

Milton Keynes Waste Development Plan Document

Public Examination October 2007

Topic Paper 3 – Schedule of Comments, Responses and Minor Amendments

MILTON KEYNES COUNCIL'S RESPONSE TO REPRESENTATIONS RAISED

RESP NO	REP NO	COMMENTS MADE	MKC RESPONSE
1	1	Objects to the Jacobs and Babbie Plan to allocate 1m cubic meters of London's waste to the Bletchley landfill site. An alternative method of disposal should be found.	<p>Paragraph CS22 of the WDPD refers to the Jacobs Babbie Report (October 2006). This was used to inform the emerging South East Plan and the approach to apportionment of levels of imports of London's waste for each constituent authority. A further revised Report was prepared by Jacobs Babbie (December 2006) to inform the examination into the South –East Plan. The Council objected to the apportionment and has not made specific provision in the WDPD to deal with waste from London although there is in-built flexibility in the capacity analysis should this be required.</p> <p>NO CHANGE REQUIRED TO THE WDPD</p>
2	2	Concerns over wheelchair access to wheeled bins. This should be considered before the black sack collection is replaced.	<p>This is a waste collection matter and falls outside the scope of the WDPD.</p> <p>NO CHANGE REQUIRED TO THE WDPD</p>
3	3	There is no mention of commercial waste. Recycling for small businesses is almost impossible under the current system	<p>The WDPD addresses all types of waste in sections CS18-CS38 and addresses commercial and industrial waste in terms of recycling and composting targets, average annual tonnages to be managed and additional capacity required at 2015.</p> <p>NO CHANGE REQUIRED TO THE WDPD</p>
4	4	The site is too close to the City Centre and on the wrong side of the A5 for possible railway	<p>It is not clear what site is being referred to. The Strategic Site at Colts Holm Road is in close proximity to the rail network and the</p>

		access	<p>Reserve site at Wymbush is located on the opposite side of the A5. The WDPD (Policy WDC3) states that proposals for waste management development must be accompanied by a TA and should wherever practicable make use of rail in preference to transporting waste by road.</p> <p>The sites were appraised as part of the Sustainability Appraisal and deemed the most acceptable.</p> <p>NO CHANGE REQUIRED TO THE WDPD</p>
5	5	Objects to Milton Keynes Councils policy for no incineration. He states that this decision was taken some years ago when such plants were less efficient than they are today. The policy needs to be reassessed in the light of the latest developments in incineration techniques.	<p>The WDPD does not make specific provision for any type of technology. It is generic and flexible enough to deal with any changes arising in terms of appropriate waste management facilities. EfW is referred to in Appendix 3, Waste Treatment Options which sets out a “user friendly” guide to the technologies.</p> <p>NO CHANGE REQUIRED TO THE WDPD</p>
6	6	Network Rail does not consider the document to be unsound but reserves the right to comment on specific development applications, particularly those within 250 meters of Network Rail land.	<p>Network Rail raises no objection but reserves the right to comment on specific development applications, particularly those within 250 metres of Network Rail Land. Comments noted.</p> <p>NO CHANGE REQUIRED TO THE WDPD (Note: Milton Keynes Council has consulted Network Rail on the site allocation representations.)</p>
7	7	Lack of consideration of the impacts of the preferred site on Haversham residents in the Waste DPD. The existence of Haversham village and its proximity to the preferred site is not mentioned in the submitted document.	<p>This representation relates to the WDPD not considering Haversham Residents in the context of the Strategic Waste Site proposed at Old Wolverton.</p> <p>The allocation of this site has been in the public domain for a</p>

