

**The West of England Partnership – Joint Waste Core Strategy**

**August/September 2009 Progress Update**

**Report: Representations to the August/September Progress Update**

Prepared by the West of England Partnership

October 2009

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## Introduction

This report lists the representations to the Joint Waste Core Strategy Progress Update. Consultees were invited throughout August and September 2009 to submit comments on the following sites and strategic areas:

### Additional Sites

1. Cabot Park in Avonmouth, (off Moore House Lane) located in an industrial area of Avonmouth.
2. Warne Road in Weston-super-Mare, North Somerset

### Strategic Areas

1. Strategic Area A – Yate
2. Strategic Area B – Weston-super-Mare

**Explanation of columns used in table 'Progress Update Representations to Strategic Areas A and B, and sites at Warne Road, Weston-super-Mare and Cabot Park, Avonmouth.**

Column	Explanation
User ID	Reference ID assigned to each participant, this ID is consistent with the Preferred Options Consultation.
Document Ref	Reference number assigned to each submission. This reference starts with either an E or an L, which indicated how the response was submitted (E for email and L for letter).
Name	If the response was submitted from a member of the public, 'Individual' populates this field; where the submission is from an organisation the name of the organisation is given. If the response is from a Councillor or MP their name is given
Representation	Representation received entered, with confidential details removed.
Response	Officer response given to the representation. N.B. Please note these are currently draft responses and are subject to cabinet and council meetings throughout October and November.

**Progress Update Representation to Strategic Areas A and B, and sites at Warne Road, Weston-super-Mare and Cabot Park, Avonmouth.**

User ID	Doc Ref	Name	Representation	Response
146	E112	Yate Town Council	Yate Town Council is fundamentally opposed to the idea of the Strategic Area at Yate. We would very strongly like to be in a position to support a local waste facility, so that the residents of Yate and Chipping Sodbury can dispose of their refuse at source, but until we have clarification about the nature of the method and the location proposed (with an equivalent level of detail provided in relation to the other sites), we have to strongly oppose because of the proximity to residential properties of the area identified.	<p>Noted.</p> <p>This Plan is technology neutral. Strategic areas have been identified when it is not appropriate to be site specific i.e. high turnover or when it is not possible to identify a discrete site.</p> <p>Applications on sites or strategic areas allocated in the JWCS will have to conform with the planning process and appropriate consultation on site specific proposals will be required when a planning application is submitted.</p>
84	E113	Individual	<p>Re: Yate Strategic Area</p> <p>So long as the sites do not generate additional noise pollution nor smells (I would point out that nowhere on the Great Western Business Park option is far from residential development, so that is an issue) the most objectionable result of placing a facility on any of the Yate suggested Sites is the additional road transport it will generate.</p> <p>All of the Yate industrial estates are poorly served with regard to road access. Any road vehicles accessing these areas would have to travel from the North on B roads already subject to excessive traffic especially HGVs through villages of Latteridge or Rangeworthy. From the West access would be through Coalpit Heath or Winterbourne both congestion spots. From the South and East via the centre of Yate and Westerleigh. Yate gets severely</p>	<p>Locating sites close to urban areas (the main source of waste arisings) is a national, regional and local policy objective.</p> <p>Noted.</p> <p>Development of the spatial options has considered traffic and transports routes at the plan making level. More detailed issues are more appropriately considered on receipt of a planning</p>

