

WASTE DEVELOPMENT PLAN DOCUMENT

PREFERRED OPTIONS RESPONSES

Main comments raised and response

The main comments from the surveys, emails, letters and from exhibitions and presentations are listed below. The Council's response is in italics.

<p>Treatment Options</p> <ul style="list-style-type: none"> • Difficult to evaluate options without knowing treatment option.
<p><i>The Municipal Waste Strategy assesses different treatment facilities including addressing the Issues and Options survey responses regarding considerations for treatment facilities. This will be considered further when the Council considers its waste contract. We now need to consider where such facilities could be located. An appendix of the Submission Draft includes Treatment Technologies Descriptions.</i></p>
<p>Further information on waste arisings, capacities and waste streams</p> <ul style="list-style-type: none"> • More figs/info are required for different waste streams. • Impacts of surplus spoil from new developments needs to be addressed (comments from developers/agents) • Include waste water/sewage • Include hazardous waste treatment and remediation • Welcome policy approach to achieving regional and sub regional self-sufficiency. Policy should be strengthened to state requirements for MK for waste arisings and requiring management within MK, and declining amount of London's waste and commitment to meeting these.
<p><i>Further information is included which shows waste arisings, capacities of existing facilities and future requirements for different waste streams. Policies in the Core Strategy reflect these requirements.</i></p>
<p>The use of rail and water to transport waste</p> <ul style="list-style-type: none"> • The use of rail and water borne transport and appropriate provision should be encouraged particularly for large facilities. • Difficult to achieve transport of waste by anything other than road. • Should include emphasis on the use of a wider transport assessment. • The possible use of canal should be investigated. • Rail not realistic.
<p><i>Policy WDC3 addresses Transport Assessment and that planning applications must demonstrate that alternative methods to road transport have been considered.</i></p>

Importing Waste and Partnership working

- Concerns / support regarding partnership working with neighbours in terms of importation of waste.
- Working with other local authorities would be beneficial in terms of economies of scale and developing optimum environmental solutions.
- The suggestion that waste imports from outside Milton Keynes should be restricted to husband void space needs to be considered in the light of emerging regional policy.

Milton Keynes is a relatively small area, and to obtain economies and efficiencies of scale, it may be necessary to combine waste activities with neighbouring local authorities. The Council support working with others to ensure appropriate waste management solutions are joined up. This includes working and joining up facilities to provide the best economies of scale and all waste sectors working together, commercial and municipal. A balance is required to deal with waste from neighbouring areas and retaining the landfill for residual waste for Milton Keynes. This is in accordance with regional policy.

Development Control Policy

- Operator's past experience should be taken into account

This has been included in the Development Control Policy WDC1.

Number of treatment facilities

- There should be various sites to reduce vehicle distance congestion and impact on individuals
- Sites should be in all sides of Milton Keynes

In considering where such facilities should be located, six strategic options, which could potentially guide development were considered and appraised by the Sustainability Appraisal. The option, which performed best against 20 sustainability objectives, was a dispersed location of pre treatment and one site for final treatment.

Location of Sites

- Strategic site should be in new expansion areas – purpose built infrastructure and away from housing
- 5 miles outside of towns
- Away from houses
- Located to NE of Milton Keynes because of prevailing wind
- Near to M1
- Return journey of 5 miles is maximum acceptable distance for waste recycling sites
- Sites require good on site traffic management flows

Construction of the eastern and western expansion areas will commence shortly. The area of future growth beyond this period is unknown. Five miles outside towns will mean that it will be further away from the source of the waste and this would also be close to other settlements or even towns. We have considered Government and Environment Agency guidance that treatment facilities should be 250 metres away from sensitive receptors. No sites have come forward close to the M1. On site traffic management is

considered in Development Control Policies and in the Key Development Criteria for the Reserve Site at Wymbush. The policy is for dispersed locations for recycling sites.

Growth

- Limit growth to reduce need for additional waste
- Growth will add to waste problem
- We have enough of our waste, growth will mean importing more waste
- The impact on growth area should be shown on the Core Strategy Plan

The Submission Draft addresses growth issues and allows for this in its assessment of future requirements and safeguarding of sites. This is highlighted on the Core Strategy Plan (Key Diagram).

Sustainable design and construction

- Should be realistic in terms cost and practicability
- Should consider combined heat and power
- Object for large scale developments

Combined heat and power is considered under biomass in the Core Strategy.

