Bournemouth, Dorset & Poole Waste Plan Pre-Submission Draft – Key Issues Raised with Officer Response

This report provides a summary of the key issues raised to the Plan. The issues below concentrate on issues of concern rather than aspects of the Plan that have generated support. A response is provided by the waste planning authority and an indication of whether it is proposed to make a modification to the Plan as a result. See separate schedule of modifications **WPDCC55**.

The issues have been divided into three sections:

- 1 Key issues raised to the text and policies of the Waste Plan
- 2 Key issues raised to site allocations
- 3 Waste Plan Omission Sites

1. Issues raised to the text and policies of the Waste Plan

Section of Waste Plan	Issue Raised	DCC Response
Chapter 3 – Guiding Principles	Concern that the Waste Plan does not include specific targets for recycling	The WPA has liaised with the three waste management authorities throughout the preparation of the Waste Plan. Where possible up to date recycling targets have been taken into account when projecting waste arisings. No modifications are proposed.
	Site allocations don't accord with the proximity principle	2. The Waste Plan aims to facilitate a network of waste management facilities to address the identified needs. Waste should be managed as close as possible to where it is produced. The preparation of the Waste Plan has involved an extensive search of suitable, available sites. The sites contained in the Pre-Submission Draft Waste Plan are considered to be the best available and in general terms comply with the proximity principle.
Policy 1 'Sustainable waste Management'	Concern raised that this policy does not refer to the Circular Economy	The circular economy is explained in paragraph 3.17. It is agreed that its importance should be reflected by specific reference within Policy 1. MM3.1

Chapter 4 – Vision and Objectives	There is little attempt to expand on Objective 5 sustainable transport modes, elsewhere within the Plan.	Objective 5 relates to the Plans role in reducing greenhouse gas emissions and assisting in the adaptation and mitigation and resilience to climate change. One way that this can be achieved is through the promotion of sustainable transport modes. This issue is deal with in Chapter 12. Specifically, with regards to sustainable transport the Plan recognises that there may be benefits from transporting waste by rail or water but in reality explains that opportunities in Dorset are limited. Policy 12 'Transport and Access' requires applicants to explore sustainable transportation.
		The development of a network of sustainable waste management facilities, in the right locations, moving towards net self-sufficiency and encouraging co-location of waste facilities will enable the Waste Plan to play its role in reducing greenhouse gases.
Chapter 5 – Spatial Strategy	Spatial Strategy sets out a need for the relocation of Wimborne HRC. However, this is to be achieved through a criteria based policy rather than a site allocation. This is not considered a sound approach, deliverability is uncertain.	The WPA, in consultation with EDDC, landowners and waste operators, has undertaken an extensive search for available land, suitable for allocation for a HRC to serve Wimborne and Ferndown to replace the existing facility. It has not been possible to allocate a specific site. However, the WPA considers that there are opportunities in the locality for a site to come forward during the life of the plan. The Waste Plan contains a criteria based policy against which an application will be assessed against and this is considered to be sufficient.
Chapter 6 – Allocated Sites	Concern that the Plan is contrary to the NPPF and local policy in not taking account the need to meet the economic needs of the area on key employment sites of strategic significance through the allocation of waste sites.	1. Waste facilities are essential infrastructure and are required to support economic growth. The development of waste facilities on allocated employment land is consistent with National Policy. The Waste Planning Authority has acknowledged the concerns raised regarding the use of allocated employment land. The Waste Planning Authority has recognised the concerns of stakeholders regarding the loss of a significant amount of employment land to waste uses. As a result, Woolsbridge Industrial Estate is only allocated for waste transfer and/or bulky waste management.

	These uses would take a far reduced amount of land than a residual waste treatment facility or a combination of these facilities.
 To avoid conflict with the local plan policy, Policies 3 and 4 should include a criteria to ensure proposals are located within allocated or permitted employment land subject to compliance with adopted Local Plan policies. 	2. The current wording of Policy 4 reflects National Planning Policy for Waste which provides guidance on the identification of suitable sites. Priority should be given to 'sites identified for employment uses'. It is agreed that applications should also be in compliance with policies in district and borough local plans. These will be considered when determining any planning application. For clarification, some additional text has been proposed within Chapter 2 to explain that planning applications are judged against the statutory development plan, which includes any relevant local planning policy documents. MM2.1
 Policies 3 and 4 should include clarification that HGVs associated with waste collection and transport would be restricted to primary routes. 	3. The issues of routing agreements are considered too detailed for inclusion in Policy 3 and 4. However, Policy 3 and Policy 4 both contain criteria to ensure that applications comply with all relevant policies of the Waste Plan. Policy 3 also refers to the 'Development Considerations'. Policy 12 is relevant to Transport and Access and requires proposals to have direct access or suitable links with the Dorset Advisory Lorry Route Network, where possible. Paragraph 12.29 states that HGVs should be encouraged to use the strategic road network and refers to routing agreements. A modification is proposed to strengthen this section of the Plan. MM12.1
4. Several sites have been put forward for allocation in Policy 3 of the Waste Plan in addition to or as alternatives to the allocated sites.	4. See omission sites below for details.

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Chapter 7 – Forecasts and the need for new facilities	1.	The latest Local Economic Forecasting Model (LEFM) 2016/17 should be used to assess the rate of economic growth and built into the waste arising projections.	1.	The latest published local economic forecasting model was used at the time of preparing the projections. The projections for commercial and industrial waste (CIW) and construction, demolition and excavation (CDE) waste have been reviewed in light of the 2016/2017 LEFM. For CIW this results in an increase in the projected tonnage at 2033 of just under 20,000 tonnes. This is not considered to be significant for the Plan, since the four sites allocated for management of non-hazardous waste (Insets 7-10) make more than sufficient provision to meet the projected shortfall. For CDE waste, using the 2016/17 LEFM results in a decrease in the projected tonnage at 2033 of around 140,000tpa. This could be considered a significant difference in estimated arisings, although this would not change the approach taken to addressing the shortfall in the Plan. Given the significant change in the forecast for CDE waste based on the updated LEFM, it is proposed to build in updated projections for both CDE waste and CIW using the 2016/2017 LEFM. See MM7.1 to 7.41
	2.	Capacity at the Site Control Centre, Canford Magna has been apportioned to recycling whereas this capacity may be apportioned to residual waste recovery. Further consideration may be needed to ensure existing facilities have been appropriately categorised with regards to streams of waste that could be managed.	2.	Further thought has been given to how the capacity at this site and others has been categorised. The site owner/operator considered that Inset 8 could address much of the shortfall in residual waste capacity without the need to bring forward other sites for allocation. The Waste Plan had apportioned this waste capacity as recycling capacity (as this was the need the original planning permission was permitted to address). Further consideration has been given to this and other sites and how capacity had been apportioned (recycling/residual). Various amendments have been made to chapter 7 of the Waste Plan to build in flexibility to enable existing permitted capacity to address recycling, residual waste needs or a combination of both during the Plan period. The proposed modifications ensure that the Waste Plan provides a flexible solution to addressing the waste management needs throughout the Plan period. The Site Allocations are considered flexible enough to ensure that proposals can come forward for a

		range of processes and for the management of a range of waste streams. Permitted sites and allocations should be able to react to changing circumstances to manage different waste streams during the Plan period due to changes to contracts or market conditions etc. See MM7.1 to 7.30
Policy 5 'Facilities to enable the recycling of waste' & Policy 6 'Recovery facilities'	Concern that there are no criteria protecting the local landscape within these policies	Applications will be assessed against all relevant policies of the Waste Plan, including the development management policies set out in Chapter 12. Policy 14 - Landscape and design quality provides policy on conserving and enhancing the landscape. No modifications are proposed.
Policy 7 'Final disposal of non-hazardous waste'	Policy 7 should include support for extensions of time frames for existing landfill planning permissions. The Waste Plan should seek to husband capacity within the two mothballed landfill sites.	The importance of the remaining capacity at mothballed landfill sites is important if Dorset is to work towards self-sufficiency. Modifications are proposed to ensure that remaining capacity is safeguarded throughout the Plan period. This approach can then be reviewed as the Plan is reviewed. See MM13.1
Policy 10 'Decommissioning and restoration of Winfrith Nuclear Licensed Site'	 It has been suggested that on-site reuse/disposal of waste resulting from decommissioning should be extended to include not just inert, but all other waste originating from decommissioning. Concern has been raised regarding the requirement that all development proposals should be supported by a masterplan and the provision of a community benefits package. Concern has been raised regarding the requirement to retain the existing railway sidings and to explore the use of an alternative access route through Dorset Green Innovation Park. 	The Waste Planning Authority is considering a number of modifications to Policy 10, and the supporting text, to take into consideration the representations received by the NDA and Magnox and ongoing discussions. With regards to Policy 10, it is considered that a modification can be made to criterion a to recognise on-site recovery or disposal of waste originating from the decommissioning of the site. The Waste Planning Authority considers that criteria c - f should be retained but with some amendments. It is proposed to include further guidance on what the Waste Planning Authority would like to see in terms of master planning and explanatory text regarding the provision of community benefits, in

		order to assist interpretation of Policy 10. It is also intended to remove the policy requirement for the production of an SPD. It is considered that the use of the rail sidings is an important consideration but it is accepted that their retention post decommissioning is not a necessary matter to include within the policy. See MM11.1 to 11.12
Chapter 12 - Development Management	should be given the same extra protection that are afforded to SACs and RAMSAR sites. 3. The following terms should be deleted or further explanation provided – • Possible SACs	 The SA report has been updated to refer to Section 85 of the Countryside and Rights of Way Act 2000. An additional modification is proposed to paragraph 12.49 to reflect this. Paragraph 12.82 of the Pre-Submission Draft Waste Plan lists the features of biodiversity and geological interest to be given protection for the purposes of Policy 18 'Biodiversity and geological interest'. This includes National Nature Reserves, SSSI and SNCI's. It is considered that this provides an appropriate level of protection. It is considered that these three categories should be retained within the Plan and it can be explained that these are as listed by the Joint Nature Conservation Committee (JNCC).
Policy 12 'Transport and access'	 Concern that it is not appropriate to leave an assessment of transport impact to the planning application stage. This work should be undertaken at the plan making stage to determine whether the allocation is effective, deliverable and therefore sound. No reference to the Dorset Rural Roads Protocol or the sustainability of the rural character of the AONB roads or tranquillity. No mention of railways or port facilities. 	 An appropriate level of assessment has been undertaken with regards to the sites allocated in the Waste Plan. Policy 12 requires a further level of assessment to be undertaken at the planning application stage when a greater level of detail about the proposal is known. The Waste Planning Authority will discuss the Dorset Rural Roads Protocol with the appropriate authorities and consider if it is appropriate to add reference to the Policy and/or supporting text.

