

Bournemouth, Dorset and Poole Waste Plan Issues Consultation, December 2013 - Schedule of Comments with Officer Responses

The first stage of public consultation on the new Waste Plan took place from 19 December 2013 to 13 February 2014. The Waste Plan Issues Paper set out a number of issues the plan will need to address.

Fifty different people and organisations responded to the consultation. The comments made are set out below, along with officer responses to each comment. The responses to the Waste Plan Issues Paper helped us to develop the Draft Waste Plan.

NB: This schedule was originally prepared following the Waste Plan Issues Consultation. The officer responses within this version have been updated to reflect information included in the Pre-Submission Draft Waste Plan and supporting evidence reports to demonstrate how issues raised have been addressed. See comments in bold in the final column.

Para/ Question No.	Com ment No.	Per son ID	Company / Organis- ation	Agree/ Disagr ee	Comment	DCC Officer Response
Waste Plan Issues Paper	WP12	805719	Poole Agenda 21	Disagree	The objectives are fine but their suggested implementation does not meet them in 2 respects: 1. There is nothing in the plan to prevent the production of waste. All the projections simply ensure waste will continue to be produced at the same rate. We need a pro-active policy to reduce the production of waste. 2. There is nothing in the plan to extend the reuse of waste. Poole used to have a re-use facility for household waste. It has gone and should be replaced. It is highly likely that within the timeframe of this plan income and resources decline due to the environment and population crises. Reuse will become ever more significant.	<p>It is agreed that waste prevention and reduction is important and to be encouraged in line with the waste hierarchy. However, the role of the waste plan is primarily to make provision for facilities for the waste that is arising and to ensure that appropriate provision is made to move waste up the hierarchy. Consideration will be given to including policy or at least reference to the Waste Planning Authority's commitment to maximising waste prevention and re-use through promoting strategies with this aim and encouraging developments that involve the preparation of materials for re-use. Facilities to enable reuse of waste can be encouraged through the Waste Plan to an extent and specifically could be referred to in the provision of Household Recycling Centres, many of which across Dorset host such facilities.</p> <p>The Pre-Submission Draft contains various references to waste prevention and re-use including through the Vision and Objective 1. Specifically, Policy 22 'Waste from new developments' requires major proposals to demonstrated that waste arisings will be minimised and managed in accordance with the waste hierarchy and that developments should incorporate adequate facilities to allow occupiers to separate and store waste for recycling and recovery on-site.</p> <p>Policy 5 'Facilities to enable the recycling of waste' also requires proposals for HRC's to make provision for re-use areas where there is space to do so.</p>

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Waste Plan Issues Paper	WP97	815324	Melbury Abbas and Cann Group Parish Council	Disagree	One problem that needs to be addressed here is that as a County we should be planning ONE waste policy. Having Bournemouth, Dorset and Poole as individual Authorities is wasteful of Public money. Dorset is the County which Bournemouth and Poole are parts, important parts, but never the less parts. Our County is only 51 miles long and considerably narrower than that. It was described by the BBC as a postage stamp sized County so all efforts should be made to reduce the cost of administering this element to a minimum especially in the light of Government cuts.	Although the three authorities are separate in terms of their waste management functions, the Waste Plan is prepared on behalf of and covers Bournemouth, Dorset and Poole.

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Waste Plan Issues Paper	WP149	558166	Somerset County Council	Comment	<p>Thank you for consulting Somerset County Council on this Waste Plan Issues. The Issues document includes a large amount of information and reflects a significant amount of work carried by Dorset County Council's planning policy officers, which should provide a strong foundation for future work on the Plan and help the Council to meet what appears to be a very challenging timeline. Some of the issues are well advanced, almost to the stage of identifying policy options. There's an impression that the document is in part an Options document (not simply an Issues document). Not a problem per se, but it is important to ensure that all issues are clear and options not prematurely constrained. Further clarity could be brought to the document in its use of certain terms and phrases. A review of certain terms (such as residual waste (para 7.1) and biomass) may be worthwhile, with reference to a more extensive glossary. Similarly, footnotes and referencing information could be strengthened to assist readers to follow through and locate source documents; and the resolution of figures should be improved (acknowledging the importance of balancing easy online access with clarity of definition). Structure / coverage - For ease of reading, the vision and objectives may be better placed earlier in the document. There is scope for more detailed coverage on cross boundary issues, and how Dorset intends to address these, acknowledging the context set by the NPPF, Localism Act and the Duty to Cooperate. Given the document follows the principles of the waste hierarchy, the Plan may benefit from a section on waste prevention. While the waste planning authority has limited sway in this area, it is still an integral part of county waste management; for example, more about reuse in the same section as freecycle- especially home grown examples such as Dorset Reclaim.</p>	<p>Your comments are noted. With regards to cross-boundary issues and the duty to co-operate, it is intended that a section will be included in the next iteration of the plan to address this and to summarise the work that has already been undertaken in this area and that will continue to be undertaken as the plan progresses. The WPA will continue to liaise with Somerset County Council and other relevant authorities on this matter.</p> <p>A separate Duty to Co-operate Statement has been prepared and was published on our website along with the Pre-Submission Draft Waste Plan. In addition, up to date information on cross boundary waste movements is included in Background Paper 3 'Cross boundary movements of waste'.</p>
Waste Plan Issues Paper	WP130	815967	Ferndown Town Council	Comment	<p>The Town Council has no comment to make at this time.</p>	Noted.

Para/ Question No.	Com ment No.	Perso n ID	Company / Organis- ation	Agree/ Disagr ee	Comment	DCC Officer Response
5	WP158	197491	Dorset Local Nature Partnership	Comment	<p>The Dorset Local Nature Partnership (DLNP) was established in 2012 with a role to: Provide leadership for those working to protect and enhance the environment in Dorset; · Advocate the good management of Dorset's natural environment for its own sake and the many benefits it offers; · Articulate the importance of Dorset's natural environment to economic and social wellbeing; · Ensure that the natural environment is taken into account in policy and decision-making. The National Planning Policy Framework, in paragraph 180, states that " Local planning authorities should work collaboratively on strategic planning priorities to enable sustainable development in consultation with Local Enterprise Partnerships and Local Nature Partnerships. " In paragraph 165 LNPs are also identified as having a key role in working with LPAs to assess existing and potential components of ecological networks, to ensure planning policies and decisions are based on up to date information about the natural environment. DLNP is looking forward to working with the LPAs as the NPPF requires and to progress these discussions. The DLNP welcomes this opportunity to comment on Waste Plan issues. DLNP operates at a strategic level in policy and planning matters, and is unlikely to become involved in site specific cases. It is therefore important at this issues stage to set out some principles which we believe the Waste Plan process should follow, in line with the DLNP Strategy. DLNP is fully supportive of actions in the plan that move waste arisings up the waste hierarchy pyramid. There are three overarching comments that we would make regarding the details in the consultation.</p> <p>1) Ensuring that benefits to sustainable development are maximized across the whole plan area. We would like to see clear recycling targets for Bournemouth and Poole presented in the plan as well as for Dorset.</p>	<p>Your comments are welcomed. A strategic aim of the Waste Plan is certainly to ensure that appropriate provision is made to enable waste to be moved up the waste hierarchy. The Waste Planning Authority will continue to work with the waste collection and disposal authorities of Bournemouth, Dorset and Poole and it is agreed that the inclusion of recycling targets would be prudent if possible. The Waste Plan will seek to facilitate the movement of commercial and industrial waste up the hierarchy in the same way of municipal solid waste. It is agreed that your suggestion on such air quality issues should form part of site selection and reference will be made to this in the plan. It is considered that the primary method of assessing this issue would be through the Habitat Regulations Assessment which will be undertaken.</p>

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					<p>2) From a sustainability point of view, commercial and industrial waste is just as important as municipal waste and we would suggest measures to reduce, reuse and recycle commercial and industrial waste should be brought in to the plan. 3) Site selection should take account of potential air quality impacts on habitats through air-borne nitrous oxides and ammonia. Sustainable development We are looking for the Waste Planning process to contribute towards integration of social, economic and environmental goals, including by:</p> <ul style="list-style-type: none"> · Accurate and transparent accounting for environmental costs and benefits in the planning and decision-making process. · Widespread adoption of the concept of 'natural value' in the planning and decision making process. · Identifying existing and potential ecological networks and policies for their improvement, and ensuring plans are based on an accurate and up to date environmental evidence base. · An holistic approach to planning and development which takes account of the need to maintain and create quality natural and historic environments near where people live, and space for wildlife to get food and shelter in a changing environment. · Greater awareness of the impacts of the decisions we take as consumers on the environment, and more sustainable choices being made as a result. · Dorset's 'ecological footprint' being reduced over time both locally and globally. <p>Natural Capital Dorset has some exceptional natural assets which already underpin the economic and social wellbeing of the county. There is a growing body of evidence that investing in natural areas produces benefits well in excess of costs. In particular we would seek outcomes through the Waste Plan which promote:</p> <ul style="list-style-type: none"> · Healthier natural systems which are managed in an integrated way. · Maintenance and enhancement of high quality landscapes in which change is well managed. <p>Natural Value While a healthy environment is a pre-requisite for a healthy economy globally and locally, in Dorset it offers additional opportunities for sustainable economic growth which does not erode our natural capital.</p>	

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					<p>Outcomes we seek through the Waste Plan are:</p> <ul style="list-style-type: none"> · A transition to a low carbon, sustainable economy in which every business is a greener business. · Reduced transport related impacts which contribute to a healthy environment. · More efficient and effective use being made of scarce natural resources, particularly land, water and energy sources. · Secure and affordable energy supplies making more effective use of locally available, appropriate renewable sources of energy, including where feasible waste to energy. · Reductions in waste in all its forms and further increases in the reuse and recycling of waste as a resource to be used rather than disposed of. <p>Natural resilience Changes in the global economy, global climate and demography present a number of potential risks and threats to the resilience of both the environment and the communities which depend on it. But a well managed, resilient natural environment can make a major contribution to our ability to adapt to these changes. In particular, the Waste Plan can contribute to:</p> <ul style="list-style-type: none"> · A high quality built environment meeting increasingly high standards of sustainable construction, waste reduction, water and energy efficiency in new and existing development, and in which sustainable travel options are promoted. · A spatial planning system which is proactive in the way in which it seeks to deliver landscape scale, ecological networks that are able to withstand the pressures of climate change. <p>I hope you find the above comments helpful. Please contact me should you require further clarification regarding Dorset Local Nature Partnership's response.</p>	
Waste Plan Issues Paper	WP185	494685	SITA UK		NOTE : Section 2 of the Background Paper (Dec 2013) does not include the Binnegar Environmental Park details. The site is shown in Figure 2, but the details have not been provided	This omission will be rectified.

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8	WP271	197579	Resident	Comment	<p>1. Chapters 5 to 9 represent the core of the Plan. Chapters 1 to 4 set the scene and Chapters 10 to 12 provide guidance on the methodology for the execution of Chapters 5 to 9. 2. Thus I have concentrated on Chapters 5 to 9 in this review of the Plan. 3. I found these chapters very complicated and convoluted to read. I found it very difficult to understand the manner in which each type of waste and in some cases subsets of types of waste are to be handled. Leading from this I found it difficult to grasp the scale and quantity of new waste facilities which the Plan considers are required. 4. To overcome these difficulties I constructed a spread sheet containing all the waste types and processes described in Chapters 5 to 9. I split the contents of the spread sheet in two for the purposes of printing. 5. The two sheets are attached. 6. I have not used abbreviations such as MRF, HRC and DWP because there are too many of them and to the lay reader they can become very confusing. 7. I don't claim that my sheets are perfectly correct or laid out in the best manner as they are my first iteration. The sheets can be improved, for example by the addition of reference paragraphs adjacent to significant statements and processes (I have done this in a few cases) to aid cross-reference with the Plan text. But the sheets do provide a good overview of the processes for the different types of waste which just reading chapters 5 to 9 does not. 8. The sheets highlight that the Plan proposes an almost total renewal of the majority of the waste processes in Dorset and to a lesser extent in Bournemouth and Poole. 9. Many of the suggestions for new sites and new equipment make sense if Bournemouth, Dorset and Poole are to meet government recycling targets, the virtual abolition of landfill and the need to deal with as much of the waste as possible within the borders of Dorset. 10. The renewal will require a large number of new sites for new or expanded processes. Given the cost of land, the new equipment required and new buildings and handling facilities, it would appear that the Plan would be very expensive to implement.</p>	<p>It is agreed that a simple flow diagram would be a helpful way of explaining how each waste is managed and consideration will be given to how this could be achieved in the Waste Plan. The Waste Plan is essentially a land use plan. However it is agreed that the plan must be deliverable and as the plan develops consideration will be given to implementation and issues that may affect implementation.</p> <p>The Pre-Submission Draft Waste Plan contains a Monitoring Framework this includes implementation issues and provides a structured way to monitor the effectiveness of the Plan following adoption.</p>

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					<p>11. But the Plan does not discuss finance at all.</p> <p>12. The Plan does not discuss the problems in finding suitable land in the desired locations and the hurdles that may be presented in the planning application and approval process.</p> <p>13. Given that all local government organisations have suffered and will continue to suffer significant budget cuts it is not easy to see where the money for the Plan will be found.</p> <p>14. There is no direct discussion in the Plan of the extent to which the private sector could/or will be brought in to provide the new facilities and processes and whether local government will have the money to pay for their services.</p> <p>15. Under the proximity principle virtually all new facilities and processes will have to be built in urban areas where land is at a premium and is expensive. As the earlier attempt to establish a Household Recycling Centre at Poundbury demonstrated there could well be significant public opposition during the planning application and approval stage to many if not all the proposed new waste processing locations.</p> <p>16. The Plan does not contain any mention of risk.</p> <p>17. Thus this is a risk free plan. Which of course it is not.</p> <p>18. And this is the major failing of the Plan. With no discussion of finance, private sector involvement, the likelihood of finding land in the required locations and the planning process, the Plan becomes merely a theoretical aspiration.</p> <p>19. This is not a practical plan.</p> <p>20. A number of the targets within the Plan will be challenging to meet in the timescales required. The Plan also indicates that a number of facilities are close to peak capacity and may become overloaded during the Plan period.</p> <p>21. Thus there is an imperative to progress the production, acceptance and implementation of the Plan.</p> <p>22. Producing a theoretical plan and tackling finance, land, private sector involvement and planning once it has been accepted is definitely not the correct way to approach the requirement. This merely delays tackling the really difficult issues and squanders considerable and crucial time.</p> <p>23. The waste authorities could end up having to export more waste</p>	

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					<p>out of the county because the facilities are not available within Dorset and the remaining landfill in the county is being used up quicker than anticipated. Recommendation 2 - finance, private sector and land. 24. I strongly recommend that the finance, private sector involvement, land availability at the desired locations and likely planning difficulties are addressed in the next iteration of the Waste Plan Recommendation 3 - risk. 25. I recommend that the next iteration of the Plan contains a section on risk which addresses the quantification of the likely risks that may be experienced in trying to implement the Plan.</p>	

