WPHD 02

Matter 2: Spatial Strategy and Allocations

Bournemouth, Dorset and Poole Waste Plan Examination

STATEMENT BY DORSET COUNTY COUNCIL ON BEHALF OF BOURNEMOUTH BOROUGH COUNCIL AND THE BOROUGH OF POOLE (THE WASTE PLANNING AUTHORITIES)

June 2018







Background Documents

- WPSD-01 Bournemouth, Dorset & Poole Waste Plan: Pre-Submission Draft (2017)
- WPSD-03 Waste Plan Sustainability Appraisal Report
- WPDCC-01 Waste Plan Issues Paper (2013)
- WPDCC-02 Draft Waste Plan (2015)
- WPDCC-03 Draft Waste Plan Update (2016)
- WPDCC-04 Waste Site Options in Blandford & Purbeck (2017)
- WPDCC-25 Background Paper 2: Waste Plan Site Selection
- WPDCC-30 Blandford Landscape & Visual Sensitivity Study
- WPDCC-30a Blandford Landscape & Visual Sensitivity Study Appendix A Defining the area of study
- WPDCC-57 The need for a waste management centre in the Blandford area and review of existing site
- WPDCC-65 Joint Municipal Waste Management Strategy for Dorset Review 2017
- WPDCC-66 Bournemouth, Borough Council Municipal Waste Management Strategy
- WPDCC-67 Borough of Poole Waste Strategy Review 2008 2018
- WPDCC-71 Bournemouth, Dorset & Poole Waste Local Plan (2006)

Statements of Common Ground

 SCG-02 – Statement of Common Ground between the Waste Planning Authority & North Dorset District Council

Matter 2 – Spatial Strategy and Allocations

Issue: Whether the vision, objectives, spatial strategy and allocations provide an appropriate basis for managing waste sustainably.

Overview

14 Does the BDPWP identify all the main challenges to providing sufficient, sustainable waste management facilities in the plan area, and are these challenges properly reflected in the vision and objectives and incorporated in policy?

Yes, the spatial strategy, vision and objectives have been developed based on a sound understanding of the waste management industry in Dorset, national planning policy priorities, evidence of future growth and the spatial characteristics of the Plan area. They have been consulted on at key stages in the Plan preparation to ensure that they fully reflect the challenges of the Plan area. The objectives will help to implement and deliver the spatial vision and have been translated into key identified needs, issues, spatial strategy, site allocations and core policies.

The policies in the Draft Waste Plan were developed to address the identified needs, vision and objectives, following early consultation on an issues paper in December 2013 (**WPDCC01**). The implementation and monitoring section of the Pre-Submission Waste Plan (**WPSD01**) shows which Plan objectives are being achieved through the implementation of each Waste Plan policy. Each policy is directly linked with one or more of the objectives. These are cross referenced in the Implementation and Monitoring tables that can be found in Chapter 14 of the Pre-Submission Draft.

15 How does the BDPWP overall support the movement of waste management up the waste hierarchy?

See Q16 below.

16 How does the BDPWP reflect the proximity principle?

The waste hierarchy and proximity principles are reflected in the Vision and Objective 1. Objective 1 explains how the waste hierarchy will be achieved through waste prevention, increased re-use, recycling, composting and recovery. Disposal to landfill will be the last resort. Proximity is reflected through the requirement for waste facilities to be appropriately located. Objective 2 explains that waste facilities should be located as close as practicable to the origin of waste to reduce the total mileage waste is transported. Reference is also made to the need for facilities in areas of growth.

The Spatial Strategy sets out the identified needs. In many cases these are directly linked to the proximity principle. The site selection exercise aimed to find suitable sites in appropriate locations to address the identified needs. Local waste management facilities such as household recycling facilities and transfer stations had specific locational requirements. The need for green waste composting facilities was identified to facilitate a good spatial spread with a specific requirement in the west of Dorset, which is addressed through an allocation. The need for residual waste management capacity was identified in South East Dorset, where the majority of waste arises. However, the Plan does acknowledge that capacity may also be appropriate elsewhere to result in a good spatial distribution. Again, the allocations

address these needs, providing most potential capacity in the South East with additional capacity further west. The Waste Plan makes sufficient provision for the recycling and recovery of non-hazardous waste, facilitating a move away from reliance on landfill and providing options for the treatment of waste, for which there is an identified shortfall in the county currently. Moving waste up the hierarchy is central to this.

The vision and objectives are then translated into more detailed policies.