Wolverton Strategic Waste Site

- Scoring - hydrogeology and groundwater risk scoring should be changed from 4 to 3.
- Right site and solution
 - Close to existing MRF
 - Could be an extension to MRF
 - Reduce vehicle movements across the city (as many lorries will have to travel from Wolverton to Bletchley as they do at present)
 - Accepted land use
 - Lorries already go here with the pink sacks
 - Good access to rail and canal for the transportation of waste
- Unknown technology
 - against incineration
 - timing of WDPD and waste procurement not lined up – what treatment will be used
- Distance from housing
 - Too close
 - Odour
 - Hours of working
 - Noise
 - Other amenity impacts
 - Fire risk (two previous fires)
 - Favourably located for prevailing winds
- Additional lorry movements
- Lorry movements not be compared to current position – as the city doubles, waste will double
- Already have additional vehicle movements with existing new developments and sand and gravel extraction will increase vehicle

movements

- Road not up to standard for vehicle movements or has the capacity
- Increased vehicle movements on Newport Road, New Bradwell
- Road on Colts Holm Road used as overnight lorry park
- Vehicles must come from V6 if goes forward

The scoring change does not affect the site as the preferred site. It is important to allow flexibility to provide the best option for the treatment solution. An assessment has been carried to consider an appropriate size footprint for a facility. PPS10 Companion Guide states, DPD, 'will not generally prescribe the waste management techniques or technologies', and, 'should normally avoid any detailed prescription of waste management technique or technology that would stifle innovation in line with the waste hierarchy'. It is considered that the vehicle movements will be minimal, as the waste collection vehicles take the recycling to the MRF, adjacent to the site. This will mean that instead of travelling across the city to deliver the residual waste to Bletchley Landfill Site (current process), the residual waste will be taken to this site. The majority of responses to the survey supported the option. Any planning application would include a Transport Assessment and Environmental Statement. The site would be regulated by Environment Agency, Environmental Health and Planning. It is considered that these could be controlled or mitigated against.

Wymbush Reserve Strategic Waste Site

- Too close to city centre
- Wrong side of A5 – cannot access rail spur
- Noise and dust for Bradwell Common
- Too central and too sensitive
- Poor alternative to Wolverton
- Too close to Lodge Lake
- Parking problems on estate
- A5 junction busy
- Busy road
- Proximity to parkland
- Lead to pollution over Milton Keynes (prevailing wind)

The site is considered to be the second most preferred site after carrying out a site assessment. The majority of responses to the survey supported the option. Any planning application would include a Transport Assessment and Environmental Statement. The site would be regulated by Environment Agency, Environmental Health and Planning. It is considered that these could be controlled or mitigated against.

Sites put forward/suggested:

1. Materials Recycling Facility for Commercial and Industrial waste, Bleak Hall
2. Pharmaceutical/clinical waste treatment, Granby
3. Primary waste treatment facility or a local recycling centre, Bletchley Landfill Site
4. In vessel composting, Broughton
5. Expansion of existing Materials Recycling Facility, Site G (Preferred)

Options) Trio Buildings, Old Wolverton
<i>1,2,3,5 can be considered under the Core Strategy (Provision for Waste Management Capacity) and Development Control Policies. The Preferred Site has been identified at Old Wolverton. Bletchley Landfill Site is safeguarded for landfill.</i>
<p>Safeguarding</p> <ul style="list-style-type: none"> • Bletchley Landfill Site – comments included: rate should be increased; working hours should be reduced; should build an incinerator; against any incineration at this site; agree with text; only used for waste generated by local people; use should not be increased; vital to protect site. The site operators have stated that ‘significant importation is needed to fill Bletchley by 2022. Company has invested to make it a regional facility in accordance with the planning permission in 2002. Maintaining facility until 2022 needs to be done through agreement between Council and WRG’. • Safeguarded could be strengthened by including policy or reference that ensures waste infrastructure (transfer/bulking facilities) are safeguarded in the submission draft.
<i>It is considered that the landfill capacity is a valuable resource. This site should be safeguarded for future disposal of residual waste. Safeguarding policy (WA2) in Allocations has been strengthened to include waste management facilities including sites for waste transfer and bulking facilities that are essential for sustainable transport of waste materials.</i>
<p>Other sites assessed in Site Assessment in Annex</p> <ul style="list-style-type: none"> • Additional sites assessed - Site M (WEA) - do not select as one of the preferred sites. Existing site raises numerous complaints due to odour problems. • Numerous Objection sites at Lathbury and Sherington.
<i>Sites have been assessed and are not considered as the preferred sites.</i>

A number of responses addressed recycling, packaging and collection issues. These have been forwarded to the Waste Strategy team to consider in their policy development and activities. A number of responses addressed ‘Incineration’, which received a mixed response. These issues are not considered to be part of the Waste Development Plan Development. However, they will feedback to current Council policy

The Citizens Advice Group on Waste attended a workshop in September 2006 to discuss the survey. They generally supported the policies and some members of the group raised the following comments (the Council’s response is in italics):

- Rail should be used for the Old Wolverton site (*This would be addressed in the Transport Assessment with any submitted planning application*)
- Supported safeguarding the Materials Recycling Facility, especially when linked to the strategic site.

- Wymbush site needs direct access from the A5 (*This would be addressed in the Transport Assessment with any submitted planning application*)
- Sites at Denbigh West could be joined together for a suitable site (*The sites are close to sensitive receptors*).

There were 30 responses, which were received after the consultation period had closed. The majority of the survey responses were in support of the preferred policy directions. The comments that no other respondent had raised were: locate the strategic site at the Cotton Valley Sewage Works; and developer contributions are required to fund habitat enhancement and creation with the restoration of sites. The Cotton Valley Sewage Works is safeguarded for future expansion of waste water and sewage. The supporting text to the restoration policy in Development Control Policies considers that restoration must provide a positive enhancement to wildlife habitats.