

**Milton Keynes Council**

**Sustainability  
Appraisal of Waste  
Development Plan  
Document**

Supplementary to Sustainability Appraisal  
Report: Appraisal of Waste Development  
Plan 2007 - 2026, Submission Draft

January 2007

Entec UK Limited



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**Report for**

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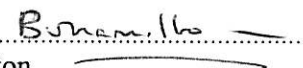
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# Milton Keynes Council

## Sustainability Appraisal of Waste Development Plan Document

Supplementary to Sustainability Appraisal  
Report: Appraisal of Waste Development  
Plan 2007 - 2026, Submission Draft

January 2007

Entec UK Limited



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## Document Revisions

No.	Details	Date

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Appendix A Appraisal Matrix for Waste Development Plan Document: Submission Draft

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# 1. Introduction

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## 1.1 Background

On 27th January 2006 Entec UK Ltd (Entec) was commissioned by Milton Keynes Council (the Council) to undertake a Sustainability Appraisal of the emerging Milton Keynes Waste Development Plan Document (WDPD). The methodology for the appraisal followed that recommended in government guidance on sustainability appraisal contained in Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents (the government guidance). The work followed on from the production of a Scoping Report by Atkins consultants. This report defined the current social, economic and environmental conditions in Milton Keynes and also set the criteria that would be used to assess the WDPD.

The appraisal process has followed three clearly defined stages:

- **Appraisal of Strategic Options:** A series of strategic options were developed by the Council that could achieve the objectives of the WDPD. This was undertaken in accordance with Task B2 of the government guidance. The strategic options were appraised with the Council at a workshop session in March 2006.
- **Appraisal of the Preferred Options document:** The strategic options were developed into the Waste Development Plan Preferred Options document (WDPPPO). This document highlighted the intentions of the policies to be included in the WDPD, however the actual wording of policies was not included. The provisions of this document were subject to a second round or iteration of appraisal, the results of which were outlined in the Sustainability Appraisal Report issued by Entec in July 2006.
- **The Waste Development Plan Document:** Following the consultation process for the WDPPPO, the WDPD was prepared by the Council. Unlike the WDPPPO the WDPD contained wording for the policies and was subject to a third round or iteration of appraisal in December 2006.

## 1.2 The Purpose of this Report

The purpose of this Supplementary Report is to describe the methodology used to appraise the Waste Development Plan Document Submission Draft 2007-2026, to set out the results of the appraisal process and to provide any relevant recommendations that have arisen as a result of the appraisal process.





## 2. Appraisal Process to Date

### 2.1 Appraisal of Strategic Options

#### 2.1.1 Results of Option Appraisal Process

As noted in section 1.1 of this report the appraisal of the WDPD has taken place in a number of stages. The first stage took place between February and May 2006 and involved an appraisal of the strategic spatial options that could form the basis of the WDPD. A report setting out the relative performance of these options in sustainability terms was issued to MKC in May 2006. The following table summarises the strategic options and their performance in sustainability terms:

**Table 2.1: Summary of Appraisal Scores for Strategic Options**

Assessment criteria	Status Quo	Dispersed location of pre and final treatment	One site pre treatment	One site pre and final treatment	Out of MK final treatment	Dispersed location of pre treatment and one site for final treatment
--	4	0	4	3	2	0
-	8	0	6	0	4	0
~	4	2	2	2	3	2
?	3	8	5	8	7	7
+	1	9	3	6	4	7
++	0	1	0	1	0	4
<b>Comment</b>	This option performed worst against the appraisal criteria. The only area where positive results were obtained related to energy efficiency	Represented the second best performing option. Performed slightly less well than option 6 against air quality and employment criteria.	Option performed badly against social criteria relating human health crime and social exclusion.	Third best performing option. Performed less well against crime, social exclusion and accessibility criteria.	Option performed badly against economic and crime criteria.	This option performed best against the appraisal criteria. Uncertainty how option related to site specific issues.

The first round of appraisal identified that option 6 performed best in sustainability terms. This option was taken forward by the Council as the basis for the WDPPO document, which was issued to Entec in June 2006.

