Crescent which cannot be accessed from any other road and there is no likelihood of an alternative route as it abuts the A38 Parkway. The proposal will considerably aggravate the current problems
of access from Ernesettle Lane on to the roundabout at Victoria Road. Rush hour traffic, accidents, incidents and roadworks affecting the A38 Parkway and Tamar Bridge already impact on traffic flows out of Ernesettle Lane. Heavy goods vehicles caught in the slow grind up this very steep hill will add considerably to the traffic pollution. The very severe bend as Ernesettle Lane leaves the roundabout causes heavy goods vehicles to cross to the other side of the carriageway in order to negotiate the corner - as this road was built in the last 25 years with the full knowledge that it was carrying heavy goods traffic to the factories and armaments depot we must assume that there is no alternative possible. CHANGES: Proposal W1 Coypool para 5.10 states: The site's direct connection to the principal road network is achieved without impact on any residential properties or sensitive uses. Surely as this factor was mentioned for Coypool, the impact of increased traffic on those residential properties in and off Ernesettle Lane must also be included for Proposal W2 with a plan for mitigation - if there is one.

38453/33 Ernesettle Crescent Residents
Proposal W2 Land West of Ernesettle Lane
Unsound Test of Soundness: 4A and 7 Appear

Representation: The proposal for Ernesettle Lane states: Para 5.20 Consultation on this option in the Preferred Option stage during the summer of 2005 revealed that there was also some concern about the potential allocation of this site for waste management development and that the concerns were significant and strongly held, particularly in relation to impact on residential amenity and pollution. The removal of the land from the east side of Ernesettle Lane responds in part to these concerns by providing greater separation between the residential area and allocated waste site. However, the Technical Note for Ernesettle states that the properties to the south (Ernesettle Crescent) are 200 m from the boundary of the proposed site. The residents who will therefore be very close to any proposed facility remain deeply concerned about the noise, pollution and health risks to which they will be exposed, as well as the substantial change in the character of their neighbourhood. CHANGES: As a principal reason given for abandoning the Prince Rock site was that there were residential properties within 250 m there must be some inclusion In Proposal W2 of the impact on the properties in Ernesettle Crescent and Ernesettle Lane.

38476/34 Dr S Lane
Proposal W2 Land West of Ernesettle Lane
Unsound Test of Soundness: 3, 7 and 8 Appear

Representation: The proposal fails to address fully the pollution implications of the development of this site. In particular it is hard to see that factors that would have been assessed for the Coypool site would not be applicable to the Ernesettle site, which is proposed for a similar range of possible functions. CHANGES: The Coypool site has been the subject of an extensive air quality analysis by Entec UK Ltd, reported in March 2006. This provides detailed evaluation of the pollutant risk of the development, considering carbon monoxide, nitrogen oxides, particulate matter (diameter <10 μm), sulphur dioxide, total organic compounds, hydrogen chloride, hydrogen fluoride, group 1 metals (e.g. cadmium), group 2 metals (e.g. mercury), group 3 metals (e.g. Lead) and dioxins and furans, including PCBs. The analysis also looks at wind-rose data over a period of several years to produce models of pollutant dispersal over a wide geographic range. There is no indication of a similar analysis for the Ernesettle site, as would be required in accordance with the guidelines laid down in the Guidance on Directive 2000/76/EC on the Incineration of Waste, produced by DEFRA in June 2006 simply a statement that: "concerns were significant and strongly held, particularly in relation to impact on residential amenity and pollution. The removal of the land from the east side of Ernesettle Lane responds in part to these concerns by providing greater separation between the residential area and allocated waste site, whilst also maintaining a viable waste development allocation". It is hard to see any way that this can be considered an
adequate interpretation of the risks inherent in the use of this site for incineration, and no reference has been made to residents to the south of the proposed Ernesettle site. Moreover, attention has not been paid to the environmental impacts associated with the full range of possible waste activities discussed for this site and current lack of knowledge on bioaerosol and particulate risks associated with composting approaches. This is particularly significant in light of the recent observations of Peter Rossington, Technical Director of Safe Waste and Power: "further issue with incineration is the production of highly toxic air pollution control residue (APCR) containing toxic heavy metals and persistent organic pollutants. Although at first this might not seem a great issue, due to the fact that only 5% of the input mass to an incinerator is converted to such material, over a 20 year lifespan an incinerator will create toxic waste equivalent to one years annual throughput. If, therefore, a large number of incinerators are built around the Country millions of tonnes of toxic air pollution residue will be produced over a relatively short period. Whilst it is likely to be argued that this as such will not matter, because the APCR will be sent to well controlled landfills, it does not get away from the fact that effectively actions are taking place that will impact on future generations. Actions that impact on future generations have been defined by the Royal Commission on Pollution and others as non sustainable development. To suggest that sending APCR to well managed landfills will solve the problem is also highly dubious when the experience of Japan and incineration is examined. Japan has some of the highest rates of dioxin contamination in the World, which many scientists attribute to its large incineration programme. Japan is, and has been for a very long time, a highly developed Country where good environmental practice has been used. Despite Japan's strict controls on the landfill of toxic material, mass contamination of the ambient environment has still taken place." (http://www.berr.gov.uk/files/file29146.pdf) It is also relevant that the river valley site of Ernesettle will produce a very different set of distributions to that seen at Coypool, particularly in relation to thermal inversions which produce stagnant air patterns in the area for extended periods of time. This has also been commented on by Saltash Council in a recent newspaper article (Western Morning News October 6th 2007) Without a full environmental assessment the proposal lacks an adequate SEA and cannot be considered without this. The assessment at Coypool is sound and already indicates that problems are not envisaged on this site.

38453/35 Ernsettle Crescent Residents Proposal W2 Land West of Ernesettle Lane Unsound Test of Soundness: 4A and 5 Appear