	<p>Paragraph CS16 refers to adverse effects on the quality of life for nearby residents but nearby is not defined. Consideration of potential impacts on Haversham residents should be explicit in the document</p>	<p>considerable period of time and the relationship with the surrounding area was considered under the scoring mechanism for sites and waste site suitability criteria (Appendix 4).</p> <p>A variety of sites were put forward by industry, landowners and the Council's Waste Section in February 2006, these include sites for larger treatment facilities and additionally as site was put forward by Milton Keynes Council Waste Planning Authority. The larger sites were assessed using the site suitability criteria and also looking at the size of sites required. This process was fully documented in the Preferred Options Document. The full results with site plans are set out in the Annex.</p> <p>A total of thirteen sites were assessed along with a review of waste management facilities for final treatment. An appropriate footprint was determined to provide flexibility in terms of built development and also flexibility to accommodate generic waste treatment options.</p> <p>The impacts arising from the various options were regarded during the sustainability appraisal exercise and all the key factors were taken into account [check emissions].</p> <p>The residents have had an opportunity to comment on the current and emerging documents and these comments have been taken on board. Potential impacts arising from the development of the strategic / reserve sites would be addressed at the planning application stage and particularly through Policy WDC1.</p>
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			CONCERNS COULD BE ALLEVIATED BY THE PREPARATION OF A PROPOSALS MAP AND ADDITION TO THE SITE CONTEXT
7	8	This objection is linked to the Ms Furniss' previous representation. The potential impacts on Haversham are noise, odour, visual impact, and traffic congestion. These should be included on page 34 as key criteria to be addressed for the preferred site.	<p>Policy WDC3 addresses specific impacts arising as a result of traffic. Issues relating to noise, odour and visual impact would be considered under Policy WDC1.</p> <p>CONCERNS COULD BE ALLEVIATED BY ADDITION TO THE SITE CONTEXT WORDING</p>
7	9	The submission document selects a preferred site before the type of plant has been decided. How can a judgment be made as to whether this is 'the most appropriate in all circumstances' or if it is 'founded on a robust and credible evidence base, when only part of the plan is known? Without knowing the type of plant to be installed, how can these assessments be properly made?	<p>In identifying appropriate sites for future waste management activities, the Council developed a waste site suitability assessment, as set out above. The sites set forward are sufficiently large in footprint to accommodate generic waste developments, allowing flexibility to address changes in waste management technology through the Plan period. This is wholly consistent with the approach set out in PPS10 Companion Guide which states “</p> <p>NO CHANGE REQUIRED TO THE DPD THE PLAN MEETS THE TESTS OF SOUNDNESS: 4, 6 & 9</p>
8	10	Policy WDC4 is weakly worded. Mr. Coppock suggests it should read "Proposals for the restoration will be permitted where they satisfy existing policies for "	<p>The Plan is considered to be sound but comments are proposed that WDC4 is weakly worded. Amendments are suggested to strengthen the policy.</p> <p>SUGGESTED MINOR AMENDMENT:</p> <p>Proposals for restoration will be permitted where they <i>satisfy</i>:</p> <p>b) the need to protect agricultural land where that is appropriate</p>

9	11	<p>Policy WCS1 sets out the waste management capacity required to deal with locally arising waste. No allowance for London's waste is included. Failure to comply with RSS9.</p>	<p>Bedfordshire County Council is concerned that the WDPD does not make provision for was for London and this may result in pressure on other authorities to make up the deficit.</p> <p>Policy W7 in the Draft South East Plan sets out the estimate of tonnages of waste to be managed in each sub-region. The figures provided are for MSW and C&I waste and are replicated in Table WCS3 in the WDPD. The additional capacity requirements are set out in Table 1 in the South East Plan (Section D6) and are replicated in Table WCS4 in the WDPD.</p> <p>Policy W3 in the South East Plan addresses regional self-sufficiency and recommends an apportionment figure for London's waste.</p> <p>Table WCS5 in the WDPD looks at the landfill requirements and surplus in capacity at 2015 and identifies 13.7 million tonnes surplus capacity at 2015, showing flexibility to provide for imports should the need arise.</p> <p>Prior to the examination into the South East Plan in October 2006, Jacobs Babtie prepared an additional paper for discussion purposes. This suggested maintaining the status quo for those LPAs not currently taking London waste and apportioning relative contributions thereafter.</p> <p>The Council objected to the apportionment on a number of basis and maintains that position in the absence of the Panel Report into the South East Plan. It is understood that this will not be</p>
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			<p>available prior to the Examination and to make provision for 10.1 million tonnes would, in this context, be premature.</p> <p>This aside, table WCS5 identifies capacity and provides necessary flexibility without making specific provision for London's waste.</p>
10	12	<p>Supports the aims of WDPD (CS39) for an in-vessel composting facility. However, they wish to clarify -1) That such a facility should be attached to an existing or new green waste composting facility in the locality.2) That food waste should be kept separate from green waste at the point of collection.</p>	<p>It is proposed by the respondent that an in-vessel composting facility should be attached to an existing or new green waste composting facility in the locality. The green waste composting facilities are referred to in CS25 and they currently use the compost on the farms.</p> <p>The strategy of the WDPD is to provide flexibility throughout the life of the Plan and provision is made in WCS2 to locate these facilities where they can serve a local need which cannot be met by existing facilities and no suitable sites are available in employment areas close to the source of waste. This does not preclude links to an existing or new green waste composting facility but is would be contrary to main thrust of the strategy to provide specific support over employment land.</p> <p>The WDPD cannot address the issue of separation of green waste and food waste, this is a matter for the Waste Disposal /Collection contracts.</p> <p>NO CHANGE REQUIRED TO THE WDPD (PARAS CS25, CS39 AND CS47 REMAIN AS IS)</p>