Policy 1 ensures that proposals for waste management facilities conform with and demonstrate how they support the delivery of the waste hierarchy and proximity principle. Policy 3 allocates sites to deliver facilities to move waste up the hierarchy. Policy 4 specifically requires non-allocated sites to demonstrate how they move waste up the hierarchy and adhere to the proximity principle. Policies 5 and 6 are positive policies to enable recycling and recovery facilities to come forward where they do not displace the management of waste by a process further up the hierarchy. Conversely, Policy 7 states that disposal should only be considered as a last resort in accordance with the waste hierarchy. Where there is an identified need, proposals for disposal should have regard to the proximity principle.

Policy 6 also requires residues arising from waste treatment to be managed in accordance with the waste hierarchy and the proximity principle.

Policy 8 requires inert waste to be managed at the highest practicable level of the waste hierarchy, achieved through the requirement to remove high quality materials for recycling. In demonstrating need for inert waste, proposals should have regard to the proximity principle.

Policy 9 also refers specially to the management of special types of waste in line with the waste hierarchy and proximity principle.

17 How does the spatial strategy relate to planned geographic areas of growth?

Chapter 2 of the Waste Plan (**WPSD01**) summarises how the need for new facilities has reflected the broad distribution of future development.

The Spatial Strategy reflects growth specifically through the need for new/improved local waste management facilities to accommodate waste from growing communities. Site allocations for the relocation of Shaftesbury HRC to Gillingham and Dorchester HRC to a larger site (Insets 3 and 5) were particularly driven by the expansion of these towns. Similarly, the increased waste arisings from Blandford and surrounding villages has driven the need for a larger site to accommodate an expanded facility (Inset 2). (See **SCG-02**).

Furthermore, the Waste Plan allocates land for an expansion of Maiden Newton Sewage Works. This is specifically to reflect catchment growth.

The need for additional capacity for managing residual waste was specially directed to South East Dorset, which will see significant growth during the Plan period.

18 How does the BDPWP support the constituent Councils?

The Waste Plan has been prepared by Dorset County Council on behalf of the Borough of Poole and Bournemouth Borough Council. The needs of all three authorities have been considered in preparing the Plan. Regular dialogue has taken place with planners and the waste management authorities of the three authorities. The Waste Management Strategies of the three authorities formed an important starting point for the preparation of the Waste Plan (**WPDCC – 65,66 and 67**).

A Joint Advisory Committee was set up with Members of the three authorities. Reports were presented to this committee to agree documents for consultation. Where it was necessary to reach a more formal agreement on the content of documents, such as the Pre-Submission Draft Waste Plan, this document was reported to the relevant Cabinet/Full Council of the three authorities.

Regular email updates were sent to Members of the three authorities, in advance of public consultation periods. Where requested, officers also provided face to face briefings.

On-going engagement has taken place with the district councils in the DCC Dorset Area¹ throughout the plan's preparation. Detailed discussions have taken place on identifying suitable locations for waste facilities. Furthermore, the Waste Planning Authority has taken account of current and emerging local plans as part of its assessment of waste projections for the plan area. In this way waste facilities are intended to be a complementary and essential form of infrastructure that help to deliver wider economic and social aspirations as expressed in various local plans and strategies.

Waste management allocations in general

19 In general how have waste management sites been assessed for allocation in the BDPWP? In a few paragraphs please provide a brief overview including the methodology, how constraints and opportunities have been considered and how allocations have been chosen over omission sites.

Background Paper 2: Waste Plan Site Selection (**WPDCC-25**) sets out the methodology for selecting sites for allocation in the Waste Plan and a detailed list of site options.

An initial long list of site options was derived from a review of sites allocated in the adopted Waste Local Plan (**WPDCC-71**), existing waste sites and allocated employment land/industrial estates, plus discussions with the waste industry, district and borough councils and landowners. This included a 'call for sites' letter/email to the waste industry and landowners.

A high-level assessment of these sites was undertaken to consider issues such as availability, land ownership, location and proximity, access, environmental

¹ District/borough councils in the DCC Dorset area comprise: Dorset Councils Partnership, comprising West Dorset District Council, Weymouth and Portland Borough Council, and North Dorset District Council; Christchurch and East Dorset District Councils; and Purbeck District Council

constraints, current and historic land uses. At this stage undeliverable sites were discounted.

Detailed site assessments were prepared for shortlisted sites including a plan and description of the site and potential uses. Further information on traffic generation, access considerations, proximity to settlements, waste arisings and sensitive receptors was included. The site plan showed details of all known environmental constraints/designations.

