

**MILTON KEYNES  
WASTE  
DEVELOPMENT PLAN DOCUMENT  
EXAMINATION**

**MILTON KEYNES COUNCIL'S RESPONSE**

**TO**

**SCHEDULE OF  
MATTERS AND ISSUES  
FOR EXAMINATION**

# **MILTON KEYNES WASTE DEVELOPMENT PLAN DOCUMENT EXAMINATION**

## **SCHEDULE OF MATTERS AND ISSUES FOR EXAMINATION**

1. The Inspector has prepared a Schedule of Matters and Issues for Examination to guide and focus the discussion at the hearing sessions of the Examination into the Milton Keynes Waste Development Plan Document ("Waste DPD"). It has been prepared using the Planning Inspectorate's *Guide to the Process of Assessing the Soundness of Development Plan Documents*<sup>1</sup>, having regard to the representations made to the Waste DPD and the guidance in PPS12 & PPS10.
2. The Paper lists the main topics and issues which are likely to be discussed at the Examination.
3. This is the Council's responses on those matters and issues. The Council has used the Inspector's format and sets out its response after each question.
4. As well as this Statement the Council refers to the three Topic Papers which have been prepared and published.

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<sup>1</sup> *Development Plans Examination – A Guide to the Process of Assessing the Soundness of Development Plan Documents (Planning Inspectorate; December 2005)*

**MILTON KEYNES WASTE DEVELOPMENT PLAN DOCUMENT**  
**SCHEDULE OF MATTERS AND ISSUES FOR EXAMINATION**

**1. PROCEDURAL & CONFORMITY MATTERS<sup>2</sup>**  
***[Soundness Tests 1; 2A; 2B; 3; 4A; 4B; 4C; 5; 7]***

**Key issues:**

- i. Has the Waste DPD been prepared in accordance with the current Local Development Scheme and have the relevant details been met?

The Waste DPD is identified in the LDS which sets out how the waste management requirements for Milton Keynes will be achieved and that sites for facilities to meet these requirements will be identified in the WDPD. The WDPD is referred to in the Milton Keynes Local Development Scheme 2006-2009 at table 3, page 13 and Appendix A, page 30. Appendix A sets out the role of the WDPD.

- ii. Has the Waste DPD been prepared in compliance with the Statement of Community Involvement and met the minimum consultation requirements in the 2004 Regulations?

The WDPD is compliant with the Statement of Community Involvement and the means by which consultation has been undertaken is set out in the Regulation 28 Statement published by the Council and the Topic Paper 2.

- iii. Has the Waste DPD been subject to Sustainability Appraisal, which has identified the process carried out, the baseline information used and the outcomes of the process?

The WDPD has been subjected to Sustainability Appraisal in 2006. A further supplementary Sustainability Appraisal was carried out prior to submission. The outcomes of the appraisal processes are set out in the following documents: Milton Keynes Council, Sustainability Appraisal of Waste Development Plan Document, Sustainability Appraisal Report, July 2006 and Milton Keynes Council Sustainability Appraisal of the Waste Development Plan, 2007-2026, Submission Draft, January 2007.

- iv. Is the Waste DPD a *spatial plan*, which properly reflects national guidance on spatial planning?

The WDPD contains a clearly set out suite of guiding principles and an appropriate vision. The Plan embraces the principles of spatial planning and goes beyond simply land use planning. Paragraphs CS16 & CS17 set out the principles and vision and Sections 2 and 3 of the introductory section set out the context in relation to other plans and strategies.

- v. How does the Waste DPD take account of the relationship between policies in the plan and the requirements and infrastructure investment programmes of other agencies and service providers?

The WDPD sets out the relationship and requirements of other agencies in terms of delivery of the objectives of the DPD at Appendix 1 where the implementation and monitoring and requirements of each agency are clearly stated. The WDPD sets out the approach to joint working, particularly with Northamptonshire County Council at CS44.

- vi. How does the Waste DPD relate to other relevant plans and strategies which influence the delivery of its proposals, including the Milton Keynes Municipal Waste Strategy, Milton Keynes Local Plan, Local Transport Plan etc.