## 2.2 Appraisal of Waste Development Plan Preferred Policy Options

### 2.2.1 Results of Policy Appraisal Process

The Waste Development Plan Preferred Policy Options (WDPPPO) document set out the Council's intentions for each of the policies to be included in the WDPD, details of the methodology that had been used to select waste management sites and also details of the sites that would be allocated in the WDPD to accommodate waste management facilities. A second round or iteration of appraisal was carried out on these policies in June 2006 and the Sustainability Report containing the results of the appraisal of the WDPPPO was issued to the Council in July 2006.

A detailed description of the appraisal process and results can be found in the Sustainability Appraisal Report. The following table summarises the performance of the policies contained in the WDPPPO:

**Table 2.2: Summary of Appraisal Scores for WDPPPO Policies**

	Occurrence of ratings for each policy							Total
	Policy 1	Policy 2	Policy 3	Policy 4	Policy 5	Policy 6	Policy 7	
<b>++</b>	2	0	0	0	0	0	0	2
<b>+</b>	12	7	12	0	8	0	13	52
<b>~</b>	3	11	5	0	10	0	13	42
<b>?</b>	0	1	3	20	2	20	2	60
<b>-</b>	3	1	0	0	0	0	0	4
<b>--</b>	0	0	0	0	0	0	0	0

This table demonstrates that the policies contained in the WDPPPO met a high proportion of the appraisal objectives, although few performed very well against them. Very few of the proposed policies received negative appraisal ratings and none received a double negative score (performed very badly against the appraisal objectives). A high proportion of the objectives were either not relevant to the proposed policies or the effect of the policies on those objectives was uncertain. This was largely due to the fact that the wording for the proposed policies was not included in the WDPPPO. For this reason it was not possible to appraise policies 4 and 6 against any of the appraisal objectives.

### 2.2.2 Key Recommendations relating to policies in the WDPPPO

Following the completion of the appraisal of the WDPPPO, Entec made a number of recommendations relating to how to improve the performance of policies in sustainability terms. These recommendations related to the general format, provisions and presentation of policies and also to the specific wording of policies. These recommendations were as follows:

**General Recommendations:** It was considered that the plan should provide more information on how policies had been selected and developed. This would allow stakeholders to understand how and why the suite of policies had been selected by the Council. Entec suggested there was a need to develop and consult on the draft wording of the policies as soon as possible.

**Preferred Policy 1: Sustainable Waste Management:** It was suggested that this policy should provide a broader description of what the Council meant by sustainable waste management and what it involves. The need to reconcile social, economic and environmental criteria should be emphasised in the policy.

**Preferred Policy 2: Working with Neighbours:** Entec considered that the policy could usefully clarify that working with neighbours to address waste management issues would not necessarily result in a lack of waste management facilities for the residents of Milton Keynes.

**Preferred Policy 3: Development Control Criteria:** It was recommended that there was an opportunity to include development control criteria to address landscape and water resource issues.

**Preferred Policy 4: Environmental Objectives:** The WDPPO document did not contain sufficient information to allow this policy to be assessed.

**Preferred Policy 5: Transport:** No specific recommendations were made on this policy, although in reference to Transport Assessments, it was considered that these would only be required where facilities would have a significant impact on the surrounding road network.

**Preferred Policy 6: Restoration:** The WDPPO document did not contain sufficient information to allow this policy to be assessed.

**Preferred Policy 7: Sustainable Design: Construction and Resource Recovery:** Entec suggested that the policy could be more specific about the design standards that waste management facilities would be expected to meet to comply with the policy. Appropriate SPGs/SPDs should also be referenced.

### 2.2.3 Appraisal of Site Allocations Contained in the WDPPO

The sites allocated in WDPPO were subject to a rigorous site selection process to determine their suitability for waste management use. The site selection process assessed candidate sites against criteria that are similar to those used in this report. The approach to and results of this assessment are contained in Chapter 7 of the Sustainability Appraisal Report, however it sought to consider the following:

#### **Is the process for selecting sites robust and does it reflect the sustainability priorities in PPS 10?**

Whilst the approach to selecting sites appeared to be sound and logical it did not appear to link with the broad criteria contained in PPS 10. To demonstrate clear compliance with PPS 10 it was suggested that the broad site identification criteria should be identified at the outset of the site allocations document, followed by a clear description of how sites were discounted.