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			<p>congested in Station Road now.</p> <p>As rail lines run close to all the Yate sites, in fact along side one estate cannot that mode of transport be used in any way to mitigate the effect of roads?</p>	<p>application or under development management policy.</p> <p>Policy in the JWCS does seek to ensure that other modes of transporting waste are considered where appropriate.</p>
273	E114	Regen SW	<p>Further to Regen SW's response to the earlier consultation we are concerned about the allocation of sites in the JWCS on a "technology neutral" basis.</p> <p>Our response emphasised the need for thermal plant to be deployed adjacent to suitable heat loads to enable operation to meet the requirements of good quality combined heat and power (GQCHP). Since our response DEFRA guidance has been released reinforcing this view (see <a href="http://www.defra.gov.uk/environment/waste/wip/widp/documents/chp-information-note090127.pdf">http://www.defra.gov.uk/environment/waste/wip/widp/documents/chp-information-note090127.pdf</a> ).</p> <p>A site, which is suitable for MBT, does not need an associated heat load – a thermal treatment plant does. Therefore, the concept of technology neutral residual waste treatment site is fundamentally flawed – waste planning on this basis is questionable.</p> <p>Sites for thermal waste treatment plant need to be driven by the identification of deliverable matching heat loads for GQCHP operations.</p>	<p>Noted</p> <p>The Joint Waste Core Strategy will acknowledge and support National policy support of generating heat and electricity through waste management processes.</p>
225	E115	The Helicopter Museum	<p>We have no objection to the strategic area being allocated at Weston-super-Mare provided due consideration is given at the appropriate time to the presence of the museum and its flight safety and safeguarding needs.</p>	<p>Noted.</p> <p>More detailed issues are more appropriately considered on receipt of a planning application or under development management policy.</p>
298	L14	Fulfords Land & Planning on Behalf of Western Power	<p>The two additional sites illustrated in the subject document are directly affected by overhead power lines. Western Power Distribution asks that the relevant Local Authority consults with them on detailed proposals to ensure principally:</p>	<p>Noted</p>

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		Distribution	<p>1, Health and safety is maintained once site is established. Western Power Distribution requires a certain minimum clearance between the lines and any fixed structures such as buildings. There also need to be sufficient clearance to vehicles etc operating on the site. Air pollution such as dust could also be an issue.</p> <p>2, Ensure safety during construction.</p> <p>3, Western Power Distribution will require access to maintain pylons and there will be restrictions as to how close to the pylons and buildings/structures can be established.</p> <p>Western Power Distribution has a number of strategic electricity distribution circuits in some of the area's being considered for development. These circuits run both underground and as overhead lines.</p> <p>Generally Western Power Distribution would expect developers of a site to pay to divert less strategic electricity circuits operating at 11,000 Volts or below. This may include undergrounding some 11kV and low voltage overhead lines as necessary.</p> <p>Western Power Distribution would normally seek to retain the position of electricity circuits operating at 132,000 Volts and 66,000 Volts and in some cases 33,000 Volts, particularly if the diversion of such circuits placed a financial obligation on Western Power Distribution to either divert or underground them as this would then go against the requirement on Western Power Distribution to operate an economic and efficient electricity distribution system. Assuming the required minimum statutory clearances can be maintained and WPD can access its pylons/poles, WPD does not have any restriction on the type of development possible in proximity to its strategic overhead lines but it would be sensible for planning guidance and layout of developments to take WPD's position into account and consider uses compatible with the retention of strategic overhead lines. WPD should</p>	<p>Noted</p> <p>Noted</p> <p>Noted</p> <p>Noted</p> <p>Noted</p>

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			be consulted on detail at an early stage.	
243	E116	Dodington Parish Council	<p>Re: Strategic Area A – Yate</p> <p>Having studied the map of the area our Members felt that the actual site of such a facility had not been specific and that, although we do support treating waste locally, there was not enough evidence for us to comment sensibly about the proposed area.</p> <p>You have asked us to comment on an unspecified site and unspecified technology. Without knowing the exact location of the proposed site we cannot comment on traffic impact.</p> <p>Finally, Members felt that the strategy should not prejudice the consideration of normal planning procedures.</p>	<p>Noted. Strategic areas have been identified when it is not appropriate to be site specific i.e. high turnover or when it is not possible to identify a discrete site.</p> <p>Noted. Development of the spatial options has considered traffic and transports routes at the plan making level. More detailed issues are more appropriately considered on receipt of a planning application or under development management policy.</p>
173	E117	Highways Agency	<p><b>Re: Strategic Areas</b></p> <p><b>Strategic Area A – Yate</b></p> <p>The Agency supports Spatial Option C of the Core Strategy Preferred Options, which makes provision for facilities commensurate in capacity to the catchments that they are to serve and allows for a greater number of potential sites to be considered. The Agency would consider the identification of a facility to serve Yate and its hinterland, within the urban area of the town, to be a preferable option to one providing a larger facility elsewhere to serve the area. This approach will seek to minimise the length of vehicle trips and encourage self-containment within Yate, reducing the potential impact of development on the SRN. The Agency notes the proximity of the Strategic area to the railway line; the utilisation of rail links for transportation is an option that the Agency strongly promotes and should be explored. It is unclear whether there is an existing spur that services the industrial estates in the locality, but in conjunction with these operations there could be potential to create the critical mass required to maintain such a facility in this location.</p>	Noted