10	13	<p>They support the aim stated in CS47 for facilities to be located close to the source of waste to minimize road transport. Waste for composting produces fertiliser which will be spread on agricultural land. It is suggested that composting waste is best composted "on-farm" from where it can be spread directly onto the fields without the further transport. This is more sustainable than transporting the composted material out to rural areas. Policies should recognise this.</p>	<p>Waste composting can take place under aerobic or anaerobic conditions. Aerobic composting takes place in open air and is appropriate to be undertaken in an open / rural environment such as a farm. Anaerobic digestion takes place in a closed environment and may be more suitable for an employment land allocation.</p> <p>The guiding principles are sufficiently flexible to be able to be accommodate composting facilities. CS47 may benefit from a minor wording change to include reference to composting and in particular on-farm composting.</p> <p>Policy WDC2 may benefit from a minor wording change to refer to proximity to end use e.g farm composting</p>
11	14	<p>Supports the aims of WDPD (CS39) for an in-vessel composting facility. However, they wish to clarify - 1) That such a facility should be attached to an existing or new green waste composting facility in the locality. 2) That food waste should be kept separate from green waste at the point of collection.</p>	<p>See 10/12</p>
11	15	<p>They support the aim stated in CS47 for facilities to be located close to the source of waste to minimize road transport. Waste for composting produces fertiliser which will be spread on agricultural land. It is suggested that composting waste is best composted "on-farm" from where it can be spread directly onto the</p>	<p>See 10/13</p>

		fields without the further transport. This is more sustainable than transporting the composted material out to rural areas. Policies should recognise this.	
12	16	The authority/ DEFRA suggestion of joining with Northamptonshire is some what strange - would an alliance with Bedfordshire or Bucks be advantageous?	<p>The WDPD addresses neighbours and partnership working at CS41-CS44. In so doing the WDPD reports a decision taken to work with Northamptonshire, as a result of the development of an appropriate business case. The WDPD recognises that there is potential to work with other LPAs.</p> <p>This does not affect the soundness of the Plan and recognises the potential economies of scale in linking up with Northamptonshire.</p> <p>Bedfordshire County Council is adopting a policy of self-sufficiency (i.e. no imports) and Buckinghamshire County Council is not seeking joint-working as a means of managing its waste.</p> <p>NO CHANGE REQUIRED TO THE WDPD.</p>
13	18-23	<p>The DPD does not have a clear approach to implementing and monitoring the use of biomass. It is suggested that the DPD could set out spatial actions that the council could use to bring forward Biomass schemes on its own and in partnership with others.</p> <p>Paragraph CS45 states that no provision will be made for London's waste in policy WCS1. This does not accord with alterations to RPG9 (June</p>	SEE TOPIC PAPER 3

	<p>2006) Policies W3 and W4, which state that capacity should be provided for dealing with waste from London. The approach also does not accord with paragraph CS17 of the Core Strategy. Policy WC31 does not accord with RSS and therefore does not comply with the advice in PPS12 (paragraph 2.10). In addition, PPS10 (paragraph 16) states that the core strategy should set out policies in line with the RSS. A change should be made in accordance with the above.</p> <p>The DPD does not set out the circumstances that would result in a Reserve site being released to meet capacity requirements. A Policy approach could be set out in the core strategy to set out the circumstances that would result in the release of a reserve site, along with the relevant monitoring process.</p> <p>GOSE are unclear how this criterion I of Policy WCD 1 could be implemented and monitored. It could go against natural justice with potentially individuals being treated differently by a public authority.</p> <p>This policy appears to be a matter of process rather than policy.</p>	
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14	24-26	<p>An issue of non-general conformity has been identified by the Assembly. The core strategy does not make provision for the disposal to landfill of a proportion of London's waste, as required by Policy W3 of RPG9 (June 2006), and insufficient evidence has been provided to justify this position.</p> <p>To ensure alignment with Policy W16, it is recommended that policy WDC3 be strengthened by the inclusion of a policy or policy reference that ensures waste transport infrastructure, including sites for waste transfer and bulking facilities are safeguarded.</p> <p>SEERA would expect to see policy provision for management of hazardous waste in the MK WDPD to address this policy gap in line with policy W15 of the draft South East Plan and RPG9 (adopted alterations). If hazardous waste policy is to be included in other DPD/ SPD's appropriate cross references must be made in the waste core strategy.</p>	SEE TOPIC PAPER 3

