
Wiltshire & Swindon Minerals and Waste Development Framework

Waste Core Strategy DPD

Examination

Position Statement MM1

WCC/SBC/PS1

August 2008

Contents

Page No.

MM1: The basis and extent of the preferred areas of search (the 16km radius)

Issues and Matters to be Considered

1. Policy WCS2 imports directly into the CS the 16km radius which appears in RSS Policy W2, and which the Panel found 'too prescriptive' for policy, recommending that it be transferred to supporting text. In these circumstances, how do the Councils consider that the CS should respond to the change? 1
2. RSS policy W2 prescribes a search sequence, starting with sites 'within', then 'on the edge of' and finally 'in close proximity to (ie within 16km of) the urban area primarily served by the facility. CS Policy WCS2 does not contain this search sequence, but summarises it as close as practicable to the SSCTs and defines this as (within 16km). Why has this broader area of search been chosen, and what are its implications? 1
3. Should the 16km radius of the areas of search be adapted (reduced?) to take account of the extent of AONB within them? [It is recognised that, with 1 exception, no Strategic Site is proposed within an AONB]. 2
4. Do the areas of search need further refinement in the light of the above? Should the CS text make clear that the 16km should be regarded as a maximum? And if it is, why does the Key Diagram show one Strategic Site to be located in the narrow area remaining between (and therefore outside) the defined areas of search? 2

The Councils Position Statements

1. *Policy WCS2 imports directly into the CS the 16km radius which appears in RSS Policy W2, and which the Panel found ‘too prescriptive’ for policy, recommending that it be transferred to supporting text. In these circumstances, how do the Councils consider that the CS should respond to the change?*

The Proposed Modifications to the draft Regional Spatial Strategy (RSS) for the South West continue to maintain the expectation that new waste management facilities will be located within “close proximity” to Strategically Significant Towns and Cities (SSCTs). This expectation is defined using indicative distance criteria of 16km. The 16km figure therefore remains a key element of draft regional policy in relation to the waste site selection process (Soundness Test 4). As such, the Councils consider that they do not have a basis to diverge from this land-use strategy or the indicative site selection criteria of 16km.

2. *RSS policy W2 prescribes a search sequence, starting with sites ‘within’, then ‘on the edge of’ and finally ‘in close proximity to (ie within 16km of) the urban area primarily served by the facility. CS Policy WCS2 does not contain this search sequence, but summarises it as close as practicable to the SSCTs and defines this as (within 16km). Why has this broader area of search been chosen, and what are its implications?*

The phrase in draft Policy WCS2 “will be located as close as practicable to the SSCTs...” and the provisions of Policy WCS3 are considered to embody the search sequence adopted by RSS Policy W2. It is not considered necessary or appropriate to replicate the approach outlined in the wording of draft RSS Policy W2 within draft Policy WCS2. However, in order to maintain conformity to draft RSS policy W2, the Councils will apply a sequential approach to developing the final list of site allocations for submission.

Given the distinctive circumstances of Wiltshire and Swindon, which are home to a number of important environmental protection designations, (including 3 AONBs covering more than 50% of the Wiltshire and Swindon area and which overlap with the 16km buffer area of all of the Plan area’s SSCTs), greater flexibility than is provided by draft RSS Policy W2 is considered necessary in draft Policy WCS2 (Soundness Test 9).

Complementing the approach outlined in draft Policy WCS2, draft Policy WCS3 provides certainty and clarity as to the Councils’ strategy for identifying preferred locations for different types of waste management facility. The approach taken is considered to also offer flexibility, particularly through the use of the term ‘Preferred Location’. Policy WCS3 states that:

“As part of the SA/SEA reports the Council will expect to see full consideration of suitable alternative sites, especially of those contained in the Site Allocations DPD”.

As part of the process of developing the Waste Site Allocations DPD, alternative, potentially suitable locations for strategic waste management facilities will be considered through the SA/SEA process, which will ensure that a rigorous and transparent assessment of alternatives is undertaken.

The approach adopted in the draft Waste Core Strategy is in general conformity with and amplifies the approach adopted in the emerging RSS (Soundness Test 4), a point made by the South West Regional Assembly in their comments on the submitted document.