The WDPD provides a context and relationship to other plans and strategies at Section 3 and takes into account the needs of the community of Milton Keynes

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<sup>2</sup> Most of these issues should be covered in the Council's Self-Assessment of Soundness

and sustainable design and construction. The guiding principles and vision and ensuing policies address the social, environmental and economic approach to waste management. The WDPD preparation process has been participative and the community and stakeholders have been involved at all stages. This further ensures that the linkages between the requirements of other plans and strategies are encompassed in the document.

The WDPD contains a Core Strategy, site allocations and development control policies. This demonstrates the means by which the Core Strategy will be delivered and how future development will be controlled. Monitoring and implementation is also addresses and is set out in Appendix 1 of the WDPD.

Joint consultation has been undertaken with the Municipal Waste Strategy and issues relating to the Community Strategy, particularly those relating to growth are addressed in the Introduction at Section 3.

- vii. Does the Waste DPD integrate effectively with plans prepared by other local planning authorities in the area (eg. unitary, district, county and adjoining local planning authorities)?

Milton Keynes is a Unitary Authority. Regard has been had to the policies and plans of neighbouring authorities and furthermore paragraphs CS41-CS44 sets out this relationship and the Council's approach to partnership working.

- viii. Is the Waste DPD consistent with national planning policy, particularly as set out in PPS10 & PPS12, and is there sufficient local justification for any policies which are not consistent with national planning policy<sup>3</sup>?

The Council considers the WDPD to be in conformity with national policy. GOSE and SEERA have raised issues in respect of full conformity with PPS12 in relation to regional policy. This is addressed below and later in the statement in the context of how the WDPD deals with London's waste.

- ix. Is the Waste DPD in general conformity with the current Regional Spatial Strategy (RPG9) and draft South-East Plan, and is there sufficient local justification for any policies which are not consistent with regional planning policy<sup>4</sup>?

The approved Regional Planning Guidance for the South East (RPG9) Waste and Minerals June 2006 has been taken into account in the preparation of the WDPD as has the draft South East Plan.

The Council objects to the level of provision being sought in the South East Plan relating to London's waste but never the less has provided flexibility in the WDPD to deal with additional waste should the need arise, although no explicit reference to London's waste is contained within policy.

The rationale behind the approach is set out in Topic Paper 1, which identifies specific local circumstances and justification for the approach based on anticipated future growth scenarios and the need to plan adequately for the waste management needs of an expanding local community. This is particularly relevant given that there is only one landfill site.

- x. How does the Waste DPD have regard to the Council's Community Strategy, and does reflect its vision and set out policies which deliver key components of this strategy in so far as they are consistent with strategic planning policy and the use and development of land?

The WDPD is a key component in the delivery of the Community Strategy. Paragraph 3.5 of the Introduction addresses the relationship. Paragraphs CS6-CS17 set out the requirements of the community and the approach to dealing with growth. Key themes in the Strategy include participative citizenship, sustainable development, designing and planning together to promote a

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<sup>3</sup> Detailed aspects of consistency with national policy will be dealt with under individual policies

<sup>4</sup> Detailed aspects of conformity with regional policy will be dealt with under individual policies

modern, safe and environmentally sustainable city. These are addressed through the Core Strategy and policies in the WDPD.

- xi. Has an Appropriate Assessment been undertaken under the Habitats Directive (Articles 6(3) & (4)) relating to European sites, if necessary?

An Appropriate Assessment has been deemed unnecessary. A Screening process was undertaken and this view was confirmed by the Environment Agency and Natural England.

- xii. Has a Strategic Flood Risk Assessment been undertaken, if necessary?

The Council has not completed a SFRA. The Council is working with the EA, Milton Keynes Partnership and other bodies on a Water Cycle Strategy and a Scoping report has been prepared. Flood risk was addressed through the Sustainability Appraisal process and no representations have been received from statutory bodies to indicate that a SFRA is required.