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Waste Plan Issues Paper	WP272	197579	Resident	Comment	<p>Targets in Chapters 5 to 9 1. It frequently wasn't possible to understand the derivation for some targets. For example in paragraph 5.6 (page 35) it is stated that..recycling rates in Weymouth are set to rise from 50% to 68% when the new service is fully established . How was the target of 68% derived? Is this a government target or a local aspiration? What is it about the new service which will enable such high and very specific target to be achieved? What is the impact if it is not achieved? 2. In paragraph 5.7 (page 35) the Plan states that Currently around 50% of waste from the commercial and industrial stream is recycled. For the purposes of this plan, it has been assumed that this level of recycling will remain constant throughout the plan period . 3. It seems very strange to make an assumption of no change for the purposes of the plan. Surely whether commercial and industrial recycling remains constant should be based upon an objective, documented analysis which should be referred to in the text. 4. I was left with significant doubts, akin to the descriptions above, about the rationale for a number of targets in Chapters 5 to 9. 5. The value of the targets in many cases drives the plan and the possible creation of new locations and equipment. They are thus very important. It should be possible to read about the rationale and derivation of all the targets quoted in Chapters 5 to 9. Recommendation 4 - explanation of targets. 1. I recommend that a new chapter be added to the Plan ahead of Chapter 4 which explains the rationale for the targets used in Chapters 5 to 9. 2. References should be provided to the source material for each target and if possible this material should be provided on the DCC Waste Plan web page as background material.</p>	<p>The figure of 68% is not a target as such, more a realistic estimate made by the DWP based on experience of rolling out the new co-mingled waste collection system in other parts of the county. The new co-mingled collection will make it easier for residents to recycle and allow residents to a wider range of materials that is currently possible. Therefore recycling rates are likely to increase. This is expected to compensate for any increase in households arising from new development over the plan period although further investigation of growth assumptions and its supporting evidence will be done to ensure these are as robust as possible. Information on the Commercial and Industrial sector is difficult to obtain and we therefore have no basis to project any significant changes to the levels of recycling in this sector.</p> <p>Since the publication of the Waste Plan Issues Paper waste arisings have been monitored. The Pre-Submission Draft Waste Plan is based on an up to date assessment of waste arisings and projections. Background Paper 1 'Waste Arisings and Projections' published alongside publication of the Pre-Submission Draft Waste Plan provides further details.</p>

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Waste Plan Issues Paper	WP218	667706	Marine Management Organisation	Comment	<p>Thank you for inviting the Marine Management Organisation (MMO) to comment on the above consultation. The MMO has reviewed the document and whilst we have no specific comments to make we would like to draw your attention to the remit of our work in relation to Marine Licensing as you may wish to be aware of this in relation to the consultation. The MMO is responsible for issuing marine licences under the Marine and Coastal Access Act 2009. We also issue consents under the Electricity Act 1989 (as amended) for offshore generating stations between 1 and 100 megawatts and are a Statutory Consultee to the Planning Inspectorate for relevant Planning Act developments (Nationally Significant Infrastructure Projects). A marine licence may be needed for activities involving a deposit or removal of a substance or object below the mean high water springs mark or in any tidal river to the extent of the tidal influence. Any works may also require consideration under The Marine Works (Environmental Impact Assessment) Regulations 2007 (as amended) and early consultation with the MMO is advised. We would suggest that reference to this be made within planning documents to ensure that necessary regulatory requirements are covered. We would encourage applicants to engage early with the MMO alongside any application for planning consent to ensure that the consenting process is as efficient as possible. If you have any questions or need any further information please just let me know. More information on the role of the MMO can be found on our website www.marinemangement.org.uk</p>	Noted.

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Waste Plan Issues Paper	WP200	816638	Devon County Council	Comment	Cross boundary waste movements The identification of key cross boundary waste movements into and out of Dorset should be acknowledged within the plan. This is particularly important in light of the duty to cooperate. This could be summarised in the plan, but supported with a more detailed evidence base report. It would also be useful to acknowledge where cross boundary movements are minimal in relation to adjacent waste planning authorities, even if simply to demonstrate movements are insignificant and therefore there are no issues.	It is intended that a section will be included in the next iteration of the plan to address cross boundary issues and to summarise the work that has already been undertaken in this area and that will continue to be undertaken as the plan progresses. The WPA will continue to liaise with Devon County Council and other relevant authorities on this matter. A separate Duty to Co-operate Statement has been prepared and was published on our website along with the Pre-Submission Draft Waste Plan. In addition, up to date information on cross boundary waste movements is included in Background Paper 3 'Cross boundary movements of waste'.
Waste Plan Issues Paper	WP255	816842	Transition Town Bridport	Comment	Transition Town Bridport welcome this chance to input to the developing waste strategy. Zero Waste is one of our key targets in Transition and we are pleased to see that it is mentioned as an aim within the strategy.	Your comments are noted.
Waste Plan Issues Paper	WP283	820286	Resident	Comment	I fully support the issues identified by Hurn Parish Council in its responses to both the Minerals and Waste Plans as agreed at their meeting on 10th February 2014. I consider the concerns raised are valid and significant, but I have yet to give full consideration to the proposed sites, and hope to be able to view further evidence once the sites have been objectively assessed as to their merits or otherwise. At that time I will be able to give a more informed opinion.	Your comments are noted.
Chapter 1 - Introduction						
1.1	WP190	816619	Highways Agency	Comment	The Agency has no comments to make on questions 1 to 7 set out in these chapters.	Your comments are noted

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1.1	WP189	816619	Highways Agency	Comment	<p>Thank you for providing the Highways Agency with the opportunity to comment on this early stage in the preparation of the above document. Introduction The Agency is responsible for operating, maintaining and improving the Strategic Road Network (SRN). Within your plan area this comprises short sections of the A303(T) in the north and the A31(T) and A35(T) in the south. It is on the basis of these responsibilities that the comments that follow in this letter have been made. The comments in this letter reflect guidance contained in: Â· the Department for Transport (DfT) & Department for Communities & Local Government (DCLG) publication entitled Guidance on Transport Assessment (dated March 2007); Â· DfT Circular 02/2013 entitled The Strategic Road Network and the Delivery of Sustainable Development, dated 10 September 2013; and Â· the National Planning Policy Framework (NPPF), published by DCLG in March 2012. General Comments The Agency is generally concerned that potential traffic impacts of any proposals coming forward through the waste plan should be fully assessed during the plan-making stage. The imperative to identify these improvements at this early stage is set out in government policy. Para 15 of DfT Circular 02/2013states that: 'In order to develop a robust transport evidence base [for local plans] , the Agency will work with the local authority to understand the transport implications of development options. This will include assessing the cumulative and individual impacts of the Local Plan proposals upon the ability of the road links and junctions affected to accommodate the forecast traffic flows in terms of capacity and safety.' Undertaking suitable assessment of transport impact at the plan-making stage avoids sites being chosen where: Â· the traffic impact of the proposed development on the operation of nearby junctions is not known; or Â· proposals for access or transport mitigation are untested and uncosted.</p>	<p>Your comments are noted. The Highways Agency will be consulted when specific sites are being considered to meet the waste management needs of the Plan area. In addition, the Waste Plan will contain guidance for assessing planning applications and some of the information contained within this response will form the basis of the guidance.</p> <p>Highways England have been consulted and have provided responses at all key stages of the Waste Plan preparation. The Pre-Submission Draft Waste Plan contains a transport and access section and Policy 12 'Transport and access'. Together these sections will ensure the impacts of waste facilities on Dorset's road network are minimised.</p>

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					Guidance on Transport Assessment (GTA) states that a Transport Assessment (TA) should be prepared to accompany a planning application for any development which is forecast to generate: 100 or more two-way vehicle movements per day; or · 30 or more two-way vehicle movements in any hour; or · significant freight or HGV movements per day, or significant abnormal loads per year. On the basis of these threshold triggers, several of the sites discussed in the consultation document are likely to need a TA to be submitted when planning applications for their development are submitted.	
1.4	WP32	812899	Resident	Comment	I cannot agree more that we must manage waste more sustainably and encourage more recycling and reduce what we dispose of to landfill. However, I understand that ink/laser cartridges and, I believe, bottle tops, are still being put into landfill. There are many companies in this country who will take empty cartridges to re-fill or dismantle to recycle certain elements. Why are bottle tops not being recycled? Will there be specific provision in the proposed new HRC's for the recycling of such items? In Gillingham we are fortunate to have the volunteering services of a member of the community who has ink/laser cartridges, mobile phones, spectacles and plastic bottle tops delivered to their door from households and businesses all over Gillingham. These items are sorted and sent onward to companies all over Britain for recycling, usually free of charge. Cartridges are sent free of charge to companies who re-fill the ink cartridge. If one person can do this for a North Dorset town, then there must be potential for inclusion in HRC's on a much large scale, given the huge number of cartridges used.	When potential sites are considered for the development of household recycling centres and waste management centres it will be important to ensure that the land available is sufficient in size to accommodate the collection of a range of materials that can be bulked up and transferred onto reprocessing sites. Sites should also be flexible enough to accommodate different uses in the future as technologies improve and recycling markets change.

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1.4	WP85	815029	Resident	Comment	I strongly believe in recycling local rubbish in the local area in order to be as green as possible from your waste plan i can see that this is what dorset planners would like to acheive once the permission is granted for sites they are run by private enterprise to acheive maximum profit and therefore they will ship rubbish from anywhere in the country to process and increase there profits. can the Dorset waste plan put in a legistation that dorset waste has to be re-cycled in dorset in order keep transport to a minimum and not burden our beautiful county with other peoples rubbish?	It is agreed that there are impacts from the transportation of waste and recyclable material. There is a move throughout the country towards self-sufficiency in waste disposal and recovery. This means that Waste Planning Authorities should as far as practicable aim to ensure that there is sufficient capacity available for waste generated in their area to be dealt with in their area. However, account will be taken of geographical circumstances or the need for specialist facilities for certain types of waste.

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1.13	WP270	197579	Resident	Comment	<p>Chapter 1, paragraph 1.14 - Time period for the Waste Plan 1. The proposed period is 2014 to 2030. 2. Table 1 states that the Plan will be submitted to the Secretary of State for independent examination in the Summer of 2015. From the experience of the timescale of the examination of the Minerals Strategy which lasted for about 10 to 11 months (I received the final report on 4 February 2014) this could mean that the Inspector's report may not be published until approximately April to June 2016. 3. The Evidence in Public Inspector appointed to review the current West Dorset District Council draft Local Plan stated at the first public meeting that he may/may not require more work to be done on the Local Plan. This of course could delay implementation of the plan 4. The Inspector appointed to review the 2015 draft Waste Plan could similarly also decide more work is necessary and this could delay implementation of the Waste Plan to 2017. The Inspector may well not be disposed to conduct a running ad-hoc review of the Plan without any public consultation (beyond the confines of the room) in the manner which the Minerals Inspector conducted her Evidence in Public. 5. Having studied chapters 5 to 9 I am very doubtful that all the proposed new facilities and sites could be achieved in the period from mid-2016 to 2030. Appendix 3 Table 13 shows that a number of the facilities proposed in the 2006 waste plan have either not been built or require further review. 6. It does appear that both the 2006 and 2013 Waste Plans may contain proposals for facilities which have not been reviewed as thoroughly as an Inspector may deem necessary and consequently the Inspector may ask for further work before starting the Evidence in Public. 7. Thus combining my doubts over the possibility of achieving the plan by 2030 and the possibility that the Inspector may ask for further work I think a more realistic period for the plan would be 2016 to 2036. 8. I think it is totally unrealistic for the plan to have start date of 2014 which predates the final</p>	<p>Your comments are noted. Whilst the NPPF is not prescriptive about the plan period which should be applied to local plans, paragraph 157 does indicate that a 15 year time horizon is preferred. Given that the Plan is expected to be adopted by 2016, and at this stage we have no reason to believe that this will be delayed, it is considered that it would be most appropriate to extend the plan period to 2031.</p> <p>The Pre-Submission Draft Waste Plan has been updated and has an end date of 2033 to ensure a 15 year Plan period from adoption – See para 1.20-1.21.</p>

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					version of the plan agreed by the Inspector; hence I have suggested a start year of 2016. Recommendation 1 - period for the Waste Plan 1. I recommend that the time period for the Waste Plan should be 2016 to 2036.	
1.13	WP191	816638	Devon County Council	Comment	Plan period The County Council questions whether the current plan period set out within the Issues Consultation document (to 2030) will cover a sufficient period by the time the plan is adopted, which is not expected until 2016. Whilst the NPPF is not prescriptive about the plan period which should be applied, paragraph 157 does indicate that a 15 year time horizon is preferred, and therefore it may be appropriate to extend this to 2031.	Agree, further work will be needed to establish an appropriate time frame for the new Waste Plan. The Pre-Submission Draft Waste Plan has been updated and has an end date of 2033 to ensure a 15 year Plan period from adoption – See para 1.20-1.21.
Question 1 – The Waste Plan will cover a time period from 2014 to 2030. Do you think this is an appropriate timeframe?						
Question 1	WP9	805719	Poole Agenda 21	Disagree	Too long a period to be tied into a single contract. Conditions may change.	The plan period is not related to contracts. The time period will influence the total waste arisings to be dealt with and the consequential scale of provision of facilities likely to be needed during that time. It is agreed that sites should be flexible to ensure that they are able to accommodate improved technologies and recycling markets during the plan period. Whilst the NPPF is not prescriptive about the plan period which should be applied, paragraph 157 does indicate that a 15 year time horizon is preferred. Given that the Plan is expected to be adopted by 2016 it is considered that it would be most appropriate to extend the plan period to 2031. The Pre-Submission Draft Waste Plan has been updated and has an end date of 2033 to ensure a 15 year Plan period from adoption – See para 1.20-1.21.

Para/ Question No.	Com ment No.	Perso n ID	Company / Organis- ation	Agree/ Disagr ee	Comment	DCC Officer Response
Question 1	WP44	670039	New Earth Group	Agree	Having regard to the stages of preparation set out in table [1] of the Issues Document, the proposed timeframe would appear sensible.	<p>Whilst the NPPF is not prescriptive about the plan period which should be applied, paragraph 157 does indicate that a 15 year time horizon is preferred. Given that the Plan is expected to be adopted by 2016 it is considered that it would be most appropriate to extend the plan period to 2031.</p> <p>The Pre-Submission Draft Waste Plan has been updated and has an end date of 2033 to ensure a 15 year Plan period from adoption – See para 1.20-1.21.</p>
Question 1	WP62	224810	Campaign to Protect Rural England	Agree	Yes we agree, but compare section 1.3 where it says that the Plan is for the management of waste over the next TWENTY years.	<p>Your helpful comment is noted and paragraph 1.3 will be amended to reflect the correct plan period. Whilst the NPPF is not prescriptive about the plan period which should be applied, paragraph 157 does indicate that a 15 year time horizon is preferred. Given that the Plan is expected to be adopted by 2016 it is considered that it would be most appropriate to extend the plan period to 2031.</p> <p>The Pre-Submission Draft Waste Plan has been updated and has an end date of 2033 to ensure a 15 year Plan period from adoption – See para 1.20-1.21.</p>

Para/ Question No.	Com ment No.	Perso n ID	Company / Organis- ation	Agree/ Disagr ee	Comment	DCC Officer Response
Question 1	WP103	815336	Resident	Comment	This is a long timeframe. Waste management continues to be a fast changing field, and as such, this plan would need periodic review and refinement in light of new developments in technology, as well as changes in financial and economical circumstances.	<p>This is in line with the National Planning Policy Framework. Whilst it is not prescriptive about the plan period which should be applied, paragraph 157 does indicate that a 15 year time horizon is preferred. Given that the Plan is expected to be adopted by 2016 it is considered that it would be most appropriate to extend the plan period to 2031.</p> <p>The Pre-Submission Draft Waste Plan has been updated and has an end date of 2033 to ensure a 15 year Plan period from adoption – See para 1.20-1.21.</p>
Question 1	WP116	815428	Bridport Town Council	Comment	This time frame is appropriate for many aspects of this strategy. However, education of behavioural change towards zero waste is an iterative process, and innovation in technology is rapidly changing so both elements will need the ability for ongoing appraisal.	<p>Your comments are noted. Whilst the NPPF is not prescriptive about the plan period which should be applied, paragraph 157 does indicate that a 15 year time horizon is preferred. Given that the Plan is expected to be adopted by 2016 it is considered that it would be most appropriate to extend the plan period to 2031.</p> <p>The Pre-Submission Draft Waste Plan has been updated and has an end date of 2033 to ensure a 15 year Plan period from adoption – See para 1.20-1.21.</p>

Para/ Question No.	Com ment No.	Perso n ID	Company / Organis- ation	Agree/ Disagr ee	Comment	DCC Officer Response
Question 1	WP160	494685	SITA UK	Comment	The timeframe is considered appropriate. However, the Plan must ensure it provides some flexibility with regards to the type of facilities / technologies needed to manage the future waste arisings. Waste Management is a continually evolving business and there may be a need to make changes to existing sites to accommodate new recycling/treatment initiatives in the future.	Your comments are noted. It is agreed that the plan will need to be flexible enough to react to changing circumstances, advances in technology etc. In addition, there will be provisions built in to review the strategy as necessary. Whilst the NPPF is not prescriptive about the plan period which should be applied, paragraph 157 does indicate that a 15-year time horizon is preferred. Given that the Plan is expected to be adopted by 2016 it is considered that it would be most appropriate to extend the plan period to 2031. The Pre-Submission Draft Waste Plan has been updated and has an end date of 2033 to ensure a 15 year Plan period from adoption – See para 1.20-1.21.
Question 1	WP225	224280	East Dorset Community Partnership	Comment	The time frame is broadly in line with that of Local Plans and appears appropriate.	Your comments are noted. Whilst the NPPF is not prescriptive about the plan period which should be applied, paragraph 157 does indicate that a 15 year time horizon is preferred. Given that the Plan is expected to be adopted by 2016 it is considered that it would be most appropriate to extend the plan period to 2031. The Pre-Submission Draft Waste Plan has been updated and has an end date of 2033 to ensure a 15 year Plan period from adoption – See para 1.20-1.21.

