
Wiltshire & Swindon Minerals and Waste Development Framework

Waste Core Strategy DPD

Examination

Position Statement MM3

WCC/SBC/PS3

August 2008

Contents

	Page No.
MM3: Specific Issues	3
Issues and Matters to be Considered	
The Sustainable Transport of Waste (at every scale of facility)	
The Councils Position Statements	4

Specific Issues

Issues and Matters to be Considered

MM3: The Sustainable Transport of Waste (at every scale of facility)

The Vision for Waste Planning (CS p14) includes the development of a sustainable waste management framework and the Strategic Objectives (CS p16) state that options for sustainable transportation should be encouraged in order to reduce the impacts of transporting waste through Wiltshire and Swindon. However, there is little reference to transport elsewhere in the document. The Highways Agency has picked this up in its representation. Policy WCS6(i) includes within the required audit proposals for the transport of waste created during the development process. But transport considerations are not made explicit in the location policies WCS2 and WCS3. Consequently the CS appears not to have taken the possibilities for limiting transport, and for a more sustainable approach to transport, fully into account in its strategic spatial policies.

The evidence base suggests otherwise: it explores the various transport policy sources and shows that they have been taken into account. However, the CS itself makes no reference, for example, to the following, which occur in the Evidence Base:

- a. the possibility of rail transport (Evidence Base A p56) – would the suggested inter-modal freight facility at Westbury be capable of contributing to waste provision? Would any of the Strategic Sites be capable of being served by rail?*
- b. The means by which waste is transported to Slough from Salisbury, and if not by rail, whether this would be feasible in future;*
- c. The means by which waste imports into Wiltshire are currently carried, and the scope for their diversion to rail;*
- d. The Freight Strategy Policies including FT5 to consider the recycling of waste using rail as a means of distribution;*
- e. Concern about the use of country roads by HGVs; the Wiltshire Freight Strategy and the Wiltshire Freight Map; and freight operator co-operation in supporting local routes;*
- f. The reported encouragement of the Waste Local Plan (where?) for waste facilities to be located within 5km of the Strategic Lorry Route Network and within 2km of the Local Lorry Route Network.*

Whilst recognising that some of this detail might more appropriately be contained in the DC Policies DPD, it remains unclear to what extent the CS has taken account of those possibilities that exist for progress in the sustainable transport of waste within its timespan to 2026. Does the CS provide a sufficient basis for subsequent DC policies relating to sustainable transport?

The Councils Position Statements

- 9. The Vision for Waste Planning (CS p14) includes the development of a sustainable waste management framework and the Strategic Objectives (CS p16) state that options for sustainable transportation should be encouraged in order to reduce the impacts of transporting waste through Wiltshire and Swindon. However, there is little reference to transport elsewhere in the document. The Highways Agency has picked this up in its representation. Policy WCS6(i) includes within the required audit proposals for the transport of waste created during the development process. But transport considerations are not made explicit in the location policies WCS2 and WCS3. Consequently the CS appears not to have taken the possibilities for limiting transport, and for a more sustainable approach to transport, fully into account in its strategic spatial policies.*

The submitted draft Waste Core Strategy seeks to provide a local focus for implementing the policies and proposals of the draft South West Regional Spatial Strategy (RSS). In doing so, the Core Strategy seeks to direct proposals for new or expanded waste management facilities to the identified strategically significant cities and towns (SSCTs) across Wiltshire and Swindon. The approach is underpinned by the principles of sustainable development and hence considers issues relating to transport and the objective of reducing 'waste mileage' through locating facilities to manage waste as close as practicable to sources of arisings.

The strategic approach to managing waste being promoted by the Councils builds upon statements in national, regional and local policy and has been supported by the findings of the Sustainability Appraisal.

In addition, it is important to stress that the policies and proposals of the submitted Waste Core Strategy should be viewed within the context of the policies set out within the wider policy framework. As a result, the policies of the Waste Core Strategy seek to provide a commitment to delivering upon the requirements of the draft RSS and local Municipal Waste Management Strategies, hence allowing detailed control aspects to be mapped out in the emerging Development Control Policies DPD.

In addition, until replaced by policies of the Waste Development Control Policies DPD, saved Policy 6¹ of the adopted Waste Local Plan will still form part of the development plan for Wiltshire and Swindon. As a result, the Councils conclude that issues in respect of transport continue to be covered in policy terms.

The Councils Approach to Managing Waste

The submitted draft Waste Core Strategy seeks to manage waste in a sustainable manner through reducing 'waste mileage' by tackling arisings as close as practicable to source. To achieve this aim, the strategy is geared to implementing the policies and proposals of the draft South West Regional Spatial Strategy (RSS) through directing new or expanded facilities for waste management towards the main towns²

¹ Policy 6 – Environmental Protection, Human Health and Amenity and Transport; Wiltshire and Swindon Waste Local Plan (Adopted March 2005).