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			<p><b>Strategic Area B – Weston Regeneration Area</b>  The Agency has previously provided comments endorsing the provision of a strategic facility to serve Weston and the southern part of the West of England area. Furthermore the Agency has encouraged the provision of such facilities in association with large scale redevelopments (i.e. urban extensions and strategic regeneration sites) as a way of promoting self containment within settlements. Due to the proximity of the Weston Regeneration Area to J21 of the M5 the Agency would need to understand the potential impact of development on the SRN. The Agency notes that the western boundary of the regeneration area abuts the railway line; they would encourage the Partnership to explore the potential for the transfer of waste via rail freight as a sustainable alternative to movement by road.</p> <p><b>Summary</b>  The Agency reiterates that sites should be assessed using the sequential approach to site selection, as it is important that new waste management facilities are located within central and highly accessible locations, which do not encourage additional trips along the SRN (although the agency recognise that due to the ‘bad neighbour’ nature of the operations that this may not be practicable in predominantly residential areas).</p> <p>The Agency welcomes the aspirations of the JWCS to reduce the amount of waste being created, as this will have a mitigating impact on the number of trips to/from waste management facilities. The Agency is also particularly keen for the Partnership to fully investigate the scope for the use of rail and water to transport waste in order to minimise trips on the SRN.</p> <p>The Agency would also like to reiterate that these comments do not prejudice and future responses in site specific matters and would like to be consulted at an early stage on any new waste sites that come forward.</p>	<p>Noted.  Policy in the JWCS does seek to ensure that other modes of transporting waste are considered where appropriate.</p> <p>Noted.</p> <p>Noted</p> <p>Noted</p>
173	E118	Highways Agency	<b>Re: Waste Preferred Options Additional Site Analysis.</b>	

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			<p><b>Site IS8: Warne Road, Weston-super-Mare</b>  The Agency supports the provision of a strategic waste facility within close proximity to the SSCT of Weston-super-Mare provided that it is to serve the Weston urban area and not generate significant additional trips into/out of Weston through the M5 junction 21. This 1.4ha site is located at a central position in Weston-super-Mare within close proximity to two railway stations. This provides an opportunity to explore the potential for transfer of waste via rail freight, which is a move that the Agency would strongly support.</p> <p>The site review completed by WEP suggests that the site is within 500m of the nearest part of the SRN. It should be noted that the A370 is not part of the SRN in this location. The A370 passes through Junction 21 of the M5 approximately 4.5km to the east; the agency would therefore need to understand the impact of a proposed strategic waste facility on Junction 21 which currently suffers from significant capacity constraints.</p> <p>The Agency notes that the site's current use is for recycling of materials and that there are a number of extant planning consents for recycling plants on the site; its suitability to accommodate a strategic waste plant is therefore apparent. However the agency would like to see a primary objective outlined to seek to secure the transfer of waste via rail freight in preference to the use of HGV's.</p> <p><b>Site IS10: Land adjacent to Cabot Park</b>  This 4.5ha Greenfield site if delivered has the potential to impact upon the M4, M5 and M49 motorways, in particular junctions 18 and 18a of the M5/M49.</p> <p>Any proposed scheme in this location would need to be supported by a robust evidence base and the Agency would need to be satisfied that there would not be any unacceptable impacts on the SRN. The use of rail freight terminal and port facilities at Avonmouth should therefore be fully investigated in order to reduce HGV trips on the SRN.</p>	<p>Noted</p> <p>Noted</p> <p>Noted</p> <p>Noted</p> <p>Noted</p>

