Plymouth Waste DPD
Examination

Hearing Statement on behalf of
Caradon District Council

Proposal W2: Land West of Ernesettle Lane

Prepared by:
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Test of Soundness 2

1. We have nothing further to add to our original response.
Test of Soundness 4

Landscape Issues

2. The policy proposes the construction of a strategic integrated waste management site on greenfield land immediately facing the nationally designated Tamar Valley Area of Outstanding Natural Beauty (AONB), Site of Special Scientific Interest (SSSI), internationally designated Special Protection Area (SPA) and Special Area of Conservation (SAC).

3. It is clear from the above that the estuary and surrounding landscapes benefit from the highest level of protection due to the rare and diverse examples of flora, fauna, wildlife and landscape qualities contained within them.

4. There is provision within national and regional policy to ensure development does not adversely affect national landscape designations. For example, Policy ENV3 of the draft Regional Spatial Strategy 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..."

5. In identifying suitable sites for new waste management facilities, Planning Policy Statement 10 (PPS10) advises waste planning authorities to assess the suitability for development against the criteria set out in paragraphs 20-21 and Annex E. Consideration is needed to protect landscapes of national and
international importance such as AONBs, SSSIs, SPAs and SACs in terms of potential visual intrusion and impact on the natural habitat.

6. Purely in terms of visual impact, the elevated nature of the surrounding land means that the site is highly visible from several points within the AONB, particularly on the Caradon side of the Tamar (see Appendix One). Such a topography clearly limits the availability to adequately screen the site, particularly an incinerator chimney, however well designed it may be. This point is accepted in paragraph 5.22 of the Sustainability Appraisal of Plymouth City Council's Submission DPD where it is stated that in the medium to long term, "It may be more difficult to accommodate structures or buildings within the wider landscape of the estuary if these are erected close to the shore".

7. By its nature, a strategic waste management site requires buildings and structures of a minimum size and bulk. Even if the development was limited to the part of the site furthest away from the shoreline, we have doubts that the visual impact could be reduced to a level that would have negligible impact on the AONB. Whilst good design can mitigate visual impact, no evidence has been provided to show how this could be achieved within the proposal site.

Site Selection

8. Caradon have concerns over the reasoning behind the Ernesettle site progressing from a “reserve” site at Preferred Options stage to a firm proposal at Submission stage. We are also concerned that the Ernesettle site proposed at Submission stage occupies different land from that shown at Preferred Options.
9. PPS10 encourages authorities to look for opportunities to identify industrial sites, giving priority to the re-use of previously developed land. This is reflected in Policy W2 of the draft RSS which states: "In all areas, identification for sites for facilities will take account of...established...industrial sites..., and other previously developed land..." The Ernesettle Site is clearly a greenfield site. Indeed, the Sustainability Appraisal of Ernesettle Lane at Preferred Options notes that the site should only be brought forward for development if other sites identified cannot be, and that the need for sensitive siting would be of particular concern. Caradon therefore argue that the most suitable site in policy terms is Coypool.

10. It is accepted that PPS10 advises waste planning authorities to avoid unrealistic assumptions on the prospect of developing particular sites (paragraph 18). We presume this is the reasoning behind Ernesettle becoming a strategic site. Indeed, paragraph 5.20 of the Sustainability Appraisal on the submission document states that the Ernesettle site: "has been upgraded to a strategic site in order to meet the need for flexibility to ensure delivery of the long term waste management strategy", presumably to accommodate for the possibility that the Coypool site will not be made available.

11. Caradon do not dispute the fact that Plymouth have made an attempt to adhere to the advice set out in paragraph 18 of PPS10, but strongly disagree with the decision to promote an alternative site that has been highlighted as having serious environmental constraints. We make the point elsewhere (Test of Soundness 7) that the necessity to comply with paragraph 18 of PPS10 should not outweigh all other planning considerations.
12. Caradon’s position is that in landscape terms the site is unacceptable for a strategic waste transfer site and evidence set out in the Sustainability Appraisal supports this. We also assert that the proposed site at Ernesettle Lane has not been identified in accordance with regional policy or the advice set out in PPS10.

Local Character

13. Notwithstanding our comments on the potential impact of the waste management site on the nationally designated AONB, this area has other special qualities which make it locally distinctive. The Tamar Road Bridge and Royal Albert Bridge are iconic local landmarks which serve as the principle gateway to Cornwall, with an average daily flow of 44,100 vehicles (source: Cornwall County Council). Indeed, the Royal Albert Bridge is Grade 1 listed and we suggest that that the landscape to the north forms an important part of its backdrop when viewed from the south.