Para/ Question No.	Com ment No.	Perso n ID	Company / Organis- ation	Agree/ Disagr ee	Comment	DCC Officer Response
Question 1	WP235	399290	Wiltshire Council	Comment	Yes. The proposed plan period presents a reasonable timeframe to plan for the provision of waste facilities to meet projected demand. It will be important to ensure that strategic waste planning matters are consistently discussed on a sub-regional / county level to ensure that long-term capacity requirements are met in accordance with existing and emerging national planning policy. In addition, attention will need to be applied to the various stages that neighbouring authorities have reached in preparing long-term waste plans. This will be particularly relevant when considering the response to sub-regional demand for merchant facilities to support future growth in commercial / industrial and hazardous wastes. However, at this stage of the plan making process, there appears to be no evidence to suggest that such matters have not been assessed by the three planning authorities.	Your helpful comments are noted. It is agreed that strategic waste planning matters will need to be discussed throughout plan preparation to ensure that long term capacity requirements are met.
Question 1	WP256	816842	Transition Town Bridport	Comment	A fixed plan until 2030 seems unrealistic, especially as we, as a country, are aiming at Zero waste by 2050. We need to be adaptable to new technology and behaviour change and be able to improve our targets, so we would like to see that element as an iterative process rather than blind following a fixed plan.	Your comments are noted. It is agreed that the plan will need to be flexible enough to react to changing circumstances, advances in technology etc. In addition, there will be provisions built in to review the strategy as necessary. Whilst the NPPF is not prescriptive about the plan period which should be applied, paragraph 157 does indicate that a 15-year time horizon is preferred. Given that the Plan is expected to be adopted by 2016 it is considered that it would be most appropriate to extend the plan period to 2031. The Pre-Submission Draft Waste Plan has been updated and has an end date of 2033 to ensure a 15 year Plan period from adoption – See para 1.20-1.21.

Para/ Question No.	Com ment No.	Perso n ID	Company / Organis- ation	Agree/ Disagr ee	Comment	DCC Officer Response
1.15	WP13	806771	Resident	Comment	This seems a long timeframe. Issues may change is this time.	<p>Your comments are noted. It is agreed that the plan will need to be flexible enough to react to changing circumstances, advances in technology etc. In addition there will be provisions built in to review the strategy as necessary. Whilst the NPPF is not prescriptive about the plan period which should be applied, paragraph 157 does indicate that a 15 year time horizon is preferred. Given that the Plan is expected to be adopted by 2016 it is considered that it would be most appropriate to extend the plan period to 2031.</p> <p>The Pre-Submission Draft Waste Plan has been updated and has an end date of 2033 to ensure a 15 year Plan period from adoption – See para 1.20-1.21.</p>

Para/ Question No.	Com ment No.	Perso n ID	Company / Organis- ation	Agree/ Disagr ee	Comment	DCC Officer Response
1.23	WP213	197703	New Forest National Park Authority	Comment	The Authority is pleased to note that the New Forest National Park is clearly shown on Figure 1 (page 8); the Authority however, is disappointed to note that this section focuses solely on the Dorset environment and no mention has been made of the National Park in relation to the Plan area. As you are aware, Section 62(2) of the Environment Act 1995 places a statutory duty for relevant bodies (including surrounding local planning authorities) to have regard to the two National Park purposes when considering proposals for development which might affect them. The two Park purposes are; To conserve and enhance the natural beauty, wildlife and cultural heritage of the National Park; and To promote opportunities for the public understanding and enjoyment of the special qualities of the National Park. Cont. National Parks have also been recognised by Government as having the highest level of protection in relation to landscape and scenic beauty (paras 115 and 116 of the National Planning Policy Framework). As the National Park is in close proximity to the county boundary (and in some areas directly adjacent to) the Authority considers it essential that the document should be amended to make reference to this statutory requirement; thereby ensuring that the Dorset planning area is correctly outlined in terms of its spatial context and the highest level of protection is afforded to the National Park. It should be noted, that this would reflect the potential for cross-boundary impacts and also the legal 'duty to cooperate' on more strategic issues.	Your comments are noted, this section will be updated as appropriate prior to the next consultation. The spatial context for the Waste Plan refers to the New Forest National Park situated to the eastern boundary of the Plan area.

Chapter 2 – Guiding Principles					
2.1	WP99	815324	Melbury Abbas and Cann Group Parish Council	Comment	<p>I support the desire to conform with National Planning Policy. There are environmental issues here as parts of Dorset are within AONB and there are clear responsibilities on all statutory bodies such as Waste Planning Authorities to 'have regard to' the purpose of conserving and enhancing the natural beauty in exercising or performing any functions affecting land in the area.</p> <p>Your comments are noted. Environmental issues, including impact on AONB, will be considered fully as the plan progresses.</p>
2.1	WP110	229404	Wessex Water	Comment	<p>Para 2.5 We note that the plan will establish planning policies and site allocations. We refer to the suggested planning policies submitted by Wessex Water for consideration by Dorset Council during February 2013. We will be pleased to discuss planning policy in relation to the services that we provide for waste water treatment. If these need to be resubmitted, updated or enhanced please advise and contact the undersigned.</p> <p>Your comments are noted, the inclusion of the suggested Wessex Water Planning Polices will be considered as the plan is progressed.</p> <p>The WPA has worked with Wessex Water throughout the development of the Waste Plan. The Pre-Submission Draft Waste Plan contains two site allocations for improvement/expansion of two exiting sewage treatment plans. Policy 11 'Waste water and sewage treatment works' provides the framework for determining applications for new and/or improved facilities.</p>

2.1	WP115	815428	Bridport Town Council	<p>Comment</p> <p>Bridport Town Council is very keen to be involved in plans to reduce waste and we support local initiatives that are seeking to encourage waste reduction and recycling in our town. We ask most earnestly that the Town Council and local community groups can be fully involved with any decision making regarding the development of the proposed Recycling and Transfer centre at Broomhills, and also the rolling out of new regimes of collection and recycling. It has always been our wish that the Plan makes provision for supporting local initiatives. The Town Council welcomes the chance to input to the Waste Strategy, and broadly supports the main thrust of its aspirations although we would prefer to see it called a 'Resource Management Strategy'. We feel the language of the document focuses too heavily on the inevitability of Waste, and not enough on Waste reduction. By doing so, it gives legitimacy to waste production rather than encouraging behaviour change to conserve our valuable resources. In this context, we are pleased to see in 2.5 that this Strategy is contributing to the aim of a Zero Waste economy, but most of the text is about predicting and accepting present or increasing loads of waste. We also support the Principle of Proximity & Self Sufficiency in 2.5. We have requested from an early stage that capacity should be provided at the new HRC/WTS facility, or locally, for commercial or community recycling enterprises to reduce the 'waste miles' and give a boost to our local economy.</p>	Your helpful comments are noted.
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2.3	WP34	682036	Dorset Wildlife Trust	Comment	<p>Dorset Wildlife Trust (DWT) is a registered charity with around 25,000 members and though our focus is on wildlife conservation, we strive to make links between the natural world and actions people can take to protect and reduce their impact on the natural environment. In particular in relation to waste we promote wildlife friendly gardening, including composting as an alternative to use of peat, the extraction of which is environmentally damaging. Many of the landfill sites in Dorset are constructed in old minerals sites, which are often located in close proximity to wildlife assets such as heathlands and in a number of cases these have had adverse affects on wildlife- including on DWT'S own nature reserves at Higher Hyde Heath and Upton Heath. We therefore support the reduction in waste to landfill from a wildlife as well as a sustainability point of view. Prevention and Re-use DWT is fully supportive of actions in this plan that will move waste arisings up the waste hierarchy pyramid. In section 2.4 it is stated that the stages of prevention and re-use involve changes in consumer and manufacturing behaviour which is outside the control of waste planning, but that actions will be taken to encourage this where possible. DWT would like to ensure that this Waste Plan, as far as it is able within its remit, directs actions that actively inform and encourage householders and businesses on how they can maximise prevention and re-use.</p>	<p>Your support is welcomed. It is agreed that prevention and re-use should be maximised and the plan will support this as far as it can within its remit.</p> <p>The Pre-Submission Draft contains various references to waste prevention and re-use including through the Vision and Objective 1. Specifically, Policy 22 'Waste from new developments' requires major proposals to demonstrated that waste arisings will be minimised and managed ion accordance with the waste hierarchy and that developments should incorporate adequate facilities to allow occupiers to separate and store waste for recycling and recovery on-site.</p> <p>Policy 5 'Facilities to enable the recycling of waste' also requires proposals for HRC's to make provision for re-use areas where there is space to do so.</p>
2.3	WP226	224280	East Dorset Community Partnership	Comment	<p>Para 2.3 The change in the wording (now "Prevent" rather than "Reduce") in the Waste Framework Directive is very welcome.</p>	<p>Your comment is noted.</p>

2.1	WP38	682036	Dorset Wildlife Trust	Comment	<p>Recycling targets Dorset Waste Partnership through its "recycle for Dorset" initiative has given a clear recycling target of 65%. DWT would like to see Bournemouth and Poole's own recycling targets clearly presented in this waste plan. Bournemouth and Poole should match Dorset's recycling target of 65%, and if they can't then the reasons for this will need explanation. At section 2.12 a combined Dorset, Poole and Bournemouth recycling target for 2015/2016 is set at 60%. Is Commercial and Industrial Waste (CIW) included in this target? If it is not then we believe it should be included or given its own target.</p>	<p>Your helpful comments are welcomed. The Plan will aim to clarify recycling targets for Bournemouth and Poole.</p> <p>The WPA has liaised with the three waste management authorities throughout the preparation of the Waste Plan. Where possible up to date recycling targets have been taken into account when projecting waste arisings. The borough of Poole has in place a target to increase its recycling rate to 50% by 2018/19. A 5% increase in recyclates has therefore been incorporated over the four-year period from 2015/15 to 2018/19. Further detail can be found in Background Paper 1: 'Waste Arisings and Projections'</p>
2.1	WP81	815029	Resident	Agree	<p>this is not happening i know that the MRF at binnegar is designed to process office waste of which not much is generated locally so most of the waste is transported from Farnham. Are there any controls on the locality of where the waste is coming from for these sites ? the MRF at binnegar is applying for permission to operate 24 hours a day so that it can process more waste from even further afield !</p>	<p>When permission was granted for the development of the MRF at Binnegar it was addressing an identified need in the Waste Local Plan at a site allocated in the Waste Local Plan. There were no restrictions on the permission relating to the origin of waste.</p>
2.1	WP150	558166	Somerset County Council	Comment	<p>Para 2.12 - presumably this applies to municipal waste (MSW) only? If so, this needs to be stated. Additionally, it might be useful to mention the Environment Permitting Regulations (2010) here in their requirement to pre-treat non-hazardous waste.</p>	<p>It is agreed that this should be clarified.</p> <p>See Background Paper 1 'Waste Arisings and Projections' which has been published to support the Pre-Submission Draft Waste Plan for further details.</p>
2.1	WP284	820726	Hampshire County Council	Comment	<p>2.11 Ref to rWFD should mention 'other sources' - other than household. This could include C&I waste. 2.12 The recycling target should say its for household waste otherwise it could be taken to mean for other/all waste.</p>	<p>Your helpful comments are noted.</p>

2.17	WP151	558166	Somerset County Council	Comment	Para 2.20 - Also agree with the merits of including a policy to support sustainable waste management in new developments.	Your support is noted.
2.17	WP285	820726	Hampshire County Council	Comment	2.20 There should be a reference to the designation of appropriate land for the delivery of sites as a primary concern of the Waste Plan - as previously mentioned in para 1.4	Your comments are noted The Pre-Submission Draft Waste Plan includes site allocations for new/improved waste facilities to meet a series of identified needs.
Chapter 3 – What waste is produced?						
3.4	WP286	820726	Hampshire County Council	Comment	3.4 Figure 3 is missing a source for the estimated waste arisings.	Your helpful comments are noted. This diagram has been updated for inclusion in the Pre-Submission Draft Waste Plan.
Table 3	WP159	226772	Resident	Disagree	WASTE DISPOSAL. I have just had another look at the plan and not the high amount of waste (30-40%) going to Landfill. This is a terrible waste of resources and of valuable land space. Twenty years ago, when I worked in the pipe industry, it was considered that INCINERATION and use of the generated heat was the way forward. I trust that the Council will endeavour to eliminate Landfill for waste purposes. Also, I would like to think that pressure will be brought to bear on the packaging industry to ensure that all packaging is made recyclable. Most/ALL of my WASTE is composed of NON-RECYCLABLE plastic. A terrible waste of resource and land. Volume wise (Uncompressed) the ratio is about 35-65 of (my) Non-recovered waste - Recycled Waste. NOT GOOD!	Your comments are noted. A key concept that will influence the Plan is the Waste Hierarchy, which ranks waste management options according to what is best for the environment. Prevention of waste is ranked as top priority with disposal to landfill a last resort.
Table 3	WP193	816638	Devon County Council	Comment	Table 3 For completeness it would be helpful to state how the remaining volumes of waste is managed (e.g. the remaining 40% of Bournemouth's waste).	Your comments are noted
Question 2 – Growth in municipal solid waste arisings						

Question 2	WP63	224810	Campaign to Protect Rural England	Comment These figures should be viewed with some caution. MSW arisings have varied widely over the past few years with the recession and with the big increases in recycling. And furthermore, Table 3 shows surprisingly large variations between Bournemouth, Dorset and Poole.	Your comments are noted. It is agreed that table 3 shows large variations between the three authorities. This to some extent it due to the existing collection arrangements and contractual agreements of the three separated waste management authorities. Further discussions will be undertaken with the three authorities to ensure that our assumptions remain as up to date as possible during the preparation of this Plan.
Question 2	WP45	670039	New Earth Group	Comment Nationally and locally waste arisings have been in decline for a number of years with the root cause of this decline linked to the economy with additional factors such as greater waste awareness contributing to the decline. More recently waste arisings have begun to stabilise and even increase although whether this is a return to growth or simply a short-term change is currently unknown. Waste arisings do grow where population increases or demographics change (such as an increase in single person households) despite measures to reduce arisings per person/household. Thus, where the population of Dorset is forecast to increase it is a reasonable assumption that waste arisings will increase. It would also seem prudent to plan for modest waste growth in order to be prepared where it does occur. Therefore, New Earth agrees that making an assumption of modest growth in waste arisings is sensible. It must be stressed that waste arisings does not equate directly to required capacity.	Your helpful comments are noted.
Question 2	WP117	815428	Bridport Town Council	Comment These predictions are presumably based on the status quo being maintained. If Zero Waste is an aim or an aspiration, then the strategy must be to achieve a reduction in waste. We feel the strategy must therefore be more proactive in reducing waste. Even a 0% growth would not achieve your goal!	Your comments are noted. Further discussions will be undertaken with the three authorities to ensure that our assumptions remain as up to date as possible during the preparation of this Plan. Moving towards zero waste is about reducing waste in the first place but it is also about ensuring facilities are available for diverting waste from landfill, through reuse, recycling and treatment and production of energy. We will aim to not landfill anything that we can use.