#### **Do the site selection criteria reflect all the relevant SA objectives?**

Most of the site selection criteria were covered by at least one indicator. The site selection criteria also reflected those contained in Annex E of PPS 10. It was suggested that the site

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selection process could demonstrate how the criteria were linked to SA objectives. The notable SA objectives that were not fully reflected in the site selection criteria were:

- Objective 3: Social Exclusion;
- Objective 5: Air Quality;
- Objective 16: Soil Resources;
- Objective 19: Local Economy; and
- Objective 20: Employment.

**Is the methodology sufficiently justified?**

It was considered that the system for scoring the sites should be more clearly explained. It was also considered that there were an unequal number of criteria relating to particular topics (landscape and visual for instance)

**What are the significant effects resulting from the site based policies?**

Entec noted that sites identified for waste management use performed well against the site selection criteria, although there were a number of criteria that attracted scores of moderate performance. In order to improve the performance of the policy against SA objectives it would be beneficial to identify in broad terms potential mitigation which could be put in place to address any significant effects.

## 3. Appraisal of the Waste Development Plan Document

### 3.1 Background

Following the completion of the Sustainability Appraisal, the Waste Development Plan Preferred Option Document was subject to a 6 week consultation period which ran from 17th August 2006 through to 28th September 2006. All representations were considered as part of the development and refinement of policies for inclusion in the WDPD. This document was passed to Entec for assessment in December 2006.

The final part of the Sustainability Appraisal process is to appraise the policies contained in the WDPD. Whilst the key principles of the policies remain the same as those contained in the WDPPO, the actual wording of policies is now available for appraisal and a number of new policies have been added. As expected, the content of the WDPD is considerably more substantial than the WDPPO. This round of appraisal will determine whether Entec's recommendations have been incorporated into the policies and whether the proposed policy wording alters the ratings for the policies at the WDPPO stage.

#### 3.1.1 Key differences between the WDPPO and WDPD Documents

The WDPD contains a number of key differences to the WDPPO. The document has been split into three sections; Core Strategy, Allocations and Development Control Policies. The actual wording for policies is now available for appraisal and a number of new policies have been added; WCS1: Capacity Requirements and WCS 2: Provision for Waste Management Capacity. The order that policies appear has also been changed from the WDPPO document. A summary of the key difference between the WDPPO and WDPD documents is contained in Table 3.1:

**Table 3.1: Summary of key differences between WDPPO and WDPD**

Policy in WDPD	Policy in WDPPO	Comment
N/A	Preferred Policy 1: Sustainable Waste Management	Principles in the text and in WDC2
N/A	Preferred Policy 2: Working with Neighbours	Principles referred to in WDPD text
WCS1: Capacity Requirements	N/A	New Policy, however based on principles within the WDPPO document
WCS2: Provision for Waste Management Capacity	N/A	New Policy, however based on principles within the WDPPO document
WCS3: Sustainable Design, Construction and Demolition	Preferred Policy 7: Sustainable design, construction and resource recovery	Policy wording set out in the WDPD. New policy appears to contain more emphasis on resource recovery

Policy in WDPD	Policy in WDPPO	Comment
WA1: Strategic Waste Management Site	Preferred Site 1 and Preferred Site 2: Reserve Site	Strategic waste management site and the reserve site remains the same as those allocated in WDPPO
WA2: Safeguarding existing and allocated waste management sites	Preferred Site 4: Safeguarding Existing Sites	New policy goes further to include proposed and existing sites for waste management use
WDC1: Development Control Criteria	Preferred Policy 3: Development Control Criteria	Policy criteria now contain specific reference to flooding
WDC2: Environmental Objectives	Preferred Policy 4: Environmental Objectives	Clear and detailed criteria now available on environmental objectives for new waste management facilities
WDC3: Transport	Preferred Policy 5: Transport	No significant change in emphasis of key principles. Increased emphasis on consideration of alternatives to road transport
WDC4: Restoration	Preferred Policy 6: Restoration	Clear set of criteria for waste development proposals requiring restoration

## 3.2 Appraisal of Policies

The policies contained in the WDPD were appraised on 20<sup>th</sup> December 2006, using the objectives set out in the Scoping Report. The appraisal process and scoring system were the same as those used to assess the provisions of the WDPPO. In particular, consideration was given to whether the recommendations contained in the Sustainability Report had been taken into account. The provisions of policies WCS1, WCS2 are new and policies WDC2 and WDC4 did not have sufficient detail to be assessed at the WDPPO stage. As such, these policies were assessed for the first time as part of the appraisal of the WDPD.