The Site Assessments were circulated to gather input from both internal and external consultees including:

- Highways Authority/Highways England
- Rights of Way
- Environment Agency/LLFA
- Landscape officer/AONB team
- County Ecologist
- DCC Historic Environment

The information contained in the site assessments was used to undertake Sustainability Appraisal on shortlisted sites (**WPSD03**). This included attributing colour scoring to each category to aid the assessments, based on the nature of potential impacts. Positive impacts and/or opportunities were given a green scoring, such as the opportunities for combined heat and power and co-location. The colour scoring was also included within the published site assessments.

The appraisal process also considered economic factors, deliverability and viability. An assessment of cumulative impacts of site options was also undertaken.

Along the way, sites were discounted for a variety of reasons such as deliverability/availability within the Plan period, environmental designations, size of site and location/accessibility. Further discussions with site promotors, consultees and additional assessments including the Habitats Regulations Assessment and the Strategic Flood Risk Assessment influenced the choice of site and/or specific site boundaries.

Public consultation on site options was undertaken in 2015, 2016 and focused consultation in 2017. Additional information, further work and responses to the consultations were considered and helped to refine and shape the allocations contained in the Pre-Submission Draft Waste Plan.

During the preparation of the Waste Plan alternative sites were suggested by stakeholders. These were considered and an assessment made of their suitability in addressing the identified needs and availability. Site assessments and sustainability appraisal was undertaken for deliverable sites before inclusion within the Waste Plan consultation document.

21 Have all reasonable alternative sites, particularly with regard to the allocated sites in the Green Belt and Areas of Outstanding Natural Beauty (AONB) and that may affect internationally designated habitats, been assessed and the reasons for rejection set out?

See Matter 1, Q12 for details of alternatives to Insets 1, 7 and 10 with respect to internationally designated sites.

Three allocated sites are situated within AONBs: Inset 2, Inset 6 and Inset 13.

Inset 2 - Land south of Sunrise Business Park

Yes. It would not be possible to provide the facility needed by redeveloping the existing site. This is because the site is too small to accommodate either a modern waste management centre or a standalone HRC or waste transfer facility. Expansion onto adjoining land was investigated and is not possible due to there being no land available. Full consideration of these matters is set out in **WPDCC57**.

An extensive, initial site selection exercise was undertaken during which employment land availability and other potential site options were reviewed and sites were discounted for reasons set out in Chapter 4 of Background Paper 2 (**WPDCC25**). This included a specific 'call for sites'. Five site options for a waste management centre and/or depot were included in the 2015 Draft Waste Plan (**WPDCC02**). Chapter 5 of **WPDCC25** sets out the reasons why alternative sites were discounted. See also Chapter 4 of the Sustainability Appraisal Report (**WPSD03**).

Land south of Sunrise Business Park was taken forward as the emerging preferred site in the Draft Waste Plan Update 2016 (**WPDCC03**). Three additional sites were put forward as a result of consultation on this document. One (land at Blandford Camp) was discounted due to deliverability and the other two were further assessed and subject to consultation through the document 'Waste Site Options in Blandford and Purbeck' (**WPDCC04**). These two alternative sites were then discounted with reasons detailed in Chapter 7 of **WPDCC25**. See also Chapter 4 of **WPSD03**.

Due to a lack of available employment land² and previously developed land in Blandford (see Statement of Common Ground between the WPA & North Dorset District Council – **SCG-02**), an assessment was undertaken of greenfield land around the Blandford bypass³ to ascertain whether an appropriate site for a waste management centre could be found. The assessment focussed on landscape and visual sensitivity due to much of the land around Blandford being located in the AONB (**WPDCC30**). The two alternative sites subject to consultation in February 2017 were assessed in the same way and incorporated into **WPDCC30**. The document provides an assessment of each parcel of land subject to the study and concluded that the proposed site (Inset 2) was less sensitive to development (subject to mitigation) than the other parcels of land assessed, and would have a minor adverse impact on the character of the AONB due to its flat plateau top location, lack of sensitive visual receptors, its maturing shelter belt along the north-eastern edge and it visual and physical association with Sunrise Business Park.

Inset 6 - Old Radio Station

Yes. An extensive, initial site selection exercise was undertaken during which employment land availability and other potential site options were reviewed and sites were discounted for reasons set out in Chapter 4 of Background Paper 2

² A lack of employment land in Blandford continues to be recognised by North Dorset District Council. Recent monitoring work suggests that only c.3.5 hectares of employment is available in Blandford and that this is made up of a combination of smaller parcels of land. NDDC's Issues and Options Consultation (November 2017) suggests there will be a need to allocate additional employment land at Blandford through the Local Plan Review.