Question 2	WP161	494685	SITA UK	Comment	<p>Planning for a growth rate of 3% for 2013/2014 in Dorset to account for population growth and future planned housing is considered appropriate. However, there seems little benefit in proposing this in the Plan as it would not be adopted before 2015. Measures should be undertaken now to deal with this expected increase in MSW. Perhaps extend the assumption into 2015? SITA consider that a 1% increase in MSW in Dorset from 2015-2030 should be applied to ensure that there will be no shortfall in capacity. Equally SITA consider that a 1% increase in MSW in Bournemouth and Poole from 2015-2030 should be applied to ensure that a reliance on 0% growth (which assumes that reductions in MSW arisings continue year on year off-sets population growth) does not lead to under provision by 2030.</p>	<p>It is agreed that the assumptions need to be amended to reflect the up to date situation and it will be necessary to discuss the assumptions with the three waste management authorities to ensure they are most up to date. Consideration will be given to the inclusion of a range of growth assumptions to ensure that the plan can adapt to changing circumstances.</p> <p>The evidence that supports the waste arisings projections that drive the need for new facilities in the Pre-Submission Draft Waste Plan has been updated. See Background Paper 1 'Waste Arisings and Projections' for further details.</p>
Question 2	WP237	399290	Wiltshire Council	Comment	<p>On the basis that evidence has been gathered which meets the aspirations of the waste management authorities over the life of the Plan, we assume that the assumptions are correct. However, the growth assumptions are nonetheless optimistic. It may be prudent to build into the plan a degree of flexibility to manage unforeseen peaks in demand that may arise over the next 15-20 years.</p>	<p>Your helpful comments are noted. Consideration will be given to how flexibility can be built into the plan, to ensure it can react to unforeseen circumstances. This could be through the use of a range of growth assumptions, particularly for C&I waste where data on waste arisings is less readily available.</p> <p>The evidence that supports the waste arisings projections that drive the need for new facilities in the Pre-Submission Draft Waste Plan has been updated. Flexibility is built into the Plan in various ways. See Background Paper 1 'Waste Arisings and Projections' for further details.</p>
Question 2	WP195	816638	Devon County Council	Comment	<p>CIW growth rates - Question 2 The County Council agrees with the claim in paragraph 3.16 that making future projections and forecasts of CIW arisings can be a difficult and complex process, however the assumption of 0% growth for CIW is questioned. The reasoning suggests that this is broadly in line with MSW, but 1% growth is assumed for MSW.</p>	<p>Consideration will be given to how flexibility can be built into the plan, to ensure it can react to unforeseen circumstances, so that this does not lead to under provision. This could be through the use of a range of growth assumptions, particularly for C&I waste where data on waste arisings is less readily available.</p>

Question 2	WP257	816842	Transition Town Bridport	Comment	<p>Whilst we recognise that predictions play an important role in any strategy, surely the emphasis now should be on Targets, and constantly reducing targets at that. Zero waste will require year on year reductions if we are ever to achieve a sustainable resource strategy</p>	<p>This is fundamentally a land use plan to ensure that we have the correct facilities in place to move waste up the waste hierarchy and divert waste from landfill. Targets to reduce waste produced will come from the waste management strategies of the authorities and be build into our assessment of need.</p> <p>The evidence that supports the waste arisings projections that drive the need for new facilities in the Pre-Submission Draft Waste Plan has been updated. Flexibility is built into the Plan in various ways. See Background Paper 1 ‘Waste Arisings and Projections’ for further details.</p> <p>The WPA has liaised with the three waste management authorities throughout the preparation of the Waste Plan. Where possible up to date recycling targets have been taken into account when projecting waste arisings. The borough of Poole has in place a target to increase its recycling rate to 50% by 2018/19. A 5% increase in recycles has therefore been incorporated over the four-year period from 2015/15 to 2018/19 and a reduction in residual waste arisings. Further detail can be found in Background Paper 1: ‘Waste Arisings and Projections’</p>
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Question 3 – Growth in commercial and industrial waste arisings

Question 3	WP2	791392	Northampton shire County Council	Comment	3. Where available local economic projections could be applied to the C&I sectors, or split the C&I waste and apply profiles for commercial growth and ind growth.	<p>Further consideration will be given to your suggestion. In particular it is agreed that growth in the commercial and industrial sectors separately could be considered as an option on which to base growth in waste.</p> <p>Since publication of the Waste Plan Issues Paper, further work has been undertaken to ensure the Waste Plan contains up to date information on waste arisings and growth in all sectors. Background Paper 1 'Waste Arisings and Projections' contains further details to support the Pre-Submission Draft Waste Plan.</p>
Question 3	WP10	805719	Poole Agenda 21	Disagree	Questions 3 and 4. We should aim to reduce the amounts of waste produced. Top of hierarchy is "PREVENT". This will need a proactive approach to persuading waste producers to reduce their waste.	The role of the Waste Plan is to make provision for appropriate facilities for the waste that is arising and is predicted to arise to ensure that waste is moved up the waste hierarchy and is diverted from landfill.
Question 3	WP46	670039	New Earth Group	Agree	Commercial and industrial (C&I) waste arisings respond to changes in the economy. The past few years has seen a contraction in the economy and a consequential reduction in C&I waste arisings however most forecasts are now point to economic growth going forward. In the Plan area a large part of commercial waste arisings also come from the tourist and hospitality sector which again can be expected to grow with economic growth and changing trends in tourism. In view of this, New Earth suggests that it would be prudent to plan for growth in C&I waste over the timeframe of the Plan. It must be stressed that waste arisings does not equate directly to required capacity.	<p>Consideration will be given to the inclusion of a range of growth assumptions to ensure that the plan can adapt to changing circumstances.</p> <p>Since publication of the Waste Plan Issues Paper, further work has been undertaken to ensure the Waste Plan contains up to date information on waste arisings and growth in all sectors. Background Paper 1 'Waste Arisings and Projections' contains further details to support the Pre-Submission Draft Waste Plan.</p>

Question 3	WP64	224810	Campaign to Protect Rural England	<p>Comment</p>	<p>Again, great caution will be needed in making any forecasts. We see no credible evidence to support option 1 or option 2 but are not really well enough informed on these matters to suggest an alternative level of growth for option 3.</p>	<p>The two options presented are considered to be reasonable alternatives. It is explained that option 1 has been presented because municipal solid waste and commercial and industrial waste are of a similar nature and similar factors influence their arisings (such as the Landfill Tax and other initiatives). Additionally recent trends have shown C&I waste arisings to be fairly stable. Option 2 is presented because commercial and industrial (C&I) waste arisings respond to changes in the economy, perhaps more so than municipal waste. Consideration will be given to the inclusion of a range of growth assumptions to ensure that the plan can adapt to changing circumstances. This may be particularly appropriate for the C&I waste stream where data on arisings is less readily available.</p> <p>Since publication of the Waste Plan Issues Paper, further work has been undertaken to ensure the Waste Plan contains up to date information on waste arisings and growth in all sectors. Background Paper 1 ‘Waste Arisings and Projections’ contains further details to support the Pre-Submission Draft Waste Plan.</p>
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Question 3	WP118	815428	Bridport Town Council	<p>Comment</p> <p>We are not qualified to assess predictions without background knowledge or data. We feel though that a single estimate is too simplistic. Existing commercial sources should be 'encouraged' (carrot or stick) to reduce their waste year on year. The introduction of new industry, which is much needed, will inevitably generate new and unknown resource streams. There should be more emphasis in this strategy to encourage or develop synergistic enterprises so that materials can be recycled locally. As in Q2, the overall aim should be reduction in waste year on year.</p>	<p>Consideration will be given to the inclusion of a range of growth assumptions to ensure that the plan can adapt to changing circumstances. There are a number of European and national initiatives and Directives to encourage businesses and industry to reduce waste. The Waste Plan is fundamentally a land use plan to ensure that we have the correct facilities in place to move waste up the waste hierarchy and divert waste from landfill.</p> <p>Since publication of the Waste Plan Issues Paper, further work has been undertaken to ensure the Waste Plan contains up to date information on waste arisings and growth in all sectors. Background Paper 1 'Waste Arisings and Projections' contains further details to support the Pre-Submission Draft Waste Plan.</p>
Question 3	WP238	399290	Wiltshire Council	<p>Comment</p> <p>On the basis of the trend data presented, it would appear reasonable to opt for Option 1. However, if this approach is followed, attention will need to be paid to the potential impact on neighbouring authorities in terms of the overall need for facilities should C&I arisings outstrip projections. It is agreed that the process of projecting C&I waste capacity requirements is inherently difficult and it remains to be seen whether adopting a zero % growth assumption will match the economic potential of the Plan area over the next 15 - 20 years. As such, it may be sensible to build in a degree of flexibility based around reasonable alternative growth scenarios - e.g. 0% / 1% / 2%. Such work could be tied to known (i.e. existing economic conditions) and planned economic development associated with plans prepared across the Plan area's constituent authorities.</p>	<p>Consideration will be given to the inclusion of a range of growth assumptions to ensure that the plan can adapt to changing circumstances.</p> <p>Since publication of the Waste Plan Issues Paper, further work has been undertaken to ensure the Waste Plan contains up to date information on waste arisings and growth in all sectors. Background Paper 1 'Waste Arisings and Projections' contains further details to support the Pre-Submission Draft Waste Plan.</p>

Question 3	WP258	816842	Transition Town Bridport	Comment	The end of life directive is, we hope, being extended to cover more products and processes. The planet is not just approaching 'Peak Oil' it is fast approaching 'Peak Every Resource' Commercial and industrial businesses are already developing synergistic processes to recover valuable resources, our waste strategy should be encouraging them to act similarly with waste.	The End of Life Vehicles Directive addresses vehicles. Regulations influence vehicle design to make it easier to reuse, recover or recycle components; reduce the use of hazardous materials in vehicle manufacturing and standardise treatment of waste End of Life Vehicles.
Question 3	WP287	820726	Hampshire County Council	Comment	Question 3 response - we believe that a figure more in line with economic growth (of 1-2%) would be more suitable and in line with the assumption for MSW growth rate, rather than the proposed rate of 0% growth.	Noted. Consideration will be given to the inclusion of a range of growth assumptions to ensure that the plan can adapt to changing circumstances. Since publication of the Waste Plan Issues Paper, further work has been undertaken to ensure the Waste Plan contains up to date information on waste arisings and growth in all sectors. Background Paper 1 'Waste Arisings and Projections' contains further details to support the Pre-Submission Draft Waste Plan.
3.18	WP152	558166	Somerset County Council	Comment	Presumably the evolving Plan will expand on what happens to most C,D&E waste within the county.	Chapter 8 summarises what happens to CD&E waste, whilst the Waste Topic Paper provides more information. Further detail and clarification can be provided as the plan progresses.
Question 4 – Do you agree that the estimated level of CDE waste arisings in Bournemouth, Dorset and Poole of 1 million tonnes per annum is reasonable, based upon the evidence available?						
Question 4	WP65	224810	Campaign to Protect Rural England	Comment	Yes, the figure is reasonable but, again, must be treated with great caution.	Noted.

Question 4	WP119	815428	Bridport Town Council	Comment	Qs 4 - 7 We have no comments other than to reiterate our concern that the strategy does not appear to be one aiming for Zero Waste, but more one of 'fire-fighting' the status quo. Where are the targets for waste reduction?	The role of the Waste Plan is primarily to make provision for facilities for the waste that is arising and to ensure that appropriate provision is made to move waste up the hierarchy. Moving towards zero waste is about reducing waste in the first place but it is also about ensuring facilities are available for diverting waste from landfill, through reuse, recycling and treatment and production of energy.
Question 4	WP132	491096	D.K. Symes Associates	Comment	The figure of 1.0 million tonnes of CDE waste seems reasonable recognising the difficulties in obtaining reliable data.	Your support is noted.
Question 4	WP162	494685	SITA UK	Comment	Given the limited amount of data available, apportioning the national figures and using population, would seem to give a relatively accurate estimate of CDE arisings.	Your support is noted.
Question 4	WP239	399290	Wiltshire Council	Comment	Again, we would agree that planning for CD&E waste is inherently difficult due to a range of factors, including the lack of data on arisings and re-use. As such, we would agree that the emerging Waste Plan should only seek to provide capacity for the management of 'residual' CD&E wastes. The assumption of capacity requirements for the management of CD&E waste are considered to be reasonable, albeit, over the life of the Plan there will need to be a significant number of facilities to cater for c.1 million tonnes of waste per annum. Again, on the basis of the assessment of current management performance (c.355,000 tonnes per annum), there would appear to be a significant need for additional facilities to manage the projected CD&E waste arisings over the plan period.	Your support is noted.

Question 4	WP259	816842	Transition Town Bridport	Comment	Qs. 4 - 7 We have no comments other than to reiterate our concern that the strategy does not appear to be one aiming for Zero Waste, but more one of 'fire-fighting' the status quo. Where are the targets for waste reduction?	The role of the Waste Plan is primarily to make provision for facilities for the waste that is arising and to ensure that appropriate provision is made to move waste up the hierarchy. Moving towards zero waste is about reducing waste in the first place but it is also about ensuring facilities are available for diverting waste from landfill, through reuse, recycling and treatment and production of energy.
Question 5 – Do you agree with using a figure of the current amount of inert waste managed as a baseline for the amount of CDE waste that we will need to manage in the future?						
Question 5	WP66	224810	Campaign to Protect Rural England	Comment	Yes, but, again, this figure must be treated with great caution.	Noted.
Question 5	WP133	491096	D.K. Symes Associates	Comment	There needs to be some caution on using this figure as it is understood some facilities are temporary and it makes the assumption that the existing capacity will remain, whereas in reality some may close down.	Whilst this is true, question 5 refers to the baseline figure of arisings. The level of growth decided upon can then be applied to this figure to project the level of arisings that will occur during the plan period. Since publication of the Waste Plan Issues Paper, further work has been undertaken to ensure the Waste Plan contains up to date information on waste arisings and growth in all sectors. Background Paper 1 'Waste Arisings and Projections' contains further details to support the Pre-Submission Draft Waste Plan.
Question 5	WP163	494685	SITA UK	Comment	SITA consider that as the economic crisis improves and more development commences, inert waste volumes will increase	The options for the assumption as to the amount of growth in risings are set out in Question 6. Consideration will be given to the inclusion of a range in the growth assumption to ensure that the plan can adapt to changing circumstances.