Representation: The Waste DPD states about this site: This is a large greenfield site, last used by the University of Plymouth in the late 1990's as a sports facility, and which has been closed down for several years. The area to the west of Ernesettle is identified in the Adopted Core Strategy as an area of search for potential sites for the location of waste management infrastructure. The impression given that the site has not been used since the late 1990's is inaccurate. This facility (the sports hall, outside court and golf course) was used by Plymouth City Council Sports Unit who ran sports activities for local children during the school holidays up to and including 2003. To quote from the Plymouth Sports Plan 2020: 3.2.2 The University has facilities that, in theory, are available to the local community but are not well marketed at the current time. It has recently appointed a Head of Sports & Recreation. The intention is that this postholder will develop both student and community-use of facilities. This is recognised as an important area, particularly in terms of income generation. The main sports facilities are off campus at Ernesettle, to the north west of the City. Facilities at this site include a sports hall; floodlit tennis/5- a-side area; a small 8-hole golf facility; fitness area; and grass pitches. There is potential for increased public access, and for sports development at this site. The University is also keen to develop an Artificial Turf Pitch (ATP). (August 2001). When was the decision taken to remove this facility from the plans for improved sports provision in an area seriously lacking such provision? The 2001 Census shows Budshhead Ward (where this site is located) as being in the 10% most deprived areas in
the country. Budshedd was also identified as a Sport England Priority Area Initiative ward at the time of the 2001 report. Taken from the Plymouth Sports Plan 2020: 'Sport and recreation has not been allowed adequate representation in the processes of initiating and developing new regeneration initiatives (or work in targeted areas). One could argue that it is the agencies working in these areas that should, perhaps, have sought out sport and recreation (being a recognised vehicle to address some of the issues that they are trying to resolve as referred to in the PAT 10 proposals). The fact remains, however, that sport and recreation has been either actively or passively sidelined.' Plymouth's Sustainable Community Strategy states: Our aim is to create successful neighbourhoods right across the city. We will work together to improve our city but we will particularly target the most deprived neighbourhoods to reduce the gap in the quality of life, prosperity and well being between those neighbourhoods and the rest of the city. We fail to understand why, when it was in the ownership of the University the Council considered this centre to be an important leisure facility to be developed in an area that is seriously lacking such facilities, yet now that PCC owns it that potential has been lost to the community. CHANGES: While there is much anger in Plymouth at the lack of swimming pools surely this would be an ideal riverside location for a much-needed swimming pool and multi-purpose sports centre which would attract residents and visitors to a very beautiful part of the city. This would also be within easy reach of three priority neighbourhoods of Kings Tamerton, St Budeaux and Ernesettle, thus helping to improve the quality of life and well being as outlined in the Sustainable Community Strategy.

38483/36 Mrs G Spiller Proposal W2 Land West of Ernesettle Lane
Unsound Test of Soundness: 2A, 3 and 4A

Representation:
1: the visual impact, as the current green valley flows from 15th Century St Budeaux Church down to the water edge. 2: the unspoilt farmland is the home for an extensive bird life and is the home to 2 pr of Buzzards, 1pr kestrels, plus, wrens, robins, blackbirds, sparrows, blue & great tits, pigeons, pheasants, buntings, skylarks, jackdaws, rooks, magpies, swallows, jays to name just a few. 3: As members of Saltash Sailing Club we race every Thursday and Friday (cadets) and the normal course is up under the bridge around buoys, which would be in front of this huge eyesore, plus Tamar Yacht Club race Tuesdays and Saturdays. The Carradon Gigg Club also use these waters to practice (current world champions). 4: Many members moor the boats in close proximity to the proposed site with the risk of pollution raining down on boats and sails. 5: the visual damage will also be a major factor to the Tamar Valley Protection Society and all who live in Saltash and overlook the river. River frontage is a rare and diminishing asset.

38484/37 Mrs J Jackson Proposal W2 Land West of Ernesettle Lane
Unsound Test of Soundness: 2A, 3, 4B, 5 and 7

Appears

Representation: Please see attached details of Petition with approx 250 signatures.

38473/38 Saltash Town Council Proposal W2 Land West of Ernesettle Lane
Unsound Test of Soundness: 6

Appears

Representation: Changes to the document required Saltash Town Council hereby objects most strongly to the proposed incinerator for the following reasons:- 1. Saltash has not been specifically consulted about a project with such potential for adverse impact on the town of Saltash ... unlike, for instance, the Environment Agency or Defence Estates. The proposals are buried deep within a mass of documentation in the Plymouth LIDF, and having been alerted to them, Saltash Town Council has just a week
to give a measured response. 2. The plans for a waste incinerator at Ernesettle seem to have passed from a Reserve to a Preferred Option (PO15), again without consultation with Saltash Town Council. 3. The principal objection is the almost certain effect on the microclimate of Saltash Waterside and the Tamar Valley. Already on early mornings throughout the year, and particularly now, the Valley is filled with dense fog that, as recently as two days ago, lasted until the afternoon. ANY emissions of steam or heat, whether “scrubbed” or not (another cause for concern) is certain to make micro climatic conditions considerably worse. Northerly winds will also being any emissions into Saltash. 4. The 40 metre tall chimney of an incineration plant will be a very visual blot on the landscape, visible from Saltash and also from the immediately adjacent Area of Outstanding Natural Beauty. If the chimney is particularly tall to avoid atmospheric pollution as described above, it will be a major air accident hazard in its proximity to the approach routes to Plymouth Airport. 5. The proposed site is also immediately to the north of the major Defence arsenal under Ernesettle hill, which is already considered hazardous enough to warrant annual warnings to Saltash households. Any major incineration plant to close must be considered dangerous. Defence Estates for DSDA Ernesettle are understood to oppose the proposal. 6. Previous public responses (again not including Saltash) “show considerable public concern”, particularly in respect of traffic congestion at Crownhill Road, and adjacent residential developments within 150 - 200 metres of the site. As background information, it should be remembered that: - (a) a proposal some years ago by CEGB for a power plant in the Tamar Valley with a similar tall chimney was rejected. (b) this same Plymouth LDF document strongly supports the Organic Recycling Plant at Broadmoor Farm (in Cornwall!) and that was decisively rejected last year by Cornwall County after massive public protests. As the proposal is on a scale of "strategic importance to the region", a Public Enquiry should be held into all aspects of the waste proposals at Ernesettle and whether they should be sited elsewhere.

36011/40 Natural England

Introduction

Sound Test of Soundness: other

Representation: Natural England has no objection to the DPD or the SA Scoping Report. The detail of proposals for waste-to-energy plant may need to be subject to further Habitat Regulations Assessment at later stages, in particular in relation to potential air quality impacts on the Dartmoor Special Area of Conservation. The detail of proposals for the Ernesettle site may need to be subject to further Habitat Regulations Assessment in relation to potential impacts on the Plymouth Sound European Marine Site and further landscape character assessment in relation to potential impacts on the Tamar Valley Area of Outstanding Natural Beauty, at later stages.

38480/41 Government Office for the South West

Regional Waste Policies

Unsound Test of Soundness: 6 and 7

Written Representation

Representation: As stated above, the Plan is not clear on how its proposals relate and contribute towards the Devon targets set out in Appendix 2 of the RSS. The assumptions about how the Devon sub-regional arisings should be dealt with should be more explicitly and transparently expressed.

38480/42 Government Office for the South West

Waste Objectives

Sound Test of Soundness: Written Representation

Representation: The objectives (in green boxes) appear consistent with PPS10, RPG10 RE5 and the Regional Waste Strategy.
38480/43 Government Office for the South West

Waste Objectives

Unsound Test of Soundness: 6 and 7 Written Representation

Representation: It is also not clear how the content and proposals in the plan relate to emerging work on the neighbouring Devon and Cornwall Waste Plans, nor to what extent discussions and co-ordination of proposals has taken place with neighbouring authorities in this respect. It is therefore unclear whether the strategy and content has had proper regard to those plans and the strategies contained within them. For example, the long term planning strategy for waste relies on the provision of landfill capacity outside the city. The issues referred to in para 3.4 could be dealt with more effectively by making the assumptions explicit.