Policy 19 'Historic Environment'	4. Concern that mitigation or compensation should be required for any impacts not just significant impacts on the transport network. Policy is inconsistent with the language and emphasis of national policy	 Opportunities to move waste by rail or via port facilities are considered to be rare within the Plan area, given the availability of suitable facilities and the rural nature of the Plan area. However, Policy 12 encourages applicants to explore and utilise sustainable methods of transport such as rail or sea where possible, practical and environmentally acceptable. The WPA considers that Policy 12 provides adequate protection to the road network from waste developments. The Waste Planning Authority has met with Historic England and is working together on a modification to the policy to address this comment.
Policy 23 'Restoration, aftercare and afteruse'	The term 'have regard to' could be strengthened to avoid confusion/misunderstanding Policy should apply to all sites	1. It is agreed that the term 'have regard to' may lead to confusion. A modification is proposed to tighten the policy. See MM12.8 2. Policy 23 is intended to ensure appropriate restoration and aftercare measures for temporary waste facilities such as landfill and other developments that are restricted to the life of associated mineral permissions. Restoration and aftercare schemes are unlikely to be appropriate or necessary for permanent facilities.
Chapter 13 - Safeguarding	 The Waste Plan should include recognition of the importance of freight flows by rail where the source or destination of the flow is itself already conveniently rail connected. Non-hazardous landfill sites should be safeguarded until surrender of their Environmental Permits. 	 The purpose of safeguarding is to protect operational, permitted and allocated waste capacity. It is not considered necessary for the Waste Plan to safeguard these railheads. The remaining capacity at mothballed landfill sites may be important if Dorset is to work towards self-sufficiency. A modification is proposed to ensure that remaining capacity is safeguarded throughout the Plan period. This approach can then be reviewed as the Plan is reviewed. See MM13.1

2 Key Issues raised to site allocations

A review of the representations made to the site allocations was undertaken. The tables below contain the key issues and officer response to the issues. Where modifications are proposed to address the representation refer to the modifications schedule for details.

Inset 1 – Woolsbridge Industrial Estate				
Issue	DCC Officer Response	Proposed Modifications		
 Impact on Horton Road Poor/dangerous access to the estate Category 'C' road unsuitable for HGV's Proposal will increase traffic out of Old Barn Farm onto Horton Road Dangerous to turn out from Forest Edge Drive and Old Barn Farm Accidents 	Development of a waste facility on this site would increase traffic movements on current levels. However, the principle of development of employment uses on this site has already been established as this is allocated employment land. As part of the allocated extension to Woolsbridge Industrial Estate, a new signalised junction onto Ringwood Road is proposed. Outline planning permission has been granted for this site. It is understood that this application was accompanied by a	None		
 Pollution/emissions Risk to pedestrians Vibration from HGV's – impact on residential properties Noise 	Transport Assessment and Framework Travel Plan. This work identified that expansion of the site with mitigation measures would not adversely affect the local highways network, or the strategic road network— notably the A31 Ashley Heath Interchange.			
 Impact on the road surface/man holes from HGVs Impact on emergency vehicles Unsuitable new access proposed Congestion on Ashely Heath roundabout Is there a weight limit on this road? Would a weight limit be appropriate? 	Planning permission has also been granted for the construction of a new junction with Ringwood Road and the industrial estate. It is understood that these proposals will provide an enhanced vehicular access and will increase junction capacity to serve the Industrial Estate.			

 Site should only be accessed by HGVs from Azalea roundabout on A31 Alternative access - continue the existing trading estate road through to the purpose-built roundabout on the A31 		
 Residential properties Other businesses on the Industrial Estate Moors Valley County Park Caravan Park Three Legged Cross Pub 	Waste managed at modern waste facilities would be stored within an enclosed building which should address odour/dust issues. Consideration may need to be given to mitigation at the application stage, such as landscaping and site design/layout to reduce impacts on the community to acceptable levels and to ensure proposals are accord with Policy 13 of the Waste Plan. Where necessary planning conditions can be attached to permissions to restrict noise levels. It should be noted that bulky waste management facilities would manage mattresses, sofas etc. and therefore would	None
 Air quality/emissions/contamination Impact on Moors River SSSI Moors Valley Country Park Pollution resulting from the washing of waste/recyclates on site 	be unlikely to generate any odours or dust. Management of bulky waste would have similar impacts to other industrial/employment activities. Depending on the location of a bulky waste facility, it should be possible to include mitigation such as an appropriate buffer between the facility and the SNCI/SSSI. This has been specifically referred to within the site development considerations to ensure it is addressed at the planning application stage. There are not considered to be any unacceptable adverse impacts on Moors Valley County Park from the siting of a bulky waste management facility/transfer facility on this site	A modification is proposed to refer to the need for sealed drainage systems within the accompanying text to Policy 16 'Natural Resources' See MM12.5
	The Environment Agency has raised no objection to this site. However, would require a sealed drainage system to	

	provide additional protection given the types of waste on site. Consideration will be given to the inclusion of specific reference to the need for a sealed drainage system within the development considerations and/or within the development management section (Chapter 12) of the Waste Plan.	
Woolsbridge is situated on the edge of Dorset Facility should be centrally located Should be located on a site with better access Cost of transporting waste across the county	This site is allocated for a general transfer station and/or bulky waste transfer station. A general waste transfer station would manage waste from the local area i.e. East Dorset. This is considered to be a suitable location for this type of facility. A bulky waste management facility would be a strategic facility bringing in waste from throughout Dorset. However, Dorset has and will continue to develop a network of transfer facilities during the Plan period. This will enable the bulking up of waste locally to be transported to Woolsbridge in fewer vehicle movements. Compared to other waste management facilities a bulky waste site would generate fewer movements overall.	None
No SA undertaken to consider economic, environmental and social impacts of the proposal	A sustainability Appraisal of the Waste Plan and site allocations has been undertaken and was available on our website throughout the Pre-Submission Draft Waste Plan consultation.	None
Proposal would provide minimal employment to the area Proposal not compatible with the Local Plan Development of a waste facility would not provide high quality employment	Waste facilities are essential infrastructure and are required to support economic growth. The development of waste facilities on allocated employment land is consistent with National Policy. The Waste Planning Authority has acknowledged the concerns regarding the use of Woolsbridge Industrial Estate for waste uses as opposed to other employment uses. In response the Waste Planning Authority has focused on the need for bulky waste	None

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	treatment/transfer (Residual Treatment previously considered). Focusing on these needs would reduce the land take to approximately 1 ha.	
Area prone to flooding EA recommend that FRA is done at allocation stage. This has not been done therefore deliverability of the site is uncertain.	Flood zones 2 and 3 have been excluded from the site allocation. In addition, a development consideration is included in the Pre-Submission Draft Waste Plan to ensure consideration is given to an appropriate buffer from Flood Zones 2 and 3. This will allow for any variability of the flood zones over future years due to climate change. The Environment Agency has raised no objection to this site. However, would require a sealed drainage system to provide additional protection given the types of waste on site. See above.	None A modification is proposed to refer to the need for sealed drainage systems within the accompanying text to Policy 16 'Natural Resources' See MM12.5
Development of an incinerator/ future expansion of the facility	The development of an incinerator or large-scale energy from waste facility was not included in the Pre-Submission Draft Waste Plan. However, if an application was submitted for this type of facility its impact would be fully considered including consideration of cumulative impacts with waste and other non-waste development in the vicinity. It should be noted that the landowner of this site has objected to the site allocation wishing to see it allocated for a wider range of waste uses including Energy from Waste. See below.	None
Object to the importation of waste to Dorset.	The Waste Plan has assessed the need for new facilities based on projected arisings from Bournemouth, Dorset and Poole during the Plan period. No allowance has been made for importing waste from Hampshire. However, there is inevitably going to be some movement of ways across local authority boundaries. For example, Dorset currently exports waste to an incinerator in Hampshire.	None
Infrastructure – Concern that the sewage treatment system isn't capable of coping with the large quantities of water that will be produced	Proposals are unlikely to use significant quantities of water. In any case, Wessex Water has been consulted on the development of the Waste Plan and has raised no issues.	None