Question 5	WP240	399290	Wiltshire Council	Comment	<p>As above. As discussed in the issues paper, the cost of transporting CD&E waste essentially prohibits the movement of such material. Therefore, if current facilities continue to manage approximately one third of projected CD&E waste arisings then there will be a need to provide further opportunities to manage projected arisings over the life of the Plan. In such circumstances, consideration may need to be given to sub-regional capacity provision through the duty to cooperate.</p>	<p>Further liaison on this matter would be welcomed in order to establish sub-regional capacity and needs.</p> <p>Since publication of the Waste Plan Issues Paper, further work has been undertaken to ensure the Waste Plan contains up to date information on waste arisings and growth in all sectors. Background Paper 1 ‘Waste Arisings and Projections’ contains further details to support the Pre-Submission Draft Waste Plan.</p>
Question 6 – Growth in construction, demolition & excavation waste arisings.						
Question 6	WP3	791392	Northamptonshire County Council	Comment	Option 1	<p>Noted. This assumption is likely to be the most appropriate, for the reasons set out. However, consideration will be given to the inclusion of a range of growth assumptions to ensure that the plan can adapt to changing circumstances.</p> <p>Since publication of the Waste Plan Issues Paper, further work has been undertaken to ensure the Waste Plan contains up to date information on waste arisings and growth in all sectors. Background Paper 1 ‘Waste Arisings and Projections’ contains further details to support the Pre-Submission Draft Waste Plan.</p>

Question 6	WP67	224810	Campaign to Protect Rural England	Comment	<p>Option1. We are inclined to agree that increases in recycling and economy with materials are likely to roughly balance the increases in the growth of the sector. But this is really rather speculative.</p>	<p>It is agreed that this assumption is likely to be the most appropriate, for the reasons set out. However, consideration will be given to the inclusion of a range of growth assumptions to ensure that the plan can adapt to changing circumstances.</p> <p>Since publication of the Waste Plan Issues Paper, further work has been undertaken to ensure the Waste Plan contains up to date information on waste arisings and growth in all sectors. Background Paper 1 ‘Waste Arisings and Projections’ contains further details to support the Pre-Submission Draft Waste Plan.</p>
Question 6	WP134	491096	D.K. Symes Associates	Comment	<p>CDE arisings are generally directly linked to the level of activity in the construction sector. On the current indications that this is picking up and will continue to grow the 0% growth is most unlikely, and the level should be increased in line with that of construction. As a further IMPORTANT matter, the document refers almost consistently to 'landfill' for inert waste. This gives a misleading picture as a noticeable amount of inert material is 'recovered' or 're-used' for restoration. This should be considered as re-use in the waste hierarchy and made clear early in the document to cross-reference with Chapter 8.</p>	<p>It is agreed that CDE waste arisings are linked to the construction sector, however other factors may mean that growth in arisings does not match growth in the construction industry (such as initiatives to ensure reuse of materials on construction sites so that they do not become waste). However, consideration will be given to the inclusion of a range of growth assumptions to ensure that the plan can adapt to changing circumstances. Consideration will be given to your point regarding infilling using inert waste being classed as recovery or reuse.</p> <p>Since publication of the Waste Plan Issues Paper, further work has been undertaken to ensure the Waste Plan contains up to date information on waste arisings and growth in all sectors. Background Paper 1 ‘Waste Arisings and Projections’ contains further details to support the Pre-Submission Draft Waste Plan.</p>

Question 6	WP164	494685	SITA UK	Comment	SITA agree with assumption 2 - that CDE will grow in line with the construction sector	<p>It is agreed that CDE waste arisings are linked to the construction sector, however other factors may mean that growth in arisings does not match growth in the construction industry (such as initiatives to ensure reuse of materials on construction sites so that they do not become waste). Consideration will be given to the inclusion of a range of growth assumptions to ensure that the plan can adapt to changing circumstances.</p> <p>Since publication of the Waste Plan Issues Paper, further work has been undertaken to ensure the Waste Plan contains up to date information on waste arisings and growth in all sectors. Background Paper 1 'Waste Arisings and Projections' contains further details to support the Pre-Submission Draft Waste Plan.</p>
Question 6	WP227	224280	East Dorset Community Partnership	Comment	Q6 The percentage growth in CDE waste arisings would appear to take into account the significant growth in recycling and use of recycled products in the construction industry.	Agree.
Question 6	WP241	399290	Wiltshire Council	Comment	See response to Qs 4 and 5. Irrespective of whether options 1, 2 or 3 are followed, there will be a need for additional facilities to manage CD&E waste. As such, consideration may need to be given to the sub-regional implications of providing such facilities.	<p>Further liaison on this matter would be welcomed in order to establish sub-regional capacity and needs.</p> <p>The SW Waste TAB has prepared a joint report on residual waste management capacity within the SW region. This had informed the preparation of the Waste Plan and is available on our website. Background Paper 3 – 'Cross boundary movements of waste' has also been published to support the Pre-Submission Draft Waste Plan.</p>
Question 7 – Growth in hazardous waste arisings						

Question 7	WP4	791392	Northampton shire County Council	Disagree	No, could be linked to growth projections for C&I.	Noted, consideration will be given to this option. Further details on hazardous waste arisings can be found in Background paper 1 'Waste arisings and projections'
Question 7	WP68	224810	Campaign to Protect Rural England	Comment	Yes. There is no clear evidence for an increase or for a decrease in hazardous waste arisings so this assumption is as good as any.	It is agreed that this assumption is reasonable for the reasons set out. Further details on hazardous waste arisings can be found in Background paper 1 'Waste arisings and projections'
Question 7	WP242	399290	Wiltshire Council	Comment	On the basis of evidence and lack of trend data, the assumption is broadly supported. However, in order to ensure that undue pressure is not exerted on sub-regional facilities (e.g. in Wiltshire at Parkgate Farm), the assumptions in terms of projected arisings and the need for 'local' capacity provision, will need to be carefully monitored.	Your support is noted. The WPA will need to consider appropriate monitoring as part of the plan's preparation. Chapter 14 of the Pre-Submission Draft Waste Plan contains a framework for monitoring the effectiveness of the Waste Plan following adoption.
Chapter 4 – Meeting our Future Needs						
4.1	WP192	816619	Highways Agency	Comment	The Agency has no comments to make on this chapter.	Noted.
Figure 4	WP136	764711	W&S Recycling Services	Comment	W&S Recycling currently operate a cardboard and paper recycling facility at Willis Way, with a capacity of 8,000 tonnes per annum. This facility processes recyclates received from Poole and Bournemouth Household Recovery Centres, Bournemouth recycling sites and from local businesses. It is considered that, given the size of the facility, it should be identified in paragraph 5.4. Planning permission has been granted for the re-provision of this facility at W&S Recycling's proposed Mannings Heath facility, with the potential to increase its capacity to 10,000 tonnes.	We are aware of this facility and data on tonnages dealt with and maximum capacity have been included in our calculations. Reference to the facility in relation to the new MRF can be made in the Waste Plan. Paragraph 7.17 of the Pre-Submission Waste Plan refers to the Cardboard Recycling facility.

4.1	WP7	791392	Northampton shire County Council	Comment	Key Issues 3-6 - Identify the capacity gap and supporting policies that allow such facilities to come forward where appropriate.	It is agreed that identifying the capacity gap will be central to addressing these key issues.
Key Issue 1 - Sustainabl e Waste Managem ent	WP5	791392	Northampton shire County Council	Comment	Plan to provide for net self sufficiency and id capacity gap between current and end of plan period based on broad waste management methods / waste hierarchy.	It is agreed that the Waste Plan should aim for net self sufficiency wherever possible as reflected in Key Issue 2.

<p>Key Issue 1 - Sustainable Waste Management</p>	<p>WP47</p>	<p>670039</p>	<p>New Earth Group</p>	<p>Comment</p> <p>New Earth believes that households, businesses and public sector organisations are generally well informed about the importance of minimising residual waste. This has been reinforced through fiscal measures such as the landfill tax escalator and successive media campaigns. New Earth welcomes the innovation shown by its clients, Bournemouth Borough Council and the Dorset Waste Partnership, in ensuring that the collection of municipal waste encourages recycling. In order to capture the full benefit of kerbside separated municipal waste and accommodate new types of collection vehicles, alterations may well be required to existing waste management facilities. This Plan should support the principle of alterations where they would give rise to operational efficiencies. Bournemouth, Dorset and Poole are blessed with an outstanding natural environment, but this in itself presents constraints on new development. As such, it is respectfully suggested that the Plan should prioritise the utilisation of established operational facilities / sites and assess whether there is any scope for further capacity and / or physical expansion and / or add complementary waste recycling and recovery activities. New Earth is mindful that waste recovery will become increasingly sophisticated over the life of the Plan. It is likely to involve multiple tiers of processing, often in pursuit of producing end products that meet 'end of waste' tests / Quality Protocols and also leading to a further reduction in residual waste that value cannot be recovered from. This is particularly true in the Advanced Thermal Conversion sector, where there are a large number of synergies with mainstream industrial processes. It will therefore be important to allow scope for complementary 'secondary' waste processing activities to grow alongside established recovery facilities. In addition, the increasing sophistication of waste recovery should be recognised within the Plan and encouragement given to new complementary activities. I would be more than happy to provide examples of complementary activities on request.</p>	<p>Noted. The Waste Plan's role is to facilitate the movement of waste up the hierarchy through the provision of sufficient appropriate facilities.</p>
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Key Issue 1 - Sustainable Waste Management	WP165	494685	SITA UK	Comment	Plan to provide for net self sufficiency as a minimum and identify the capacity gap between current and end of plan period based on broad waste management methods / waste hierarchy. There should be no cap on maximum capacity as consented capacity is not the same as built operational capacity. The waste market will set its own maximum capacity (i.e. if an area is at operational capacity, funding will not come forward to provide for over-capacity. The Waste Plan therefore does not need to limit maximum capacity. Also the Waste Plan will need to make it clear that facilities recovering energy which do not meet the R1 recovery threshold are still considered Recovery and not disposal akin to landfill.	It is agreed that the Waste Plan should aim for net self sufficiency wherever possible as reflected in Key Issue 2. It is agreed that a cap does not need to be set on capacity. However, need for a facility should be demonstrated where it is for disposal rather than a facility higher up the waste hierarchy. Further consideration will be given to classification of facilities according to the waste hierarchy. The waste hierarchy is a guiding principle of the Waste Plan and referred to in the core policies.
Key Issue 1 - Sustainable Waste Management	WP228	224280	East Dorset Community Partnership	Comment	Key Issue 1 Every business and consumer has a role to play in achieving this but when busy it's too easy to forget that every item thrown away is actually a resource. This has always been recognised in times of austerity (during war-time rationing and in less developed countries). But we need to make it easy for people to do the right thing. Fly-tipping is once again becoming a major problem in East Dorset. It includes garden waste (dumped in hedgerows and on verges) which is still viewed by some as being OK because "it's natural and will not cause a problem". We need to ensure that people are able to cope on those occasions (such as over Bank Holiday periods) when they accumulate more waste than their normal containers can hold and just want to get rid of it. HRF facilities could usefully extend the "bring and take" initiative that EDDC established in community centres and village halls across the District a few years ago. Some nurseries will accept plastic plant pots for recycling. More publicity is needed on what can go where: it must be updated with advances in recycling technology.	The Recycle for Dorset scheme will enable people to recycle a wider variety of waste and should help people to minimise the amounts of residual waste they throw away. Household Recycling Centres generally include an area of bring and take items and it is intended that this will be retained. Policy 5 of the Pre-Submission Waste Plan supports the development of re-use areas at HRC's where there is space to do so.
Key Issue 2 - Movement of waste	WP6	791392	Northamptonshire County Council	Comment	Identify a spatial strategy to provide guidance regarding establishing a network of facilities.	Your suggestion is noted.

<p>Key Issue 2 - Movement of waste</p>	<p>WP48</p>	<p>670039</p>	<p>New Earth Group</p>	<p>Comment</p> <p>Bournemouth, Dorset and Poole are blessed with an outstanding natural environment, but this in itself presents constraints on new development, particularly around the main centres of population and hence the main source of waste arisings. The challenge of identifying suitable sites was well documented. As set out in Appendix 3 of the Issues Document a number of the preferred sites identified in the adopted Joint Waste Local Plan 2006 are no longer capable of being brought forward (notably Land at Bournemouth Airport and land at Hatchpond Depot). There is nothing to suggest that a fresh site search would prove any easier or yield sites capable of being delivered. It is respectfully suggested that the Plan should prioritise the utilisation of established operational facilities / sites and assess whether there is any scope for further capacity and / or physical expansion. For instance, New Earth Solutions' operational facility at Canford in Poole is well placed to serve the needs of the SE Dorset conurbation (presenting the main sources of waste arisings) and may offer potential for further recovery capacity and physical expansion. New Earth considers that the approach outlined above would be the most practicable way of promoting self-sufficiency.</p>	<p>The principle of co-location of waste facilities can be considered as part of the Plan's preparation. The site identification exercise that will be undertaken will consider opportunities for expansion and will consider sites that have been nominated by existing operators for additional facilities and/or capacity. Further consideration is needed as to the most appropriate means of dealing with existing waste management sites through the plan. Where sites are considered strategic and/or where opportunities for expansion have been highlighted, it is likely that consideration will be given to allocating them in the Plan, subject to consideration of the issues highlighted in the site selection methodology.</p> <p>Opportunities for expansion of existing waste facilities has been important in identifying additional capacity to meet identified needs. Many of the site allocations contained in the Pre-Submission Draft Waste Plan will enable expansion of activities/capacity at existing facilities.</p>
<p>Key Issue 2 - Movement of waste</p>	<p>WP82</p>	<p>815029</p>	<p>Resident</p>	<p>Comment</p> <p>surely controls need to be put in place to ensure that only waste material local to the site is processed at that site. as an example most of the processed waste at the MRF at binnegar comes from Farnham</p>	<p>When sites come forward we would expect them to fulfil a need identified in the Waste Plan. Guiding principles within the plan include that waste should be disposed of, or recovered, as closely to where it is produced as possible and that that the network of facilities should enable a move towards self sufficiency in waste disposal and recovery. In order to justify investment in a facility, there may be a need to manage waste from a wider area however this would be subject to assessment of the impacts of doing so. Legal agreements could provide a means of controlling the origins of waste at a facility if this was considered necessary, at the planning application stage.</p>

<p>Key Issue 2 - Movement of waste</p>	<p>WP98</p>	<p>815324</p>	<p>Melbury Abbas and Cann Group Parish Council</p>	<p>Comment</p> <p>It is highly likely that changes will take place during the life of this plan to methods of recycling and the amount of waste material that can be recycled. We need to put in place a plan that will start now and take us into the 22nd Century and beyond. Councils will need to balance their books on decreasing allowances from Central Government and there could be grants available for innovative projects if a good business plan is put forward. Recycled raw material could be sold if processed to a sufficient degree and in sufficient quantities to manufacturing industry either now or in the future. It would be more cost effective if there was a central base for Dorset capable of expansion to cope with new methods as they are developed. Such a centre should have a Rail Head to take as much of the transportation as possible from Dorset's road network. One such site that could be examined (if vacant) is the old Admiralty owned former munitions base at Holton Heath. It would be capable of expansion ,it has previously been used to manufacture volatile materials, has the capacity to connect to the Railway network, has nearby access to the East- West strategic road route, is adjacent to an industrial area and the last time I saw it was derelict.</p>	<p>The site suggested will certainly be considered as part of the site identification exercise that will take place, to assess its suitability for a range of waste management facilities which are stated to be needed in the Issues Paper. Should there be opportunities for reprocessing in conjunction with the sorting of recyclables this could be considered. Note that reprocessing facilities which are not classified as 'waste' developments will be a matter for district local planning authorities to consider and so may be outside the scope of the Waste Plan.</p> <p>Land at Holton Heath has been allocated for waste transfer/depot in the Pre-Submission Waste Plan. Admiralty Park was investigated as an option for a range of waste facilities however it was discounted as there are environmental designations coving the site.</p>
<p>Key Issue 2 - Movement of waste</p>	<p>WP166</p>	<p>494685</p>	<p>SITA UK</p>	<p>Comment</p> <p>Existing sites should be safeguarded and their suitable for expansion/re-development be carefully considered. In addition, criteria based policies (like those proposed) should allow for facilities to be developed in an appropriate manner to meet the identified needs. Positive encouragement needs to be given to alterative forms of waste transportation such as rail and sea transportation for out of county recovery.</p>	<p>Existing waste facilities will be safeguarded as set out in Chapter 10 of the Issues Paper. The Plan will include policy encouraging the use sustainable transportation methods where possible and practicable. However, it is considered that opportunities for using rail and sea to transport waste are limited in Dorset.</p> <p>The policy for Safeguarding existing facilities is contained in Chapter 13 of the Pre-Submission Draft Waste Plan.</p>