² The draft RSS designates Swindon, Chippenham, Trowbridge and Salisbury as 'Strategically Significant Cities and Towns' (SSCTs).

in Wiltshire and Swindon – namely Swindon, Chippenham, Trowbridge and Salisbury. These towns are expected to accommodate the majority of the projected housing and employment land quota for the next twenty years.

In addition to the main SSCT settlements, the draft Waste Core Strategy recognises the important role played by Wiltshire's market towns. The Councils intend to augment the existing framework of waste management facilities through providing a hierarchy of sites to meet the 'strategic' and 'local' scale needs of Wiltshire and Swindon. In addition, by promoting a flexible approach to the identification of sites (draft Site Allocations DPD – Issues and Options Report, March 2006), the Councils are aiming to reduce the need to travel to facilities.

In terms of managing the movement of waste through and within the Plan area, the Councils approach of directing capacity towards the main nodes of future growth – the SSCTs, is considered to be sound and within the ambit of sustainable development. Chapter 4 of the submitted draft Waste Core Strategy sets out explicit and implicit statements relating to the need to encourage sustainable modes of transport and minimising of cross-boundary movements (paragraph 4.6). These statements are embodied within the Vision and Strategic Objectives (particularly 2, 3 and 4) and hence form the basis upon which the development strategy for identifying sites and increased capacity (draft Policies WCS2 and WCS3) is premised.

Whilst the Councils would accept that neither draft Policy WCS 2 nor WCS 3 **specifically** refers to issues relating to the transport of waste, these policies should not be read in isolation. The management of waste in Wiltshire and Swindon should be considered in the light of the draft RSS, local 'saved' policies and the emerging policies of the draft Waste Core Strategy and Development Control Policies DPDs (see draft Policy WDC11). However, in order to address specific concerns in respect of transport, the Councils would be prepared to offer minor changes to draft Policies WCS1 and WCS 2 and supporting text to encourage all proposals for new or expanded waste management development to fully scope the potential for adopting sustainable modes of transport.

Other Matters

Whilst the submitted Core Strategy may not contain specific policies for the encouragement of sustainable transport, the evidence base does examine the potential for encouraging the use of rail over road. It is clear that there may be potential opportunities to utilise rail, particularly in the Swindon area. However, detailed consideration of such potential will naturally be made during the preparation of the Site Allocations DPD.

10. *The evidence base suggests otherwise: it explores the various transport policy sources and shows that they have been taken into account. However, the CS itself makes no reference, for example, to the following, which occur in the Evidence Base:*

- a. *the possibility of rail transport (Evidence Base A p56) – would the suggested inter-modal freight facility at Westbury be capable of contributing to waste provision? Would any of the Strategic Sites be capable of being served by rail?*

As a general introduction to this issue, the Councils would wish to make the point that the submitted draft Waste Core Strategy has been designed so as not to replicate the contents of the evidence base. Early drafts included a wealth of supporting evidence and this made the document extremely bulky and relatively inflexible. In addition, the approach taken with the submitted document was a direct response to points raised through consultation by the Government Office for the South West who were keen to see a succinct statement of strategy.

Within the context of the strategy for waste management, the Councils would accept that more encouragement should be given to utilising sustainable modes – including rail, but these matters are not generally within the gift of the Councils to deliver. The development of an inter-modal freight facility at Westbury has been consistently encouraged by Wiltshire County Council. Indeed, an application to secure operational land at Westbury for use as an inter-modal facility was permitted by West Wiltshire District Council but unfortunately not implemented.

The transport policy team at the County Council are currently undertaking a feasibility study to determine the viability of an inter-modal freight facility at Westbury. Previous investigations have demonstrated little commercial interest in such a development. Further, it is believed the land is no-longer considered surplus by Network Rail who wish to submit a fresh application to use the land for their own operational requirements. It is believed this application is pending and has been subject to pre-application discussions with colleagues in Highways Development Control

Also, the relocation of the preferred site for waste management in Westbury (from a site adjacent to the railway line) could further hinder any potential transfer of waste from road to rail in this context. Again, there has been a lack of interest from the waste industry in promoting rail freight in this respect.

Wiltshire County Council is currently reviewing its freight strategy and whilst it is the intention of the Councils to continue to seek opportunities for the potential transfer of freight from road to rail, it is important to be realistic about the deliverability of a dedicated rail-freight facility at Westbury, and in particular the potential to utilise the rail network to transport waste materials in Wiltshire and Swindon generally..

Further, the Councils have undertaken objective assessments of the potential for rail (reference the Wiltshire and Swindon RAD Study) and concluded that the best options for such development are located in the Swindon Borough area – particularly sites at Octotal Way and South Marston. The Councils will continue to assess these sites and work with Network Rail through the on-going preparation of the Waste Site Allocations DPD.

In terms of delivering the objectives of the draft Waste Core Strategy, the Councils will work with Network Rail and other key transport stakeholders through the preparation of the detailed Site Allocations DPD, particularly in terms of potential rail-

links. At this stage, the Councils consider it would be prejudicial to name existing strategic sites that may be capable of being served by rail.