15	27	Fully support the content of the WDPD	In support of the WDPD. NO CHANGE REQUIRED TO THE WDPD
16	28	<p>On page 64 no evidence is given to justify why Milton Keynes Council policy opposes the use of mass burn incineration. Cost/ benefit analysis is needed to relate potential treatment options to fines and potential council tax increases. The need to evaluate new technologies is repeated elsewhere in the report (page 16) and a review of the 'no incineration' policy is needed. Incineration offers the potential of Energy from waste and careful siting of a plant could enable the MRF and EFW on the same site, reducing transport demand. Landfill sites have a very short future and alternative treatments will be essential within the life of the plan. It is inappropriate for the Council to commit to a negative policy at the outset of a 20 year plan, which could lead to loss of opportunity to introduce new technology in a timely fashion. This policy should be amended to require periodic review of new treatment methods.</p>	<p>The Council addresses the need for facilities for final treatment in a generic way. Policy WCS2 makes provision for waste management capacity to 2026 and includes a strategic site for a waste management facility for final treatment.</p> <p>Final treatment is defined as:</p> <p><i>Final treatment process i.e the processing of residual wastes left after sorting for recycling or composting such as advanced thermal treatment, mechanical biological treatment etc.</i></p> <p>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 the increase waste minimisation, re-use and recycling and promote facilities which maximise front-end recycling.</p> <p>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 the waste is burnt with an excess</p>

			<p>of oxygen, usually on a grated leaving behind ash,</p> <p>However, there is no reference to types of technology in the plan which ensures that it remains flexible enough to accommodate emerging technology as the plan period unfolds.</p> <p>NO CHANGE REQUIRED TO THE WDPD</p>
17	29-31	<p>Objects to the allocation of Colts Holm Road as a new waste facility, as there are other more appropriate sites.</p> <p>The document does not have proper regard to Policy E1 of Milton Keynes Local Plan</p> <p>The Core strategy has not been finalised and so the DPD cannot conform to it and is therefore premature.</p>	<p>Policy E1 in the Milton Keynes Local Plan relates to protection of existing employment land. The policy seeks to ensure that such land is protected. The sites at Colts Holm Road and the site at Wimbush are on employment land. Employment land is defined as B1, B2 and B8. Waste uses of the type envisaged are sui-generis and as such there is a potential conflict with this policy. However, a waste use will satisfy the three criteria listed.</p> <p>Advice has been sought from GOSE on submission of the WDPD in advance of the Core Strategy and no issues have been raised in respect of prematurity.</p> <p>NO CHANGE REQUIRED TO THE WDPD</p>
18	32-35	<p>Final Treatment plant - The options for the reserve site (Garamonde Drive) refer only to a waste management facility, and in a way which can be interpreted as not including the final treatment plant. If the interpretation is that Colts Holm Road is suitable for final treatment, a clear and credible reserve is needed for final treatment provision.</p> <p>The collection of kitchen waste for composting</p>	<p>In respect of the Strategic Waste Site and Reserve Site Allocation, it was never intended that the reserve site would not be able to accommodate a similar scale / type of facility to that at Old Wolverton. Waster management facility is defined in the Glossary as a site or plant intended for the processing or disposal of waste.</p> <p>MINOR CHANGE PROPOSED TO A8 TO INCLUDE REFERENCE TO <i>facility for final treatment</i></p> <p>It is not the Council's intention to continue to haul waste to High</p>