Property Devaluation	The Waste Planning Authority needs to consider whether the development would have unacceptable effects on amenities and existing permitted/authorised land uses/activities in the area.	None
Contrary to the East Dorset & Christchurch Core Strategy policy VTSW6	Waste facilities are essential infrastructure and are required to support economic growth and do provide jobs. The development of waste facilities on allocated employment land is consistent with National Policy. Policy VTSW6 of the Christchurch and East Dorset Core Strategy – Local Plan Part 1 removes land at Woolsbridge Industrial Estate from the Green Belt and allocates it for new employment including B1, B2 and B8 uses. Outline Planning permission (3/15/0556/OUT) was granted for the construction of mixed employment development at Woolsbridge Industrial Estate. The proposal includes a waste transfer facility, in lieu of an industrial building. The conclusion to the planning officers report refers to the provision of a waste transfer station being 'beneficial to the wider community'.	None
Risk of fire given the proximity to MOD Fuel Storage Facility	The Waste Planning Authority has recognised the concerns of stakeholders regarding the loss of a significant amount of employment land to waste uses. As a result, this site is only allocated for waste transfer and/or bulky waste management. These uses would take a far reduced amount of land than a residual waste treatment facility or a combination of these facilities. The Waste Planning Authority is not aware of any significant risk of fire from waste management facilities that cannot be minimised through good site management and monitoring. No objection has been received from the MOD or the	None

Update site assessment to remove ref to Stack	Land at Woolsbridge Industrial Estate is proposed for waste transfer and/or the management of bulky waste. Neither of these uses would require the development of a stack. Consideration will be given to the removal of reference to a Stack within the assessment, however it would be noted that there is a note on the site assessment to explain that residual waste treatment is no longer proposed	The site assessment should be updated to remove reference to Stack.
Contamination following decommissioning	The proposed facilities are likely to be permanent facilities. The Environment Agency have raised no objection to the allocation of this site provided that any required assessments, permits, etc are undertaken / obtained at the appropriate stage. This includes the requirement for a standard condition for the protection of land and groundwater from contamination and oil storage.	None
Allocation should also include the eastern parcel of allocated land and the existing Industrial estate.	The Waste Planning Authority understands that there is no scope for further development within the existing industrial estate. This is confirmed within the East Dorset and Christchurch Local Plan and is why it was discounted for the allocation of future uses. However, if evidence is available to suggest that opportunities for new waste facilities might become available during the Plan period, the Waste Planning Authority would consider including the existing industrial estate within an 'Area of Search' for waste facilities in order to provide additional flexibility. The eastern parcel of land allocated for employment uses at Woolsbridge was considered for allocation. However, the southern parcel of land was considered more than sufficient in size to accommodate the proposed waste facilities. In landscape terms, the southern area is was considered more acceptable than the eastern area. The southern area of land	The WPA is happy to consider the inclusion of the existing industrial estate within an 'Area of Search' at Woolsbridge Industrial Estate if evidence is provided to demonstrate that opportunities are likely during the Plan period. It is proposed to modify the title of the site contained in the Pre-Submission Draft Waste Plan to refer to an 'Area of Search'. This reflect the terminology used in the Planning Practice Guidance. See MM AS1.1

	is also further from sensitive receptors than the eastern area.	
Environmental Permit should be applied for prior to allocation	Under the Environmental Permitting (England and Wales) Regulations 2016, permits are needed to carry out a wide range of specified activities lawfully including waste facilities.	None
	For some activities (principally relating to waste), a permit cannot be granted if relevant planning permission is not already in place. Therefore, it would not be appropriate to require an Environmental Permit at the Plan making stage.	
Site should be allocated for residual waste treatment – considered suitable for a large scale, strategic residual waste management facility.	For a range of reasons this site was not included in the Pre-Submission Plan for residual waste treatment. The WPA was unaware that the site was actively being promoted for this purpose by a waste company. The other sites that have been allocated were being actively promoted by companies and were therefore considered deliverable. The location of Woolsbridge was another key reason for not taking it forward for a large scale strategic treatment facility. The site lies on the eastern edge of the Plan area. Other site options, alone or in combination, were considered better located to minimise waste miles and/or provided a good spatial spread of capacity across the county.	None

Inset 2 – Land south of Sunrise Business Park, Blandford		
Issue	DCC Officer Response	Proposed Modifications
Location within and impact on Cranborne Chase	There is a need for an improved waste management centre	Modifications are proposed to the
& West Wiltshire Downs Area of Outstanding	because the existing facility is at its limits in terms of	development considerations to
Natural Beauty (AONB)	capacity and is not fit for purpose (including due to traffic	refer to paragraphs 115 and 116
	management, safety and efficiency).	of the NPPF and to address
 Site is outside bypass 		points raised regarding light spill,
 High point of the bypass 	It would not be possible to provide the facility needed by	formation levels, retention of
Structures should be set back from road	redeveloping the existing site. This is because the site is too	hedgerows and scale of planting
 Impact of access on landscape 	small to accommodate a modern waste management	schemes.

- Potential for alternative access through business park to reduce impact
- Provision should be made within the plan to ensure that harmful impacts on the AONB are satisfactorily mitigated.

centre. Expansion onto adjoining land has been investigated and is not possible due to there being no land available.

The Waste Planning Authority has undertaken a thorough search for sites in the Blandford area. There are no other suitable options on allocated employment land in Blandford. The WPA undertook a thorough assessment of employment land and issued a 'call for sites', as set out in WPDCC-25.

The site has been selected based on an assessment of potential landscape and visual impact on greenfield land bordering the Blandford bypass (excluding land in flood zones 2 and 3, land to the west of Blandford designated as a conservation area and land with extant planning permission or allocated through the North Dorset Local Plan for housing growth). This assessment is set out in WPDCC-30. The assessment concluded that this site (Inset 2) was less sensitive to development (subject to mitigation) 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 northeastern edge and it visual and physical association with Sunrise Business Park.

Two additional sites put forward during consultation on the Waste Plan Draft Update (2016) and included in an additional consultation paper (Waste Site Options in Blandford & Purbeck February 2017) were assessed in the same way and included in WPDCC-30.

It is acknowledged that the site is outside the bypass, but considered that this location close to the bypass and adjoining an existing business park would have the least impact on the AONB, based on the landscape and visual sensitivity study undertaken (WPDCC-30). It is considered that development of a WMC would be in the public interest

See MM AS2.2, MM AS2.3 MM AS2.5 AND MM AS2.6

	given the unsuitability of the existing site and need for a new facility, and the inability to provide a fit for purpose facility on the existing site. The Waste Planning Authority has undertaken a thorough assessment of alternatives, as summarised above. The Waste Planning Authority has sought to keep the AONB team fully informed and involved in the progression of the site through the Plan process. Matters including the need for lowering land levels and the location of buildings within the site are addressed in the development considerations for Inset 2, to which the Cranborne Chase & West Wiltshire Downs AONB team have had input. The potential access options are access from the existing roundabout or a right turn lane from the bypass. Access through the business park as an alternative to the proposed access either from the bypass or from the roundabout is being investigated.	
Impact on ecology	It is considered that provision is made within the Plan to ensure that any impacts on the AONB are mitigated satisfactorily, through the detailed development considerations set out in Inset 2 and through policies in the Plan. Any proposal would need to be in accordance with all relevant policies in the Waste Plan, including those relating to landscape and visual impact for example. The Environment Agency suggest that ecological survey of	None
 Retention of hedgerows where possible, otherwise appropriate mitigation and compensation measures should be put in place. 	the site should be undertaken at the application stage. Any proposal would need to be in accordance with Policy 18, which provides safeguards relating to biodiversity. The development considerations for Inset 2 include provisions for retaining, protecting and enhancing tree/hedge belts and the preparation of a landscape and ecology masterplan.	

Impact on water resources Site is close to Source Protection Zone 1 Aquifer is in a Nitrate Vulnerable Zone Surface water protection zone Protection from infiltration to aquifer is needed and sealed drainage required.	The Environment Agency has raised no objection to this site, however they advise that hydrogeological/contaminated land risk assessment should be prepared and that the preparation of a drainage strategy would be needed, requiring drainage to foul sewer. The Environment Agency would also require a sealed drainage system to provide additional protection. It is considered that an additional development consideration could be included for Inset 2, referencing this issue.	A modification is proposed specifying the need for hydrogeological/contaminated land risk assessment. See MM AS2.7 A modification is proposed to refer to the need for sealed drainage systems within the accompanying text to Policy 16 'Natural Resources' See MM12.5
Impact on existing businesses in the business park Odour Vermin	Any proposal would need to be in accordance with all relevant policies in the Waste Plan, including those relating to amenity and transport for example. This along with good design and enclosure of waste within buildings will ensure that there would not be unacceptable adverse impacts. The Environment Agency advises that control measures should be put in place to reduce effects from odour, dust etc and it is considered that planning conditions could be attached to any planning permission to address such matters.	None
Need for robust transport evidence base to inform proposals.	The Highways Authority has raised no objection to the site, however they advise that information on trip distribution and timing would need to support an application. Any proposal would need to accord with Policy 12 – Transport and access, which requires provision of a transport assessment. Such an assessment would address these matters.	None
Compatibility of proposal with aspirations for urban extension on adjoining land, including school on land to the east of the site.	There are no agreed proposals for an urban extension at this stage, although it is understood that the Blandford + Neighbourhood Forum are preparing a neighbourhood plan and have aspirations for an urban extension on land adjoining the site. This is a matter that is being coordinated with work by the district council on its review of the North Dorset Local Plan. Planning for waste is a County Matter but the Waste Planning Authority has maintained ongoing	None

	discussions with both the district council and Blandford + to ensure there is no conflict between any proposals for an urban extension (including any school requirements) and the proposed waste plan allocation. The waste proposal is not dependent upon any review of the North Dorset Local Plan or the emerging neighbourhood plan and can be considered discretely as part of the Waste Plan. It is therefore not considered necessary to include reference to this within the Waste Plan. Notwithstanding this, the policies in the Waste Plan provide protection for sensitive receptors.	
New Lidl supermarket building (on opposite side of A350) not shown on the plan	At the time of preparing the plan for Inset 2, the new supermarket building was not available on the OS base map. However, Inset 2 will be updated to show the new building.	Inset 2 plan to be updated. See MM AS2.1