## **2. CORE STRATEGY [POLICIES WCS1, WCS2 & WCS3] [Soundness Tests: 4A; 4B; 4C; 6; 7 & 9]**

### **Key issues:**

**Is the Core Strategy for waste soundly based and appropriate for Milton Keynes, consistent with national and regional policy, reflecting community views, and providing a sound basis for the strategic and other policies in the Waste DPD?**

#### **(i) The soundness of the overall Core Strategy**

**Is the Core Strategy sound in terms of:**

- (a) its Guiding Principles and Vision?

The Guiding Principles and Vision are soundly based around the principles in national policy, enshrining the concepts of sustainable development, the proximity principle and reduced future reliance on landfill. Both the Vision and the principles address the need to implement, meet and be consistent with the National Waste Strategy, the Regional Waste Management Strategy, the Milton Keynes Municipal Waste Strategy and the need to meet the appropriate government, regional and local targets.

- (b) properly reflecting the objectives, policies and requirements of the adopted RSS and draft South-East Plan, and providing sufficient flexibility to deal with changing circumstances?

As set out in Section 1, the WDPD reflects the objectives in both RPG9 and the draft South East Plan. Detailed comments on London's waste are set out below.

- (c) properly reflecting local issues and circumstances relevant to Milton Keynes?

Paragraphs CS1-CS15 set out the key issues for Milton Keynes. These are the current reliance on landfill and the need for the strategy to address this matter, future growth of Milton Keynes and sustainable design and construction. Milton Keynes is a major, regional focus for housing and economic growth. As a result population will be rising significantly, with an additional 48,000 new homes by 2026. This has implications for decisions on future waste management. The WDPD addresses this and recognises that the figures may change in the future. For this reason a 10% margin has been included for municipal solid waste to ensure that the Strategy and ensuing policies delivers what is required for Milton Keynes over the plan period.

- (d) setting out a strategy for sustainable waste management with spatial guidance to enable sufficient opportunities for waste management facilities, including waste disposal and recovery, in appropriate locations?

The Core Strategy sets out the key issues, what is currently happening, what needs to happen and policies WCS1-WCS3 set out the means by which the

strategy can be delivered. These are over-arched by the guiding principles and vision. The Core Strategy sets out the appropriate targets and identifies the levels of capacity required for MSW and C&I waste. Policy WCS2 provides for a strategic site to deal with final treatment, compositing and recycling. The policy sets out a priority for such sites in existing employment areas and existing waste management sites.

- (e) supporting the provision of new or enhanced waste management facilities and technologies, in line with the adopted/draft RSS, Municipal Waste Management Strategy, the latest National Waste Strategy, and the key planning objectives in PPS10?

The WDPD is not technology specific as this reduces the flexibility should new technologies come forward. However Appendix 3 sets out a range of ways in which waste can be managed.

**(ii) Capacity, Targets and Requirements**

- (a) Are the waste recycling and composting targets and figures for existing tonnage of waste managed and additional capacity required appropriate and soundly based (Tables WCS2-4)?

The targets are soundly based as they are derived from regional guidance and work undertaken by ERM in respect of capacity needs in the South-East. These have been tested through the examination of the South East Plan and no specific issues have been raised in connection with the figures.

- (b) Are the waste management capacity requirements soundly based and appropriate, and how will they be delivered? (Policy WCS1);

The waste management capacity figures are soundly based and are derived from regional guidance and the South East Plan.

**(iii) Provision for particular types of waste**

**Does the Core Strategy make sufficient provision for:**

- (a) non-hazardous landfill capacity to meet regional requirements?

Non-hazardous landfill capacity is addressed at CS21-CS23 and the landfill requirements are set out in Table WCS5. There is one landfill in Milton Keynes, with planning permission to 2022 and a resultant surplus capacity of 13.7 million tonnes at 2015. This capacity includes London imports, as identified in the Table. The Council maintains its objection to the level of imports from London as set out in the South East Plan but acknowledges that there is capacity at 2015.

- (b) recycling and composting capacity, including in-vessel and on-farm composting and kitchen waste?