	<p>is currently taken to High Heavens at Wycombe. Aylesbury Vale's view is that it will need a treatment plant, and one which is compliant with the Animal Bi-product Regulations which provides 'in-vessel composting'. The authority objects to hauling Kitchen Waste from Milton Keynes through Aylesbury Vale and suggests the inclusion of a treatment plant in the MKC area..</p> <p>London Waste - Aylesbury Vale are concerned that in the event that MKC is successful in resisting London's Waste, this merely moves the problem elsewhere. This could impact the Bucks Waste Strategy. Aylesbury Vale are also concerned the Bletchley Landfill site is only served by road and the lack of detail as to how the site will be safeguarded for even MK waste.</p> <p>There is no mention of the possible 'overspill' growth from MK into the Newton Longville area, and where that waste would go. It would seem logical to consider whether waste from the expanded Newton Longville area should be treated in the MK area where the facility is close at hand. This potential conflict between the growth of MK into the Aylesbury Vale District and the principle of net self-sufficiency was raised by AVDC at the Preferred Options Stage.</p>	<p>Wycombe, hence the food waste trial. If that is successful the WDPD proposes that a specific facility should be located in Milton Keynes.</p> <p>The Council has had due regard to neighbouring authorities and the impact of policies on those areas. The Council is satisfied that explicit provision to take London's waste is premature in advance of the final South East Plan. Dealing with London's waste is a collective responsibility and the South East Plan will clarify the position on apportionment.</p> <p>SEE WORD CHANGES PROPOSED ABOVE</p> <p>The WDPD safeguards the Bletchley Landfill site, however it is not possible, given market conditions, to include a policy which restricts the site to taking only waste from Milton Keynes.</p> <p>The WDPD is dealing with waste from Milton Keynes. The Council does not consider it appropriate to make provision to take waste from Aylesbury Vale albeit that waste may be deposited at Bletchley landfill site as part of an alternative commercial arrangement with the site operator.</p> <p>NO CHANGE REQUIRED TO THE WDPD</p>
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		It was suggested, in the long-term, waste arising from this may be dealt with in MK outside the net self-sufficiency vision.	
19	36	Support the content of the WDPD	No specific response received. NO CHANGE REQUIRED TO THE WDPD
20	37	The views of members of the Old Wolverton Residents' Association at a meeting with Milton Keynes Council Officers were not sufficiently taken into account. Only 9 objections were reported. The concentration of the facility on one site is 'placing all our eggs in one basket'. The parish council suggest using smaller sites to serve the two halves of Milton Keynes. Another concern is that the plant seems to be getting the go-ahead without the type of treatment that will occur on the site being determined. The parish council also suggest the facility will place more strain on the road network, especially the Old Wolverton Road. The best option for a waste treatment plant would be to locate it in a new growth area of the city where the roads are carefully designed to cope with additional traffic congestion caused by the Waste Facility. Site F is a choice of site that does not sufficiently take into account the Development Control Committee's approval of	The strategic and reserves sites have been thoroughly appraised as part of the plan preparation process and the views of residents have been taken on board. These residents have had the opportunity to comment on the WDPD at all stages. The site has been chosen as it is deliverable and the treatment has not been specified to ensure that the Plan remains flexible. This allows emerging technologies to be factored in through the life of the WDPD. The respondent provides no realistic alternative. The growth areas referred to already have planning permission and no suitable sites have come forward in those locations. The Preferred Options on the Core Strategy say that future major growth is likely in the south west and south east but this is not certain. The Council has had due regard to the development referred to in Old Wolverton. The nearest residential property to the existing building will be some 400m away.

		400 new homes in Old Wolverton.	NO CHANGE REQUIRED TO THE WDPD
21	38	<p>The document does not reflect the legal planning status of Bletchley Landfill Site and is not consistent with emerging regional policy. MKC should acknowledge that accepting imported waste from outside the area is a possibility. The text should be changed to:</p> <p>1) Acknowledge that Bletchley Landfill Site will shortly be accepting substantially increased imports from outside the Milton Keynes area, including London, in accordance with the planning consent granted by the Council in 2002.</p> <p>2) Recognise that in accordance with emerging regional policy Milton Keynes will be expected to continue to receive a proportion of London's waste throughout the Plan period, albeit the actual level of the apportionment is still a matter of debate.</p> <p>3) Reflect the fact that the importation of waste from outside the Borough is not inconsistent with the need to ensure provision for Milton Keynes' own landfill requirements throughout the Plan period</p> <p>1) It is proposed that WA1 be modified to</p>	<p>The WDPD correctly states that the landfill has planning permission to 2022. Planning permission was refused to extend the life of the site but it is still the case that the site's life is likely to extend and a further planning application may be determined favourably. It is too early to predict with accuracy at this stage.</p> <p>The Council recognises that the site can receive imports from outside of the Borough but that is a commercial consideration and it is not considered necessary to amend the plan.</p> <p>The issues relating to importing London's waste are dealt with above and in Topic Paper 1.</p> <p>The site at Bletchley has been considered through the plan preparation process and as part of the sustainability appraisal. The Council has appropriately identified the site to be safeguarded but remains of the view that it is not the most suitable location for a built strategic waste facility.</p> <p>The Council does not accept that WA1 should be modified to include this site.</p> <p>Policy WCS2 relates to provision for waste management capacity. The Policy is deliberately worded to ensure the WDPD is flexible enough to accommodate various types of waste facility.</p> <p>The Council is satisfied that the Strategic Site is deliverable and</p>