Entec understands that the site selection process was not undertaken for a second time as part of the production of the WDPD, since no new strategic sites were put forward during the consultation process for the WDPPO document. As such the site selection exercise was not reassessed during the appraisal process and the results of the assessment from the WDPPO stage were carried forward. Policies relating to specific site allocations were not assessed as part of the appraisal process.

### 3.2.1 Results of WDPD Policy Appraisal

The following table summarises the results of the appraisal of policies in the WDPD:

**Table 3.2: Results of WDPD Policy Appraisal**

Occurrence of ratings for each policy										Total
	WCS1	WCS2	WCS3	WA1	WA2	WDC1	WDC2	WDC3	WDC4	
++	3	2	0	N/A	0	0	1	1	1	8
+	7	12	13	N/A	7	13	8	7	5	72
~	10	2	5	N/A	13	5	11	10	12	68
?	0	4	2	N/A	0	2	0	2	2	13
-	0	0	0	N/A	0	0	0	0	0	0
--	0	0	0	N/A	0	0	0	0	0	0

The results of the appraisal of the WDPD demonstrate a much higher degree of certainty of how the policies perform against the appraisal objectives. This is largely due to the fact that the wording of policies was not available at the WDPPO stage. Now this has been added it is possible to undertake a full appraisal of the policies. Since four of the policies were not appraised at the WDPPO stage it is difficult to determine if there has been an overall improvement in the performance of policies. For the most part it appears that Entec's recommendations made following the appraisal of the WDPPO document have been taken into account.

The following improvements in the rating of policies have occurred following the implementation of Entec's recommendations:

- **Preferred Policy 3/DCS1: Development Control Criteria:** Criteria introduced in relation to flooding and hydrology.
- **Preferred Policy 5/WDC3: Transport:** Policy now refers to the fact that Transport Assessments will only be required where proposals have a major impact on the surrounding road network.
- **Preferred Policy 7/WCS3: Sustainable design, construction and demolition:** Entec recommended that the policy should refer to the need to implement effective sustainable design. The policy now states that design principles and construction methods should be implemented to minimise the use of primary aggregates and maximise the use of secondary resources.

Entec notes that a number of additional changes were implemented as a result of the recommendations made in the Sustainability Report. In particular, additional criteria have been added to the WDPD to be addressed when planning applications for new sites are submitted. Appendix 4 of the WDPD now contains details of how the sustainability appraisal objectives relate to site selection criteria.

### 3.3 Secondary, Cumulative and Synergistic Effects

The SEA Directive requires an assessment of the secondary, cumulative and synergistic effects, which should be incorporated into the SA. These effects are difficult to predict and could not be assessed with sufficient certainty at previous stages of the appraisal process since policy wording was not available. Table 3.3 provides a qualitative assessment of these effects for each policy.

**Table 3.3: Secondary, Cumulative or Synergistic Effects**

Policy	Secondary, Cumulative or Synergistic effects
WCS1: Capacity Requirements	Providing sufficient capacity to manage waste effectively will have a wide range of secondary and cumulative effects. Many of these effects are reflected in the appraisal results contained in <b>Appendix A</b> . Effective waste management has a direct link with human health and it is considered that meeting these targets will indirectly and cumulatively lead to a more healthy society. The policy will also create employment through the development of new technologies. Meeting the targets associated with recycling and composting will add to the national effort to minimise carbon emissions and should cumulatively help to minimise the impact of waste management on climate change. The provision of sufficient waste management capacity could also have an indirectly positive impact on crime by reducing the likelihood of fly tipping.
WCS2: Provision for Waste Management Capacity	This policy seeks to meet waste management targets through the provision of a strategic site for a waste management facility. It is expected that the provision of such a facility will reduce the number of vehicle miles travelled and therefore have an indirectly positive impact on climate change. The provision of an integrated rather than dispersed solution to waste management will minimise the number of waste management sites and indirectly help to protect landscapes, soil resources and wildlife habitats.
WCS3 - Sustainable Design, Construction and Demolition	There will be a cumulative decrease in the amount of energy used by waste management facilities as policies associated with sustainable design begin to become effective. The reduction in resources used will have an indirect impact on climate change. The policy also contains provisions to use construction and demolition materials that minimise waste production and re-use/recycle materials as far as practicable on site. This will have a cumulative effect on the protection of resources as the policy is implemented over time.
WA1: Strategic Waste Management Site	Specific site allocation policies were not appraised. However, the site assessment criteria and methodology was assessed. The results of this assessment are contained in Section 2 of this document.
WA2: Safeguarding existing and allocated waste management sites	This policy will indirectly protect human health by allowing sufficient land for waste management activities to come forward. The policy will also help to maintain a strong local economy and maintain high and stable levels of employment by employing people within the waste management sector.
WDC1: Development Control Criteria	This policy will help to ensure that waste management facilities come forward in the right location and that they do not have adverse social, economic or environmental effects. Cumulatively, it is expected that the positive effects of the policy will be compounded as it is implemented.
WDC2: Environmental Objectives	The cumulative effects of this policy will be similar to those associated with WDC1. The criteria will also have cumulative social effects, protect the environment in Milton Keynes and help to maintain a healthy economy.
WDC3:Transport	It was considered that the control of vehicle movements will improve air quality in Milton Keynes and will indirectly improve human health in the town. Improved public transport access facilities could also indirectly reduce the incidence of crime associated with fly tipping. The policy requires sites to be located in relation to the strategic road network. This should help to protect the vitality and