<p>Key Issue 3 - Recyclables</p>	<p>WP49</p>	<p>670039</p>	<p>New Earth Group</p>	<p>Agree</p> <p>As highlighted in the question, it is important to understand the means by which recyclables are collected. Co-collection vehicles will operate most efficiently (minimise journey lengths and turnaround times) where they have a single point of delivery for both residual waste and kerbside separated recyclables. New Earth would highlight that permanent planning permission has been secured for the extension of the established 'dirty' MRF building at Canford in Poole (Borough of Poole ref: 13/00855/F dated 2/12/13), such that it will be capable of processing source segregated dry recyclables. For the avoidance of doubt, the Canford MRF lies within the Broad Area identified in Figure (6) of the Issues Document. It should be stressed that the above permission could facilitate the processing of recyclables collected from households and / or commercial businesses. The former will be determined in part by the award of the forthcoming 'MRF' contract being procured by Bournemouth Borough Council and the Dorset Waste Partnership. New Earth is aware that planning permission has also been granted for MRF's elsewhere within the Plan Area, including at a new facility at Mannings Heath in Poole and established operations at Binnegar Quarry near Wareham. New Earth considers that sufficient consented capacity exists, such that the Plan need not identify further capacity / sites. The delivery of one or more 'fit for purpose' dry recycling MRF will therefore aid the self sufficiency of Bournemouth, Dorset and Poole. The market for some recyclables, such as rigid plastics, is very volatile albeit there are indications that it is likely to strengthen over the medium to long term. The quality of the sorted recyclables will be essential to the success of any operation. The Issues Document's emphasis on 'fit for purpose' facilities is wholeheartedly embraced. However, it must be recognised that new markets are likely to emerge over the life of Plan. The Plan should therefore support the ongoing improvement and adaptation of established MRF facilities. This might well entail expansion for the installation of new plant or processes that are required in order to exploit new market opportunities. New Earth supports the ongoing enhancement of the established network of household recycling centres and waste management centres.</p>	<p>It is agreed that further capacity for a MRF is unlikely to be necessary and that the Waste Plan will not need to identify a site given the existence of three existing consents.</p> <p>The Pre-Submission Draft has not sought to identify a new site for a MRF given existing consents. However, if during the Plan period an application can forward for a MRF to serve a proven need this would be determined in accordance with Policy 5 'Facilities to enable the recycling of waste'.</p>
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<p>Key Issue 3 - Recyclables</p>	<p>WP139</p>	<p>764711</p>	<p>W&S Recycling Services</p>	<p>Comment</p> <p>W&S Recycling welcomes identification of an urgent need for a strategic MRF and is currently seeking to discharge conditions on its current consent for a MRF at Mannings Heath to enable this development to come forward in the near future. W&S Recycling is aware that there are other consents for similar facilities in the plan area, and as such considers that it is not necessary for the emerging plan to identify further capacity/sites. Upgrading of the network of local household recycling centres and waste management centres will be an essential part of achieving the aims and objectives of the plan, ensuring that a future MRF facility is able to operate effectively.</p>	<p>It is agreed that further capacity for a MRF is unlikely to be necessary and that the Waste Plan should not need to identify a site given the existence of three existing consents. It is agreed that the upgrading of and provision of new household recycling centres and waste management centres will be integral to the provision of a fit for purpose network of recycling facilities. The Waste Plan will include site specific allocations where necessary.</p> <p>The Pre-Submission Draft has not sought to identify a new site for a MRF given existing consents. However, if during the Plan period an application can forward for a MRF to serve a proven need this would be determined in accordance with Policy 5 'Facilities to enable the recycling of waste'. Where possible, site allocations are included in the Waste Plan for the development of new/improved HRC's. Where it has not been possible to allocate a specific site the Plan contains a criteria based policy which should allow for appropriate sites to come forward.</p>
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<p>Key Issue 3 - Recyclables</p>	<p>WP167</p>	<p>494685</p>	<p>SITA UK</p>	<p>Comment</p> <p>Develop a new strategic Materials Recycling Facility at the earliest possible opportunity. SITA's existing Poole site at Mannings Heath is considered highly suitable given its current planning status, location within the area and its links to the strategic road network. Further details are provided in Site Nomination Form. The Authority could take steps to stimulate the private waste management industry by;</p> <ul style="list-style-type: none"> - Providing funding or make capital available to build local infrastructure to meet the need of local collection and processing requirements. - Procure output based contracts which require contractor(s) to obtain, through process of MEAT evaluate, higher levels of recycling, thus stimulating the local or regional processing of wastes. - When offering processing contracts to the market the Authority should consider exclusivity and/ or guaranteed tonnages so that new infrastructure projects are bankable. - Allow the market to determine if recycling is more cost effective than recovery for some commodities such as End of Life Plastic, carpets, mattresses etc.. 	<p>It is agreed that a strategic MRF needs to be developed as soon as possible, within the broad area identified on Figure 6. The existing MRF at Mannings Heath is highlighted as an option under Identified Need 1. Further discussions would be needed as to the suitability of the existing facility or its need for adaptation. However, the development of the MRF is likely to come forward before the completion of the Waste Plan, with the tendering process currently underway.</p>
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<p>Key Issue 4 - Organic Waste</p>	<p>WP50</p>	<p>670039</p>	<p>New Earth Group</p>	<p>Agree</p>	<p>New Earth recognises that 'organic waste' encompasses a wide range of waste types, including green, food, liquid and animal wastes and a wide range of sources of such waste - household, commercial, farming and food processing. Accordingly a wide range of facilities might be appropriate. New Earth is of the view that green waste is best treated by means of composting, comingled green and food wastes best treated by means of enclosed ABPR compliant composting facilities and segregated food waste best treated by means of AD. The comments below focus upon the collection and treatment of food waste. It is important to understand the means by which organic waste, particularly food waste, is collected. Co-collection vehicles will operate most efficiently (minimise journey lengths and turnaround times) where they have a single point of delivery for both residual waste and food waste. Opportunities may well exist for the co-location of residual waste treatment facilities and organic waste treatment facilities. However, even where this is not possible it would be appropriate to integrate food waste bulking stations within residual waste treatment facilities where these are proximate to the main sources of waste arisings and enjoy good access. Such an approach will ensure that RCV's and commercial collection vehicles minimise journey lengths and maintain efficient turnaround times. Food waste could then be bulked up and transported to AD plants, which might well be located in more rural areas owing to the production of digestate and its application to agricultural land as a soil conditioner. The Plan should therefore support the provision of bulking stations. Given the long term capacity deficit identified within the Issues Document, it is evident that new AD plants are likely to be required. Aside from digestate AD facilities produce bio-methane. Bio-methane can either be cleaned up to form a bio-gas for direct injection into the gas network or utilised within an engine / combuster to generate electricity and heat. Bio-gas can also be used as a renewable transport fuel. This is pertinent to the EU commitment to achieve a 20% reduction in GHG emissions against a 1990 baseline by 2020. The 2020 targets also include renewable energy targets set at 20% for the EU as a whole and 15% for the UK. In 2012 around 4% of the UK's energy came from UK in</p>	<p>Your helpful comments are noted. It is agreed that a range of facilities to manage the different components of organic waste may be appropriate. The principle of co-location of waste facilities could be encouraged through the Plan and it is agreed that opportunities for bulking up/transfer facilities with residual waste facilities should be considered. The use of heat and energy from anaerobic digestion plants will be an important consideration and this will be reflected in the Plan and policy criteria for this type of development.</p> <p>The principle of co-location of waste facilities is encouraged through the Pre-Submission Draft Waste Plan.</p>
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					renewable sources and 15.5% of electricity generated in the Q2 of 2013 was renewable. However electricity is only part of overall energy use, hence the lower 4% figure overall, with road fuel, domestic and industrial heating dragging the overall position down. Appropriately sited AD plants have considerable potential to deliver renewable heat and / or renewable transport fuels. Sites that offer the opportunity of direct injection into the existing gas network, co-location with potential heat users / heat networks and / or the on-site use of transport fuels (e.g. co-location with transport yards/ hubs) should be afforded priority.	
Key Issue 4 - Organic Waste	WP168	494685	SITA UK	Comment	Consider small scale AD plants to deal with organic C&I waste	<p>It is agreed that small scale facilities could well provide capacity for managing organic waste. It is thought that a criteria based policy within the Waste Plan could provide the appropriate mechanism for meeting this need.</p> <p>The Pre-Submission Draft Waste Plan contains criteria based policies for determining application for appropriately sited AD facilities if they come forward during the Plan period.</p>

<p>Key Issue 5 - Residual Waste</p>	<p>WP51</p>	<p>670039</p>	<p>New Earth Group</p>	<p>Agree</p>	<p>As aptly illustrated in Figure 1 of the Issues Document, Bournemouth, Dorset and Poole are blessed with an outstanding natural environment, but this in itself presents constraints on new development. The difficulties in identifying new sites are well documented in the evidence base underpinning the adopted Joint Waste Local Plan, 2006. As such, it is respectfully suggested that the Plan should prioritise the utilisation of established operational facilities / sites and assess whether there is any scope for further capacity and / or physical expansion and / or add complementary waste recycling and recovery activities. As recognised at paragraph 7.22 of the Issues Document planning permission has recently been granted to extend the life of New Earth's operational MBT facility at Canford from 2027 to 2035 (i.e. beyond the proposed Plan period). Planning applications for the permanent retention of the Canford MBT facility have been submitted to the Borough of Poole. The operational MBT facility is Permitted to treat up to 100,000 tonnes of residual waste per annum. MBT recovers materials from residual waste for recycling and produces a renewable fuel (RDF) for energy recovery, driving waste up the waste hierarchy. As recognised in paragraph 7.6 of the Issues Document, New Earth has also secured consent for the development of a Low Carbon Energy Facility ("LowCEF") adjacent to the operational MBT facility. The LowCEF will employ a patented Advanced Thermal Conversion ("ATC") technology. Refused Derived Fuel ("RDF") from the adjacent MBT facility will be heated to very high temperatures in the absence of oxygen (a process known as pyrolysis) to break it down into a syn-gas and a solid carbon char. The syn-gas will be cleaned, such that it meets the end of waste test, before being fed into a bank of CHP engines to generate up to 10MWe for export to the local distribution grid. Char from the pyrolysis process will be heated but with the controlled addition of a small amount of oxygen (a process known as gasification), to liberate any remaining syn-gas. This will in turn, be used to generate heat for use in the process. More information can be found in the original planning application that was submitted to the Borough of Poole (Ref: APP/12/01559/F, granted 01/07/2013). It is envisaged that construction will begin in</p>	<p>The principle of co-location of waste facilities could be encouraged through the Plan. The site identification exercise that will be undertaken will consider opportunities for expansion and will consider sites that have been nominated by existing operators for additional facilities and/or capacity. Further consideration is needed as to the most appropriate means of dealing with existing waste management sites through the plan. Where sites are considered strategic and/or where opportunities for expansion have been highlighted, it is likely that consideration will be given to allocating them in the Plan, subject to consideration of the issues highlighted in the site selection methodology.</p>
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					<p>2015 and allowing for commissioning the first phase of the LowCEF would become operational in 2016. New Earth is mindful that waste recovery will become increasingly sophisticated over the life of the Plan. It is likely to involve multiple tiers of processing, often in pursuit of producing end products that meet 'end of waste' tests. This is particularly true in the Advanced Thermal Conversion sector, where there are a large number of synergies with main stream industrial processes. It will therefore be important to allow scope for complementary 'secondary' waste processing activities. New Earth's ATC technology is also deliverable at smaller scales thus enabling the provision of energy to high capacity industrial energy users (both heat and power). Consideration therefore also needs to be given to how energy production utilising fuels and other products derived from waste can be made ancillary to existing industrial users. This assists with the Government's desire for decentralised energy production. With the above in mind, New Earth is confident that technological advancements will free up latent capacity within the established residual waste treatment facilities, particularly by the end of the Plan period. The greater challenge is perhaps how the Plan can harness the benefits associated with complementary 'secondary' waste processing activities - in terms of products and supply chains, energy, training and job creation. New Earth believes that substantive benefits can be delivered locally which sit comfortably with the area's natural capital.</p>	
Key Issue 5 - Residual Waste	WP169	494685	SITA UK	Comment	See Question 13 below	Noted.
Key Issue 6 - Inert Waste	WP170	494685	SITA UK	Comment	Recognise the opportunity to provide recycling/recovery facilities at existing and planned mineral voids that require restoration.	It is agreed that such locations could provide appropriate opportunities for inert recycling facilities. Proposals for such facilities will be considered against Policy RE1 of the Minerals Strategy.

Chapter 5 - Recycling						
5.1	WP153	558166	Somerset County Council	Comment	Projections are included for 2014, 2016, 2019 and 2027. Presumably 2014 data in the Plan will become actual data (and thus a baseline) rather than projections. It may be interesting to reflect (and/or provide more detail on) the rationale for including a projection for both 2016 and 2019. There is an inherent logic underlying Figures 6 and 7, linked with proximity to development and existing land-use patterns, but an Inspector may welcome further detail on the supporting justification.	Your helpful comments are noted. The timeframes used in our projections were linked to key changes in waste management in the Plan area, such as the end of existing contracts. The baseline data and projections set out in the Pre-Submission Draft Waste Plan have been updated. See also Background Paper 1 'Waste arisings and projections' for further information.
5.1	WP154	558166	Somerset County Council	Comment	The Issues consultation seems to suggest that criteria-based policies could be developed for wood recycling, organic waste facilities, metal recycling and general recycling. No doubt there will be a degree of cross-checking and where appropriate consolidation to mitigate the risk of any internal policy conflict(s) within the Plan.	Your helpful comments are noted and will be considered as the plan progresses. An internal policy checklist has been undertaken and can be viewed as Appendix 2 of the Soundness Self-Assessment Checklist. This can be downloaded from our website.
5.1	WP221	816695	Dorset AONB Partnership	Comment	Having reviewed the broad areas of need for a Materials Recycling Centre and Household Recycling Facilities, I consider that their proximity from the AONB is such that adverse effects are unlikely to arise. Consequently it should not be necessary to consult the AONB on these developments. Having reviewed the areas of need for new waste transfer stations, I note that some are located within or in close proximity to the AONB. Consequently I consider that it may be necessary to consult the AONB team during the site selection and design process. I note that requirements for relocating, updating and expanding existing facilities are outlined in the Issues Paper. At this stage the AONB team is unable to comment on the detail of these requirements, beyond observing that the proposals in Dorchester, Blandford and Bridport may produce adverse effects on the AONB. We are happy to engage in consultation on siting and design in due course.	Your comments are noted. Input will be sought from the AONB team when consideration is given to sites within or likely to impact on the Dorset AONB. In addition, the Waste Plan will contain policy guidance for considering applications that come forward for sites in the AONB and advice will be sought from the AONB on the criteria as it is development. The AONB team has been fully involved in the consideration of site options and their input has contributed to the 'development considerations' set out for the site allocations in the AONB. In addition, the Pre-Submission Draft Waste Plan contains policy's to ensure development proposals minimises impact on the AONB to acceptable levels.