38480/48 Government Office for the South West

Policy W5 - Weston Mill

Sound Test of Soundness: Written Representation

Representation: Judging from 5.29 (the waste management function of the site should be protected), it appears that this site is important to the waste management strategy rather than just an opportunity for miscellaneous waste management activities. If this is the case waste management development should be proposed/ allocated.

38480/45 Government Office for the South West

Proposal W1 Coypool China Clay Works

Unsound Test of Soundness: 4A and 4B Written Representation

Representation: GOSW commented at Preferred Options Stage that the site-specific proposals should indicate the types of facility envisaged (PPS10 #18). The plan has positively moved forward in this respect although it would be helpful if the plan was more specific about the nature of proposals at each location. For example, the DPD does not comment on the expected range of tonnages (input and processed) which each treatment type could potentially handle at each site - nor does it mention the impact of cross boundary waste should Plymouth’s emerging joint waste procurement plans (with Devon and Torbay) prove successful. Again, this could be addressed by making the assumptions clearer and more transparent. THIS COMMENT ALSO APPLIES TO PROPOSAL W2 AND W3

38480/47 Government Office for the South West

Site Policy W4 Chelson Meadow

Unsound Test of Soundness: 6 Written Representation

Representation: Judging from 5.29 (the waste management function of the site should be protected), it appears that this site is important to the waste management strategy rather than just an opportunity for miscellaneous waste management activities. If this is the case waste management development should be proposed/ allocated.

38480/46 Government Office for the South West

Prince Rock

Sound Test of Soundness: Written Representation

Representation: It is noted that the Prince Rock location identified in the adopted Core Strategy (Policy CS25) has been dropped as a result of further assessment.

38480/44 Mrs S G Pym

Plymouth’s Waste DPD - Submission Stage

Unsound Test of Soundness: 2A, 5 and 6 Written Representation

Representation: Saltash Town Council and possibly Carradon District Council (and their residents) have not been consulted on the Ernesettle site proposals. This needs to be rectified as all east facing properties in Saltash and those on the Waterside in particular will look directly onto the Ernesettle site. Concerns over omissions on surrounding areas especially over the Tamar River when damp and foggy weather conditions prevail.

38480/47 Government Office for the South West

Site Policy W4 Chelson Meadow

Unsound Test of Soundness: 6 Written Representation

Representation: Judging from 5.29 (the waste management function of the site should be protected), it appears that this site is important to the waste management strategy rather than just an opportunity for miscellaneous waste management activities. If this is the case waste management development should be proposed/ allocated.
Unsound  Test of Soundness: 6  Written Representation

Representation: It is not clear whether the proposal in CS25(4) has been re-assessed or downgraded. If it remains part of the strategy, this policy should be expressed as a proposal/ allocation.

38480/49 Government Office for the South West  
Policy W6 - Northern Area

Unsound  Test of Soundness: 6  Written Representation

Representation: It appears to be a reasonable judgement to propose this development in the Derrifod AAP if it is more important to co-ordinate it with other development in the Derriford area than with other waste management development. If that is the case, this policy/proposal appears unnecessary, and could lead to misunderstanding about the status and implications of the proposal. It should be deleted, and replaced by an explanation of the approach in the RJ.

38480/50 Government Office for the South West  
Policy W7 Unallocated Sites

Unsound  Test of Soundness: 6 and 7  Written Representation

Representation: Policies W7 and W8 appear to partly duplicate each other and there may be scope to combine them into a single policy.

38480/51 Government Office for the South West  
Policy W8 Considerations for Waste Development Proposals

Unsound  Test of Soundness: 6 and 7  Written Representation

Representation: Policies W7 and W8 appear to partly duplicate each other and there may be scope to combine them into a single policy.

38480/52 Government Office for the South West  
Delivery

Sound  Test of Soundness:  Written Representation

Representation: Supported

38480/53 Government Office for the South West  
Measuring Performance

Sound  Test of Soundness:  Written Representation

Representation: Supported

38485/54 Mr W R Pym  
Plymouth’s Waste DPD - Submission Stage

Unsound  Test of Soundness: 2A, 5, 6 and 9  Written Representation

Representation: The Saltash community, including the Town Council and the residents, have not been consulted or involved in the proposals for the Ernesettle site. This is unacceptable. The absence of any comment from Caradon District Council so far may also indicate that they also have not been consulted. The Tamar mudflats, uncovered by the tide twice daily, are a haven for bird life which could suffer badly from the proposed site. From time to time, either through temperature inversion or sea mist, the valley is immersed in a thick mist/fog which only evaporates very slowly - this changing environment is unsuitable for chimney led emissions.

38488/55 Mr F Linford  
Plymouth’s Waste DPD - Submission Stage
Unsound Test of Soundness: 4B Written Representation

Representation: It has not given any consideration to neighbouring communities outside of Plymouth i.e. the Ernesettle proposal W2 has not given any consideration to the impact on Saltash and in particular to the homes immediately in the vicinity of the proposed site.

38490/56 Dr S Candy The Need for Change

Unsound Test of Soundness: 2A and 7 Written Representation

Representation: Feel the Ernesettle site should be removed from the plan for following reasons 1. Development would ruin the natural beauty of area 2. Potential to diminish enjoyment of leisure, sailing, kayaking etc 3. Water pollution risks 4. Threat to wildlife populations 5. Risk of impact on biodiversity of area Plus I feel there has been a lack of consultation with Saltash residents and other river users

38479/57 Landulph Parish Council Plymouth’s Waste DPD - Submission Stage

Unsound Test of Soundness: 2A, 5, 6, 7 and 8 Appear

Representation: 2A: Changes required: The document needs to be referred back so that Plymouth City can consult with its neighbours who are potentially affected by the proposals in the document. In particular Landulph PC is very concerned that the Ernesettle site has been elevated to a 'preferred' option from being a reserve option in 2005 without any attempt to consult our community. We note that there appears to have been some consultation recently within Plymouth, but that the surrounding communities have been excluded - we do not regard this as an acceptable level of consultation. We would be most grateful if Plymouth would take the trouble to explain their plans to us and answer our questions before re-submitting the document. 5. Community strategy is to involve the community in decision making process not to exclude it 6. Fails to take account of the Cornwall plan which has not yet reached preferred option stage. Approval of this document should be held until the plans can be synchronised. 7. There is a lack of evidence to support the upgrading of Ernesettle from reserve to preferred option 8. There is no apparent mechanism for monitoring pollution (or hopefully lack of pollution) caused by waste treatment processes.

38479/58 Landulph Parish Council Introduction

Unsound Test of Soundness: 2A, 2B and 5 Written Representation

Representation: Changes required: The process referenced in para 1.4 (to be deleted in the final submission) has not been adhered to. There was no consultation in March 2005 or June 2005 that we are aware of with the residents or representatives of Landulph Parish - who could clearly be affected by both visual intrusion and dispersion resulting from certain types of operation at Ernesettle. The DPD consultation should be revisited so that adjacent communities have an opportunity to understand and express approval (or not) of the proposals.