	<p>identify Bletchley Landfill site as a third potential option for the location of a strategic waste management facility. As a site that clearly might be suitable, there is no logic in excluding it from the options at this stage. It would satisfy commercial and environmental requirements.</p> <p>2) Policy WCS2 should be more specific about the type of facility envisaged and the alternative sites reviewed on that basis. However, expanding the number of options will at least increase the likelihood of an appropriate solution.</p> <p>It is considered that the change is necessary to make the Plan more robust and achievable, in accordance with the guidance in PPS 10, by increasing the range of sites available for a primary treatment facility.</p>	<p>proposes minor changes to A8 and A13 to reflect the up to date position:</p> <p>A8 <i>Delivery:</i> <i>The Council's Cabinet resolved on 6 March 2007 (C220)</i></p> <p><i>(1) That the Head of Legal Services be authorised to take all steps necessary to secure the making and implementation of a Compulsory Purchase Order under section 226(1)(a) of the Town and Country Planning Act 1990 (as amended) and / or any other enabling statutory provisions deemed appropriate by him, in order to acquire all interests in the 39,000 sq metres of land shown edged red on the plan and known as the Colossus at Colts Holm Road, Old Wolverton, Milton Keynes MK12 5QG ("the CPO Land"), including the publication and service of all statutory notices and the presentation of the Council's case at any public inquiry.</i></p> <p><i>(2) That the Head of Legal Services be authorised to acquire all interests in the CPO Land either by agreement or compulsorily and approve agreements with owners of interests within the CPO Land, including the making of any arrangements for the relocation of any occupiers.</i></p> <p><i>Currently the Milton Keynes Council is under negotiation to purchase the site.</i></p> <p><i>The site's potential to accommodate strategic waste uses will be safeguarded through the planning process. It is</i></p>
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			<p><i>anticipated that the site will come forward for use as a residual waste treatment facility in 2012/13. This date could be brought forward if an alternative or simpler waste plant was proposed. A reserve site has been identified in case the Old Wolverton site is not available.</i></p> <p>A13 Delivery: <i>This option could be delivered through public and private sector investment, separately or potentially in partnership. Delivery of this site will be based on a sequential approach, which considers first the availability of Option 1. It is anticipated that the site will come forward for use as a residual waste treatment facility in 2012/13. This date could be brought forward if an alternative or simpler waste plant was proposed.</i></p>
22		<p>Incorrect wording of references to the Brooklands Ridge.</p> <p>They recommend the following - Delete reference to Brooklands Ridge from Figure W1 Item 8, page 17; Delete reference of Brooklands Ridge from Figure W1 "Current Waste Sites in Milton Keynes"; Reword and merge paragraphs CS31 and CS32 to form a new paragraph (As stated in full</p>	<p>Figure 1: Table and Map Figure 1 is a list of all current sites in the Borough that are used for various waste and recycling activities. The location of the sites is shown diagrammatically on a plan that does not have the status of a Proposals Map. We think the Brooklands site should be retained in Figure 1 as it is part of the current position, but we propose listing it under a new sub-heading that will make clear that it does not have permission for general landfill.</p> <p><u>Suggested amendment</u> Instead of being listed under 'Inert Landfill Sites', the Brooklands</p>

	<p>on written representation)</p> <p>Incorrect wording of references to the Brooklands Ridge.</p> <p>They recommend the following - Delete reference to Brooklands Ridge from Figure W1 Item 8, page 17; Delete reference of Brooklands Ridge from Figure W1 "Current Waste Sites in Milton Keynes"; Reword and merge paragraphs CS31 and CS32 to form a new paragraph (As stated in full on written representation)</p>	<p>site would be listed under a new sub-heading 'Inert Landraising (to form Acoustic Ridge)'</p> <p>Paragraph CS31 We propose revised text to explain the purpose and status of the Brooklands ridge. The text reflects the decision by MKP and the estimated amount of inert material that will need to be imported on to the site to create the ridge. This figure is taken from the report by Peter Brett Associates (Design Rationale of Brooklands Ridge, Sept 2006 - para 3.5.11). We do not consider that it is necessary or appropriate to comment on the relative sustainability or otherwise of the Brooklands proposals, but simply to reflect the factual situation.</p> <p><u>Suggested amendment</u> Amend CS31 to read, after "... restoration at quarries":</p> <p>"Surplus soils from development sites are increasingly re-used on site to form acoustic bunds and create landscape screening. A planning application at Brooklands in the Eastern Expansion Area has recently been granted resolution for approval by Milton Keynes Partnership for housing, employment, commercial uses and community uses with an ancillary acoustic ridge. This acoustic ridge, which will be designed and constructed to provide noise attenuation and public open space for the scheme, will have the capacity to accommodate approximately 408,000 cubic metres of clean inert material imported from other development sites primarily from the Milton Keynes area. "</p>
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			<p>Paragraph CS32 We think it is important to explain where material will come from to create the ridge but agree that the figures in para CS32 may change as sites come forward for development in the city. We note MKP’s view that the source and nature of material can be controlled as part of the ridge management plan required as part of the S106 agreement for the site. We proposed retaining para CS32 with some revise wording.</p> <p><u>Proposed change</u></p> <p>“The Brooklands planning application estimated that within Milton Keynes 132,800 cu m per annum of inert material would be generated from residential development and 65,200 cu m per annum from commercial / industrial development during the period of construction of the ridge. These figures may change as sites come forward for development in the city. The source and nature of the material used to create the ridge will be controlled through a legal agreement that will accompany the planning permission for the Brooklands area. The total from these sources (198,000) is similar to the amount of inert material currently disposed of at Bletchley Landfill Site. The adopted Minerals Local Plan ...”</p>
23		Imposes unnecessary requirements on anyone preparing the required transport assessment, therefore all reference to rail, canal, conveyor, pipeline as an alternative to road transport needs to be deleted.	The Council considers that policy WDC3 addresses sustainable transportation and the use of transport assessments will ensure that due regard is given to alternative means of transporting waste around the Borough. The Council does not consider this too onerous or unreasonable in policy terms.