5.1	WP294	822292	Resident	Comment	Please can I comment on the way that waste is managed in Purbeck. The focus has appeared to concentrate more on recycling, rather than reducing and reusing. Please can we have more information and encouragement to achieve the top two targets of the new waste hierarchy. Reduction, reusing and make and mend. The recycling site in Swanage is well placed for a reuse shop and a make and mend initiative, either connected to the council recycling business or as an independent business working co-operatively and collaboratively with DCC/PDC/STC and Parish Councils. I have had some discussions with other reuse and make and mend initiatives and think this would also work well in Swanage. Please can we somehow try to bring attention to this, and explore the possibilities further. The new Swanage Prospect Business Park (site of recycling) would make a convenient site, and was made available with a view to supporting employment in Swanage for start- up businesses. Could a unit be subsidised/ made available by the council/s ?	It is agreed that reduction and reuse are at the top of the waste hierarchy and will be encouraged wherever possible. However, prevention of waste involves changes in consumer and manufacturing behaviour which are outside the control of local waste planning.
5.2	WP137	764711	W&S Recycling Services	Comment	W&S Recycling currently operate a cardboard and paper recycling facility at Willis Way, with a capacity of 8,000 tonnes per annum. This facility processes recyclates received from Poole and Bournemouth Household Recovery Centres, Bournemouth recycling sites and from local businesses. It is considered that, given the size of the facility, it should be identified in paragraph 5.4. Planning permission has been granted for the reprovision of this facility at W&S Recycling's proposed Mannings Heath facility, with the potential to increase its capacity to 10,000 tonnes.	We are aware of this facility and data on tonnages dealt with and maximum capacity have been included in our calculations. Reference to the facility in relation to the new MRF can be made in the Waste Plan. Paragraph 7.17 of the Pre-Submission Waste Plan refers to the Cardboard Recycling facility.
5.5	WP288	820726	Hampshire County Council	Comment	5.6 Should include a reference to household' (or municipal) waste other it could imply the recycling rates are for other waste streams too.	Agree

Summary of Assumptions	WP39	682036	Dorset Wildlife Trust	Comment	Recycling targets Dorset Waste Partnership through its "recycle for Dorset" initiative has given a clear recycling target of 65%. DWT would like to see Bournemouth and Poole's own recycling targets clearly presented in this waste plan. Bournemouth and Poole should match Dorset's recycling target of 65%, and if they can't then the reasons for this will need explanation. At section 2.12 a combined Dorset, Poole and Bournemouth recycling target for 2015/2016 is set at 60%. Is Commercial and Industrial Waste (CIW) included in this target? If it is not then we believe it should be included or given its own target.	It is agreed that it would be helpful to include recycling targets for Bournemouth and Poole. The WPA has liaised with the three waste management authorities throughout the preparation of the Waste Plan. Where possible up to date recycling targets have been taken into account when projecting waste arisings. The borough of Poole has in place a target to increase its recycling rate to 50% by 2018/19. A 5% increase in recyclates has therefore been incorporated over the four-year period from 2015/15 to 2018/19. Further detail can be found in Background Paper 1: 'Waste Arisings and Projections'
5.9	WP138	764711	W&S Recycling Services	Comment	W&S Recycling welcomes the identification of Mannings Heath MRF as a known option for the provision of a facility to meet the needs of Bournemouth, Dorset and Poole. Discharge of conditions to enable commencement of development is currently progressing.	Noted
5.9	WP289	820726	Hampshire County Council	Comment	5.9 It would be helpful to mention the new MRF capacity is estimated to be 100,000tpa as this helps in understanding the figures that follow. However the MRF capacity will need to be determined by the (yet to be determined) estimated growth rate in C&I waste arisings (see answer to Question 3 above). Note: we suggest the term Material Recovery Facility is more helpful in distinguishing the difference between (household) recycling centres and these more specialist, mostly automated, advanced sorting facilities. 5.10 and Table 4 It looks as if there is an error in Table 4 and thus the shortfall indicated in para 5.10 is slightly out. It would seem the third row is mislabelled and is actually the shortfall figures (and should be shown in negative with a red highlight) as they are the difference between rows 1 and 2. Row 4 would then shown the capacity surplus (42k - 56K) with a new MRF.	It is agreed that it would be helpful to include the capacity of the new MRF to ensure the figures that follow are clear. With regards to table 4, it is agreed that clarification is needed to confirm that the figures in the 'Capacity' row include 1 MRF with a capacity of 100,000t. In reality this should be increased to show that a further permission has been granted for an additional MRF, giving an even greater overcapacity if both were to be developed. Further clarification is contained in the Pre-Submission Draft Waste Plan and the supporting Background Paper 1 'Waste arisings and projections'.

Question 8 – Do you have any comments on the location and/or land use requirements of a MRF and options suggested? Do you have any suggestions for alternative sites that could be suitable for a MRF to serve Bournemouth, Dorset and Poole?						
Question 8	WP69	224810	Campaign to Protect Rural England	Comment	Option 1, Mannings Heath, and option 2, Canford Magna, both seem to be good places to site an MRF. Option 3, Binnegar, is too remote from where the most rubbish will arise and would generate a lot more traffic on narrow rural roads. Remember the Proximity Principle ! You did not ask for comments in section 5, Recycling, but it will be necessary to bring all HRCs up to date to fit in with the new Recycle for Dorset regime. And we do need more Bring Banks". There should be many more of these excellent facilities in public spaces for use by residents and holiday-makers.	<p>Your comments are noted. This facility is urgently required and will be out of the scope of allocation in the Waste Plan. It is understood that a tender will be awarded to a waste management company later this year to build this facility in partnership with the waste authorities.</p> <p>Capacity of one of the two permitted material recycling facilities has been included within our assessment of need from 2020 onwards, when a facility could realistically come on board. The Waste Plan also includes a criteria based policy (Policy 5 'Facilities to enable the recycling of waste') against which any additional applications for such facilities will be considered during the Plan period.</p>
Question 8	WP52	670039	New Earth Group	Comment	New Earth is pleased to see the inclusion of the Canford MRF as a 'known option' on page 39 of the Issues Document. The position has however, moved on from that described in the supporting text in that the condition restricting the life of the established 'dirty' MRF operation and consented extension to 2035 has been removed - effectively granting permanent consent.	Your helpful comments are noted and the Plan we be updated as necessary.

Question 8	WP106	815590	Blandford Forum Town Council	Comment	Mannings Heath appears from this document as the most practical proposal.	<p>Your comments are noted. This facility is urgently required and will be out of the scope of allocation in the Waste Plan. It is understood that a tender will be awarded to a waste management company later this year to build this facility in partnership with the waste authorities.</p> <p>Capacity of one of the two permitted material recycling facilities has been included within our assessment of need from 2020 onwards, when a facility could realistically come on board. The Waste Plan also includes a criteria based policy (Policy 5 'Facilities to enable the recycling of waste') against which any additional applications for such facilities will be considered during the Plan period.</p>
Question 8	WP120	815428	Bridport Town Council	Comment	We reiterate our wish to see more decentralised recycling by having facilities available at preferably all HRCs and WTSs. This would not only help local economies and reduce 'waste miles', but it might well reduce the required size of the central facility, hence making the choice and delivery of that facility more achievable.	Your comments are noted. The reduction in waste mileage is important and as such there is an identified need for transfer facilities outside of the conurbation to bulk up and transfer waste and recyclable materials to more centralised facilities. Treatment facilities work on economies of scale and therefore it is unlikely to be possible to have localised treatment facilities.
Question 8	WP140	764711	W&S Recycling Services	Comment	W&S Recycling welcomes the identification of Mannings Heath MRF as a known option for the provision of a facility to meet the needs of Bournemouth, Dorset and Poole. Discharge of conditions to enable commencement of development is currently progressing.	Noted.

Question 8	WP171	494685	SITA UK	Comment	SITA consider our Mannings Heath site as the best location for a Strategic MRF facility. The site benefits from a planning permission for a "Waste Reclamation, Recycling, and Transfer Station" that can handle up to 75,000 tonnes per annum of C&I, CDE and bulky household waste. The site has been operational since 1992 and the surrounding land use is generally industrial in nature, with a number of other large industrial enterprises nearby, including a foundry and plant hire units. There are only a limited number of residential receptors nearby and no statutory designation at or adjacent to the site. The site is also well located with regards to the waste arisings and has excellent links to the strategic road network. It is considered that the re-development of this site would have no significant impacts upon the surrounding environment or local amenity. The site is well situated within the Poole or Bournemouth area, in close proximity to the largest airings of Co-mingled material. Co-mingled recycling by its very nature is low density and therefore costly to transport both financially and environmentally, therefore it would be sensible to consider the location of an MRF close to the large conurbations Whilst located outside of the area of search, SITA does also operate a recyclables MRF at Binnegar Environmental Park in Wareham. The existing MRF is permitted to accept 30,000tpa. Permission existing for an Inert Recycling Facility and IVC which are yet to be development - meaning there remains 80,000 tpa of capacity remaining at the site.	Your comments are noted.
Question 8	WP229	224280	East Dorset Community Partnership	Comment	Q8 We support the logic of MRF being located within the Bournemouth/Poole conurbation as that is the source of most waste arisings and reduces transport costs and fuel.	Your support is welcomed
Question 8	WP243	399290	Wiltshire Council	Comment	At this stage, we agree that the broad location for bringing forward MRF capacity should be proximal to the main centres of population. However, we do not have any further comments to make in respect of the site options.	Noted

Question 8	WP194	816619	Highways Agency	<p>The Agency notes the comments in the consultation document on the need for a MRF within the waste plan area and the context of some materials being taken for sorting outside the county. We also note the intended sustainability benefit of constructing a MRF in Dorset in terms of reducing the movement of waste (presumably in terms of total miles travelled) and the consequent overall positive impact on highway congestion and air quality. At this stage no information has been provided which sets out current and future numbers of journeys, their origins and destinations, and the net change in trips which would occur if a MRF is developed in the waste plan area. The Agency will need this information, along with data on the impact such a development is forecast to have on the operation of the trunk road, before a substantive response can be provided. The Agency does note that recyclables arising from most of the South East Dorset Conurbation being transported to the three potential sites listed (Manning's Heath, Poole, Canford Magna and Binnegar Quarry, west of Wareham) would not cross or use the trunk road network, thus minimising the impact on the SRN.</p>	<p>Your comments are noted. This facility is urgently required and will be out of the scope of allocation in the Waste Plan. It is understood that a tender will be awarded to a waste management company later this year to build this facility in partnership with the waste authorities.</p> <p>Capacity of one of the two permitted material recycling facilities has been included within our assessment of need from 2020 onwards, when a facility could realistically come on board. The Waste Plan also includes a criteria based policy (Policy 5 'Facilities to enable the recycling of waste') against which any additional applications for such facilities will be considered during the Plan period.</p>
Question 8	WP260	816842	Transition Town Bridport	<p>It is a key part of 'Transition' that we become more resilient by dealing with issues of energy, resources and waste locally. We therefore wish to see more decentralised recycling by having facilities available at preferably all recycling centres. This would not only help local economies and reduce 'waste miles', but it might well reduce the required size of the central facility, hence making the choice and delivery of that facility more achievable.</p>	<p>Your comments are noted. The reduction in waste mileage is important and as such there is an identified need for transfer facilities outside of the conurbation to bulk up and transfer waste and recyclable materials to more centralised facilities. Treatment facilities work on economies of scale and therefore it is unlikely to be possible to have localised treatment facilities.</p>

5.13	WP290	820726	Hampshire County Council	Comment	Hampshire County Council has recently undertaken a review of its HWRC network and will be looking at options for changes to the service over the coming year with public consultation starting in June 2014. With the increasing financial pressures on local authorities we are seeking innovative ways of ensuring longer term provision of service for the public including the HWRC Service. Hampshire is keen to look at the potential to look at ways of working in partnership with neighbouring authorities to deliver services close to the boundaries between them to reduce the overall cost of services being provided and would welcome the opportunity to discuss proposals in terms of HWRC provision.	Dorset County Council would welcome the opportunity to work with its neighbouring authorities to deliver services where appropriate.
Identified Need 2: Household Recycling Centres (HRCs)	WP87	558509	North Dorset District Council	Comment	North Dorset District Council acknowledge the issues identified on the existing site in Blandford and will work with the WPA/DWP to investigate opportunities for relocation within the town.	Noted, your input into the site identification exercise will be appreciated. North Dorset District Council has been a key stakeholder in the identification of a site to replace the existing Blandford Waste Management Centre.

<p>Identified Need 2: Household Recycling Centres (HRCs)</p>	<p>WP296</p>	<p>826966</p>	<p>Resident</p>	<p style="writing-mode: vertical-rl; transform: rotate(180deg);">Comment</p> <p>I've had a brief discussion with S Hardy about the current consultation document concerning a new Waste Plan for Dorset. I see that it is recognised that Dorchester needs some new facilities - good! Attached is a self-explanatory discussion with Steve Burdis and Jason Jones of the DWP from December 2012. However, efforts to find a new site or sites in the current century have been characterised by failure on at least two occasions. In my view the reason for this is that single sites have been produced which then attract opposition from those living anywhere near. (a) a site adjacent to the bypass on St Georges Road was rejected on grounds of noise by Government Inspectors around 10 years ago. (b) Subsequently, a new site (again adjacent to the bypass) was put forward by West Dorset a few years later only to be put in abeyance because of objections received. Now West Dorset and the Duchy are set to abandon the site for the purpose then suggested and use it for light industrial instead. I am alarmed and urge that several sites with their strengths and weaknesses, be brought forward so that there can be an informed local discussion before a preferred option is identified. If we make the same mistake as previously and come out with one suggestion only, there is a real risk of experiencing yet another rejection and being lumbered with continuing on the present site even though it's long outlived its usefulness.</p>	<p>The need for a new Household Recycling Centre for Dorchester is recognised and it is intended that an appropriate site for such a facility will be identified in the Waste Plan. The next stage in the preparation of the plan is to conduct a site finding exercise to meet the needs identified in the Issues Paper. Wherever possible alternative options will be considered and consulted upon when a draft version of the Waste Plan is published.</p> <p>Following consideration of a range of options, the Pre-Submission Draft includes land for the development of a new and improved HRC to serve Dorchester and surrounding areas.</p>
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Question 9 – Do you have any suggestions for sites that could be suitable for household recycling facilities in the general areas where a need has been highlighted on Figure 7?