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			<p><b>Summary</b> The Agency reiterates that sites should be assessed using the sequential approach to site selection, as it is important that new waste management facilities are located within central and highly accessible locations, which do not encourage additional trips along the SRN (although the agency recognise that due to the 'bad neighbour' nature of the operations that this may not be practicable in predominantly residential areas).</p> <p>The Agency welcomes the aspirations of the JWCS to reduce the amount of waste being created, as this will have a mitigating impact on the number of trips to/from waste management facilities. The Agency is also particularly keen for the Partnership to fully investigate the scope for the use of rail and water to transport waste in order to minimise trips on the SRN.</p> <p>The Agency would also like to reiterate that these comments do not prejudice and future responses in site specific matters and would like to be consulted at an early stage on any new waste sites that come forward.</p>	<p>Noted</p> <p>Noted</p> <p>Noted</p>
290	E119	The Coal Authority	We have no specific comments to make on the additional assessments for the two sites at Cabot Park, Avonmouth and Warne Road, Weston-super-Mare at this stage. The Coal Authority would, however, draw your attention to the comments we have recently submitted in response to earlier consultations on the JWCS.	Noted
312	E120	Individual	The Avonmouth site appears the obvious choice because of transport links already in place and Avonmouth has a long industrial history so the site should not meet with too much local opposition. The W-s-M site would cost more to implement but because of the usable area around the site provide a better long term solution to waste management. I'm sure W-s-M could use the employment potential this site would bring.	Noted
313	E121	Neighbourhoods Parks and Estates	<p><b>Site IS10 Cabot Park</b> The Rhine along the South-western boundary is Sallt Rhine and Moorhouse Rine SNCI. This needs to be referred to under the Planning Policy section of the site assessment. The site itself is also a wildlife network site (policy</p>	Noted

User ID	Doc Ref	Name	Representation	Response						
			NE6). If this site is taken forward as part of the JWCS at any stage in the future, it is vital that it's wildlife corridor and green infrastructure function is retained. This would result in the developable footprint of the site being smaller than the area shown.							
176	E122	Weston-super-Mare Town Council	<p>The Town Council supports the option of Area B and does not support Warne Road as this is very close to residential areas and the road infrastructure may not support a major waste treatment facility in this location.</p> <p>We believe the choice of Area B, which is largely undeveloped at present, will enable good planning of the residual waste site away from residential property and with good transport access, minimizing community objections to any future planning application.</p>	<p>Noted.</p> <p>Development of the spatial options has considered traffic and transports routes at the plan making level. More detailed issues are more appropriately considered on receipt of a planning application or under development management policy.</p>						
314	E123	Individual	<p>Re: Proposed sites for residual waste management facilities W-s-M</p> <p>My only real concerns are if you are sending heat arisings up chimneystacks. I know the EU regulations are set out in strict policy, plus our own planning requirements. You will also have done wind pattern strategy's etc.</p> <p>Providing all the guidelines and regulations are followed and adhered to, No Problem. Additionally, I would hope it would be your council's policy to employ local people for as many posts as possible.</p>	<p>Noted.</p> <p>All plant should be operated to legal requirements and will be subject to monitoring from the appropriate authority. PPS10 advises that modern plant should not cause health effects.</p>						
290	E124	Coal Authority	<p><b>Re: Strategic Area A – Yate</b></p> <p><i>Test of Soundness</i></p> <table border="1"> <tr> <td>Justified</td> <td>Effective</td> <td>Consistency with National Policy</td> </tr> <tr> <td></td> <td></td> <td>X</td> </tr> </table> <p>Whilst the Coal Authority expressed no preference in relation to any particular spatial option in our comments in response to the Preferred Options Report (March 09), Proposed Scope and Policies Document (July</p>	Justified	Effective	Consistency with National Policy			X	<p>Noted</p>
Justified	Effective	Consistency with National Policy								
		X								