			NO CHANGE REQUIRED TO THE WDPD
24		Support the content of the WDPD.	NO CHANGE REQUIRED TO THE WDPD
25		<p>Cllr Irons states that the consultation process has been flawed in that not enough notice has been taken of the responses from the people of Old Wolverton.</p> <p>Cllr Iron fully accepts that a site is needed for Milton Keynes but feels that the Council has taken insufficient notice of local conditions when deciding on this option.</p> <p>Not enough account has been taken of the proposals to build 95 dwellings, in the area known as Electric Park, and 300 dwellings being built in Railway Park. Both sites are adjacent to the Old Wolverton Road.</p> <p>The Cllr disagrees with the 5 allocated to the Colts Holm Road site in the Transport and Access Suitability criteria. (See accompanying diagram).</p>	<p>The consultation process has not been flawed. The Council has undertaken a wide range of consultation in respect of the site at Old Wolverton. This has included publicity on the various stages of the Plan and public meetings in Old Wolverton.</p> <p>The Council has had due regard to residential receptors through the sustainability and site selection process.</p> <p>Residents in Old Wolverton have had an opportunity to comment on plan and at preferred options and submission stages and very few representations have been received.</p> <p>There will be no additional waste movements as a result of a facility in this location. Collection vehicles already travel to the MRF, located opposite the site and the same vehicles carry recycled and residual waste. There are only a small number of vehicles associated with removing the end product.</p> <p>The site is currently a distribution unit and generates more vehicle movements.</p> <p>NO CHANGE REQUIRED TO THE WDPD</p>
26		<p>Brooklands Ridge</p> <p>The Ridge has a capacity to accommodate</p>	<p>For the reasons set out above (at Rep..) the Council considers it wholly appropriate to refer to the site as a landfill site.</p>

	<p>approximately 408,000 cubic meters of clean inert material which will be sourced from the Eastern Expansion Area and other sites primarily from the Milton Keynes area. In light of this and its planning background, it is not considered appropriate to refer to the Ridge as an inert landfill site as it does not have permission for general landfill.</p> <p>Further information should be given to prevent any confusion about its status within the document.</p>	<p>Need to check quantities..</p>
<p>27</p>	<p>CS35 indicates that hazardous waste is transported away from Milton Keynes because it needs large specialised facilities. This is not the case, as Advanced Thermal Processes with energy recovery can be economic from about 600 tpa using proven pyrolysis.</p> <p>Dreh Resources Ltd are proposing an advanced thermal process that will be located in an existing B2 building on an industrial estate in North MK and consistent with CS47 and CS48.</p> <p>CS17 points out that a planning approval has previously been made for a clinical waste processing plant at Lyon Road, Bletchley, but</p>	<p>The Council considers that the use of the word “generally” in this sentence (CS35) is sufficient so as not to mislead that all hazardous waste is dealt with at such facilities. The fact it is generally market led makes it difficult to plan for, though criteria against which proposals may be considered are set out in the Development Control Policies.</p> <p>NO CHANGE REQUIRED TO THE WDPD</p>

		was never put into operation.	
28		<p>Mass burn incineration has been excluded from consideration for no good economic or ecological reason. This option (with associated energy from waste recovery) should be evaluated on equal terms with other processes.</p> <p>The apportionment of London Waste to be dealt with here conflicts with the policy of disposing waste near to its source. All London waste should be processed within the London boundary and only treated waste transported elsewhere.</p>	<p>See comments at Rep</p> <p>No specific technology is referred to in connection with the proposed sites to provide maximum flexibility.</p> <p>The comments re London's waste are noted.</p> <p>NO CHANGE REQUIRED TO THE WDPD</p>
29		<p>Information contained on Autoclaving as a waste treatment solution is incorrect.</p> <p>Autoclaving has been used as a method for treating municipal waste for several years in the US. Sterecycle firmly believes that autoclaving will form a major part of the solution to the municipal waste problem in the UK going forward. The Sterecycle process, delivered waste is not sorted or shredded prior to loading into the autoclave vessels.</p> <p>Plastic deformation does not happen to the extent whereby dense plastics are deformed</p>	<p>The Council proposes a minor amendment to reflect the fact that there may be difference types of autoclaving processes:</p> <p><i>Paragraph 2 on autoclaving should read:</i></p> <p><i>Waste may be....</i></p>

