

Martha Savage
Regional Waste Plan Coordinator
Denbighshire County Council
Ruthin
Denbighshire

GN/
14th January 2008
Mr. Gary Nancarrow
01352 703275
01352 756444

E Mail Address:
gary_nancarrow@flintshire.gov.uk

Dear Ms. Savage

Consultation Response on Revisions to the North Wales Regional Waste Plan

The views expressed within this response are those of Officers of the Flintshire County Council in its capacity as Local Planning Authority, and has not been endorsed by Members.

The documentation comprising the revised plan, and the sustainability appraisal, strategic environmental assessment, areas of search and sustainability appraisal, strategic health impact assessment amounts to upwards of 1000 pages of text, tables and data. Given the quality of the original data and some of the assumptions made during the selection and weightings exercises carried out and applied to the sustainability criteria, for example, the volume of subsequent assessment seems disproportionate and is perhaps an over analysis. The 200 or so pages of the revised plan (the Plan) are supported by 800+ pages of subsequent analysis, and this is presumably quite an expensive exercise, so does this represent good value for money. That said, the overall process will have more than complied with the various requirements to assess spatial plans.

The Plan acknowledges a wide range of technologies and techniques can be utilised to manage waste and is welcomed, and a wide range of options is identified and given full assessment.

The introduction to document should make it clear what the purpose and status of the Plan is. The Plan should also make it absolutely clear what its limitations are, and should set out those matters that are not within its remit. The Plan is a land use document, and it must emphasise that it applies to any waste project or proposal that will be the subject of appraisal against local development plan policies and requires a planning permission, or be subject to some form of planning control. It must be made absolutely clear that the purpose of the Plan is to inform the development plan

process, and local authorities should have regard to the Regional Waste Plan in preparing Local Development Plans. It should also be acknowledged that in some circumstances local authorities may not choose to adopt some, or in extreme cases, all of the recommendations of the Regional Waste Plan if local circumstances can justify such a departure.

It should also be made absolutely clear that the Plan only deals with post consumer (household, business, commerce, industrial etc) waste and is not a primary tool for influencing public perception and behavior towards waste management. For example, the primary responsibility for promoting and implementing waste reduction and waste minimization, whether in the home, or manufacturing plant or distribution network, will rest with the individual, company, business etc who produces waste. The planning system can only deal with land use for waste management once the 'waste' has been discarded. The steer for greater sustainability in the management of resources has to come from society itself and with the assistance of Government.

It is worth stressing that, apart from the landfill only option (which is not an option), all of the options presented are a mix of different waste management techniques applied in varying proportions. There is no single option that would require, for example, 100% MBT or 100% EfW. I mention this because there are a number of parties who are already under the impression that the Plan is a charter for EfW to the detriment of recycling. This is simply not the case, as almost all proposals for production or consumption of waste derived fuels will still remove high value combustible and non-combustible materials for recovery or recycling somewhere along the handling chain. Strong emphasis must be placed on the EEC/EU Directives and Government Policy to significantly reduce dependence upon landfill.

Whichever option is selected, no single option will be compatible with the diverse needs and requirements of local authorities, business and commerce. Heavy industry is increasingly looking to minimize waste management and energy costs. It is likely that, notwithstanding which option is eventually selected, industry will continue to make applications to satisfy its own needs to remain economically attractive or even viable within Wales and the UK.

On a specific point, the reference within the Core Review Document, Chapter 10 table 7 entry for Flintshire requires updating and the specific reference to RAF Sealand and Garden City must be deleted. I will provide an amended wording to encompass the whole of the Deeside industrial estate/park and surrounding area following discussion with my Policy colleagues in the light of our recent UDP Inquiry. The reason for this is that Garden City is subject to a number of proposals for the "Gateway to Wales" projects, and regional waste facilities may not be considered as being compatible with high quality business, residential and leisure uses currently proposed. There may, however, still be areas within these zones suitable for smaller projects, or high quality recycling manufacturing units. Our comments in Appendix N still apply and do not require amendment.

Existing or former licensed waste sites have been identified throughout the Plan process. In many instances, the presence or former presence of a licensed waste site does not constitute a sound basis for making future planning provision. Many such sites are historic and in entirely unsuitable locations, and continuation or reactivation of activities at such sites may not be supported at planning application stage.

The Welsh Assembly Government and the Environment Agency appear to place barriers to new technologies by applying unfavourable weightings, not based on scientific evidence, but seemingly based on the technology on not being in common usage in the UK. The corollary of this is that perfectly good alternative means of managing waste may be discounted and existing but out dated or inefficient technologies are encouraged to be developed. This flies in the face of innovation and a desire for Wales to be at the forefront of waste management practices and sustainable development.

The areas of search plans have previously been the subject of some deep seated concern. I continue to question the value or point of these plans. They offer little in the form of credible guidance to the preparation of LDPs and merely illustrate areas of lesser constraint based on a select list of constraints, rather than identifying areas with genuine potential for locating regional waste facilities. They still, by and large, identify the upland areas of North Wales (including Powys), and do not take into account the real life distribution patterns of human economic activity and the presence of services (roads, power, water). I am aware that these plans are already being misused by developers as a development control tool.

Much criticism has been levied at the Public Consultation Process. Whilst some events were poorly attended, and some organisations have been unable to respond, at a local level, the consultation nevertheless exceeds that carried out for Government policy and guidance. The frequent review period for the plan means that any factors not taken into account because they were 'missed' at the consultation state can be picked up in the subsequent review. In practice, because all development plans are at a different stage, there will always be a disparity between the requirements of national and regional plans, and local development plans. New or updated requirements can be dealt with by local planning authorities by means of interim supplementary planning guidance notes.

Yours Sincerely,

Gary Nancarrow
Minerals & Waste Planning Manager for and on behalf of the
Chief Planning Services Officer