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			<p>2009) and Proposed Scope Document V2 (August 2009), it was highlighted that some strategic options could raise the possibility of sites being chosen within areas where mining legacy and ground stability issues may be present. This was noted to be particularly the case within the Yate and North-east Bristol areas.</p> <p>The Authority's earlier comments also noted that there are shallow coal resources within each of the local authority areas of Bristol, North Somerset, Bath and North East Somerset and South Gloucestershire, which are capable of extraction by surface mining methods. The Coal Authority is keen to ensure that these coal resources are not unduly sterilised by new development. In situations where this may be the case due to development of residual waste treatment facilities, the Coal Authority would be seeking prior extraction of the coal. Prior extraction of coal also has the benefit of removing any potential land instability problems in the process.</p> <p>Having reviewed the plans of the proposed Strategic Areas, the Coal Authority would draw your attention to the fact that Strategic Area A (Yate) is located within an area where shallow coal resources are present. In addition, it should be noted that, within site A, most of the eastern part of the Great Western Business Park (the broad area bounded by North Road, the railway lines and the B4059) is located within an area where shallow coal mining activities have previously taken place. As a result, this area has the potential to be affected by land stability and other public safety risks.</p> <p>It is therefore recommended that the Joint Waste Core Strategy should include a statement that as part of taking forward the development of any waste treatment facilities within Strategic Area A (Yate):</p> <ul style="list-style-type: none"> <li>• Account should be taken of any risks associated with former coal mining activities and, where necessary, suitable mitigation measures should be incorporated to address them; and</li> <li>• Consideration should be given to any sterilisation effects on the coal resource, as well as whether the prior extraction of coal would be appropriate.</li> </ul>	<p>Noted</p> <p>Noted</p> <p>Noted</p>

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			<i>Reason</i> – To comply with guidance set out in PPG14 relating to unstable land and MPS1 regarding the sterilisation of mineral resources.	
64	E125	WP2	<p>WP2 Ltd fully supports the identification and inclusion of both sites in the Core Strategy; in particular the site at Warne Road, which, during an earlier round of consultations by WEP, WP2 had specifically proposed, should be included. From our previous submissions it is clear that this site meets site selection criteria in as much as it is an existing waste transfer station, on an industrial estate within a waste generating area, which is large enough to accommodate a thermal waste treatment facility and which is deliverable. The results of ERM's investigations into flood risk and habitat assessments indicate that these particular considerations do not pose and significant problem for the development of the site as a thermal waste to energy facility.</p> <p>In addition to the above we have the following comments to make in respect of the Site Assessment for Warne Road dated August 2009.</p> <p>1, Although the description of the location of the site is accurate, describing the industrial estate as 'busy' in the site assessment is a subjective assessment and also implies that it is always such when in fact there are times when the estate is also 'quiet'. The same comment also applies to the description of the roundabout at Herliun Way/ Winterstoke Road. A more objective description is appropriate unless there is quantitative information to help define 'busy'.</p> <p>It is also the case that the south east of the site there is another leisure centre (Hutton Moor) associated with the playing fields and that the electricity sub station is not within the site that is plotted on the plan which accompanies the assessment and as might be inferred from the written description. The substation is actually outside the site boundaries-but within the 'U'.</p> <p>2, Under planning policy the site is within the gateway area. Reference to</p>	<p>Noted</p> <p>Noted</p> <p>Noted</p> <p>Noted</p>

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			<p>policy E1B is incomplete and it is therefore suggested that for consistency either the complete text of the policy is reproduced or preferably and for brevity and to avoid having to list all the policy text, as shown for the other relevant locational policies e.g Policy GDP2 floodplain, that only the policy number and its topic are shown.</p> <p>3, the site is not an allotment the Local Plan is out of date in this respect.</p> <p>4, This site also has a waste management planning history that pre-dates 2006.</p> <p>5, With regard to 'proximity of waste arisings' it is stated that the site is approximately 1km from Weston-super-Mare. The site is actually in WsM.</p>	<p>Noted</p> <p>Noted</p>
176	E126	Weston-super-Mare Town Council	<p>The present infrastructure surrounding the Warne Road site is not sufficient to support the high level of increased heavy vehicle movements to and from the site. The effect of which would mean both immense and adverse impacts on the surrounding residential and trading areas.</p> <p>As a result the Town Council would support the proposal that a site within Strategic Area B would be preferable for future waste management facilities to that of Warne Road.</p>	<p>Development of the spatial options has considered traffic and transports routes at the plan making level. More detailed issues are more appropriately considered on receipt of a planning application or under development management policy.</p>
206	L15	New Earth Solutions Group Ltd	<p>New Earth Solutions Group Ltd has previously expressed concern about the timely delivery of a facility within the Western Regeneration Area (further comments, dated 31 July). These concerns remain and will not be resolved through the identification of a 'strategic area'.</p> <p>In summary:</p> <ul style="list-style-type: none"> <li>There is an implicit commercial tension regarding the mix and phasing of development that is likely to delay the delivery of a new waste management facility.</li> </ul> <p>This would appear to be recognised by ERM in stating, <i>'in order not to</i></p>	<p>Noted.</p> <p>Noted.</p>