3. *Should the 16km radius of the areas of search be adapted (reduced?) to take account of the extent of AONB within them? [It is recognised that, with 1 exception, no Strategic Site is proposed within an AONB].*

The approach adopted within the draft Waste Core Strategy means that the broad areas of search for new waste management facilities defined by the 16km proximity zones does not need to be adapted. Draft Policy WCS2 makes it clear that sites within AONB areas will only be suitable for local-scale waste management facilities, an approach that was fully endorsed by the Waste Development Forum.

It is considered that the draft Waste Core Strategy approach is coherent, whereby the plan confirms upfront within draft Policy WCS2 that parts of the AONB within the 16km proximity zone will only be suitable for local-scale waste management facilities. It is considered that this approach provides clarity to the reader (Soundness Test 6).

Specific reference has been made to the status of a site situated in the north of the Plan area and within the Cotswolds AONB. This site is called Knockdown Quarry and it provides significant capacity (circa 1 million cubic metres) for the on-going deposition of Construction, Demolition and Excavation (CDE) wastes for the purposes of restoring the void left by mineral extraction. It is for this reason that the site is considered as offering 'strategic scale' waste management capacity, in spite of it's location within the AONB. The Councils would not accept any new, strategic scale development at Knockdown.

4. *Do the areas of search need further refinement in the light of the above? Should the CS text make clear that the 16km should be regarded as a maximum? And if it is, why does the Key Diagram show one Strategic Site to be located in the narrow area remaining between (and therefore outside) the defined areas of search?*

It is not considered that the areas of search need further refinement, the approach adopted in the draft Waste Core Strategy is considered to be coherent.

It is not considered appropriate for the draft Waste Core Strategy text to make clear that the 16km proximity zone should be regarded as a maximum. The draft RSS does not adopt this terminology. There will be other considerations that *may* override the 16km approach. The Councils have sought to embed an element of flexibility within the strategy (Soundness Test 9) to account for the extensive environmental constraints that exist in the Plan area. The 16km proximity zone is intended as an important guiding principle and does not represent an embargo on new strategic facilities beyond the 16km proximity zone, particularly if such a facility was proven to be necessary in the light of the need to manage wastes at the nearest available facility. The approach is therefore considered to be more of a presumption against such facilities being located outside the 16km radii of SSCTs.

There may be instances where no suitable sites for strategic waste management facilities exist within the 16km proximity zone of a SSCT, but an identified requirement exists for such a facility to serve the SSCT, which cannot be met by upgrading an existing waste management facility within the 16km proximity zone but which could be met at an existing facility beyond the zone.

It should be noted that the Councils' record is good with respect to resisting strategic waste facilities in the AONB, as demonstrated in the Key Diagram, which shows that only one strategic waste management facility is currently located in the AONB. However, as stated above, it is important to note that this particular site is classified as 'strategic' by virtue of its scale alone. The site in question is a long-standing limestone quarry that has permission to accept significant quantities of Construction, Demolition and Excavation Wastes (CDE) for the purposes of restoration. In effect, it is a legacy site that provides capacity to support the **existing** overall waste management framework but may not be suitable to accommodate new 'strategic scale' development that, in accordance with the draft Waste Core Strategy, should otherwise be developed in close proximity to the SSCTs.

Reference has also been made to the status and significance of the site at Chitterne. Again, this site currently offers 'strategic scale' waste management capacity because there are no restrictions on the amount of inert waste that can be tipped at the site. The site has also been extended recently through the creation of a screening bund involving the tipping of inert waste and identified for potential green waste composting.

It is important to stress that the Chitterne facility is currently operational and hence forms part of the Councils' overall capacity for the management of inert (Construction, Demolition and Excavation) waste. Its location pre-dates the approach now being taken by the Councils in terms of identifying future waste management capacity – i.e. developing a framework of strategic scale facilities as close as practicable to the SSCTs; hence it would only now be considered for local scale waste management development.

In summary, the Key Diagram shows **existing** strategic and local waste sites not future allocations. Although some of the sites listed may be suitable for accommodating future waste management development (i.e. in line with draft policy WCS3), the work involved in justifying new allocations is being undertaken in the emerging Waste Site Allocations DPD. This approach is deemed to be in accordance with the national policy (PPS10 and the original PPS12).