38479/59 Landulph Parish Council Regional Waste Policies

Unsound Test of Soundness: 6 Written Representation

Representation: 6 - Para 2.11 notes that the Cornwall Waste DPD should reach 'Preferred Options' stage in March 2008. It also mentions the need for a 'joined-up' approach between Cornwall, Devon and Plymouth. It seems inappropriate to confirm the Plymouth DPD before the Cornwall DPD has reached Preferred Option stage as it may prejudice neighbouring interests. A delay to allow the Plymouth DPD to be properly
consulted with adjacent communities would seem appropriate as this would also give the opportunity to better synchronise the Cornwall and Plymouth DPDs.

38479/60 Landulph Parish Council

What the Waste DPD does

Unsound Test of Soundness: 2A, 2B and 5 Written Representation

Representation: Changes required: The public consultation mentioned in para 2.21 has been inadequate in that there has been no consultation with immediately surrounding communities in Landulph (and, we understand, Saltash). Refer back for proper consultations.

38479/61 Landulph Parish Council

The Evidence Base

Unsound Test of Soundness: 6 and 7 Written Representation

Representation: Changes required: There is no satisfactory evidence to mitigate the many concerns raised about the Ernesettle site in previous consultations with people within the city. In addition Landulph and Saltash residents were not invited to comment at the earlier stage so their specific concerns have not been considered. We do not see any evidence to support the change of status of Ernesettle from reserve to preferred option. Ernesettle should be reclassified as a reserve option for waste treatment and in addition energy from waste or thermal treatment plants should be excluded from potential uses of the site.

38479/62 Landulph Parish Council

Strategic Environmental Assessment / Sustainability Appraisal (SEA/SA)

Unsound Test of Soundness: 3 Written Representation

Representation: Changes required: The Issues & Options stage SEA (March’05) did not even consider Ernesettle. The Preferred Option stage SEA (July’05) expressed serious reservations about Ernesettle - "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." The Submission stage SEA does not appear to have fully addressed these issues - we would like to see more detail as to why it is now considered that the earlier SEA was incorrect.

38479/63 Landulph Parish Council

Proposal W2 Land West of Ernesettle Lane

Unsound Test of Soundness: 2A, 2B, 3,5 and 7 Written Representation

Representation: Changes required: Although the policy is hedged around with concerns for mitigation there is no limitation on the types of facility which could be installed at the site. Combustion with energy recovery and advanced thermal treatment should be specifically excluded from the range of possible uses as being inherently unsuitable both in terms of visual impact (chimneys) and potential for pollution. We are unaware of any modelling for dispersion patterns of possible pollutants from chimneys in the Tamar valley. We note that the site is low down in the Tamar valley in an area which is prone to still conditions and mists in winter which will allow pollutants to precipitate out onto the surrounding area. We are also concerned that Landulph is downwind of the site - local conditions tend to funnel prevailing winds from SE, S, or SW up the river valley - and we need to see modelling of the anticipated pollution from any thermal treatment or combustion on the site. Suggested change number paragraph 1 to - "1. Waste management facilities restricted to: recycling and composting; waste transfer; mechanical & biological treatment; publicly accessible recycling facilities." Numbered paragraph 2 to remain as is.
Miss T Martin

Plymouth's Waste DPD - Submission Stage

**Unsound**  Test of Soundness: 2A, 7 and 9  Written Representation

**Representation:** The DPD is incorrect relating to the Ernesettle site. It states that the site is fully fenced and gated - this is not the case the southern most field is openly accessible in the south eastern corner allowing access to the site which has been openly used by walkers and users of the adjoining field to exercise their horses for a number of years - as such prescriptive easements may well have arisen benefitting the adjoining land. The DPD also has not considered the full environmental impacts of proceeding at the Ernesettle site. As a greenfield site, no consideration appears to have been given in respect of wildlife or domestic animals in adjoining fields (there are a large number of plant species, horses, Various wildlife, sightings of which include Heron, Pheasants and Deer). Consideration has not been given to the impact of the facilities and the increased traffic at Ernesettle Lane relating to recreational use of the area - for example the site is extremely popular with dog walkers and horse riders (being one of only a few sites in Plymouth at present available to have horses at livery) The increased traffic will have an adverse affect on surrounding animal welfare (as well as its impact on properties and existing businesses nearby), for example traffic fumes are known as a factor connected with sinus problems in horses. The increased traffic will also impact on the safety of these recreational pursuits unless suitable measures are taken to provide alternative routes suitable for pedestrians, cyclists and riders.

Landulph Parish Council

**Unsound**  Test of Soundness: 2A, 2B, 4B, 5, 6, and 8  Written Representation

**Representation:** Changes required. Table 3. In order to safeguard against future failures in the consultation system we request that it should be explicitly noted under the column 'Delivery Mechanisms' against Policy Proposal W2 that Planning Application Procedure must include positive involvement of both Saltash Town Council, Landulph Parish Council and Caradon District Council (or successor authorities) as neighbouring stakeholders. Whilst this would be normal good practice we would like to see it enshrined in the document as we do not automatically or normally scrutinise Plymouth City planning applications, and experience now shows that Plymouth is not always good at remembering to consult its neighbours across the Tamar.

Landulph Parish Council

**Unsound**  Test of Soundness: 8  Written Representation

**Representation:** Changes required. We note that the monitoring is solely concerned with the wastes treated (quantities, types etc) with and not with the pollutions and environmental impacts arising from waste treatment. In this respect the monitoring program seems inadequate - we would like to see a commitment to monitor and manage the emissions and products of waste treatment.

Landulph Parish Council

**Unsound**  Test of Soundness: 7 and 9  Written Representation

**Representation:** Changes required: We can find no justification in the body text for the lifting of Ernesettle from Reserve Site to a "full allocation". A substantial change of this nature requires a full justification statement. Ernesettle site is extremely low lying and may we prone to flood by the middle of the century if the latest average models for sea level rise as a result of Greenland ice reduction are accurate. There is no evidence
that this has even been considered as a factor. For this reason alone it would be sensible to return Ernesettle to its reserve option status as in the previous drafts.

**38476/68 Dr S Lane**  
**Considerations in response to alternative site suggestions**

**Unsound**  
**Test of Soundness:** 4B and 7  
**Appear**

**Representation:** The development of the Langage Power Station site presents a credible and logical alternative; a previous suggestion about use of this site by another commentator has been discounted as the site is outside the City boundaries, but this is not a valid reason not to explore this opportunity. Langage gas-fired power station received final approval in 2006 and its planned development includes a large industrial estate. As this site will already have to deal with air pollution monitoring, will require adequate access and would offer a chance to connect to an efficient power distribution network, it would appear to have real potential for the incorporation of waste to energy schemes which could logically include incineration, municipal waste composting and gasification. On their website the site operators, Centrica, make the following statement: "as part of our strategy of diversifying our sources of energy, we are also investing £750 million in renewable projects both on and offshore here in the UK". This alternative site is dismissed in appendix 2 of the submission on the grounds that the Council cannot consider sites outside the City jurisdiction. However, An Action Plan for the Waste Infrastructure Development Programme (DEFRA 2006) states that "To bridge the capacity gap WIDP will encourage collaboration between local authorities ensuring economies of scale and quicker, more efficient delivery of infrastructure". and the Western Morning News reports "For some time, Plymouth has taken waste from South Hams and West Devon. In a recent report the city council concluded that a "sub-regional residual waste treatment plant" in Plymouth, taking waste from as far afield as Torbay, would be more cost-effective. It could potentially take waste from South Hams, West Devon and Teignbridge districts". This indicates that there is already interaction across boundaries; on this basis it is invalid to exclude this site from the current analysis and it should be actively considered.