14. Local Community Plans such as the Saltash Gateway plan and Saltash Regeneration Study set out their own vision for the future development of Saltash and for the sensitive development of the waterside and Tamar Estuary. As the proposal site is clearly visible from the two bridges and from Saltash waterfront (see Appendix One), the Council consider that the visioning objectives for the waterfront set out in these Community Plans will be compromised by a development of this nature.
15. Caradon are in the process of preparing a Core Strategy which is currently in the early stages of evidence gathering. As part of the process of creating a local vision, we will be taking account of community plans including the local work that has been carried out in Saltash. We are therefore concerned that the proposal is not compatible with the emerging spatial vision for this part of Caradon which will eventually form part of the statutory Development Plan.

16. We also draw the Inspector's attention to the importance tourism has to the local economy of Caradon. Apart from the visual impacts on Cornwall's gateway, we note that the river, adjacent villages (e.g. Cargreen), and localities north of the bridges are used heavily for leisure related activities (especially in the summer), and are concerned that the introduction of a waste management site abutting the estuary will have potentially damaging impact on the local economy.

Wildlife

17. Both the European SPA designation (Birds Directive) and SAC designation (Habitats Directive) of the Tamar estuary have been made for specific reasons associated with the river environment. Caradon are not aware of any scientific studies that have been carried out to investigate potential conflicts between the proposed waste management site and local wildlife apart from the Sustainability Appraisal. We believe that these studies should be carried out to inform the plan making stage and not retrospectively, after the proposal has been adopted.

18. Even if it was subsequently demonstrated that the risk to the SSSI was negligible, we question why an internationally recognised wildlife habitat should
be exposed to any potential risk from new development (however small) when another, less sensitive, site is available at Coypool.

**Test of Soundness 7**

*Weight Given to SEA in Decision Making Process*

19. The Ernesettle site identified at Preferred Options stage was only introduced as a reserve site if other options could not be brought forward. This is because particular concern was attached to the environmental impact the development may have on the Tamar Valley. At Submission stage an entirely different site at Ernesettle (occupying land closer to the river) is introduced for the first time. However, the Sustainability Appraisal continues to raise concerns over the potentially negative impacts the development would create in terms of biodiversity, landscape and local distinctiveness.

20. Despite this advice, Plymouth City Council state in paragraph 5.21 of the Submitted DPD that the proposal: “requires development to be both sensitive to these issues and provide mitigation for them”. Whilst it may be possible to mitigate against noise, odour or dust (although this is not proven) the evidence provided in the Sustainability Appraisal suggests that mitigating the visual impact of the development on the Tamar Valley AONB cannot be achieved.

21. Caradon accept that the authority have responded to paragraph 18 of PPS10 in selecting an alternative, deliverable site (albeit different from that proposed at preferred options stage). However, the Council is concerned at the limited weight
given to the results of the Sustainability Appraisal in arriving at the proposed option at Ernesettle. It is noted here that paragraph 18 comprises one small component of the overall objectives set out in PPS10, and when read in its entirety, along with PPS1, it is clear that the primary purpose of the planning system is to promote sustainable development. This includes a strong emphasis on protection of the most important environmental resources. From the evidence available, these objectives appear incompatible with the siting of a strategic waste management site at Ernesettle.

22. Caradon believe that Ernesettle is an unsuitable location for development of this nature and should not have progressed as a viable alternative to Coypool beyond the Preferred Options stage. We accept that a number of competing issues need to be balanced when selecting sites for strategic waste management, and that there are limited opportunities to find suitable locations in Plymouth. However, it appears that the need for deliverability (paragraph 18 of PPS10) is taking precedence above all other planning policy considerations and that the role of the Sustainability Appraisal and Annex E of PPS10 have been relegated to a minor consideration within the overall site selection process.

Detail Contained within the Sustainability Appraisal

23. Caradon accept that all Sustainability Appraisals take a fairly superficial, standardised approach in terms of how they measure impacts such as noise, odour, dust and the visual implications associated with development. We also accept and that it will not be possible to establish the design and exact nature of the scheme prior to the submission of a planning application. However, there are
fundamental issues associated in locating a waste management site adjacent to a SSSI and AONB that are relevant regardless of the specifics contained within any subsequent planning application.

24. At all stages of the Waste DPD, the Sustainability Appraisal has indicated that development of land at Ernesettle may have negative impacts on nationally important environmental resources (the AONB and SSSI). Plymouth City Council have stated that these issues will be explored further as part of the EIA at the planning application stage. However, Caradon believe that issues raised within the Sustainability Appraisal should have been followed-up by more detailed investigations of environmental impact during the plan-making stages. It is not sufficient to investigate these issues retrospectively (once the site is allocated within an adopted DPD). Indeed, a scenario could emerge where an EIA at planning application stage concludes that environmental impact could not be sufficiently mitigated. In this case, the site would not be deliverable, which is not the intention of PPS10 (paragraph 18).
Appendix One: Views of proposed site

View of site from Ernesettle Battery emphasising visual exposure to AONB northwards

Taken within site, emphasising visibility from bridges to the south.
Taken within site, emphasising visual exposure to Saltash waterfront.

View of site looking downwards from entrance to Tamar Bridge (Saltash side).
Site viewed from Landulph area, within the Tamar Valley AONB.