Paragraphs CS24-CS27 address recycling and composting capacity. There is an existing MRF at Id Wolverton which is owned by the Council. Rates of throughput have varied over the years ranging from 17,000 tonnes to 60,000 tonnes. The facility is licensed to take up to 93,000 tonnes and has sufficient capacity to deal with the levels of throughput anticipated. Along with the existing composting sites and community recycling centres there is sufficient identified capacity. The WDPD does identify a need to expand the community recycling facilities as Milton Keynes grows and also identifies the prospect of a food waste plant. The capacity requirements for MSW are addressed in Policy WCS1.

The future is uncertain, however the development control policies allow for such sites to come forward in appropriate locations.

- (c) treating and disposing of construction and demolition waste?

The Core Strategy addresses construction and demolition waste at paragraphs CS28-CS31. Provision for facilities can be delivered through the development control policies in the Plan.

- (d) treating, managing and disposing of hazardous waste, and should it include a specific policy to deal with hazardous waste?

Paragraphs CS33-CS35 deal with hazardous waste. Hazardous waste is dealt with at specialist facilities and tends to be on a scale larger than the quantities of hazardous waste likely to be generated in Milton Keynes. The provision of facilities tends to be market led and deal with specific waste streams. This makes it difficult to plan for. Criteria against which proposals may be considered are contained within the development control policies.

- (e) treating and disposing of commercial and industrial waste?

The capacity requirements for C&I waste are set out in Policy WCS1. Most of this type of waste is landfilled and it is considered that there is enough landfill void within Milton Keynes to meet the disposal needs. Provision for any specific treatment facility can be dealt with through either the strategic facility identified or through the other development control policies.

- (f) facilitating biomass, including implementing and monitoring its use?

Bio-mass is specifically addressed at paragraph CS38 and supported is cited for such use on a site by site basis. Such facilities can be delivered through the development control policies. The means of monitoring and implementation are set out in Appendix 1 of the WDPD.

- (g) Does the Core Strategy give sufficient emphasis to waste minimisation, reduction of packaging, and waste recovery/disposal methods?

The Core Strategy does give sufficient emphasis to waste minimisation and the other methods set out above. Paragraph CS9 talks about waste reduction and paragraph CS10 addresses waste minimisation and recovery and the need to design recycling into new facilities.

- (h) Should Policy WCS2 be more specific about the type(s) of facilities envisaged and the alternative sites considered?

Policy WCS2 should not be more specific. It is worded in this way to provide flexibility in the Plan and allow for emerging technologies to come forward and additional facilities in appropriate locations should the need arise. This is supplemented by the additional criteria set out in the development control policies.

**(iv) Sustainable Design, Construction & Demolition**

- Is Policy WCS3 soundly based and founded on a robust and credible evidence base, consistent with national and regional guidance?

Policy WCS3 is robust and further information is provided in Appendix 3 demonstrating the linkages to the Waste Strategy of the Council, Supplementary Planning Document: Social Infrastructure, September 2005 and BSI 5906:2005 Waste Management in buildings – Code of Practice.

- (v) London's waste** - Should the Core Strategy make specific provision to accommodate a proportion of London's waste, in line with RPG9 and the draft South-East Plan?

The Core Strategy addresses the issue of London's waste at paragraphs CS21-CS23 and Table WCS5 sets out the landfill requirements. This is further addressed at Policy WCS1 and paragraph CS45.

Since the WDPD has been submitted the Panel has published its Report on the South East Plan. This is not a statement of policy and further modifications/consultation is expected as a result of the recommendations within the Report.

In respect of London's waste it considers the evidence and implications of apportionment of London's waste as set out in Policy W3. Milton Keynes Council objected to the level of apportionment and the justification for this is set out in Topic Paper 1. A key issue for the Panel was whether there should be a single or deferred apportionment. There was considerable debate about this issue and on balance the Panel has recommended a single apportionment. MKC argued strongly for a reduction in the 10.1% level of apportionment due in part to its growth area status. The Panel considered this contradictory given the planning status of Bletchley.