**38489/69 Dr J McBrien**  
**Proposal W2 Land West of Ernesettle Lane**

**Unsound**  
**Test of Soundness:** 2A and 4A  
**Written Representation**

**Representation:** There has been no information provided to Saltash residents whose properties overlook the proposed Ernesettle site. The PCC website for this plan is difficult to find and difficult to follow in terms of how to make a representation. The Saltash Town Council did not know of the proposal. The Ernesettle site is very close to an AONB. The valley is frequently full of fog which makes one worry about emissions. The view for residents in Saltash will be spoiled - currently it is an open view with no tall structures. There is a particularly open view of the sky. The proposal has a very high visual impact.

**38489/70 Dr J McBrien**  
**Plymouth's Waste DPD - Submission Stage**

**Unsound**  
**Test of Soundness:** 2A  
**Written Representation**

**Representation:** There has been no communication about this plan with the residents of Saltash. Many properties overlook the proposed Ernesettle site and the householders should be consulted. I understand the Saltash Town Council has not been consulted. The whole plan speaks of the benefits to the people of Plymouth as if the other side of the River Tamar did not exist. The PCC website pages concerning this plan are hard to locate and hard to follow. It is particularly taxing to discover how to make a representation on that site. We are regularly communicated with about the dangers posed to us by the Ernesettle munitions site, so why not this plan?
Plymouth’s Waste DPD - Submission Stage

Sound Test of Soundness: Written Representation

Representation: Whilst the DPD is in general sound, further detail and consideration to the amount of residual waste (municipal industrial & commercial) that will require disposal by landfill within or outside of the Plymouth area needs to be quantified until 2026, to enable a greater understanding within the sub-regional area of the shortfall in landfill capacity and the likely demands that will be placed on the subregional landfill infrastructure until suitable recycling and recovery facilities are constructed within Plymouth.

Tamar Valley AONB Service

Proposal W2 Land West of Ernesettle Lane

Unsound Test of Soundness: Written Representation

Representation: The Tamar Valley AONB Service have serious concerns relating to the potential visual impact of the development of this site, given its prominent unobstructed position next to the River Tamar. It is particularly visible from Kingsmill Lake on the Cornish bank and from the Tamar Bridge looking upstream to the Bere Peninsula. Although the PCC proposal states that mitigation measures will be necessary, particularly in terms of visual impact, it is questionable as to how such a complex waste management facility might be effectively screened in such a sensitive location. Lastly, the proximity of AONB status is not mentioned within the Policy Proposal. Under the CRoW Act 2000, Local Authorities must have due regard for AONB status, as well as the designation having equal status to National Parks when it comes to planning consent and other sensitive issues. Surprisingly, the AONB was not notified or consulted on this matter. Please would you ensure that the AONB is kept abreast of future developments.

Strategic Waste Management Facilities

Sound Test of Soundness: Written Representation

Representation: I support the principle of not seeking to allocate a minimum amount of land needed to manage waste arisings as this "close fit" scenario is overly prescriptive and can inadvertently hamper appropriate future development of waste management facilities with the layout, capacity and landscaping needs appriate for that particular location.

Railfuture Devon and Cornwall

Proposal W2 Land West of Ernesettle Lane

Unsound Test of Soundness: Written Representation

Representation: The land shown by the City Council for this development conflicts with a proposal to link the main railway from Cornwall, just east of the Tamar river crossing, via a new curve to the Plymouth Bere Alston railway. If the site is designed with a protective strip of land for our proposed Ernesettle line and there are no health and safety issues for an adjacent railway, the Railfuture will no longer object to the waste disposal facility. If built we suggest that our proposed line could serve the incinerator.

Proposal W1 Coypool China Clay Works

Unsound Test of Soundness: Written Representation

Representation: The allocation of Coypool China Clay Works is supported. However the identification to acheive a BREEAM excellent standard is not supported. The use of
BREEAM is the incorrect and inappropriate tool and incorrect policy wording for specialist facilities such as waste management facilities.

38492/76  SITA  

Policy W7 Unallocated Sites

Sound  

Written Representation

Representation: I support the inclusion of a separate policy specifically allowing development on sites not allocated in the development plan, therefore allowing potential windfall brownfield and under certain circumstances greenfield sites to come forward. This stand alone policy is essential given the small number of strategic sites allocated, one of which is only appropriate for C & D wastes, and one site being severely constrained in available footprint due to existing waste management activities.