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			<p><i>frustrate broader development objectives, the JWCS does not allocate any specific plot of land or site for such facilities'. Tensions are further illustrated in the summary of Persimmon Homes Special Projects Comments, which in respect of urban extensions state: 'We are not sure how in general terms a location on an industrial estate is comparable to a location in an urban extension. This implies such facilities would need to be located on industrial estates in urban extensions, but this may not be appropriate if the industrial estate is a high quality B1 business park as proposed at Weston Airfield east or in a fully mixed use area' (representation 274/E110)</i></p> <ul style="list-style-type: none"> <li>• A lack of detail prevents a proper assessment.</li> </ul> <p>This is considered problematic in two respects. Firstly communities can become disenfranchised from the process when faced with large 'strategic areas'. This is aptly illustrated by Yate Town Council's response to the identification of a strategic area covering Stover Road Estate, Great Western Business Park and Westerleigh Business Park (representation 146/E98). Second, it is evident that a large proportion of the area lies within the functional flood plain (Zone 3b). Only essential infrastructure should be located within this zone, which would exclude waste management facilities. It is not clear how this constraint has been taken into account when arriving at the boundaries of the 'strategic area'.</p> <p>It is understood that the Weston Regeneration Area DPD has been deleted from North Somerset's LDF and will instead be brought forward as an SPD. It should be noted that SPD has no formal planning status and is effectively empowered through having strong guiding Core Strategy policies. In this instance the generality of the 'strategic area' is only likely to generate uncertainty.</p> <p>Whilst the principle of an allocation within the strategic area should not be discounted it should only be considered if it is capable of being</p>	<p>Noted.</p> <p>Noted.</p>

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			<p>delivered in a realistic timescale. It is notable that other respondents have referred to the exclusion of prospective sites which are unlikely to be available until the long term i.e. in excess of 10 years (from 2009). New Earth Solutions Group would agree that such sites should be excluded as their identification would otherwise only serve to preclude the identification of more deliverable sites.</p>	
221	E127	Cllr Claire Young, Westerleigh Ward	<p><b>Strategic Area A (Yate trading estates)</b></p> <p>Local residents remain concerned about the impact on the already congested local road network if a site in Strategic Area A was to take waste from a wide area. This problem would be worsened if there was to be significant development to the North of Yate, as the draft RSS proposed. Policy 12 should be made as strong as possible to ensure that the impacts can be fully taken into account.</p> <p>There is also concern among residents about how such a facility would fit in with regeneration plans for this part of Yate and about the possible adverse impacts on residential amenity.</p> <p><b>Phasing of the Spatial Strategy</b></p> <p>Given that no specific site has been identified in Yate, only a strategic area, the revised phasing of the spatial strategy makes sense, moving Yate to the long term phase. Aside from being more realistic, it may be that before this phase the indicative capacity shown in figure 6.1 for this area could be met through facilities within new urban extensions.</p>	<p>Development of the spatial options has considered traffic and transports routes at the plan making level. More detailed issues are more appropriately considered on receipt of a planning application or under development control policy.</p> <p>Noted.</p> <p>Noted.</p>
183	E128	Wessex Water	<p><b>Sites and Strategic Areas for Residual Waste</b></p> <p>In our previous letter we advised the measures we would consider to protect our assets where they conflicted with any of the proposed sites. Once preferred sites are promoted we would seek to gain a greater understanding of the level and nature of the foul flows emanating from the sites where</p>	<p>Noted.</p>