The Panel considered the scale of London's waste outside their remit and even if it had been within their remit they did not feel there was sufficient evidence to substantiate the figures allowing an accurate prediction of the levels of waste attributed to the percentage apportionment. This work will be undertaken by a combination of bodies. The Council's main concern is that the Panel Report does not make it clear how much waste the Council is being asked to take. This is a cause for concern given the geographical location and potential pressures to take waste from other areas e.g. Bedfordshire. The Council is also working jointly with Northamptonshire.

The Council will work with GOSE and SEERA to set the appropriate figures but further work is required to understand how much other regions will take. The Council also intends to work closely with GOSE and SEERA to continue to put pressure on London to reduce the quantity of waste to be exported.

Milton Keynes is geographically located in the South-East (with that level of proposed apportionment) but having a closer relationship with the East Midlands and East of England. MKC feels this an important issue and the context should be borne in mind. This does not seem to have been considered in the context of the South East plan and consideration of appropriate levels of apportionment.

The Panel Report recommends a single apportionment and the percentage sub-divisions that results from the sensitivity test of the distribution model which does not include green belt as a constraint. The impact of this is a 10% level of apportionment for Milton Keynes.

The Council remains in opposition and will respond accordingly to any further consultation on the Plan.

The Council remains of the view that the policies in the plan are sufficiently flexible as they stand to accommodate imports should the need arise. Furthermore the Council fully endorses joint working with appropriate bodies to identify /quantify appropriate levels/defined quantities of waste arising and the resultant quantities for each WPA.

With this in mind no further changes to policy are suggested (over and above Topic Paper 1) however there is a need to update the WDPD to reflect the fact that the Panel has reported. These are set out in Appendix 1.

**(vi) Role of existing waste sites**

(a) Should the Core Strategy acknowledge that Bletchley Landfill Site will be accepting increased imports of waste from outside Milton Keynes, including from London?

There is no current, conclusive evidence that this is the case and for this reason it is not deemed appropriate to change the text in this manner. Furthermore a planning application for an early landfill store to allow the importation of waste outside normal operating hours (primarily to facilitate importation of such waste) has recently been refused planning permission.

(b) Does the text adequately describe the Brooklands Ridge site and should it be excluded from Fig W1?



Topic Paper 3 addresses this matter in the Council's comments to representation 22. Figure 1 is a list of all current sites in the Borough that are used for various waste and recycling activities. The Brooklands site should be retained in Figure 1 as it is part of the current waste management position statement. However, it is proposed that it is listed under a new sub-heading "Inert Landraising (to form Acoustic ridge)". An amendment is proposed to CS31 to reflect the fact that the Brooklands Ridge is for acoustic purposes.

- (vii) Alternative options** - What alternative waste management options were considered and how was the preferred option selected?

A number of alternative options were considered during preparation of the WDPD process and the approach is set out in the Preferred Options document.

- (viii) Cross-boundary issues** - How does the Core Strategy address longer-term cross-boundary issues, such as dealing with waste arising from possible future development at Newton Longville in Aylesbury Vale district and the relationship with Northamptonshire and Bedfordshire?

The WDPD makes it clear as part of the guiding principles that waste is to be disposed of as near as possible to the source in line with the proximity principle and net self-sufficiency. The WDPD acknowledges that given the large capacity of non-hazardous landfill in comparison to the rest of the South East that neighbouring authorities may use the facilities at Milton Keynes. Through the planning policies it is intended that the capacity to deal with residual waste arising from Milton Keynes is safeguarded but there remains sufficient flexibility to cope with a certain amount of imports should market conditions prevail.

The WDPD recognises that waste moves across boundaries and between regions/sub-regions. These movements need not necessarily conflict with the guiding principles. Given the relatively small area covered by the WDPD, and to obtain economies and efficiencies of scale the WDPD recognises that it may be necessary to combine waste activities with neighbouring local authorities. The relationship with neighbouring authorities and partnership working is addressed in paragraphs CS41-CS44.