Policy	Secondary, Cumulative or Synergistic effects
	viability of town centres as facilities will be located elsewhere. As with many policies in the plan, it is expected to have a cumulatively positively impact on reducing greenhouse gas emissions.
WDC4: Restoration	Restoration schemes are important to those living around the site and determine the extent to which the site can be re-used in the future. Effective restoration schemes can indirectly encourage a healthier lifestyle where sites are restored for recreational use. They can also help to encourage ecology and bio-diversity where these issues are designed into the scheme.

### 3.4 Uncertainties and Limitations

As noted above, there were far fewer limitations to the appraisal at this stage since draft wording was available for all policies. Entec considered that for the most part, policies were sufficiently comprehensive to determine their relationship with the objective. For some policies it was considered that a wait and see approach was needed to determine how they would relate to the objective. An example of this is the relationship between policy WDC1: Development Control Criteria and objective 13: to reduce energy efficiency. It was considered unclear at this stage if development control criteria would result in energy efficiency.

It was noted that the details of the monitoring and implementation information contained in Appendix 1 of the report set out a number of indicators and targets to measure the success of policies. Whilst this was useful in the appraisal process some uncertainty, particularly in relation to the short, medium and long term effects remained. For example, policy WCS2 refers to the development of the strategic waste management facility. Whilst a target date of 2012/2013 is set for the delivery of this facility there is still some uncertainty as to exactly when it will come forward.

### 3.5 Timescale of Effects

Task B3 of the SA process set out in the government guidance requires a description of the timetable over which changes resulting from the policy will occur. Clearly the policies have been written with a view to implementing changes within the period of the plan. Table 3.3 provides a summary of how changes resulting from the policies are likely to occur.

**Table 3.4: Timetable of policy effects**

Policy	Short Term Effects	Medium Term Effects	Long Terms Effects
<b>WCS1: Capacity Requirements</b>	<p>The amount of waste produced in Milton Keynes is expected to increase to the amount shown in the policy.</p> <p>The short term effects of this policy will be that sufficient capacity for this amount of</p>	<p>The amount of waste produced in Milton Keynes is expected to increase to the amounts shown in the policy.</p> <p>The medium term effects of this policy will be that sufficient capacity for this amount of waste will be</p>	<p>The amount of waste produced in Milton Keynes is expected to increase to the amounts shown in the policy.</p> <p>The long term effects of this policy will be that sufficient capacity for this amount of</p>