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			<p>connection to the public system is required. At this juncture we can indicate if network reinforcement might be required to accommodate the extra flows.</p> <p>Please refer to our general comments to the Preferred Options Consultation in March 2009, which apply to the following proposed sites and also consider site specific issues as follows:</p> <p><b>Land adjacent to Cabot Park, Avonmouth (off Moor House Lane) located in an industrial area of Avonmouth</b> No additional comment</p> <p><b>Warne Road, Weston-super-Mare, North Somerset</b> No additional comment</p> <p><b>Yate – Strategic Area A</b> There is limited sewer capacity within the area. Once a specific area is identified, and flow data provided we will provide comment on whether the current sewer network has capacity to accept foul flows from the site.</p> <p><b>Weston Super Mare – Strategic Area B</b> Flows may not be directed to the linked village system to the south of the area where capacity is limited. The most suitable drainage location would appear to be an extension of the existing major waste treatment facility.</p>	<p>Noted.</p> <p>Noted.</p>
256	E129	Environment Agency	<p><b>Warne Road</b> Although the Warne Road site is already a waste site, serious consideration will need to be given to the proposal for a strategic waste site in this area due to its proximity to potential sensitive receptors. Emissions, bioaerosols and other environmental impacts will need to be considered, dependent on the technology chosen and the scale of any proposed operation. Access to the site may be problematic.</p> <p>The site lies primarily in Flood Zone 2, with part in Flood Zone 1. Accordingly, 'Less Vulnerable' development uses, including waste</p>	<p>Noted.</p> <p>Development of the spatial options has considered traffic and transports routes at the plan making level. More detailed issues are more appropriately considered on receipt of a planning</p>

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			<p>treatment/recovery are appropriate in principle in these flood zones, subject to the sequential test detailed in PPS25. Even hazardous waste treatment use, which is designated 'more vulnerable' development could be sited here, again subject to the PPS25 sequential test. Therefore, from a flood risk perspective, we have no objections to the recommendation that the site is promoted in the JWCS, subject to the sequential test of PPS25 being applied and successfully passed by the Council/West of England Partnership.</p> <p><b>Cabot Park</b> This is an isolated green field site that would require a large investment in infrastructure to develop its potential for a strategic waste facility. Access to the site is limited and any potential benefits that could be achieved from certain technologies could not be used in this isolated position.</p> <p>The site is located within tidal flood zone 3a, with the access/egress also extensively within this flood zone. The site is also crossed and bounded by various rhymes and ditches. Whilst less vulnerable uses are not excluded in principle in Flood Zone 3a, there are, in likelihood, wider planning reasons why this site is less suitable, and thus less preferable for waste treatment uses. Accordingly, we have no objections to the recommendation not to promote the site in the JWCS.</p> <p><b>Strategic Sites</b> With regard to the identified strategic sites, we must advise that further information is required before an appropriately detailed assessment can be undertaken.</p> <p>As recommended in PPS10, consideration needs to be given to the capacity of existing and potential transport infrastructure to support the sustainable movement of waste and products arising from resource recovery. At both sites the transport infrastructure is not clear. Whilst there are railway links it is unclear if this would be an option for a potential facility. It is also unclear if the supporting highways will be adequate.</p>	<p>application or under development management policy.</p> <p>Noted.</p> <p>Noted.</p> <p>Noted.</p> <p>Noted.</p> <p>Noted.</p>

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			<p>Further, it is not clear if there are any ownership issues for either area of search. PPS10 states states that “planning authorities should...avoid unrealistic assumptions on prospects for the development of waste facilities...having regard in particular to any ownership constraint which cannot readily be freed, other than through the use of compulsory purchase powers”.</p> <p>Notwithstanding the above, the following comments should be noted:</p> <p><b>Strategic Area A</b> The Yate site lies predominantly in Flood Zone 1 however, the Bristol Frome main river passes through the northern half of the area, with associated Flood Zone 3 and 2. Due to the limited extent of these flood zones, we would expect the partnership to adopt an ‘avoidance’ strategy when exploring potential sites within this area. Opportunities to retro-fit sustainable drainage systems solutions to individual sites should be encouraged where appropriate.</p> <p><b>Strategic Area B</b> The Weston-super-Mare site encompasses all the flood zones from 1 to 3b. The central area of the Strategic Area around Drove Farm is fluvial 3b, so there must be no waste site promotion in that specific area. The area of Flood Zone 3b should be acknowledged within the site assessment documentation however, the North Somerset Council SFRA (level 2) is not yet publically available. Within the remainder of the Strategic Area, a sequential approach to siting should be adopted, with new waste sites located in Flood Zone 1 wherever possible, and avoidance of Flood Zone 3a for any ‘hazardous substances consent’ uses, which are deemed ‘Highly Vulnerable’ (see table D2 of PPS25). The Strategic Area is also crossed by numerous ditches and rhynes therefore, a note to the effect that potential waste sites are better located away from these pollution receptors may be warranted.</p>	<p>Noted.</p> <p>Noted.</p> <p>Noted.</p>