3. **ALLOCATIONS [POLICIES WA1 & WA2]**  
***[Soundness Tests 4A; 4B; 4C; 6; 7 & 9]***

**Key issues:**

**Will Policies WA1 & WA2 deliver the required strategic waste management facilities identified in the Core Strategy and adequately safeguard existing and allocated waste management facilities?**

**(i) Preferred Strategic Waste Management Site at Old Wolverton**

- (a) How was this site selected, is the methodology for its selection and allocation soundly based, and is it deliverable in planning terms?

A question was asked at the Issues and Options stage about where sites for waste facilities should be located. The site at Old Wolverton was identified as the preferred site at the preferred options stage.

The allocation of the site has been in the public domain for a considerable period of time and the relationship with the surrounding area was considered as part of the site assessment work and through the waste site suitability criteria, as set out in Appendix 4 of the WDPD.

A variety of sites were put forward by industry, landowners and the Council's waste section in February 2006. The process and outcome of the assessment of sites is fully documented in the Preferred Options document and in particular in Annex 1. A total of thirteen sites were assessed along with a review of waste management facilities for final treatment. Local residents have had an opportunity to comment at all stages of the process.

The site is deliverable and the Council is now actively negotiating to buy the site.

- (b) Have the environmental, locational, traffic and amenity consequences of allocating the preferred site been properly addressed?

These issues have all been addressed through the site assessment process after applying the site criteria.

- (c) Is the plan sound and credible, by selecting a preferred site before the type of waste management plant has been decided?

The site has been chosen as it is deliverable and the treatment has not been specified to ensure the Plan remains flexible. This allows emerging technologies to be factored in through the life of the WDPD. An assessment has been done of the footprint of the different technologies to ascertain an appropriate size for the site. This is addressed in the appendices to the WDPD.

- (d) Were local residents properly consulted about the preferred site?

Local residents have been consulted and have had the opportunity to comment at all stages of the process,

**(ii) Reserve Strategic Waste Management Site at Wymbush**

- (a) How was this site selected, is the methodology for its selection and allocation soundly based, and is it deliverable in planning terms?

The site was identified in the same way as the strategic site, as set out above. It is deliverable in planning terms through public and private sector investment, though given the nature of negotiations on the strategic site this is less of a concern.

- (b) Have the environmental, locational, traffic and amenity consequences of allocating the reserve site been properly addressed?

These issues have all been addressed through the site assessment process after applying the site criteria.

- (c) Would the reserve site provide the same facilities as the preferred site, or is a reserve site needed for a final waste treatment plant?

It is anticipated that the reserve site will be safeguarded for a waste management facility if the Old Wolverton Site does not come forward. In that instance it will come forward as a residual waste treatment facility.

- (d) Were local residents properly consulted about the reserve site?

Local residents have been given the opportunity to comment at all stages of the process.

- (e) Does Policy WA1 give sufficient guidance about the circumstances when the reserve site will be released?

Yes. The policy states that if the strategic site cannot be delivered then planning permission will be granted for the site at Wymbush.

**(iii) Alternative/additional sites**

- (a) Should alternative sites suggested at the Preferred Options stage be considered, and if so, which sites?

There is no identified need to consider the alternative sites. It is the Council's view that the strategic site can be delivered and in the unlikely event that negotiations break down a reserve site is safeguarded.

- (b) Should Policy WA1 identify Bletchley Landfill Site as a third potential strategic waste management site?

There is no need for a third potential site. The site at Bletchley has been considered as part of the WDPD process and did not score well during the site suitability assessment process. The results of that exercise are set out in Annex 1 in the Preferred Options report.

- (c) Should the DPD refer to proposals for a thermal process to deal with hazardous waste (*omission site to be clarified*)

This was originally proposed in a representation received. The site has not come forward as an "omission site" as it is no longer available. It is not considered appropriate to refer to these proposals.

**(iv) Safeguarding Existing and Allocated Waste Sites**

- (a) Will Policy WA2 adequately safeguard existing and allocated waste management facilities?

Policy WA2 adequately safeguards existing and allocated sites by being a negative policy which will need to be considered as part of consideration of any planning application.

- (b) Does Policy WA2 safeguard and refer to all existing and allocated waste sites to be safeguarded, and should they be shown on the Proposals Map?