38497/77  Caradon District Council  

Proposal W2 Land West of Ernesettle Lane

Unsound  

Appears

Representation: Test of Soundness Two Paragraphs 6.12-6.14 of the Plymouth SCI outline the minimum requirements for consulting on cross-boundary matters. A number of consultees are listed, including a selection of parish and town councils within Caradon. These bodies are consulted at statutory stages of DPD preparation, which means they are sent a copy of the relevant documentation at each stage in the process. The SCI treats this form of consultation as the statutory minimum and proposes other methods of engagement— including public exhibitions— depending on the nature of the issues being consulted on (paragraph 4.26). Caradon District Council have been informed that adjacent town and parish councils were not made aware of Policy W2 until it was highlighted by the local media. We assume that these councils were sent copies of the Waste DPD as part of the statutory process but did not identify Policy W2 as a matter of local significance until a late stage. Caradon believe that the public-engagement process falls well short of what is inferred in the Plymouth SCI and is certainly well short of best-practice. A proposal of this scale, within such a sensitive local environment, justifies some form of active community engagement such as a public exhibition. Caradon believe that the impact of the proposal affects Cornish residents as much as Plymouth residents. On a separate matter we note that the list of Caradon's parish and town councils is somewhat arbitrary— with some bordering Plymouth (e.g. Saltash) and others many miles away (e.g. Warleggan). There are some parishes within the Tamar Valley (e.g. Botus Fleming) that are potentially affected by Policy W2 but are not on the list of statutory consultees. The SCI may need revising in this respect. Test of Soundness Four Policy W2 represents one of the largest waste management proposals in the south-west region and the Sustainability Appraisal recognises that the facility will have a very significant environmental impact. Caradon District Council is concerned that the cross-boundary implications of such a development have not been adequately taken into account during the plan-making process. The policy proposes the construction of an industrial plant and waste sorting facilities on greenfield land immediately facing the Tamar Valley AONB. The elevated nature of surrounding land means that the site is highly visible from several points within the AONB, particularly on the Caradon side of the Tamar. Such a topography clearly limits the ability to adequately screen the site, particularly an incinerator chimney, however well designed it may be. There is substantial local and national policy designed to protect AONBs from such development. For example, Policy ENV3 of the draft RSS makes it clear that particular care will need to be taken to ensure that no development is permitted outside AONBs which would damage their natural beauty, character and special qualities. The development also threatens the setting of the Tamar Bridges which are distinctive local landmarks. The presence of an incinerator near the base of the bridges would not only be visible from the bridges themselves, but would affect the green backdrop of the bridges when facing upstream. These bridges serve as the principal gateway into Cornwall and are used by
thousands of tourists each year. The local significance of this part of Caradon is reflected in community studies such as the Saltash Gateway Area Community Strategic Action Plan. Caradon is using plans such as these to inform its LDF Core Strategy, which is currently in the early stages of preparation. The landscape immediately north of the Tamar Bridges is predominantly rural in character and the estuary is a popular location for sailing and tourist boat trips to Calstock and elsewhere. The economic value of these activities to Caradon has not been quantified, but it is likely to be significant. Caradon's economy is highly reliant on tourist related activities and the Local Plan (and emerging RSS) aims to protect the natural resources of the area for these reasons. The Sustainability Appraisal acknowledges that the proposed development is likely to generate noise, and concerns are therefore raised about the compatibility of this proposal with the existing uses of the estuary. Whilst there is no evidence that the proposed development will cause pollution harmful to wildlife, the location of an incinerator and waste transfer plant immediately adjacent to an SSSI of European importance should be subject to close scrutiny. The compatibility of the scheme with proposals to regenerate the Saltash waterfront (as outlined in the Saltash Regeneration Study) is also an issue of concern. The scheme faces much of the Saltash waterfront and is more visible from Caradon than it is from Plymouth. We are therefore concerned that this proposal is incompatible with the aims and strategies of the Caradon Local Plan and emerging Caradon LDF, which aims to protect local distinctiveness and protect natural assets. Indeed, the SEA draws specific attention to the problems of locating such a development in this location. In regional terms, the draft RSS states that waste facilities should be optimally located on established industrial sites or previously developed land (Policy W2 of the draft RSS) which would appear to favour the Coypool option over the Ernesettle option. Test of Soundness Seven Policy W2 is not identified as the optimal location for a strategic waste management site at Preferred Options stage but is included as a proposal at the Submission stage. The reasoning behind this change is not clear from the evidence provided in the SEA. It appears that that the decision was based on the fact that the China Clay plant at Coypool may not be practically or financially easy for Plymouth City Council to acquire and convert. However, the evidence set out in the SEA strongly indicates that the Coypool site is the optimal location compared to the Ernesettle site (Policy W2). Caradon are also concerned that the SEA takes a fairly superficial approach to the impact of Policy W2 in terms of noise, odour, dust and visual implications. Whilst these issues may be explored in more detail as part of an EIA at planning application stage, it is important to determine basic facts at the plan-making stage when the principle of using the site for a particular purpose is established. The scale of the proposal in such a sensitive clearly justifies a more detailed appraisal than is provided. The Scoping Report (on which the SEA is based) acknowledges the importance of the Tamar Valley in terms of its landscape and wildlife value. However, the Scoping Report primarily deals with issues within the city limits of Plymouth. Caradon's own Scoping Report (produced for the Local Plan) raises issues specific to south-east Cornwall, and it is likely that an Appraisal of Policy W2 in this context would give a different perspective on the proposed development.

38498/78 Ms Jo Butcher
Plymouth's Waste DPD - Submission Stage

Unsound

Test of Soundness: 2A, 3, 4A, 5 and 6

Written Representation

Representation: There has been no knowledge of this plan until 5 days ago in the communities on the opposite bank of the Tamar to Plymouth City Council. We have therefore not had time to discuss the plans with PCC or attend any of the consultation events they have organised to obtain more information. There are many points that need more information regarding the Ernesettle proposal, including wildlife, early morning fog on still days which means that there are periods with no wind in the river valley and the area is the interface between the sea breeze and the gradient wind. /.

38501/79 St Mellion Parish Council
Plymouth's Waste DPD - Submission Stage

Soundness Not Specified

Test of Soundness: other

Representation: Dear sir/madam I am writing on behalf of St Mellion Parish Council, will the following comments on the above documentation There has been no consultation whatsoever with any of the neighbouring communities, across the river or across the tamar bridge. Many of the residents along the river Tamar are much closer than the vast majority of the population of Plymouth. A consultation process must be put in place before any decision is made. I understand the closing date is today - I hope that I am not too late to be included? Many thanks Helen Helen Dowdall Clerk to St Mellion Parish Council

38499/80Ms Kate Garner; Landrake & St Dominik Ward
Plymouth's Waste DPD - Submission Stage

Unsound

Test of Soundness: 2A, 4A and 7

Appearance: From: kasg12@hotmail.co.uk To: elaine.towns@plymouth.gov.uk Subject: ernesettle waste incinerator & recycling facilities Date: Wed, 10 Oct 2007 16:44:13 +0100 Sir, I wish to alert the inspector to my concerns regarding the proposed development of the Ernesettle site; 2) Plymouth have not followed their own required consultation and community involvement. This is a major development and will have a huge impact across the border in Cornwall, particularly Cargreen Landulph and Saltash and none of these communities have been consulted or involved in this project. While Caradon District Council and Cornwall County Council may have been informed neither appeared aware of the change for preferred option from Coypool where no Cornwall residents would have been effected to Ernesettle where the impact for Cornwall would be greater than on Plymouth itself. Is this a political decision ie Conservatives took over control of the Council and co incidently Coypool has a Conservative MP and Ernesettle has a Labour MP? 4) the requirement for Plymouth, Devon and Cornish Plans and Policies to link up. The cross boundary issues have not been taken into account, ie the SSSI and AONB the position in relation to an iconic landmark (the Tamar Bridge), it would change the nature of the waterfront. 7) There should surely be some evidence to change the preferred option (Coypool) to Ernesettle which I believe came near the bottom of the list regarding sustainability. Regards kate garner

38502/81South Hams District Council
Plymouth's Waste DPD - Submission Stage

Sound

Test of Soundness: other

Representation: The City Council's approach to managing its waste and its objective to be self-sufficient, as far as practicable, supporting sustainable waste management is supported. The Council acknowledges the constraints of the Plan area in its ability to accommodate landfill capacity and support the need to work with all the relevant waste planning authorities to identify a sustainable long-term alternative to Chelston Meadow.