³ See WPDCC30-a Blandford Landscape & Visual Sensitivity Study: Appendix A – Defining the area of study.

(WPDCC25). Six site options for a waste transfer station and/or vehicle depot were included in the 2015 Draft Waste Plan (WPDCC02). Chapter 5 of WPDCC25 sets out the reasons why alternative sites were discounted. See also Chapter 4 of the Sustainability Appraisal Report (WPSD03).

Two potential options were taken forward in the Draft Waste Plan Update 2016 (**WPDCC03**) for a transfer facility – the Old Radio Station and an enlarged site at Stinsford Hill. The reasons for the alternative options being discounted are set out in Chapter 6 of **WPDCC25** and in Chapter 4 of **WPSD03**. The alternative site of Stinsford Hill, although outside the AONB, was assessed as having a greater impact on the landscape and historic environment.

As an already developed site in the Dorset AONB, this site is considered to present the best opportunity for the development of a transfer facility and depot with appropriate mitigation possible to avoid unacceptable landscape and visual impact.

Inset 13 - Maiden Newton STW

There are very specific locational requirements for the expansion of this facility and therefore options were limited.

Site expansion is required to enable the installation of additional streams within the treatment process to improve phosphorous removal from the effluent (as determined by the National Environment Plan) and provide space for future plant dictated by water quality and population growth demands of the area. It is understood that new plant will be located to be sympathetic to landscape and visual impacts but also to ensure managed and continuous gravity flow between processes to reduce construction, pipework and future maintenance and electricity demands.

Several options were considered to ensure that impacts on the AONB were minimised. The 2015 Draft Waste Plan (**WPDCC02**) included options to the north west and north east. Concerns related to the landscape and visual impacts resulted in land to the east of the existing site being discounted and land to the north being expanded in a westerly direction, abutting the north of the site, in order to enable mitigation to be built into any future development.

Two sites are situated in the Green Belt: Eco-Sustainable Solutions (Inset 7) and Canford Magna (Inset 8).

<u>Inset 7 - Eco-Sustainable Solutions and Inset 8 – Canford Magna</u> – An extensive, initial site selection exercise was undertaken. Site options were reviewed and sites were discounted for reasons set out in Chapter 4 of Background Paper 2 (**WPDCC25**). See also Chapter 4 of the Sustainability Appraisal Report (**WPSD03**).

Undeveloped greenfield sites in the Green Belt were also discounted at an early stage. Nine options for managing residual waste were included in the 2015 Draft Waste Plan (**WPDCC02**) with an additional site included in the 2017 public consultation (**WPDCC04**). A range of sites were taken forward for allocation to provide a flexible strategy.

The most appropriate options outside of the Green Belt considered as alternatives to Inset 7 and 8 were:

• Land at Blunts Farm and within the Ferndown 'area of search' – This area is strategically well-located employment land, outside the Green Belt. However,

the landowner has objected to the use of land for waste uses and the site was therefore considered undeliverable. There was also concern from EDDC regarding the importance of Blunts Farm for meeting the districts employment needs.

 Woolsbridge Industrial Estate – given the more remote location of this site there was concern that development of a strategic waste facility for managing residual waste would result in waste travelling greater distances. This site was being considered for a range of waste facilities. Given the concern raised to the loss of this employment land from EDDC the range of uses proposed was limited to reduce the required land take. During the preparation of the Waste Plan this site was not being actively promoted by a waste management company, significantly reducing the likelihood of delivery compared to other allocated options.

22 How would development of the allocated sites safeguard and enhance local amenity, landscape and natural resources, environmental, cultural and economic assets, tourism and the health and well-being of the people?

The Waste Plan has been subject to sustainability appraisal incorporating health impact assessment and other assessments including; habitats regulations assessment, strategic flood risk assessment and site-specific landscape and heritage work, as appropriate. This work has informed the formulation of policy, consideration of site options and 'Development Considerations' for allocated sites. Where specific effects were identified, mitigation measures have been incorporated into the Plan. As a result, the allocated sites are considered appropriate to address the identified needs. The policies safeguard amenity and environment by ensuring that inappropriate developments are not permitted and, where appropriate, opportunities for enhancement incorporated into proposals.