Policy	Short Term Effects	Medium Term Effects	Long Terms Effects
	waste will be provided for.	provided for.	waste will be provided for.
<b>WCS2: Provision for Waste Management Capacity</b>	<p>The SWMF is unlikely to be delivered in the short term. The current waste management situation is not sustainable since the policy states that local need cannot be met from existing facilities.</p> <p>The policy will not have a significant effect on social and economic conditions until it is implemented.</p>	<p>If the strategic site comes forward in the medium term the benefits of the facility should start to be delivered. In particular, the economic benefits in terms of new jobs. It is unclear how long existing facilities will continue to operate alongside the new facility.</p> <p>Some initial disruption and temporary environmental effects associated with dust and noise may result from the construction of the facility.</p>	<p>In the long term the social, economic and environmental benefits of the facility will be fully realised. These are highlighted in the Appraisal schedule contained <b>Appendix A</b> of this report and include more efficient land use, improved air quality due to reduced reliance on landfill and a stronger local economy.</p>
<b>WCS3: Sustainable Design, Construction and Demolition</b>	<p>The effect of this policy in the short term is dependent on the extent to which it is promoted by the Council. In order to encourage developers to take on board the principles of the policy the Council may need to prepare an SPD or undertake other promotional work. The short term effects are therefore uncertain although the existence of the policy itself may have a positive effect on construction practice.</p>	<p>This policy will increase the amount of recycling that takes place in the medium term. This will result in the use of recycled materials to construct buildings and also inclusion of recycling facilities in buildings.</p> <p>This policy should help to meet recycling and other waste management targets in the medium term.</p>	<p>The long term aim of this policy is to help to secure the efficient use of material. In the long term, this policy will make a significant contribution to the prudent use of resources.</p>
<b>WA1: Strategic Waste Management Site</b>	<p>Specific site allocation policies were not appraised. However, the site assessment criteria and methodology was assessed. The results of this assessment are contained in Section 3.6 of this document.</p>	<p>Specific site allocation policies were not appraised. However, the site assessment criteria and methodology was assessed. The results of this assessment are contained in Section 3.6 of this document.</p>	<p>Specific site allocation policies were not appraised. However, the site assessment criteria and methodology was assessed. The results of this assessment are contained in Section 3.6 of this document.</p>
<b>WA2: Safeguarding existing and allocated waste management sites</b>	<p>This policy aims to safeguard all sites allocated for waste management use and to prevent inappropriate development from taking place on them in the short, medium and long term.</p>	<p>This policy aims to safeguard all sites allocated for waste management use and to prevent inappropriate development from taking place on them in the short, medium and long term.</p>	<p>This policy aims to safeguard all sites allocated for waste management use and to prevent inappropriate development from taking place on them in the short, medium and long term.</p>
<b>WDC1: Development Control Criteria</b>	<p>This policy seeks to prevent inappropriate waste management development from coming forward. It is unlikely that there will be any significant adverse impacts associated with the policy in the short, medium or long term.</p>	<p>This policy seeks to prevent inappropriate waste management development from coming forward. It is unlikely that there will be any significant adverse impacts associated with the policy in the short, medium or long term.</p>	<p>This policy seeks to prevent inappropriate waste management development from coming forward. It is unlikely that there will be any significant adverse impacts associated with the policy in the short, medium or long term.</p>
<b>WDC2: Environmental Objectives</b>	<p>The direct effects of this policy will be immediate in the sense that all development will be</p>	<p>This policy will ensure that as more waste management facilities are developed into the medium term to replace</p>	<p>In the long term the environmental impact of waste management facilities will be significantly reduced</p>

Policy	Short Term Effects	Medium Term Effects	Long Terms Effects
	expected to meet the policy criteria.	existing facilities, their environmental impact will be reduced.	as a result of this policy.
<b>WDC3: Transport</b>	The immediate impact of this policy will be that all proposals for waste management development will need to be accompanied by a transport assessment.	In the medium term it may be that more proposals will make use of rail, conveyors, pipelines and water in preference to road.	In the long term it may be that more proposals will make use of rail, conveyors, pipelines and water in preference to road.
<b>WDC4: Restoration</b>	This policy will ensure that waste development proposals will, where appropriate, include comprehensive restoration schemes.	This policy will ensure that waste development proposals will, where appropriate, include comprehensive restoration schemes.	This policy will ensure that waste development proposals will, where appropriate, include comprehensive restoration schemes.

### 3.6 Appraisal of Site Selection Methodology

As noted elsewhere in the report the site selection methodology was assessed as part of the appraisal of the WDPPO. Section 2.2.3 sets out the results of this appraisal and the associated recommendations. The site selection process was not assessed in detail as part of the appraisal of the WDPD stage, however the implementation of the recommendations made at the WDPPO stage were investigated.

