

Cyngor Cefn Gwlad Cymru Countrywide Council for Wales

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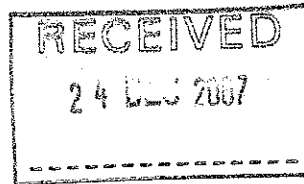
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20 December 2007



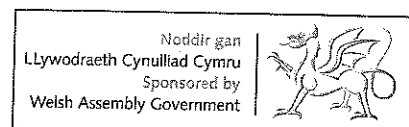
Dear Ms Bond,

Consultation response on the Sustainability Appraisal & Strategic Environmental Assessment for the Areas of Search for Regional Waste Facilities

Thank you for your email of 13th November 2007 informing CCW of the opportunity to comment on the Strategic Environmental Assessment (SEA) Environment Report entitled 'Identifying Areas of Search for Regional Waste Facilities Across Wales'. Our comments are made in the context of our roles as consultation body under the Environmental Assessment of Plans and Programmes (Wales) Regulations 2004 and adviser to the Welsh Assembly Government on matters pertaining to the natural heritage of Wales and its inshore waters.

As highlighted in our response to the scoping reports for the SEA of the Strategic Waste Management Options (letters dated 13th June 2007), we are aware that in order to fully assess the effects of regional waste management operations, the two assessments need to be coalesced. Many of the effects that CCW would have concerns about would relate to the specific operation undertaken at a specific location and as such we wish to comment on the proposals once the two assessments have been joined together. We understand that this more detailed assessment is likely to take place at the Local Development Plan stage for individual Local Authorities. We seek clarification on the applicability of the two SEAs to the SEAs of individual LDPs, especially given that some local authorities are well underway with their LDP. We also wish to know what role the Regional Waste Group will have in influencing specific allocations.

Table 5.1. We recommend that the biodiversity objective is reworded to consider the potential to enhance biodiversity at certain locations such as through appropriate planting to screen works from view, or contributing to connecting habitat networks. There are no objectives on soil quality or geodiversity and we recommend inclusion of these elements. In addition, water quantity may be an issue in some parts of Wales. Inclusion of an objective on this would help guide the choice of locations where water resources may be an issue.



Gofalu am natur Cymru – ar y tir ac yn y môr • Caring for our natural heritage – on land and in the sea

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Paragraph 1.8.5. While we recognise that buffers have been placed around internationally and nationally designated sites to help protect them, this may not obviate the need for an appropriate assessment under the Habitats Regulations, as a pathway for pollutants may still exist outside of this buffer zone. This will be a site-specific issue and we recognise that there has been a zoning approach to the buffers with the total distance reaching 10km.

We recognise that a significant amount of work has gone into this report and into the production of the maps to guide the allocation of waste management facilities. We expect that much of the assessment work will need to be replicated at a detailed site basis once the operation is defined. We agree with paragraph 1.9.2 that appropriate assessments may be required once the detail is defined.

Paragraph 8.5.3. We believe that information held within the Wales Spatial Plan may help to inform information on waste arisings, as each area has information about projected levels of household growth.

Paragraph 8.5.5. We agree with the statements in this paragraph about each facility needing to be assessed for its wider and associated impacts. These impacts may include noise and light pollution, landscape in respect of surrounding topography, and impacts on the road transport network as well as an associated change in the level of carbon dioxide emitted due to waste transportation.

Paragraph 8.7. We recognise the difficulties of finalising the monitoring framework before the strategic options work has been coalesced with the areas of search work. We seek clarification on when this process is likely to happen and whether CCW will be asked formally for its opinion on the adequacy of the framework.

I hope you find these comments helpful. Please do not hesitate to contact Gayle Wootton or Michael Willis in the first instance if you wish to discuss this response further.

Yours sincerely,



Keith Davies
Penarth Polisi Amgylcheddol/
Head of Environmental Policy