38503/82Landrake & St Dominik Ward: Cllr O Eggleston on Behalf of Six Parish Councils
Proposal W2 Land West of Ernesettle Lane

Unsound

Test of Soundness: 2A

Appearance: There has been no correspondence or communication with Parish Councils. Please see attached communication on behalf of six parish councils. there has been no correspondence or communication whatsoever regarding this proposal with parish councils, town councils (Saltash), district councils or any other committees or groups. Local participation is essential before any decision any decision is made.
Proposal W2 Land West of Ernesettle Lane

Unsound

Representation: Lack of consultation with stakeholders. (see attached letter).
UNSUITABILITY OF THE SITE: The proposed site is unsuitable for the following reasons.
1) The Tamar Valley is an historic AONB. 2) A river valley, subject to low air movement, mists and fogs is de-facto a poor site for a chimney. Ernesettle and Saltash are already subject to inequalities in public health and the emissions from the proposed site are likely to exacerbate them. 3) It is in the immediate proximity to MOD munitions storage site and neither the MOD nor the Civil Protection Unit have been adequately consulted. Both are opposed to the proposal. 4) there is potential for the proposed facility to contaminate the River Tamar. The impact of the proposed waste facility on Tamar Valley flora and fauna, the local micro-climate, public health, the safety of the MOD munitions storage and river safety and quality has not been adequately detailed through reference to relevant experts. UNACCEPTABLE VISUAL INTRUSION: The proposed waste facility represents an unacceptable visual intrusion in the Tamar Valley (an AONB), for the thousands of Saltash residents who will directly overlook the site and for the recreational water sport users of the river. If you require these objections to be presented in the format suggested by the council website, then I propose that the plan fails the test of soundness associated with 'community involvement', specifically the community of Saltash. Stakeholders who need to be involved:- Saltash Town Council, Caradon Council, Tamar Protection Society and Saltash residents on the eastern slopes of the town.

Proposal W2 Land West of Ernesettle Lane

Unsound

Representation: No mention of the effect on increased traffic in & around Ernesettle lane, roundabout at victoria Rd, Slip Rd from Parkway. Severe bend on Ernesettle Lane - causing heavy goods lorries to negotiate what looks like a difficult area to manouvre in. It is very difficult to see an alternative route. Changes: Proposal Coypool para 5.10 states the site has direct connection to the principal road network is achieved without impact or any residential properties. Overall Coypool would seem to be the most appropriate site with respect to location, residents, wildlife, environment, social, traffic, views. Simply it would seem this location will not ‘upset’ anyone.

Proposal W2 Land West of Ernesettle Lane

Unsound

Representation: During the preferred option stage during 2005 it was revealed there was much concern about Ernesettle Lane in relation to residents blight and plution. This was a reserve site. I would like to comment on how difficult I have found this process to be, filling in the forms and trying to make sense of the documents. I do however understand this is how this process is done and not just meant to confuse us here in Plymouth! It is certainly not designed for 'Mr and Mrs Average Citizen'. I hope I have filled them out correctly and mine and my families views will be taken into account. This is a sensitive issue that I’m sure is not easily resolved but we all find it so hard to understand how a beautiful area was even a reserve site, let alone now appearing to be one of two sites, the other I understand to be Coypool, with Ernesettle seeming to be the most obvious as it is owned by the Council. The allotment and adjacent fields on east side of Ernesettle lane, opposite our crescent was not accepted, as being even more sensitive than the current location. So there is clearly an opinion that W2 was also seen as sensitive - please what has changed?
38505/86 Mr Sullivan-Waite
Proposal W2 Land West of Ernesettle Lane

Unsound Test of Soundness: 4A Written Representation

Representation: The proposed site has very high visual impact not acceptable under the terms of other local plans. The document states the site is 'poor'. No consideration on the increase in traffic, already difficult at peak times. There have been a number of accidents and near misses at the south end of the crescent, traffic comes at speed down the hill around a blind corner. Steep hill up from the site will cause pollution and will be dangerous in icy conditions. The area is in a valley and prone to regular heavy mist and fog throughout the winter months. Am I correct in understanding buildings and open sites should not be situated in a valley? This area was in use for local children up to 2003 and mentioned in the sports plan 2020 report. We fail to understand why, when it was in the ownership of the university the Council considered it to be an important leisure facility to be developed in an area seriously lacking such things - now that PCC own it, its potential to the community is lost.

38505/87 Mr Sullivan-Waite
Proposal W2 Land West of Ernesettle Lane

Unsound Test of Soundness: 3 Written Representation

Representation: I would like to question the change that siting a 'tip' in an area of outstanding natural beauty will have on tourism and wildlife socially. Tourism: The river and small rail network used by visitors to Plymouth and local people will sadly be ruined by the sight of a waste unit set among beautiful surroundings. Wildlife: Concern about leakage into the river Tamar, I understand this caused problems when the waste was collected on the Saltash side. The area has been described as grassland housing 600 individual plant species - which include rare and locally scarce species. We have seen many bird species, rabbits, foxes, badgers, deer - how will the site effect their ever endangered habitats? Socially: The road leading to the site passes the local grave yard - that is still maintained and in use - heavy and constant vehicles seem disrespectful to the living relatives. The graveyard is well maintained and cared for. We have a duty as residents of Plymouth to care, protect and enhance our beautiful city - its river and seascape, culture, heritage, settlements and biodiversity. In an ever changing world it is our duty to look after our land for our future generations. We strongly feel that this alone makes the site unsuitable, flawed and should be disregarded. Would like to mention the horse riding stables are in the field belonging to the MOD - the horses and riders use Ernesettle Crescent and Lane as access to the field.

38505/88 Mr Sullivan-Waite
Proposal W2 Land West of Ernesettle Lane

Unsound Test of Soundness: 2A Written Representation

Representation: City Council failed this test on a number of reasons: 1. Most residents in our crescent unaware the site has gone from reserve to proposal to secretary of state - no advance notice. 2. No knowledge of the event at Ernesettle Library. Several residents unaware of the existence of the library - residents local to the library thought it was a derelict building! 3. Time of the meeting inconvenient for working people 2-5.30pm 4. No local transport for elderly residents. 5. 9 days from the 1st October meeting to get our responses to PCC - this coincided with the postal strike! Although website stated the document was available at all the city libraries. St Budeaux had difficulty in finding it and were unclear what we were asking to see. I understand a neighbour had a similar problem at West Park. Sadly it is rather late in the day to suggest a change to make test of soundness 2 -sound. For future reference every resident that this site will effect a personal letter of information should be put through our doors.
Mrs M Pugh

Proposal W2 Land West of Ernesettle Lane

Unsound Test of Soundness: 2A Written Representation

Representation: This area should remain a greenfield site. It is an area of natural beauty. Any building of size and a large chimney would destroy the view. Also contaminate the air of near by houses, also the traffic would become a major problem. I believe that with 400 extra vehicles per month as proposed Ernesettle lane will become grid locked. The dust fumes and associated mess will in my opinion be unbearable. The tall chimney will expel its dust and fumes over the entire area of ernsettle crescent on prevailing winds. The beautiful views we now enjoy over the river will be lost.

Mr & Mrs B Chapman

Proposal W2 Land West of Ernesettle Lane

Unsound Test of Soundness: 3 Written Representation

Representation: This is a greenfield site and should remain so. I believe this site to be too small for the proposal and the environmental effects of the plan are major. A large chimney will blot the landscape and affect the Ernesettle Crescent area with the effect of fumes and dust on the prevailing winds. Also traffic will become a problem. I believe more studies of the traffic which will be created is necessary. Also the need to look at the (previous) proposal for future homes on the allotment site at the top of Ernsettle Lane. These extra volume of cars, lorries and container trucks now using this area will become gridlocked. The beauty of the River Tamar will be lost behind a huge chimney. Shame on you!