#### 3.6.1 Is the process for selecting sites robust and does it reflect the sustainability priorities in PPS 10?

It was suggested that the broad site identification criteria should be identified at the outset of the of the site allocations document. Entec notes that the broad criteria for selecting waste management sites are now defined in paragraph A2 of the Site Allocations section of the WDPD.

#### 3.6.2 Do the site selection criteria reflect all the relevant SA objectives?

Most of the SA objectives were covered by at least one of the criteria used to site select sites in the WDPPO. The notable SA objectives that were not fully reflected in the site selection methodology were as follows.

- **Objective 3:** Social Exclusion;
- **Objective 5:** Air Quality;
- **Objective 16:** Soil Resources;
- **Objective 19:** Local Economy; and
- **Objective 20:** Employment.

Recommendations are made in the Sustainability Report as to how the site selection criteria could meet these objectives. Appendix 4 of the WDPD contains a table setting out how the site

selection indicators relate to the SA Objectives. It is noted that objectives 3, 16, 19 and 20 were taken into account in the indicators. Objective 5 relating to air quality does not appear to have been taken into account.

### **3.6.3 Is the methodology sufficiently justified?**

The Sustainability Report recommended that the basis for the scoring system and associated weighting should be clearly explained in the WDPD.

Appendix 4 of the WDPD provides an explanation of the scoring system and the reasons for not weighting the site selection indicators. It is noted that weighting is not required to meet legislative requirements, however, Entec considers that the process can be used to reflect the sustainability priorities contained in PPS 10. For example, PPS 10 gives clear priority for sites located on previously developed land and it could be argued that this criterion should have a higher weighting in the site selection process.

### **3.6.4 What are the significant effects resulting from the site based policies?**

Entec recommended that it would be beneficial to identify the potential mitigation that could be put in place to address any significant effects. It is noted that the site allocation policies now provide a schedule of the key development criteria to be addressed by planning applications for the allocated sites.

## **3.7 Policy Recommendations**

Entec notes that the majority of recommendations made in relation to policies in the WDPPO document have been implemented. The appraisal of the WDPD highlighted that there is still some areas of uncertainty regarding the relationship between some of the policies to the appraisal objectives. These issues are discussed in section 3.4 of this report. The only specific recommendation that Entec would make relates to Policy WDC1: Development Control Criteria. Notwithstanding the provisions of Policy WDC3, it is considered that the need for sustainable transport could be reflected in the development control criteria.

## 4. Conclusions

### 4.1 Summary of Policy Appraisal

The following table summarises the performance of policies in the Milton Keynes Waste Development Plan Document Submission Draft against the appraisal objectives:

**Table 4.1: Summary of policies against the appraisal criteria**

	Occurrence of ratings for each policy									Total
	WCS1	WCS2	WCS3	WA1	WA2	WDC1	WDC2	WDC3	WDC4	
<b>++</b>	3	2	0	N/A	0	0	1	1	1	8
<b>+</b>	7	12	13	N/A	7	13	8	7	5	72
<b>~</b>	10	2	5	N/A	13	5	11	10	12	68
<b>?</b>	0	4	2	N/A	0	2	0	2	2	13
<b>-</b>	0	0	0	N/A	0	0	0	0	0	0
<b>--</b>	0	0	0	N/A	0	0	0	0	0	0

Table 4.1 shows that the policies in the WDPD performed well against a high proportion of the appraisal objectives, although few received a ++ rating. None of the policies received a double negative score against the objectives, only two received single negative scores during the WDPPO appraisal and these policies are no longer in the plan. A high proportion of the objectives were not relevant to the proposed policies, although significantly fewer than those in the WDPPO document received an uncertain rating.

The site selection methodology was not reappraised, although the extent to which Entec's recommendations have been implemented was assessed.

### 4.2 Recommendations

Entec notes that the majority of recommendations made in relation to policies in the WDPPO document have been implemented. The appraisal of the WDPD highlighted that there are still some areas of uncertainty regarding the relationship between some of the policies to the appraisal objectives. These issues are discussed in section 3.4 of this report. The only specific recommendation that Entec would make relates to Policy WDC1: Development Control Criteria. Notwithstanding the provisions of Policy WDC3, it is considered that the need for sustainable transport could be reflected in the development control criteria.



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# **Appendix A**

## **Appraisal Matrix for Waste Development Plan Document: Submission Draft**

2 Pages

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