- b. The means by which waste is transported to Slough from Salisbury, and if not by rail, whether this would be feasible in future;*

The contract with the Slough facility was completed on the basis of a commercial decision to ensure that Wiltshire secures long-term LATs compliance. The Councils consider that neither the procurement process, nor the detailed terms of the contract are land-use matters. It is also important to note that neither the Slough facility, nor the bulking up facility at Thorney Down is rail-linked, or indeed capable of rail-linkage.

Further, previous investigations of the potential for land in and around Salisbury to accommodate some form of freight facility has concluded that the area is heavily constrained both in terms of environmental and social respects. Further, volumes of traffic in the Salisbury area will increase and a transport model has been commissioned by Wiltshire County Council to review a number of potential growth scenarios.

- c. The means by which waste imports into Wiltshire are currently carried, and the scope for their diversion to rail;*

The current pattern of waste movements into Wiltshire and Swindon is not something the Councils can seek to influence. The Councils do not have direct control over the commercial operators and the way in which they choose to operate their businesses.

- d. The Freight Strategy Policies including FT5 to consider the recycling of waste using rail as a means of distribution;*

The Councils have fully assessed the policies of the Local Transport Plan (LTP) and in particular the Freight Strategy set out in Appendix 3 of LTP2. Policy FT5 was developed in consultation with officers from the Waste Planning Authority at the time of preparing the Wiltshire and Swindon Waste Local Plan. Since that time, the Councils have maintained support for initiatives designed to maximise the use of rail over road for transporting waste materials. However, it is recognised that opportunities to implement the use of rail are relatively limited within the Wiltshire Swindon context. It is for this reason that South Marston (in Swindon) and Westbury have been identified at this stage as offering the best potential for moving freight (including waste materials). Further, it is in this context that the Freight Strategy for Wiltshire is being reviewed.

- e. Concern about the use of country roads by HGVs; the Wiltshire Freight Strategy and the Wiltshire Freight Map; and freight operator co-operation in supporting local routes;*

The Councils recognise the importance of seeking to minimise the social and environmental impacts arising as a consequence of HGV movements in Wiltshire and Swindon, particularly on country roads. However, it should be recognised that the majority of Wiltshire and Swindon is rural in nature and hence it is not always possible to completely limit the impact of such vehicles on local roads.

The Councils have developed Freight Quality Partnerships to prepare and review Freight Action Plans, and to provide a forum for representatives from industry, freight operators, local government and other interested parties to discuss freight related matters and promote solutions which reconcile the need for access with local

environmental and social concerns. The FQP for Wiltshire has also overseen the implementation of an area wide weight restriction in the Downton and New Forest National Park Area in October 2007.

Wiltshire County Council have also developed a local freight assessment and priority mechanism to provide a more equitable means of assessing local freight issues and prioritising resources as a consequence. This was presented to the Regional Freight forum in May 2008.

A key component of the Freight Strategy is the establishment of a two-tier system of lorry routes, comprising a network of strategic routes and a supporting network of local lorry routes. As an aid to the implementation of this network in Wiltshire, the County Council produced a map entitled 'Freight Routes in Wiltshire' in 2003 to inform HGV drivers of the most appropriate routes to use in Wiltshire. This also includes a 'HGV Code of Conduct'. This network will be revised in the context of the Freight Strategy review that the County Council are currently undertaking, and the potential conflicts that have emerged as a result of Proposed Modifications to the Regional Spatial Strategy.

Further, waste operators will be required to establish waste site transport plans for specific sites and submit transport assessments with planning applications.

- f. The reported encouragement of the Waste Local Plan (where?) for waste facilities to be located within 5km of the Strategic Lorry Route Network and within 2km of the Local Lorry Route Network.*

The Councils have consulted on potential site allocations³; the methodology used to identify and appraise sites recognised the need for appropriate access arrangements and the importance of directing traffic towards the Wiltshire HGV Route Network⁴.

The approach adopted for site assessment built upon work undertaken to support the adopted Waste Local Plan (March 2005) and utilised search parameters based (in part) upon a series of transport related criteria. 'Thresholds of concern' were utilised to hone the search process down – including indicators related to distance from the strategic and local lorry route networks⁵. Therefore, although the adopted Waste Local Plan does not explicitly refer to such thresholds, they are implicitly referenced and underpin the site assessment process utilised for the emerging Waste Site Allocations DPD.

Since adopting the Waste Local Plan, the Councils have refined their search criteria in respect of linkages to the Wiltshire HGV and Primary Route Networks. This is evidenced in the approach taken with draft policy WDC11 of the submitted Waste Development Control DPD which requires "direct access or suitable links with the Wiltshire HGV Route Network or Primary Route Network" as well as waste site transport plans, Transport Assessments with applications and the minimisation of transport distances.

³ Wiltshire & Swindon Waste Site Allocations Development Plan Document – Issues and Options Report, March 2006; Appendix 4 – Site Appraisal Process.

⁴ Wiltshire HGV Route Network: <http://www.wiltshire.gov.uk/freight-route-network-map.pdf>

⁵ 5km from the Strategic Lorry Network; 2km from the Local Lorry Network.