Mr & Mrs C Spiller

Proposal W2 Land West of Ernesettle Lane

Unsound Test of Soundness: Written Representation

Representation: The increase in traffic flow will add to an already very congested traffic situation at the top of Ernesettle Lane where it joins the main road leading to the Parkway Express. The extra traffic will add to the noise and air pollution which local residents will have to suffer. The idea of building an on the banks of the River Tamar is unbelievable as it is an area of outstanding beauty and habitat for many flora and fauna. Most of the site is a greenfield site and although there is a sewerage site and a factory on the northern end of the site that is hardly a reason to compound the mistakes of a previous era. The proposed site is in a river valley which is subject to mist and low cloud which would not help the dispersal of emissions from the stack. Plymouth Airport was never fully developed because of the poor weather factor. We would respectfully suggest Devonport Dockyard as a suitable alternative as it is not a greenfield site and has the infrastructure. Another proposal is Lee Moor Clay pits which are closing soon because it is not economically viable any more (the clay is now brought from South America). This site has all the infrastructure to cope with waste for generations.

Plymouth Sports Forum

Proposal W2 Land West of Ernesettle Lane

Unsound Test of Soundness: Not specified

Representation: On behalf of Plymouth Sports Forum I object to the proposed plans inrespect to Option 2 - Land West of Ernesettle Lane. My understanding is that this land was acquired from the University of Plymouth and that prior to the purchase was used for recreational purposes, this included pitch and putt, 4 senior football pitches, 2 senior rugby pitches, a cricket pitch and the provision of a 4 badminton court sized sportshall. The City cannot afford to lose such facilities let alone in this area. According to "Planning Policy Guidance 17" any loss of open space or recreation land should be quote "to exchange the use of one site for another to substitute for any loss of open space, or
sports or recreational facility. The new land and facility should be at least as accessible to current and potential new users and at least equivalent in terms of size, usefulness, attractiveness and quality”. If this ended up as the preferred site/option where could you identify such an "exchange site" within the Plymouth Boundary?

38502/94   South Hams District Council  Proposal W3 para 5.22
Unsound  Test of Soundness: 4A ?+  Appear
Representation: Paragraph 5.22 and Proposal W3 on Moorcroft Quarry is considered to be "unsound" as it is not consistent with the adopted Sherford AAP prepared by South Hams District Council. The text currently says "The construction and demolition process is currently carried out in the southern part of the site. This is on part of the proposed alignment of the High Quality Public Transport (HQPT) route that is proposed to serve Sherford in the long term." The Council requests additional wording to Paragraph 5.22 and a new clause to be added to proposal W3 to explain the future change of use to HQPY required during the life of the plan. The following sentence should be added to Paragraph 5.22. "The route of the HQPT is safeguarded and will take precedence over inert waste processing when the new public transport system to serve Sherford is implemented." The following clause should be added to Proposal W3; "Land in the southern part of the site will be safeguarded for the HQPT route to serve Sherford."

38502/95   South Hams District Council  Paragraph 6.7
Unsound  Test of Soundness: 4A  Appear
Representation: Paragraph 6.7 is considered to be "unsound" as it is not consistent with the LDF plans and policies prepared by South Hams District Council for the adjoining area. The Council objects to the suggestion that a recycling centre could be provided at Langage if the site at Coypool is not delivered. The basis for development at Langage is the creation of a quality strategic employment site contributing to the economic growth and prosperity of the city region in line with the Regional Spatial and Economic Strategies. The aims are for quality jobs in a quality environment with quality public transport links. A recycling centre would not align with these aims. To make the plan "sound" the last sentence of Paragraph 6.7 "Whilst it is outside the planning control of the City Council, a second alternative option for a local centre to serve Plympton would be the provision of such a facility within the Langage Business Park, including any extension to it" should be deleted.

41266/96   Mr L Garraway  Proposal W2 Land West of Ernesettle Lane
Unsound  Test of Soundness: 7  Written Representation
Representation: Combustion should not be permitted on the site as it requires an extremely high chimney which would be visible along the Tamar Valley. The visual impact of which would blight a beautiful landscape and the green fields it would be on. This site is only 200 metres away from residences in Ernesettle Crescent and Ernesettle Lane itself. They would also have to endure a huge increase in traffic noise and congestion as lorries come up the hill in low gear. This is a residential area not an industrial estate and a total new road layout would be required to protect the inhabitants from distress.

44229/97   Mr J McDaid  Proposal W2 Land West of Ernesettle Lane
Unsound  Test of Soundness:  Written Representation


**Representation:** Summary: traffic; flooding; H&S smells and gulls; Leakage into water system;

**45099/98** Messrs A J & S J Davies E-F and 514-517 Proposal W2 Land West of Ernesettle Lane

Unsound Test of Soundness: Written Representation

**Representation:** The proposed site in Ernesettle Lane sits in a valley with hills all around (effectively in a bowl) and most days there is a mist that hangs in the valley for hours. How does the council envisage moving standing air? E - there are horses in the same field as the monument; F - missed out there is a blind bend on the lane and a side-road known as Ernsettle Crescent, or the fact that horses are ridden daily on the lane. 514-517 Omission (re recreational use) Part of the land marked in purple is still in use to date by dog walkers, horse riders and walkers for more than twenty years.

**46047/99** Mrs J R Flood Proposal W2 Land West of Ernesettle Lane

Unsound Test of Soundness: Not specified

**Representation:** After attending a meeting about the above plan at my library, I wish to say a most definite 'No' to this plan. The timing of the planned meeting should have been a lot sooner and later in the day to allow people working during the day to attend; personally I think this was deliberate. Objections: 1) It will be an eyesore in what, at the moment, is a beautiful place. 2) We already have to deal with the stench of the sewage works which is bad enough without anything else being added. 3) The volume of traffic which is already bad enough. Why Ernsettle? Or is it a case of Ernesettle does not matter and neither do its occupants. We have to deal with enough as it is - a shopping centre which is diabolical, more and more houses which is ridiculous, I don't think it would even be considered to be placed at say more affluent areas. Also my opinion is whether we agree or disagree to the above plan it has already been decided, considering you have already had surveyors on site, you have, so to speak, have to go through the motions of informing people.

**46064/100** Mrs L F Lloyd Proposal W2 Land West of Ernesettle Lane

Unsound Test of Soundness: Written Representation

**Representation:** I am assuming that there has been liaison between yourselves, the Highways Dept and the Property Development Planning Dept. If not this should be a high priority if, as suspected, the ex-allotment field has been allocated to housing. As the work is likely to be completed long before the Waste Development Plan is implemented I would like to know what impact that proposal alone will have on our present road system. At the meeting we were told approx 400 lorries a week would be using the tip - 80 each day assuming a 5 day week. All that without the possibility of it being used by other councils and the public. Perhaps before any decision is made a 7 day survey should be urgently considered to monitor current traffic flows and speed.