Issue	DCC Officer Response	Proposed Modifications
 Deliverability The landowner, Sigma Aldrich/Merck, does not support the proposed allocation/use of land for a HRC Unknown nature of operations close to Sigma Aldrich facility and potential impact on current and future operations Landowner considers this could sterilise part of the site for various users Landowner unwilling to commit space for HRC until users are identified for rest of site Cost and time implications of proposed development due to landowner objection 	The Waste Planning Authority has been liaising with North Dorset District Council regarding progress on the masterplanning of the southern extension to Gillingham, but were not aware the landowner had stated they were unwilling to make space available for the facility until other users for the site were identified. The need for recycling facilities is identified in the Concept Statement for the southern extension, set out in the North Dorset Local Plan (2016). Additionally, the North Dorset Infrastructure Delivery Plan (2014) identifies within its 'Schedule of Infrastructure Currently Programmed/ Needed to Support New Development' the need for a waste transfer station/household recycling centre at Gillingham.	A modification is proposed to Inset 3 to refer to the site allocation as an Area of Search, in order to reflect the terminology used in the Planning Practice Guidance. The area identified covers the allocated employment site, within which a suitable site for a household recycling centre could be delivered. See MMAS3.1

	It is hoped that a new household recycling centre could be provided within the planned southern extension to provide for the needs of the existing and planned residential properties of the area.	
Traffic and access Through traffic congestion through Le Neuburg Way to the north and Shaftesbury Road to the south. Development should take into account routing of HGVs to/from the site	Development consideration 3 addresses capacity and access issues that need to be resolved at the application stage. It is considered that HGV routing can be addressed at the application stage and a transport assessment can consider how users of the site will access it and potential impacts and suitable mitigation.	None
Cumulative traffic impacts in association with Gillingham southern extension and other developments in Shaftesbury	The Gillingham southern extension includes plans for a new link road between the B3081 and the B3092, so that the majority of traffic need not access the site from the town. The proposed HRC is being considered as part of the wider southern extension package. Cumulative traffic impacts would be addressed through Development Consideration 3, which has been included based on advice from the Local Highways Authority.	
Suitability of junctions on the A303	It is unlikely that a significant amount of vehicles would be coming to the site from the A303. The majority of traffic will be from Gillingham, Shaftesbury and surrounding villages. HGVs are likely to travel south to the waste transfer facility in Blandford.	
 Impact on water resources An adequate buffer should be provided to protect the River Stour and Lodden Surface water draining to tributary of the River Stour upstream of Longham (a public water supply) 	The Environment Agency has raised no objection to this site. However investigation regarding contamination may be required and this would guide surface water drainage strategy. The Environment Agency would also require a sealed drainage system to provide additional protection. It is	A modification is proposed to refer to the need for sealed drainage systems within the accompanying text to Policy 16 'Natural Resources' See MM12.5

 Sealed drainage required due to types of waste on site Any existing contaminated land would require site investigation and risk assessment 	considered that additional text in Chapter 12 could refer to drainage matters. The area of search enables a suitable site to be found with space for a buffer from the River Stour and Lodden. It is considered that an additional development consideration could be included in Inset 3, referencing the need for an appropriate buffer.	A modification is also proposed to include the need for a contaminated land risk assessment and the need for an appropriate buffer to protect the River Stour and Lodden within the development considerations. See MM AS3.2 and MM AS3.3
Flood risk • Parts of the site in Flood Zone 2 and adjacent to Flood Zones 2 & 3	The site is located within Flood Zone 1 and is adjacent to Flood Zone 2. The Environment Agency has raised no objection to this site.	None
Impact on take up of employment land on the business park by other businesses	The development of waste facilities on allocated employment land is consistent with National Policy. Any proposal would need to be in accordance with all relevant policies in the Waste Plan, including those relating to amenity and transport for example. This along with good design and enclosure of waste within buildings will ensure that there would not be unacceptable adverse impacts.	None
Acceptability of relocating the HRC from Shaftesbury to Gillingham New residential development in Shaftesbury Fly-tipping Need for a facility in each town 	The existing facility in Shaftesbury, although well used, is at its limits in terms of capacity. It is not a modern, split level facility and the site has to be closed when containers are emptied, resulting in tailbacks. The Waste Planning Authority has taken into consideration the new and planned residential development in both towns. However, there is only likely to be sufficient funding for one new facility. The Waste Planning Authority has undertaken a thorough search for new sites. Expansion of the existing facility was considered as an option (see Draft Waste Plan 2015, site reference ND06). However on balance the Waste Planning Authority considered Brickfields Business Park to be the best option for the development of a new facility.	None.
Impact on landscape	It is acknowledged that the development would have an adverse impact on the local landscape if viewed in isolation, however the site is on allocated employment land, identified	None

Impact on historic environment – the setting of Grade II listed Madjeston Farmhouse	as a Key Strategic Employment Site in the North Dorset Local Plan (2016). The site would be part of the much larger Gillingham southern extension, also identified through the North Dorset Local Plan (2016). Given this, the site is considered suitable. Development considerations 1 and 2 reflect the need for the development of this facility to be consistent with the design principles for the wider area. Assessment of and appropriate mitigation against unacceptable adverse impacts on the landscape and the setting of the listed building (located 280m south of the site) would be undertaken at the planning application stage, in accordance with Policies 14 and 19.	
Impact on residential amenity Noise Dust Odour	Any proposal would need to be in accordance with all relevant policies in the Waste Plan, including those relating to amenity and transport for example. This along with good design and enclosure of waste within buildings will ensure that there would not be unacceptable adverse impacts. The nearest residential properties are 230m to the northeast, located on the other side of the existing business park. Properties at Madjeston are located just over 250m to the south. The Concept Plan for the proposed Gillingham southern extension (set out in the North Dorset Local Plan) includes provision for open space between the employment land and the properties, which would provide a buffer.	None
Concerns over neighbour notification	Properties within 250m of the site boundary were directly notified by letter. Properties in Madjeston fall just over 250m away from the site. Site notices were also displayed in the area.	None

Inset 4 – Land at Blackhill Road, Holton Heath		Dropood Modification
Issue	DCC Officer Response	Proposed Modification
 A site investigation and risk assessment will be required for the site due to its location, if there is any below ground work (including foundations/hardstanding). Sealed drainage required due to types of waste on site 	The Environment Agency has raised no objection to this site. However, investigation regarding contamination is required and this would guide surface water drainage strategy. The Environment Agency would also require a sealed drainage system to provide additional protection. It is considered that an additional development consideration could be included for Inset 4, referencing this issue, along with additional text in Chapter 12 to refer to drainage matters.	A modification is proposed to refer to the need for contaminated land risk assessment within the development consideration. See MM AS4.3 A modification is proposed to refer to the need for sealed drainage systems within the accompanying text to Policy 16 'Natural Resources' See MM12.5
Confirmation that all waste would be stored indoors and a monitoring programme to ensure the site's housekeeping is strictly managed to ensure no outdoor waste that would attract birds.	It is proposed that all waste would be stored inside at the proposed waste transfer facility. It is considered that a condition could be attached to any planning permission requiring a monitoring programme as requested. Further consideration has been given to Policy 20 and the accompanying text to ensure the Plan provides adequate protection to aircraft operating in close proximity to waste facilities.	Modifications are proposed to Policy 20 and the accompanying text. See MM12.7
 Impact on neighbouring businesses Increase in traffic on the access road Impact to on road parking by existing businesses Dust, smell and vibration Impact on air quality and therefore impact on neighbouring chemical laboratory 	Development of a transfer station would generate additional traffic. Given the number of vehicle movements involved the proposal is thought to be acceptable. Dorset County Council highways authority does not object to the proposal. Provision of parking facilities for DWP staff would be incorporated into the design of any depot to avoid on road parking. A transfer facility and depot is considered unlikely to unlikely to generate vibration or unacceptable odours or dust, given	None

	that the waste will be stored within a building. If a waste facility were to be allocated and permitted, planning conditions could be attached to restrict noise to acceptable levels.	
	Any proposal would need to accord with relevant policies of the Waste Plan. Policy 13 – Amenity and quality of life - requires that proposals should demonstrate there would not be an unacceptable impact on sensitive receptors in relation to airborne emissions.	
Preparation of a comprehensive management plan should be required.	It is not clear what is being requested here. At the time of application, the Waste Planning Authority will assess whether the proposals accord with the development management policies of the Waste Plan.	None