Many of the allocated sites are existing waste management sites proposed for expansion and/or intensification. Utilising existing sites and co-location of waste activities has many advantages, subject to an assessment of cumulative effects. Allocation of existing waste sites reduces the need to develop green field sites or allocated employment sites and avoids impacts from waste sites in new areas. Where new sites are required, allocated employment land or previously developed land has been allocated for a waste use wherever possible, thereby reducing impacts on amenity and the environment.

Traffic generated from waste facilities is often cause of concern for communities. The allocated sites are located close to centres of population which are the main generators of waste e.g. the South East Dorset Conurbation, Wimborne, Ferndown, Verwood, Blandford, Wareham, Dorchester, Gillingham/Shaftesbury. Locating facilities in these areas should keep travel distances to a minimum. Where possible the sites are located close to the strategic road network and/or the primary road network with access to bus services and cycleways/Rights of Way network as appropriate.

The Waste Plan contains a number of criteria in policies throughout the Plan that are intended to prevent development that would lead to unacceptable impacts upon valued receptors unless adequate avoidance or mitigation of impacts can be provided. In particular, Chapter 12 (Development Management) sets out generic policies that would apply to all waste proposals covering matters such as transport and access, amenity and quality of life, natural resources and so on.

23 How would development of the allocated sites seek to optimise the location of facilities and travel modes and distances? How would use of sustainable transport modes be promoted?

The Waste Plan has sought to make provision for waste management facilities in appropriate locations, in accordance with the proximity principle. It contains a clear spatial strategy to guide future development.

Detailed comments have been sought from both Highways England and the highways authority on site options which were fully considered when assessing sites and carrying out SA. Sites in good strategic locations and with good access received a more positive score in the assessment matrices. This enabled potential barriers to the development of the site to be highlighted and ensured consideration of how the issues could be overcome took place at an early stage.

The WPA has also liaised with the waste management authority to ensure that the allocations for recycling and transfer facilities are in appropriate locations to serve local needs and to reflect locational requirements for the management waste.

The Spatial Strategy explains that the need for strategic residual waste treatment facilities will primarily be addressed through new capacity in south east Dorset. However, additional capacity elsewhere will ensure the capacity gap is adequately addressed and result in a good spatial spread of facilities. This is specifically reflected in the allocated sites with three sites for residual treatment capacity in south east Dorset and one further west. Additionally, transfer capacity within sites in the west (Inset 6) and north (Inset 2) will assist in reducing waste related vehicle movements.

Policy 12 specifically encourages the use of sustainable transportation. However, the potential to use sustainable modes of transport for waste are currently limited in Dorset, with all waste being transferred via road. The transfer of waste via the rail network is not currently a viable option in Dorset, due to limited coverage across the county. Where possible the sites are located close to the strategic road network and/or the primary road network with access to bus services and cycleways/Rights of Way network. The potential for 'greener' waste transfer vehicles in the future will be developed as technology progresses e.g. electric-powered, biofuels. Through the planning process, site specific Travel Plans for employees will be required, though this type of land use will generally require relatively small numbers of employees compared with other uses.

In addition, Policy 22 encourages on-site management of waste from non-waste developments which will reduce the transportation of waste.

24 Would any of the allocations result in significant adverse impacts that could not be acceptably mitigated? In such cases how have the benefits of allocation been demonstrated to outweigh the detriment?

No, the Waste Plan contains safeguards in the form of policy wording and development considerations attached to site allocations. This will ensure that applications will only be granted where proposals will not result in significant adverse impacts.

25 The spatial strategy in respect of strategic recycling facilities states that "The strategy is based on the assumption that one of two permitted

material recovery facilities (MRF) becomes operational in the early part of the Plan period". Would development of one of the two permitted facilities be sufficient or would further MRF be required?

The Waste Plan identifies a shortfall in capacity for managing recyclates based on the assumption that only one of the two permitted MRFs becomes operational.

There is theoretically nothing to prevent both facilities coming forward during the Plan period which would result in sufficient capacity for the management of recyclates. However, following discussions with the waste management authorities and waste industry it was considered unrealistic to assume that both facilities would come forward for the management of recyclates. This is because a facility is most likely to come forward with the benefit of a local authority contract which would be unlikely to apply to a second site. For this reason the Plan is based on a presumption that only one would come forward.

In addition, modifications are proposed to clarify that Insets 7 to 10 are allocated for the management of non-hazardous waste which could include the development of a MRF should the need arise.

Monitoring waste arisings and capacity will be essential to ensure that the Plan reflects the needs of the Plan area.