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			<p>Additionally, it is noted that both areas have a local nature reserve running through them (Site A the River Frome and site B the Grumplepil Rhyne).</p> <p>As previously stated, any proposals on brownfield sites must fully consider land contamination issues, in accordance with PPS23.</p>	<p>Noted.</p> <p>Noted.</p>
315	L16	Westerleigh Parish Council	<p>Council concur with the comments of Yate Town Council in their opposition to this proposal because of the allocation of a Strategic Area rather than particular sites.</p> <p>There is a lack of strategic information given that the document relates to the strategic nature of development.</p> <p>Due to the lack of clear and concise information the proposals are simply a 'blank cheque' for the type of facility. It is noted that whilst there will be a further consultation in Jan/Feb of 2010 any comments at this stage will be restricted to issues of soundness rather than the content of the plan itself.</p> <p>Council are disappointed with the process, opportunity to comment and poor quality map.</p>	<p>Strategic areas have been identified when it is not appropriate to be site specific. The area identified is industrial land that has many potentially suitable plots for a residual waste treatment facility, but the high turnover of these plots and the need to ensure any proposal fits with any future development plans for the area means that it is not possible or appropriate to identify a discrete site.</p> <p>The JWCS is a Core Strategy and a key document in the Local Development Framework. The level of detail provided is appropriate at the plan making level; it sets out the policies by which any proposed development on the potential locations for residual waste treatment facilities will be considered and assessed by the relevant planning authority.</p> <p>An allocation of a site in the JWCS does not automatically mean that any proposal for the site will be granted planning permission. Any proposed planning application will need to</p>

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				<p>demonstrate that the proposals confirm with the JWCS and comply with development management policies, and will have to go through the normal planning process including a period of public consultation. It is at this planning permission stage that the nature of any residual waste treatment facility will be known and assessed in the normal way.</p> <p>Noted. The map should have been more clearly labelled although the Strategic Area is clearly indicated.</p>
316	E131	Banwell Parish Council	<p>Although there is at first sight no immediate impact on Banwell. It was felt that going with Site NS2, (land adjacent to the existing waste transfer station, Aisecombe Way Weston) was the best solution, as it would lessen the environmental impact of lorry movements from the existing site.</p> <p>Concerns were raised about incinerators within Weston and the surrounding area as an option residual waste disposal.</p>	<p>Noted. Development of the spatial options has considered traffic and transport routes at the plan making level. More detailed issues are more appropriately considered on receipt of a planning application or under development management policy. There are 11 sites recommended for inclusion in the JWCS, although it is not envisaged all 11 will be required. Of the 11 sites two are at Weston, Strategic B at Weston and Warne Road, the need could be met at one or across both of these sites subject to a planning application that is approved following the normal planning process.</p> <p>The plan is technology neutral and there is no bias towards or away from any particular type of technology for any particular site subject to key development criteria for each site.</p>

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				However, the JWCS will acknowledge and support National Policy support of generating heat and electricity through waste management processes. All plant will be operated to legal requirements and will be subject to monitoring from the appropriate authority.
214	E132	SW RDA	Further to the South West RDA's response to the earlier consultation, we are concerned about the allocation of sites in the JWCS for the development of waste facilities in the JWCS for the development of waste infrastructures in light of the proposals coming in for Avonmouth. This is to ensure that development of waste management facilities are well integrated to enhance the use of electricity, heat etc in and around Avonmouth.	Noted.  The JWCS will acknowledge and support National policy support of generating heat and electricity through waste management processes.

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