Inset 5 – Loudsmill, Dorchester		
Issue	DCC Officer Response	Proposed Modification
 Impact on ecology System of drains and water meadows flowing from alongside the site into the River Frome SSSI Mitigation measures to ensure no adverse impacts on the River Frome should include substantial areas of wet woodland planting to buffer and protect the river from any pollution, all landscape and mitigation planting must be of native species. 	Development considerations 7 and 8 require mitigation against adverse impacts on the River Frome and species. It is considered that development consideration 7 could be expanded to reference the types of mitigation that could be appropriate.	It is considered that a modification could be made to development consideration 7 to reference the types of mitigation that could be considered appropriate. See MM AS5.2
 Impact on the historic environment Potential for impact on Mount Pleasant henge (Scheduled Monument) and its setting Further information on the degree and form of harm to the significance of the affected designated heritage asset required Further information on whether it is possible to mitigate any adverse impact 	The County Archaeologist has undertaken further assessment in order to address Historic England's concerns, looking at the immediate vicinity of the site, views from across the Frome valley at Stinsford and views from the top of Coneygar Hill. This assessment has now been included in the Site Assessment. The County Archaeologist comments that the significance of the henge, along with the adjacent scheduled monument Conquer Barrow, is partly due to its location as a prominent feature of the local landscape, being located on high ground. It is considered that development consideration 6 could be expanded to reflect this. The Waste Planning Authority has met with Historic England to discuss this further assessment and the proposed modifications. Further assessment of setting from the henge itself is being undertaken and the Waste Planning Authority	It is considered that a modification could be made to development consideration 6 to reflect the significance and setting of Mount Pleasant and Conquer Barrow. See MM AS5.1

	The Beliefe and date I Beat after Foundation at an about an after 100	T
	us liaising with Historic England on the wording of the	
	development consideration.	A 1:6: 1: 1
 Impact on water resources Located within Source Protection Zone 2; chalk aquifer of principal designation used for public water supply. Likely that infiltration to the ground would not be acceptable and that the drainage system would need to be separated from the groundwater. Site investigation and piling (if used) risk assessment will be needed due to historical possible contaminative uses. 	The Environment Agency has raised no objection to this site. However, investigation regarding contamination is required and this would guide surface water drainage strategy. It is considered that Development Consideration 4 addresses this matter. It is considered that an additional development consideration could be included for Inset 5, referencing ground contamination.	A modification is proposed to refer to the need for contaminated land risk assessment within the development consideration. See MM AS4.3 A modification is proposed to refer to the need for sealed drainage systems within the accompanying text to Policy 16 'Natural Resources' See MM12.5
Access	It is accepted that there are currently congestion issues in	None
Narrow access road with unsuitable surfacing	this location. However, the site will soon be served by an extension to Lubbecke Way that will take traffic away from the constrained St. Georges Road residential area. Furthermore, if investment were to be put into developing a household recycling centre (HRC) it is likely that the immediate access along St. Georges Road would also need to be improved, including surfacing. The development of a new facility would allow for improved circulation within the site and would ensure that the site would not need to close when skips are removed. These measures would significantly reduce queuing traffic along St. Georges Road and improve accessibility to the site.	
Impact on amenity	The site itself is over 500m from existing housing. It is considered that the site is a reasonable distance from	None
 Proximity to residential housing Access through residential area Proposed increase in residential properties in the area approaching the site which would be adversely affected by traffic flow to and from site 	residential properties and it also separated by industrial units and a sewage treatment works. See above for comments regarding access. It is considered that the development of the site would reduce adverse impacts on amenity resulting from traffic. Transport	

 Likely higher demand for the HRC due to proposed residential development in and around Dorchester Facility should be located outside of town so that traffic doesn't affect residential areas 	assessment at the application stage will need to address and satisfactorily mitigate any potential impacts. The Waste Planning Authority has undertaken an extensive search for sites and considers this site to be the most appropriate.	
Use of the site Limited sites available for housing in the town The development should not restrict further employment development at the wider site The development should not restrict future expansion of the sewage works.	Loudsmill is allocated as a Key Employment Site in the West Dorset, Weymouth & Portland Local Plan (2015). The development of waste facilities on allocated employment land is consistent with national policy. The proposed development of a HRC is at the far end of the wider Loudsmill industrial estate and it is not envisaged that this would restrict other employment development on the wider site. The site has been selected with input from Wessex Water as the most suitable in order to avoid any conflict with the future expansion of the sewage works.	None
Alternative sites Land at Stinsford Hill considered a more appropriate location for a HRC	The Waste Planning Authority has undertaken an extensive search for sites and considers this site to be the most appropriate. The site at Stinsford Hill was not considered appropriate due to concerns related to traffic/access and likely landscape impacts that could be difficult to overcome through mitigation. There was also considerable uncertainty over the deliverability of this site.	None

Inset 6 – Old Radio Station, Dorchester		
Issue	DCC Officer Response	Proposed Modifications
Impact on water resources	The Environment Agency has raised no objection to this	A modification is proposed to
	site. However investigation regarding contamination is	refer to the need for contaminated

 Located within Source Protection Zone 3; chalk aquifer used for public water supply. Site investigation and piling (if used) risk assessment will be needed due to historical possible contaminative uses. 	required and this would guide surface water drainage strategy. It is considered that an additional development consideration could be included for Inset 6, referencing this issue. The Environment Agency would also require a sealed drainage system to provide additional protection. It is considered that an additional development consideration could be included for Inset 6, referencing this issue, along with additional text in Chapter 12 to refer to drainage matters.	land risk assessment within the development consideration. See MM AS6.3 A modification is proposed to refer to the need for sealed drainage systems within the accompanying text to Policy 16 'Natural Resources' See MM12.5
Confirmation that all waste would be stored indoors and a monitoring programme to ensure the site's housekeeping is strictly managed to ensure no outdoor waste that would attract birds.	It is proposed that all waste would be stored inside at the proposed waste transfer facility. It is considered that a condition could be attached to any planning permission requiring a monitoring programme as requested.	None
Potential for conflict should the bus station be sub-let for other uses before the waste facility comes forward.	The Waste Planning Authority is aware that the temporary uses on the site may change in the short term. This is not considered to affect the allocation of the site in the Waste Plan, although it is acknowledged that this could potentially impact on timings with regards to an application being made.	None
Impact on neighbouring residential properties	It is agreed that impact on amenity should be fully considered at the planning application stage. Policy 13 'Amenity and quality of life' ensures this.	None
Avoiding impact on Dorset Area of Outstanding Natural Beauty • Ensuring development does not adversely impact on the Dorset Area of Outstanding Natural Beauty when	The Dorset AONB team does not object to the site. The site is already developed and they wish to see the baseline position maintained. Development consideration 1 requires a landscape led masterplan approach, which is supported by the Dorset AONB team. It is considered that additional text could be	Modifications are proposed to the development considerations to address points raised and reflect the design guidelines included within the Site Assessment. See MM AS6.2

compared to the existing situation, ensuring mitigation of additional effects and achieving enhancement opportunities.	included in the development considerations to provide further guidance on the design and landscape mitigation measures expected and to reflect the design guidelines included within the Site Assessment.	

Inset 7 – Eco Sustainable Solutions Issue	DCC Officer Response	Proposed Modifications
Aerodrome safeguarding Stack height Impact on radar performance	The site promotors are understood to be working closely with the airport authorities to ensure there are no unacceptable issues relating to aerodrome safeguarding resulting from development.	A modification is proposed to development consideration 4 to refer to impact on radar reflections and shadows. See MM AS7.1
	Consideration will be given to the addition of reference to radar performance within the development considerations to provide a more comprehensive list if issues to be addressed through any application. Additional text could be added to development consideration 4.	Modifications are also proposed to the development Management chapter of the Waste Plan and Policy 20 to ensure relevant proposals prepare an aviation impact assessment so that an assessment can be made, by the relevant authorities, to ensure the safe operation of aircraft. See MM12.7
Bird Strike	The possibility of bird strike will need to be assessed and mitigated through any planning application. The risk of bird strike is likely to be reduced by proposals for modern waste treatment facilities as all waste will be stored/treated within an enclosed building.	A modification is proposed to include an additional development consideration to require the preparation of a bird management plan to support any application. See MM AS7.4
	Given the proximity of the airport to this site it is considered appropriate consider the inclusion of an additional development consideration to require a bird management plan to be prepared to support any application.	
	Additionally, applications will be considered against all relevant polices within the Waste Plan. Policy 20 'Airfield Safeguarding Areas' requires proposals to demonstrate that the development will not give rise to new or increased hazards to aviation.	

Odour	The development of a residual waste treatment facility would involve strict air pollution/emission and odour controls from the Environment Agency, who would need to issue a waste management licence. Once operational they would monitor the site on a regular basis.	None
Sufficient capacity should be available elsewhere to allow for the potential that this site will not be able to come forward. Site should be deleted in favour of the other three options which will adequately meet the Plan requirements.	It is agreed that there are constraints with this site that will have to be addressed in order to bring the site forward. The Waste Planning Authority has, and will continue, to work with the operator, Natural England and the airport authorities to address the issues satisfactorily. However, the Waste Plan contains four sites that together provide in excess of the capacity required to meet the identified shortfall in the Plan area. This provides flexibility should one site not come forward. Additionally, the allocation of land is not technology specific. If the conclusion is reached that Energy from Waste is not acceptable on this site there are other methods of residual waste management such as the preparation of RDF/SRF that may be appropriate.	None
Emissions/Air Quality issues/Ecology	The Waste Plan contains safeguards in the form of specific criteria to ensure that there are no significant effects on European sites from future waste proposals (See Policy 18). Further assessment work is required to understand the range of waste management technologies that may be appropriate on this site. The Waste Planning Authority will need to be satisfied that there are no significant effects before planning permission is granted. Further information has been requested from the site promoter regarding the impact on Dorset Heaths from proposals.	None
Traffic Increased traffic in an already congested area	Development of an energy from waste facility on this site would see an increase in HGV traffic. Dorset Local Enterprise Partnership is funding significant transport	None