The policy does seek to safeguard and refer to all existing and allocated waste sites. It is not considered appropriate to show all of these on the Proposals Map as new sites will continue to be added as further planning permissions are granted.

4. **DEVELOPMENT CONTROL POLICIES** [POLICIES WDC1 – WDC4]  
**[Soundness tests: 4B, 4C, 6, 7 & 9]**

**Key issues:**

**Do the policies represent the most appropriate in all the circumstances, are they founded on a sound, robust and credible evidence base, and are they consistent with national and regional guidance and other policies in the Waste DPD?**

**Policy WDC1 – Development Control Criteria**

- (i) Are the criteria set out in the Policy relevant, soundly based and appropriate?

The criteria set out are relevant, soundly based and appropriate. They cover the relevant issues pertinent to controlling waste management development.

- (ii) How will the criteria be implemented and monitored?

Appendix 1 sets out the means by which the policy will be implemented and monitored. This appendix sets out indicators and targets. The indicator is the number of applications for waste management facilities which provide adequate and relevant information to fully consider the proposed development and a further indicator is the number of complaints relating to waste facilities. The target is a progressive year on year decrease.

(iii)

**Policy WDC2 – Environmental Objectives**

- (i) Are the criteria set out in the Policy relevant, soundly based and appropriate and how will they be implemented and monitored?

The criteria are relevant, soundly based and appropriate.

Appendix 1 sets out the means by which the policy will be implemented and monitored. This appendix sets out indicators and targets. The indicator is the number of applications for waste management facilities which demonstrate environmental objectives and the target is a year on year increase.

- (ii) Does the Policy give sufficient guidance for composting?

The Policy does give sufficient guidance for composting and this is supplemented by Policy WDC1. Policy WDC1 provides the appropriate criteria.

**Policy WDC3 - Transport**

- (i) Is the Policy more a matter of process rather than policy?

This is a policy and is intended to ensure that local residents and the highways network are not subjected to adverse impacts as a result of waste developments.

- (ii) Does the Policy impose unnecessary requirements on developers of proposed waste management developments, particularly for Transport Assessments?

The policy does not impose unnecessary requirements as it is linked to the scale of the proposed development, as set out in paragraphs DC8-DC10. The thresholds are those commonly applied in terms of traffic generation.

- (iii) Should the Policy safeguard waste transfer infrastructure, including sites for waste transfer and bulking facilities?

The policy is not specific to any type of waste development so it would not be appropriate to safeguard waste transfer infrastructure.

#### **Policy WDC4 – Restoration**

- (i) Is the wording of the Policy strong enough?

The wording of the policy is considered to be strong enough.

- (ii) Are the criteria set out in the Policy relevant, soundly based and appropriate, and how will they be implemented and monitored?

The criteria are all considered to be relevant and soundly based and cover all types of restoration. Appendix 1 of the WDPD sets out the means by which the Policy will be implemented and monitored. The indicator is the number of restoration schemes meeting Biodiversity Action Plan Targets and the target is a progressive year on year increase.

- (iii) Should the Policy set out the opportunities that restoration could create and the role of restored land for other activities?

Opportunities for other landuses would require further planning permissions and it is not considered appropriate to set out various afteruses.

- (iv) Should restoration be considered as a greater priority than landraising?

Restoration is a very important element of considering any applications for planning permission for waste development. In the case of proposals for landraising it is particularly important to consider the impact of the landraising and the resultant landscape impacts. In this context restoration is a greater priority.

**5. OTHER MATTERS**  
**[Soundness tests 6, 7 & 8]**

**(i) Appendices**

- (i) What is the status of the appendices; are they formally part of the Development Plan Document?

The appendices are formally part of the development plan as they set out amongst other things the means by which the plan will be monitored and implemented.

**(ii) Appendix 1 – Monitoring & Implementation**

- (i) Does the Waste DPD contain sufficient targets, indicators and milestones to monitor the performance and delivery of the strategy and the policies, which are realistic and achievable?