	<p>making them difficult to separate and market.</p> <p>Sterecycle is currently in the process of constructing its first full-scale facility in the UK.</p> <p>Therefore, the position of the Autoclave information on page 65 of Appendix 3 is extremely misleading. Autoclaving should sit above MBT since the "floc" from an MBT process is generally contaminated with plastics, whilst the Autoclave fiber is 98% biomass and has many more uses.</p>	
<p>30</p>	<p>A6 states the nearest residential properties are approx. 400 metres away. However, planning permission had been received for 300 new dwellings and a commercial conversion at Wolverton Park whose access is 100 metres from the entrance to Colts Holm Rd.</p> <p>Permission is also due to be granted for a further 95 residential and 3 office units on the former EMEB site, which is closer to Colts Holm Rd than the Galleon Estate. This will produce increased traffic on the Old Wolverton Rd.</p> <p>Both of these developments should be taken into account when assessing the suitability of the proposed site.</p>	<p>The Council has had due regard to the proposed new development, the nearest property within the site is some 400 metres away.</p> <p>The Council's Highways Engineer also considered the site and the site scored 5 as the access is in a good location off a low speed road and has a good surrounding road network.</p> <p>NO CHANGES EQUIRED TO THE WDPD.</p>

		<p>DC6 States that 'HGV movements should generally be restricted to the primary road network'. No one would consider the Old Wolverton Rd to be an acceptable part of the network.</p> <p>DC7 pays lip service to the use of rail and water in preference to road. The associated cost of building such facilities would be too high.</p> <p>DC10 - The proposal fails the criteria laid down for any Transport Assessment.</p>	
31		<p>Policies are generally reflective of current and emerging HA DC Policy.</p> <p>The Highways agency wishes to be consulted on any waste development site proposals coming forward to support the WDPD.</p>	NO CHANGE REQUIRED TO THE WDPD
32		Supports incineration	NO CHANGE REQUIRED TO THE WDPD
33		Supports the WDPD and wishes to be involved with its implementation, particularly individual responsibility for recycling.	NO CHANGE REQUIRED TO THE WDPD
34		Opposes Milton Keynes Council's anti incineration policy. The council's opposition to	See comments in relation to Rep

	incinerators is misplaced in logical terms.	NO CHANGES REQUIRED TO THE WDPD.
35	<p>Existing landfill capacity should be managed to last as long as possible. Para CS31 is incorrect.</p> <p>Restoration of quarries should not be considered a greater priority than landraising and should be adopted where appropriate.</p> <p>The capacity outlined in table WCS6 is unlikely to be sufficient for inert waste generation over the plan period. It is inadequate to say that further monitoring will identify any future need and will be considered under D.C Policies. Extra provision should be made now.</p> <p>The Calculation of generated volume is difficult. Precise data on inert wastes are notoriously hard to acquire.</p> <p>Development outside the area should be noted as it may lead to greater than expected inert waste generation in London than can be absorbed there. The policy should be based on having the capacity to absorb extra amounts of inert waste, i.e. 20% of likely annual generated amount</p> <p>MK needs to provide spare disposal capacity or</p>	<p>The capacity assessment in CS31 is complete and up to date.</p> <p>The provision of landraising schemes can result in situations where the restoration of sites with planning permission is prejudiced. This is not an unusual situation or aim.</p> <p>NO CHANGE REQUIRED TO THE WDPD.</p>

	<p>developers will be faced with unnecessarily expensive tipping charges.</p> <p>They support CS37, 38 and 39.</p> <p>Ref. CS45 - It is important for authorities with potential spare capacity to allow it to be used by those without e.g. London.</p>	
36	No comment	NO CHANGE REQUIRED TO THE WDPD
37	<p>1) Little mention of waste minimisation. Could have a significant impact on collection and disposal requirement.</p> <p>2) Waste Strategy requires a much wider brief.</p> <p>3) The WDPD did not raise the topic of making adequate provision for the recovery of waste.</p>	<p>Paragraph CS9 talks about issues of reduction. Paragraph CS10 also addresses waste minimisation and recovery and the need to think about designing recycling into new facilities.</p> <p>The WDPD addresses a range of matters from waste reduction, covering all types of waste management, including bio-mass.</p> <p>NO CHANGE REQUIRED TO THE WDPD.</p>
38	Suggests abandoning the Bletchley Landfill site because of the noise and pollution.	<p>The site has a valid planning permission to 2022 and is monitored by the Council and Environment Agency. There are no current problems reported.</p> <p>NO CHANGE REQUIRED TO THE WDPD</p>