 Cumulative impact of increased vehicles from other development Emissions Increased movements associated with development have not been considered as part of the planned improvements to the B3073 	improvements in this area that will be implemented over several years. It is noted however that the increase in vehicle movements associated with the waste proposals have not specifically been considered as part of the current planned B3073 improvements. A transport impact assessment will be required, at the planning application stage, to determine the specific impact on the network from proposals and how any impacts will be mitigated. The highways authority has no objection in principle to development subject to in the form of a contribution towards the corridor improvements. Highways England has confirmed that the estimated increase in daily movements proposed would not cause a significant impact on the SRN and therefore does not require mitigation to be identified in the Waste Plan. However, for clarity the Pre-Submission Draft Waste Plan includes a development consideration relating to mitigation and possible contributions to the B3073 corridor improvements.	
Impact on the Green Belt	It is acknowledged that the site lies within the Green Belt. The National Planning Policy Framework allows for the limited infilling or the partial or complete redevelopment of previously developed sites. The Waste Plan has allocated this site to allow opportunities for the intensification of operations which would include the management of an additional tonnage of waste. It is likely that intensification will be achieved by partial or complete reconfiguration of the existing site. The Waste Planning Authority is therefore confident that this scale of development would be consistent with National Policy on Green Belt.	None

	See below – further extension into the Green Belt	
 Flood Risk Effects on flood risk mitigation measures required to develop the adjacent employment site Fail the sequential test – all other residual waste allocations are within FZ1 	It should be noted that the Environment agency have no objection to the proposals on this site provided that any required assessments, permits, etc are undertaken. Flood Zones 2 and 3 make up a very small part of the periphery of the site and therefore it should be possible to avoid built development within these areas avoiding the need for a sequential text. Clarification on site design and master planning has been sought from the site promotor. Consideration will be given to the inclusion of an additional development consideration to ensure adequate protection is	A modification is proposed to include an additional development consideration to require protection of nearby flood risk mitigation measures. See MM AS7.2
	afforded to flood alleviation mitigation measures being implemented on the adjacent employment site.	
Impact on water resources/contamination	The Environment Agency has raised no objection to this site. However, would require a sealed drainage system to provide additional protection given the types of waste on site. Consideration will be given to the inclusion of specific reference to the need for a sealed drainage system within the development considerations and/or within the development management section (Chapter 12) of the Waste Plan. This site is on a minor aquifer of Secondary or Unproductive designation and the Environment Agency would require the protection of land and groundwater from contamination and oil storage.	A modification is proposed to refer to the need for sealed drainage systems within the accompanying text to Policy 16 'Natural Resources' See MM12.5 A modification is proposed to refer to the need for measures to protect land and groundwater from contamination and oil storage within the development consideration. See MM AS7.3
Impacts on the strategic employment site	The Waste Planning Authority has worked with the airport authorities and the Local Economic Partnership to consider the intensification of this waste site and its impact on the aviation park. Issues such as appropriate stack height, colour and lighting have been highlighted within the Waste	None

	Plan development considerations in order to ensure they are addressed through any planning application. It is appropriate to deal with these issues, in detail, at the planning application stage when precise details of the proposal are known.	
Contingency arrangements	Development of a facility for the management of residual waste on this site would mean that Dorset had (a minimum of) two major facilities for managing this waste stream. This would provide a contingency that currently does not exist. In addition, a new transfer facility in Bridport would offers a significant quantity of temporary waste storage. The Waste Plan also allocates land for a new transfer facility in Blandford, Dorchester and Wareham. These facilities, if developed, would allow for additional quantities of temporary storage of waste if there was a short-term issue at a treatment facility.	None
Impact on nearby sensitive receptors	Waste managed at modern waste treatment facilities would be stored/treated within an enclosed building which should address odour/dust issues. Consideration may need to be given to mitigation at the application stage, such as landscaping and site design/layout to reduce impacts on the community to acceptable levels and to ensure proposals are accord with Policy 13 of the Waste Plan. Where necessary planning conditions can be attached to permissions to restrict noise levels.	None
Extension to the red line boundary proposed to include an additional 1.04 hectares of land	The Waste Planning Authority would resist any further extension into the Green Belt in this location. It is hoped that it will be possible to re-configure the site to ensure that intensification and redevelopment can take place within the existing site without the loss of existing capacity that is fundamental to the Waste Plan spatial strategy. The WPA would like to see evidence that there would be no loss of capacity, or that any lost capacity could be accommodated elsewhere.	None

	Further details on the design and site masterplan have been requested from the site promotors.	
Site has the potential to manage up to 220,000pta	Further consideration will need to be given to the increased tonnage proposed taking into account impacts such as traffic movements, emissions and displacement of existing capacity.	None
	The WPA has sought details on vehicle movements associated with the management of this tonnage of waste and site design and layout.	

Inset 8 – Land at Canford Magna, Poole			
Issue	DCC Officer Response	Proposed Modifications	
Development of new houses on land south of Magna Road will bring sensitive receptors closer to the waste facility	It is understood that a decision has not yet been made for housing development to the east of the waste facility but resolved to grant pending preparation of a S106 agreement. It is acknowledged that this development would bring residential development closer to the existing waste facility. The Waste Plan does not propose to extend the existing waste facility in the direction of the new housing. Any future applications for waste activities will need to consider the	The site assessment will be updated to include reference to proposed residential development to the east of the waste site.	
	impact on these houses. Depending on the details of the proposals it may be necessary to mitigate impacts. The site assessment will be updated to ensure that regard has been given to the proposed development.		
Increase in traffic	Intensification of development of this site would require an assessment of the cumulative impact of this proposal plus other committed development on the local network including residential and Magna Business Park. This work is likely to be most appropriate at the planning application stage when detailed proposals/vehicle movements are known.	None	

Mitigation required for any loss of wet habitat Protection of the SSSI	Development consideration 2 acknowledges that ecological mitigation is likely to be required. Consideration will be given to expanding this development consideration to explain that mitigation would be required for any loss of wet habitat and that an appropriate buffer from the SSSI should be provided.	A modification is proposed to amend Development Consideration 2 to widen its scope and ensure mitigation against loss of wet habitat and protection of the SSSI. See MM AS8.2
Impact on water resources/contamination	The Environment Agency has raised no objection to this site. However, would require a sealed drainage system to provide additional protection given the types of waste on site. Consideration will be given to the inclusion of specific reference to the need for a sealed drainage system within the development considerations and/or within the development management section (Chapter 12) of the Waste Plan.	A modification is proposed to refer to the need for sealed drainage systems within the accompanying text to Policy 16 'Natural Resources' See MM12.5
 Proposal not consistent with National Planning Policy on Green Belt - impact on the openness of the green belt from the extension Extension area is not included in the 'Major developed Site in the Green Belt' Policy SSA26. The emerging Poole Local Plan does not propose that the site is allocated as a 'Major developed Site in the Green Belt' 	Consideration will be given to the deletion of reference to 'Major Developed Site in the Green Belt' within Inset 8 and the accompanying Site Assessment to reflect up to date local policy. It is acknowledged that the site lies within the Green Belt. The National Planning Policy Framework allows for the limited infilling or the partial or complete redevelopment of previously developed sites. The submitted Waste Plan allocation of land at Canford Magna to allow opportunities for the intensification of operations which would include the management of an additional tonnage of waste. It is considered that this level of intensification could be achieved by partial or complete renovation of the existing site or allowing for limited infilling. The Waste Planning Authority believes that it should be possible to achieve a scale of development that would be consistent with National Policy on Green Belt to ensure it would not have an	A modification is proposed to amend Inset 8 to remove reference to 'Major Developed Site in the Green Belt'. See MM AS8.1

	unacceptable impact on the openness of the Green Belt or the purpose of including land within it.	
	The area to the south west, allocated for expansion of the facility is considered to be currently well-screened on all sides, with the exception of the boundary with the existing	
	waste Control Centre.	
Air pollution/Odours	The operation and development of a waste facilities involves strict air pollution/emission and odour controls from the Environment Agency. Once operational they would monitor the site on a regular basis to ensure that the site complies with its Waste Management Licence.	None
 Reference should be made to Footpath 125, the definitive line of which passes through the site. 	Footpath 125 lies some distance to the north west of the Site Control Centre outside the scope of the Inset map. It is not considered that future waste proposals would adversely affect this right of way.	A modification is proposed to amend Inset 8 to include reference to BW 118. See MM AS8.3
 Inset 8 – missing refence to bridleway 118 	It is agreed that consideration should be given to including reference to Bridleway 118 which crosses the entrance to the site. Bridleway118 is already referred to within the site assessment.	
Bird Strike	The possibility of bird strike will need to be assessed and mitigated through any planning application. The risk of bird strike is likely to be reduced by proposals for modern waste treatment facilities as all waste will be stored/treated within an enclosed building.	A modification is proposed to include additional criteria in Policy 20 and the supporting text to provide additional protection to aviation. See MM12.7
	Applications will be considered against all relevant polices within the Waste Plan. Policy 20 'Airfield Safeguarding Areas' requires proposals to demonstrate that the development will not give rise to new or increased hazards to aviation.	
The Plan should provide for the opportunity for the experimental pyrolysis and gasification plant on this site to be expanded.	This site allocation is intended to be flexible to encourage opportunities for intensification of waste management activities at the site. This could include the expansion of the	None