The targets and indicators are considered realistic and achievable and will allow monitoring of the performance without placing onerous requirements on the WPA.

- (ii) Does the Waste DPD include clearly identified delivery mechanisms and timescales for the implementation of policies, along with a clear indication of who is intended to implement each policy?

Appendix 1 clearly sets out the source of the data. The implementation of each policy is clearly set out with the lead body identified in each case.

**(iii) Appendix 2 – Practical Issues to be addressed in New Developments**

- (i) Should the Appendix address the provision for management of hazardous waste, in accordance with current and emerging regional guidance?

Hazardous waste is dealt with in this Appendix under the heading of future requirements.

**(iv) Appendix 3 – Waste Treatment Options**

- (i) Is the policy opposing the use of mass-burn incineration soundly-based and appropriate for Milton Keynes?

Appendix 3 sets out the waste treatment options in a "user friendly" manner. This includes reference to energy from waste and the various technologies that can be applied. Mass burn incineration is referred to along with a reference to the Council policy against mass burn which is consistent with the waste hierarchy and the need to increase waste minimisation, re-use and recycling and promote facilities which maximise front end recycling.

The Council's "no-incineration" policy was derived in 2002 and is set out in the Milton Keynes Waste Strategy. It is not an explicit policy in the WDPD. For clarity, incineration for the purposes of the Strategy is the process known as "mass burn incineration" that accepts whole waste and where waste is burnt with an excess of oxygen. There is no reference in policy to the types of technology which ensures that it remains flexible enough to accommodate emerging technology as the plan period unfolds.

- (ii) Is the description of autoclaving appropriate and correct?

The Council has proposed a minor wording change at paragraph 2 of the description on auto-claving to reflect comments received. The paragraph should commence "waste may be.."

**(v) Key Diagram and Proposals Map**

(i) Does the Key Diagram meet the requirements specified in PPS12 & PPS10?

The key diagram is considered adequate.

(ii) Is the Proposals Map clear and adequate, in terms of the guidance in PPS12 & PPS10?

The proposals map is considered clear and adequate, though the Council has suggested that additional context could be added to clarify the exact locations and context of the sites.

## APPENDIX 1

Proposed text changes to reflect the publication of the Panel Report on the South East Plan.

As a result of the publication of the Panel Report a number of minor changes are proposed to the text of the WDPD.

Paragraph CS22

**CS22** London currently has limited capacity for waste processing and recovery (with recycling dominated by building industry capacity) and very little landfill capacity. The SE Plan assumes that London's exports to the region will decline over the period of the strategy and be limited to landfill waste and use of materials in landfill restoration that cannot be recycled or recovered within London, or residues of processing and treatment. Milton Keynes currently does not take any of London's waste. Policy W3 of the SE Plan seeks to apportion levels of London waste to be dealt with by each WPA in the South-East..

**CS23** The SE Plan states that Milton Keynes should provide for landfill capacity for 10.1% (1 million tonnes in total between 2016-2025) of London's exported waste into the South East. The Council objected to the apportionment and this was considered at the Examination in Public to the SE Plan. The Panel Report recommends a single apportionment and a revised apportionment of 10% for Milton Keynes. There is no consideration of the amount of waste that equates to. The Panel Report is not a statement of Policy and changes to the Plan will be subject to further consultation. The Council maintains its objection to the level of apportionment proposed but is fully committed to working with SEERA and other bodies to quantify the waste arising from London to determine the impact on Milton Keynes.

**CS45** To deliver this policy, it is considered that much of this capacity is already in place. There is enough non-hazardous landfill void to provide for disposal of residual waste and for a continuing but declining landfill capacity. We currently have enough capacity for recycling. However, further facilities for treatment of waste to reduce the need for landfill is required. Also further composting will be required, such as in-vessel composting of food waste. Also to increase recycling, two further Community Recycling Centres will be required and we need to allow for an increase in the recycling of commercial and industrial and construction and demolition waste. Specialist facilities and agricultural waste requirements maybe required. The future is uncertain. However, the wording of policies in the development control policies should allow for such sites to be considered through the life of the document.