Site allocation not adequate to address the	existing permitted activities as long as proposals accord with all the relevant policies in the Plan and the specific development considerations that ensure adequate protection of amenity and the environment. Land at Canford Magna has been allocated along with	None
shortfall in capacity.	others to address the identified need for capacity for managing residual waste.	
The site has further scope to meet the Waste Management Needs of the Plan area	Further thought has been given to how the capacity at this site and others has been categorised. The site owner/operator considered that Inset 8 could address much of the shortfall in residual waste capacity without the need to bring forward other sites for allocation. The Waste Plan had apportioned waste capacity as recycling capacity (as this was the need the original planning permission was permitted to address). Further consideration has been given to this and other sites and how capacity had been apportioned (recycling/residual). Various amendments have been made to chapter 7 of the Waste Plan to build in flexibility to enable existing permitted capacity to address recycling, residual waste needs or a combination of both during the Plan period. The proposed modifications ensure that the Waste Plan provides a flexible solution to addressing the waste management needs throughout the Plan period. Site Allocations are considered flexible enough to ensure that proposals can come forward for a range of processes and for the management of a range of waste streams. Permitted sites and allocations should be able to react to changing circumstances to manage different waste streams during the Plan period due to changes to contracts or market	Various modifications are proposed. MM7.1 to MM7.30

Land adjoining the site control centre should be allocated for the management of organic waste.	Extension of this site to the south east, to accommodate a facility for the management of organic waste, has been considered during the preparation of the Waste Plan. However, the Waste Planning Authority did not take this forward for allocation. As with the existing site, the land is situated within the Green Belt. Unlike the existing footprint of the waste facility it is not a previously developed site and is considered to be visually separate from the existing facility. Development of this area would constitute inappropriate development as it would be harmful to the openness of the Green Belt and would result in encroachment into the countryside. The Waste Planning Authority do not consider that very special circumstances have been demonstrated that would warrant an extension into the Green Belt in this location. In addition, it would be very close to proposed residential development. The existing waste management centre (Inset 8) is allocated for intensification including the management of nonhazardous waste. This would allow for an application to come forward for the management of organic waste within	Site has been included in list of omission sites (see table below). A modification has also been proposed to clarify that allocated sites could accommodate a range of facilities for the management of non-hazardous waste. MM7.18 MM7.19
	the boundary of the existing site. Modifications are proposed to clarify this.	

Inset 9 – Land at Mannings Heath Industrial Estate		
Issue	DCC Officer Response	Proposed Modifications
Small site – would not fulfil a strategic treatment	It is proposed that this site could manage up to 100,000tpa	None
role	of residual waste. This would make a significant contribution	
	to the shortfall in residual waste management capacity.	
Displacement of recycling capacity	However, this is an existing waste facility with current	
	capacity to manage 75,000pta of waste (Environmental	
	Permit). The site already performs an important function in	
	managing waste arisings and its capacity has been	

	accounted for before deriving capacity shortfalls. Therefore, the actual additional capacity that this proposal would release may only be 25,000tpa. Should it come forward for the treatment of residual waste it is acknowledged there may be displacement of the existing waste management capacity on this site. However, opportunities to push waste up the waste hierarchy and add value to waste locally	
	through the preparation of RDF and SRF could be brought forward and provide advantages over existing activities.	
No evidence to justify restricting future waste management processes to the preparation of RDF/SRF	The Waste Planning Authority has concerns about the development of an Energy from Waste facility on this site in particular, with regards to the impact on the Dorset Heaths European Sites. This has led to the restrictions placed on the site in the Pre-Submission Draft Plan.	None
Impact on water resources/contamination	The Environment Agency has raised no objection to this site. However, would require a sealed drainage system to provide additional protection given the types of waste on site.	A modification is proposed to refer to the need for sealed drainage systems within the accompanying text to Policy 16 'Natural Resources' MM12.5
	Consideration will be given to the inclusion of specific reference to the need for a sealed drainage system within the development considerations and/or within the development management section (Chapter 12) of the Waste Plan.	
Bird Strike	The proposals include the management of non-hazardous waste. Waste managed at modern waste treatment facilities would be stored/treated within an enclosed building which should address any issues associated with bird strike. The proposals put forward do include the storage of wrapped bales of RDF or SRF externally. The Environment Agency have not raised any concerns with regards to this method of storage.	Modifications are proposed to the development Management chapter of the Waste Plan and Policy 20 to ensure relevant proposals prepare an aviation impact assessment so that an assessment can be made, by the relevant authorities, to ensure the safe operation of aircraft. See
	Applications will be considered against all relevant polices within the Waste Plan. Policy 20 'Airfield Safeguarding	MM7.1 to 7.30

Areas' requires proposals to demonstrate that the	
development will not give rise to new or increased hazards	
to aviation.	

Inset 10 – Binnegar Environment Park			
Location – site located some distance to the west of Bournemouth/Poole	Until recently, most of the waste arising from Dorset was sent to landfill sites situated in relatively close proximity to Binnegar. However, the management of waste is changing from landfill to treatment and there is, in theory, a greater choice over location. The search for sites to manage residual waste did focus primarily on south east Dorset as this is where the greatest quantities of waste arise. However, Binnegar would be in a good location for managing waste from western Dorset and coupled with capacity in SE Dorset could provide a good overall solution for the management of waste in the Plan area.	None	
 Traffic Increase in traffic – on the existing position Capacity of the A351 between the Bakers Arms roundabout and Wareham. Details of routes taken by HGVs needed Noise from HGV movements/reversing bleepers The junction with the A352 is difficult to navigate for any vehicle coming from the west and the Purbeck roundabout at the junction of the A352. The Purbeck District Council transportation may result in HGVs being routed via Bere Regis resulting in additional waste miles. 	The site already benefits from planning permission for the development of an Environmental Park, comprising a series of different waste management activities. The proposals set out in the Waste Plan would be a replacement for what is already permitted and it is understood that there would be no increase in HGV movements on permitted levels. It is acknowledged that should a facility produce RDF/SRF but not treat it on site, i.e. send it to facilities elsewhere for final treatment, then HGV movements would be higher than if waste were treated on site. However, the local highways authority is content that HGV numbers and routes would remain the same as currently with only a minor variation in destination to this site as opposed to the two existing landfill sites. No concern has	None	

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	been raised regarding access from Puddletown Road to the A352 or capacity of the A351 between the Bakers Arms roundabout and Wareham.	
	The Waste Plan includes a specific development consideration to ensure that applications consider appropriate HGV routes.	
Uncertainly of delivery – given development considerations	It is agreed that there are constraints with this site that will have to be addressed in order to bring the site forward. However, the Waste Plan contains four sites that together provide in excess of the capacity required to meet the identified shortfall in the Plan area. This provides flexibility should one site not come forward. Additionally, the allocation of land is not technology specific. If the conclusion is reached that Energy from Waste is not acceptable on this site there are other methods of residual waste management such as the preparation of RDF/SRF that may be appropriate.	None
Visual Impact	Initial assessment by the council's landscape officer suggests that the site should be subject to a detailed landscape and visual impact assessment at the planning application stage. It is suggested that the impact of any stack should be minimised by its design, formation level, colour, texture and overall height.	None
	The Waste Plan includes a specific development consideration to ensure that applications are accompanied by a detailed landscape and visual impact assessment and preparation of a comprehensive Landscape and Ecological Masterplan for the site. This should demonstrate how impacts will be minimised, particularly from any stack by its design, formation level, colour, texture and overall height. This should also give regard to how lighting on the site will be minimised. Proposals should also incorporate	

	appropriate screening to ensure protection of the adjacent public right of way.	
Limited opportunities to utilise heat and power	It is agreed that opportunities to utilise the heat generated by the facility are limited on this site. However, the Waste Planning Authority understands that there is a viable and feasible grid connection on the western side of Wareham.	None
Impact on ecology	The Waste Planning Authority's Conservation Regulations Assessment Screening Report concludes that significant effects on European protected habitats are uncertain at this stage. It is acknowledged that further assessment of impacts from the proposals in terms of emissions of nitrates would be necessary to determine whether likely significant effects can be ruled out. The Waste Plan contains sufficient safeguards within its Policies to ensure that there are no significant effects from the development of waste facilities on this site. The Waste Plan includes a specific development consideration to ensure an Appropriate Assessment is undertaken at the application stage. There is also a requirement for the preparation of a comprehensive Landscape and Ecology Masterplan for this site. This	None
	reflects the importance of the environment surrounding the site.	
Impact on water resources	The Environment Agency has raised no objection to this site. However, it is advised that further consideration of surface water features is required as part of any planning application. An adequate buffer is recommended from the River Piddle to protect the watercourse. The Environment Agency would also require a sealed drainage system to provide additional protection.	A modification is proposed to development consideration 5 to refer to the need for a buffer from the River Piddle. See MM AS10.1 A modification is proposed to refer to the need for sealed drainage systems within the
	The Pre-Submission Draft Waste Plan includes a specific development consideration to ensure that a site-specific strategy of surface water management should demonstrate	accompanying text to Policy 16 'Natural Resources' See MM12.5

	that runoff rates are not increased and therefore do not contribute to a cumulative impact or off site downstream worsening of flood risk. The Waste Planning Authority will consider making specific reference to the need for a buffer from the River Piddle and the need for a sealed drainage system.	
The site should be restored to heathland and no permanent waste facilities should be developed.	This site already has permanent planning permission for the development of a range of waste management facilities. It is the Waste Planning Authorities understanding that the proposed facilities would replace some of the consented operations and there would be no change in the maximum consented throughput of the Binnegar Environmental Park. As part of the planning permission to develop the Environmental Park there was a requirement to prepare a Master Plan for the restoration, aftercare and long-term management of the Binnegar Estate north and south of the C80 Puddletown Road.	None
Air pollution/Emissions/Odour Prevailing wind from the SW	The development of a residual waste treatment facility would involve strict air pollution/emission and odour controls from the Environment Agency, who would need to issue a waste management licence. Once operational the site would be monitored on a regular basis to ensure that emissions and odour are within acceptable levels.	None
Litter/dust	Modern waste management facilities will be designed to ensure all wastes are enclosed within a building. Additionally, the facility would be located within a quarry void. This should provide additional protection from litter or dust being blown off the site. Nevertheless, the potential for dust deposition on surrounding heathlands will need further consideration at the planning application stage. Vehicles transporting waste to facilities would be enclosed or covered to ensure no waste escapes during transportation.	None

Vermin	Modern waste management facilities should not give rise to vermin. The majority of waste would be stored within enclosed buildings.	None
Impact on Scheduled Monument	It is agreed that the barrow and its setting should be conserved and that this should be factored in to a masterplan for the development of the site.	None
	The Waste Plan includes a Development Consideration to ensure that consideration is given to the impact of development on the setting of the Scheduled Monument situated south-west of the site.	
Potential for fire at the waste facility	The Waste Planning Authority is not aware of any significant risk of fire from waste treatment facilities that cannot be minimised through good site management and monitoring.	None
Contrary to the Puddletown Road Policy in the Mineral Sites Plan.	This is an existing waste management site with planning permission for a range of waste activities. Consideration will be given to some additional text for inclusion within the Mineral Sites Plan to refer to existing developed areas within the area covered by the Puddletown Road Policy.	None

Inset 11 – Bourne Park, Piddlehinton		
Issue	DCC Officer Response	Proposed Modifications
 Traffic and access Increase in vehicle numbers HGV's should not be able to use rat-runs to access the site Narrow roads and soft verges Impact on properties from HGV movements Impact on ancient bridge over the River Piddle 	In response to the Pre-Submission Draft Waste Plan consultation the site promotor has updated the details regarding traffic generation from the proposals. A greater increase in traffic is expected from the development. Advice from the Highways Authority has been sought on the increase but the comments remain as follows; 'No objection from DCC Highways subject to a traffic routing agreement'	A modification is proposed to Development Consideration 3 to encourage traffic to access the site from the major road network in the south rather than from the north via the Piddle Valley Villages. See MM AS11.2
Traffic travelling to Bourne Park should use the A35 and B3143	In response to representations received and discussions with the Highways Authority the WPA consider it would be appropriate to modify one of the development considerations to further encourage proposals to route traffic to the site from a southerly direction, avoiding local roads.	
Concern that this facility will have to deal with much greater levels of green waste than 6,500 tpa as proposed. Given the shortfall identified in the Plan is 37,000tpa	This allocation has been assessed on the basis of a 6,500tpa facility it is not proposed that this facility would address the entire shortfall for the Plan period. The Waste Plan contains a criteria based policy to assess other applications that come forward during the Plan period for green waste composting facilities.	None
Impact on conservation area	It is not considered that there will be an adverse impact on the conservation area from this development. The Waste Plan policies and development considerations include an appropriate level of protection for sensitive receptors. See also response below relating to the Piddle Valley Neighbourhood Plan.	None
Concern raised about the carbon footprint from transporting garden waste from the west of the county	There is a need for a facility in the west of Dorset to manage green waste. This location is considered appropriate.	None

Consistency with the Piddle Valley Neighbourhood Plan	Neighbourhood Plan are covered by the 'Development Considerations' set out in the Waste Plan. There is however	A modification is proposed to Development Consideration 1 to include reference to the historic character of Piddlehinton Camp. See MM AS11.1
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Inset 12 – Gillingham Sewage Treatment Works				
Issue	DCC Officer Response	Proposed Modification		
NB: planning permission has been granted for an extension to this facility. There is no need to allocate the site and it can be deleted from the Plan see MM AS 12.1				
No evidence is provided of the need to extinguish any part of N64/51	Consideration will be given to updating development consideration 1 to remove reference to extinguishment of public right of way N64/51.	If this site allocation is to be retained consideration will be given to updating the development consideration to remove reference to extinguishment of public right of way N64/51.		
Landscape/Impact on AONB	It should be noted that a Planning application has been submitted for the expansion of Gillingham Sewage Treatment Works. If Planning Permission is granted there will be no need to allocate this site in the Waste Plan. However, if the site is retained the Waste Plan contains a development consideration to require an application to include a comprehensive landscape masterplan scheme of hedge and copse planting to mitigate impacts on the open countryside in this part of the AONB.	None		
Odour	Issues of odour management will be considered as appropriate through the current application.	None		

Inset 13 – Maiden Newton Sewage Treatment Works

(NB: Due to the deletion of Inset 12 Gillingham Sewage Treatment Works this site allocation will be re-numbered Inset 12 see MM AS13.1)

Issue	DCC Officer Response	Proposed Modification
Development will require adequate landscape mitigation.	The Pre-Submission Draft Waste Plan contains policy guidance to ensure the protection of landscapes including the AONB. A specific development consideration has also been included to ensure that a comprehensive landscape masterplan scheme of hedge and copse planting is developed to mitigate impacts on the open countryside in this part of the AONB.	None
Development will need to ensure impacts on the internationally protected Poole Harbour wildlife site are protected.	The need to extend the sewage treatment works is partly due to the requirements of the Urban Waste Water Directive and therefore should assist in protecting Pool Harbour SPA/Ramsar.	None
Traffic/damage to access road	The Waste Planning Authority understands that development proposals would give rise to a very small increase in vehicle movements – an additional tanker every three to four weeks. At this level, there are no specific concerns. Depending on the ownership of the access track it may be possible to require future proposals to make necessary improvements to the access track through a condition attached to a planning permission.	None

3. Waste Plan Omission Sites

The sites below were put forward during the Pre-Submission Draft Waste Plan as alternatives or additional site allocations.

Reference	Site Name	Proposed use	Is this site proposed as an alternative to an allocated site?	DCC Response
WPOM1	Extension to Site Control Centre, New Earth Solutions	Organic waste treatment plant	No – an additional proposed use on land adjoining Inset 8 of the Pre-Submission Draft Waste Plan	It is agreed that this site may provide an opportunity to address the shortfall in the management of food waste. However, an extension of this existing waste site to the south east has been considered during the preparation of the Waste Plan. The Waste Planning Authority did not take this forward for allocation. As with the existing site, the land proposed to form an extension, is situated within the Green Belt. However, unlike the existing footprint of the waste facility it is not a previously developed site and is considered to be visually separate from the existing facility. Development of this area would constitute inappropriate development as it would be harmful to the openness of the Green Belt and would result in encroachment into the countryside. The Waste Planning Authority do not consider that very special circumstances have been demonstrated to allow development to take place. The Waste Plan contains a criteria based policy that would be used to consider applications that come forward for the management of organic waste during the Plan period to meet the need.

WPOM2	Land at the Dorset Innovation Park and land to the south of the innovation park.	Flexible waste allocation – no specific waste proposals	Not specifically – but could provide an alternative site for a residual waste treatment facility or the management of other waste should the need arise.	Recent changes in land ownership, together with the Lulworth Estate's capacity to provide land for access to the south mean that it may be appropriate to re-consider this site as a waste allocation. However, the site has been proposed too late in the process of preparation of the Waste Plan and not enough information has been provided to fully assess the sites suitability.
WPOM3	Land at Woolsbridge Industrial Estate (Inset 1 of the Pre- Submission Draft Waste Plan)	Management of residual waste Landowner considers that the Waste Plan unnecessarily limits the range of proposed uses at the Woolsbridge Industrial Estate to a local waste transfer and/or bulky waste treatment facility.	Not specifically – but could provide an alternative site for a residual waste treatment facility	Previously discounted due to its remote location, at the time the site was not being actively promoted for the management of residual waste. Could provide additional flexibility to ensure that residual waste management needs can be met over the Plan period. However, not enough information has been provided to fully assess the sites suitability.
WPOM4	Land at Woolsbridge Industrial Estate – Eastern parcel of land	General waste management	No – as a wider area of search to provide additional flexibility	The notation of only the south part of the Woolsbridge Industrial Estate for a local waste management plant is considered by the landowner over-restrictive and inflexible. The eastern parcel of land was considered unacceptable from a landscape and visual point of view. The southern parcel is also further from sensitive receptors which provides advantages to the development of a waste facility.
WPOM5	Woolsbridge Industrial Estate –	General waste management	No – as a wider area of search to provide additional flexibility	Our initial review of the existing Woolsbridge Industrial estate concluded that there was no

	existing industrial estate			available land of sufficient size for the development of a waste facility. If the situation has changed the Waste Planning Authority would consider including the exiting industrial estate within a new 'Area of Search' encompassing the Pre-Submission Waste Plan Inset 1 (southern parcel of land).
WPOM6	Henbury	Expansion/intensification of existing activities including a variety of recovery and recycling activities and landfill space available on-site to take final residues.	No – an additional allocation	The Waste Plan does not seek to allocate sites for inert waste recycling. This is the role of the Minerals Strategy and Mineral Sites Plan. Allocations for inert recovery were considered for allocation in the Waste Plan. Landowners and operators were given sufficient opportunities to put their sites forward for consideration during the preparation of the Plan. However, the site has been proposed too late in the process of preparation of the Waste Plan and not enough information has been provided to fully assess the sites suitability. In any case, the Waste Plan contains a criteria based policy which provides against which an application will be assessed. This is considered a sound approach.