Question 9	WP1	206690	Resident	Comment	I believe that the Brook Rd HRC should be relocated and enlarged onto a site on the Ferndown or Uddens Industrial Estate.	<p>Opportunities for the relocation of Brook Rd HRC will be investigated further.</p> <p>A range of options for improving and/or relocating the Brook Road HRC have been considered and subject to consultation. Unfortunately, the WPA has not been able to identify an available, deliverable site for allocation in the Pre-Submission Draft Waste Plan. The Waste Plan includes a criteria based policy (Policy 5 'Facilities to enable the recycling of waste') against which an applications would be considered during the Plan period.</p>
Question 9	WP29	812899	Resident		Yes, I would like to suggest Gillingham dorset as a suitable site for a household recycling facility. Gillingham is expanding fast with 12,000 population set to significantly rise from 2016 with the development of the southern extension with 2000 plus new homes and expansion of the existing business parks. The closest HRC is Shaftesbury which, although provides a good service for the area, invariably has long queues or closed for compaction of the waste which causes people to have to come back another time or alternatively fly tip.	<p>Your comments are noted and opportunities will be investigated.</p> <p>Land at Brickfield Business Park, Gillingham is included in the Pre-Submission Draft Waste Plan for the development of a replacement HRC.</p>
Question 9	WP33	812899	Resident	Comment	For Gillingham, I would suggest a site on the Kingsmead Business Park or within the Brickfields Business Park, so long as access to the latter is not via New Road.	<p>Your suggested sites are noted and opportunities will be investigated.</p> <p>Land at Brickfield Business Park, Gillingham is included in the Pre-Submission Draft Waste Plan for the development of a replacement HRC.</p> <p>Kingsmead Business Park was considered however this site was discounted as there is a conflict with the Local Plan. The site is proposed for the development of a local centre and would be incompatible with the development of a HRC.</p>

Question 9	WP86	558509	North Dorset District Council	Comment	North Dorset District Council agree with the identified need in the north of the District and suggest that a HRC is considered in Gillingham to accommodate waste from the proposed growth in the town.	Your comments are noted and opportunities will be investigated. Land at Brickfield Business Park, Gillingham is included in the Pre-Submission Draft Waste Plan for the development of a replacement HRC
Question 9	WP70	224810	Campaign to Protect Rural England		Several new HRCs are certainly needed but we are not really well enough informed to suggest specific sites.	Noted
Question 9	WP121	815428	Bridport Town Council	Comment	Qs 9 & 10 Site selection for HRCs & WTSs Broomhills site has now got planning permission.	Agreed, the Plan will be updated to reflect this new permission. The Pre-Submission Draft Waste Plan has been updated to reflect the development of Broomhills, Bridport.
Question 9	WP107	815590	Blandford Forum Town Council	Comment	An HRC should be located at each major town. The existing HRC in Blandford is adjacent to housing. Relocation to the industrial areas on the outskirts of Blandford Forum parish should be more acceptable.	It is unlikely that resources or sites will be available to locate a HRC in each major town. However, it is acknowledged that the existing HRC requires improvement and opportunities for relocation will be investigated. Land at Sunrise Business Park, Blandford is included in the Pre-Submission Draft Waste Plan for the development of a replacement WMC.
Question 9	WP244	399290	Wiltshire Council	Comment	At this stage, we do not have any suggestions for suitable sites for accommodating new and/or improved HRC facilities. The approach being given to the identification of options to plug gaps in the strategic HRC network is supported. As outlined in the Issues Paper, the Plan area is largely rural (similar to that of Wiltshire and Swindon) and, as such, there will be a need to present a framework of opportunities to service rural and urban communities.	Noted.

Question 9	WP196	816619	Highways Agency	<p>The Agency notes the waste disposal authorities' comments that several existing HRCs probably need to be relocated (Wimborne, Bridport, Dorchester, Blandford & Sherborne). You will be aware that the Agency has been very closely involved in the proposals to relocate the Bridport HRC (and also provide a new transfer facility for the west of the county). Subsequent to the publication of this consultation document, permission has been granted with conditions that will ensure works are undertaken on the A35(T) which provide suitable access to the site and ensure the safe and efficient operation of the mainline carriageway of the trunk road. The Agency is likely to take a close interest in proposals that come forward for any replacement or new facilities in Dorchester and Wimborne (or Ferndown), as these settlements are adjacent to the trunk road. In these instances the Agency will expect the waste plan authorities to:</p> <ul style="list-style-type: none"> · demonstrate how trips are forecast to reassign on the highway network (including the trunk road where relevant) to reach the relocated HRCs and the net change this will lead to; · explain whether your acknowledgement in the consultation plan that relocated HRCs may enable increased recycling and a greater range of materials to be recycled translates into higher traffic generation; and · quantify the net impact at specific junctions on the trunk road, where necessary. <p>The Agency does not have detailed comments to make on identifying specific sites at this stage. It would draw your attention to the para 43 of DfT Circular 02/2013 (which makes it clear that the Agency's preference will always be that new development should make use of existing junctions with the trunk road, rather than proposing new accesses.</p>	<p>Your helpful comments are noted.</p> <p>Highways England have been key stakeholders in the development of the Waste Plan throughout and the consideration of allocated sites.</p>
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Question 9	WP219	816681	Gillingham Town Council	Comment	Members of Gillingham Town Council wish to request that consideration is given to relocating the HRC at Shaftesbury. Gillingham Town Councillors have attended the recent consultation and the matter was discussed at a meeting of Gillingham Town Council held on Monday 10th February 2014. After careful consideration, Gillingham Town Council wish to suggest that Kingsmead Business Park in Gillingham would be a suitable location for an HRC. At this location, there is easy access to Shaftesbury via the B3081 and onwards to the materials recycling facility. Gillingham is the largest and fastest growing town in North Dorset and is a prime location for a household recycling centre. Members of Gillingham Town Council wish to recommend that further investigations are carried out with regards to locating a household recycling centre (HRC) at Kingsmead Business Park in Gillingham.	Your helpful comments are noted and suggested opportunities will be investigated further. Kingsmead Business Park was considered however this site was discounted as there is a conflict with the Local Plan. The site is proposed for the development of a local centre and would be incompatible with the development of a HRC. Land at Brickfield Business Park, Gillingham is included in the Pre-Submission Draft Waste Plan for the development of a replacement HRC.
Question 9	WP261	816842	Transition Town Bridport	Comment	Qs.9 & 10 No comment	Noted
Question 10 – Do you have any suggestions for sites that could be suitable for a bulking up transfer facility in the general areas where a need has been highlighted on Figure 7?						
Question 10	WP53	670039	New Earth Group	Comment	It is evident that the Issues Document considers Transfer Stations in the context of bulking up residual waste and recyclables within rural Dorset. The areas identified on Figure 7 appear sensible and New Earth is not in a position to comment further. However, as highlighted in New Earth's response to Key Issue 4 on organic waste treatment, there would be merit in facilitating food waste bulking stations with established operational residual waste treatment plants, so as to allow for the efficient operation of co-collection vehicles. It is unclear whether this should be addressed within this section or whether this should be a matter for separate consideration.	Your comments are noted Paragraph 7.53 of the Pre-Submission Draft Waste Plan acknowledges the need for food waste transfer stations around the county to reduce the distance travelled by waste. This could include at operational residual waste treatment facilities.

Question 10	WP30	812899	Resident	Comment	I would suggest that should a HRC be located in Gillingham, then perhaps the Shaftesbury HRC should be upgraded to include a bulking up transfer facility. The household items for sale at the Shaftesbury depot is a very good idea BUT they remain outside, open to all weathers and readily deteriorate. Large bulky items could be deposited at Shaftesbury, sorted so that the best can be re-sold or given to charitable organisations that have a need for such items, BUT KEPT UNDER COVER and the un-saleable forwarded to the nearest treatment facility for bulkywaste.	Your comments are noted. Land at Brickfield Business Park, Gillingham is included in the Pre-Submission Draft Waste Plan for the development of a replacement HRC. Policy 5 'Facilities to enable the recycling of waste' encourages the development of covered areas for the collection of items that could be re-used, where there is space to do so.
Question 10	WP88	558509	North Dorset District Council	Comment	North Dorset District Council would prefer that opportunities at the Blandford site are investigated further rather than a new site being proposed elsewhere in the District.	Opportunities to improve the existing site will be considered as an option. Following a full site assessment of available sites, Land south of Sunrise Business Park, Blandford is included in the Pre-Submission Draft Waste Plan for the development of a replacement WMC.
Question 10	WP71	224810	Campaign to Protect Rural England	Comment	We see the need but we are not well enough informed to be able to make any specific suggestions.	Noted
Question 10	WP108	815590	Blandford Forum Town Council	Comment	No Comment	Noted
Question 10	WP172	494685	SITA UK	Comment	SITA currently lease land to the Dorset Waste Partnership for the provision of the current Blandford Waste Transfer Station. SITA UK is willing to review this property agreement in light of the Authority's need to offer strategic WTS in this area. This may allow the Authority to undertake the necessary investment required to build or develop/upgrade the WTS facility on the site. Details of the site are provided in the Site Nomination Form	Opportunities to improve the existing Blandford Waste Management Centre will be investigated further. Opportunities to improve the existing site have been investigated. On balance, the decision has been made to allocate a new site, south of Sunrise Business Park, for the development of a new, modern Waste Management Centre to meet the needs of Blandford and surrounding areas.

Question 10	WP245	399290	Wiltshire Council	Comment	We do not have any suggestions for potential sites, but support the intention to consider innovative ways of addressing the need for transfer capacity to support the management of waste in the Plan area and deliver sustainability benefits.	Your support is noted.
Question 10	WP199	816619	Highways Agency	Comment	In similarity to the answer to question 9, the Agency is likely to take a close interest in proposals that come forward for a transfer facility or Waste Management Centre (combined HRC and waste transfer station) for Dorchester. We note the comment in the consultation document that a larger network of transfer and sorting facilities across the county will reduce the mileage travelled by refuse collection vehicles, helping to reduce congestion and improve air quality. In justifying sites for transfer facilities the Agency will expect the waste plan authorities to: <ul style="list-style-type: none"> • demonstrate the trip generation based on existing and planned future traffic movements; and • quantify the net impact at specific junctions on the trunk road, where necessary. 	Your helpful comments are noted.
Question 11 – Do you have any suggestions for sites that could be suitable for a bulky waste transfer and/or treatment facility?						
Question 11	WP31	812899	Resident	Comment	Shaftesbury should be upgraded to become a bulky waste transfer facility, but an actual treatment facility should perhaps be more central, i.e. Blandford, located in an area where there is easy access and will not cause unnecessary detriment to landscape and quality of life.	Your comments are noted.
Question 11	WP89	558509	North Dorset District Council	Comment	North Dorset District Council cannot identify any new sites in the District for bulky waste transfer and /or treatment facilities. The Council are concerned about co-locating such facilities with existing or proposed HRC and WMC. For the existing HRC in Shaftesbury, and if a HRC is built in Gillingham, the Council does not support co-locating bulky waste transfer and /or treatment facilities due to the suitability of the sites and the impact on local amenity. In particular there are concerns on the negative impact locally from vehicle movements.	Your comments are noted. If any sites options are identified in North Dorset the views of North Dorset will be sought and issues such as traffic impact will be considered.

Question 11	WP72	224810	Campaign to Protect Rural England	Comment	No suggestions but we really should be able to recycle, that is make some use of, most forms of bulk rubbish. Bicycles are almost all metal and could surely be added in with other scrap metal. Soft furnishings and plastic garden furniture could be used in a Combined Heat and Power facility or other heat treatment plant to produce heat for the central heating of buildings or electrical power.	Your comments are noted.
Question 11	WP109	815590	Blandford Forum Town Council	Comment	No Comment	Noted
Question 11	WP122	815428	Bridport Town Council	Comment	Bulky waste by definition is expensive to move, so, again, plans for more local treatment and distribution of waste would be desirable.	Your comments are noted. Land at Woolsbrige Industrial Estate has been allocated for the development of a bulky waste treatment facility. This would be supported by the bulking up of waste at HRC's around the county.
Question 11	WP173	494685	SITA UK	Comment	It is not correct that no facilities exist in the Plan area for this waste type. Planning Permission (ref. APP/13/00401/R) was granted in April 2013 to allow SITA's Mannings Heath Facility to accept "Residual and Bulky Waste arising from local HWRC's". It is proposed that the facility be used to bulk the material and send it to Fareham to be processed as RDF. As stated in Question 8 - Binnegar Environmental Park has permission for other waste uses that are yet to be developed. The site could be suitable for the bulking up and transfer of drying recycling either source segregated or commingled. The site may also be suitable for the co-location of a Local Authority collection vehicle depot	Your helpful comments are noted and the plan will be amended to ensure that capacity at Mannings Heath is recognised. Land at Woolsbrige Industrial Estate has been allocated for the development of a bulky waste treatment facility. This would enable the preparation of RDF locally without the need to export.
Question 11	WP246	399290	Wiltshire Council	Comment	We do not have any suggestions for potential sites, but support the intention to consider innovative ways of addressing the need for transfer capacity to support the management of waste in the Plan area and deliver sustainability benefits.	Your support is welcomed

Question 11	WP201	816619	Highways Agency	Comment	The Agency does not have detailed comments to make on identifying sites at this stage. It will however require any proposals that come forward to be assessed in line with GTA and the DfT Circular to demonstrate the net impact (positive or negative) such facilities would have on traffic movements on the trunk road network.	Noted, the views of the HA will be considered when site options are identified.
Question 11	WP262	816842	Transition Town Bridport	Comment	Bulky waste by definition is expensive to move, so, again, plans for more local treatment and distribution of waste would be desirable.	Your comments are noted. Land at Woolsbrige Industrial Estate has been allocated for the development of a bulky waste treatment facility. This would be supported by the bulking up of waste at HRC's around the county.

Chapter 6 – Organic Waste					
6.1	WP222	816695	Dorset AONB Partnership	Comment	<p>With regard to the management of organic waste, I note that there is a projected shortfall in permitted capacity. I would support a strategic response to this issue, notwithstanding uncertainties regarding the predictions of future organic waste collections. One foreseeable issue that could arise relates to the use of on farm anaerobic digesters as part of the County's response to increased volume. Such facilities are sometimes located in sensitive rural landscapes and may be considered unsuitable for handling externally sourced organic waste.</p> <p>It is most likely that a criteria based approach will be taken to making provision for organic waste. However further consideration will be given to the matter when work begins on the site identification process. The issues surrounding locating facilities in rural locations are known; we would welcome further input from the AONB Partnership in developing appropriate policy guidance.</p>

6.1	WP295	822292	Resident	Comment	<p>Dog Mess Waste: Anearobic Digestors: Many Town and Parish Councils have endless complaints about dog mess !! Are we able to turn this waste into a sustainable waste initiative?? And find some solutions to the endless complaints. Each Town could have an anaerobic digester suitable for its own population. Please can I suggest that anaerobic digesters be explored further to cope with food waste/animal waste. Bridport and other areas have these up and running and other areas are doing it. It's becoming more necessary for communities to take responsibility for their own waste. Purbeck - Particularly Swanage and its adjacent villages are particularly suited to the above initiatives, as it would reduce the traffic on the A351, which is a consideration in the Local Purbeck Plan and would reduce Carbon Footprint. Please can we explore the above. I have previously forwarded details to Alison Patrick (Mayor/chair/leader of Swanage Town Council/Purbeck District Councillor, chair of Swanage Town Community Partnership), Bob Foster (Swanage Development Trust), Kim Gallagher (STCP), Martin Ayres (clerk to Swanage Town Council) and others associated with renewable/sustainable energy and concerns about waste. [Links provided] County (Wikipedia list of Ceremonial Counties of England 2010) Estimated Dog Population (Taken from Pet foods Manufacturers Association www.pfma.org.uk/pet-population Estimated annual dog waste (tonnes) (based on average dog 0.16kg twice per day) Estimated annual landfill cost from April 2013 (tipping charge £30.50 + Landfill tax of £72) [Table provided]</p>	<p>There remains a need for landfill capacity for certain types of waste, including dog waste. It is the role of Dorset Waste Partnership to decide how municipal waste will be managed, however your suggestions are noted and will be discussed with DWP as the Plan progresses.</p>
6.5	WP14	228734	Environment Agency	Comment	<p>Section 6.5 (page 50) An additional anaerobic digestion plant has been permitted at the same site on Parley which will provide additional capacity for local authority collected and commercial food waste to the in-vessel composting facility.' Section 6.5 should be amended to reflect that we have not granted an Environmental Permit for an Anaerobic Digestion (AD) facility at Parley and it cannot be assumed that we will. Please note the following for this site: 1. We have not received a permit application for an AD facility at this site. 2. An assessment of the potential environmental impact of this operation is yet to be made.</p>	<p>This paragraph should clarify that planning permission has been granted, not an environmental permit.</p> <p>Paragraph 7.48 of the Pre-Submission Draft Waste Plan explains that planning permission exists for an additional AD Plant at Parley. However, the waste planning authority has not counted this capacity as it is our understanding that this facility will not be built. The site has been allocated in the Waste Plan for other uses.</p>

6.5	WP15	228734	Environment Agency	Comment	Section 6.6 (page 50) There are also two on farm anaerobic digestion plants in the county, one near Dorchester and one in Blackmore Vale, which accept a small proportion of food waste along with agricultural waste.' Please note there is only one on farm AD site in Dorset that accepts any food waste and this site only take a small amount	Both Rainbarrow Farm, near Dorchester, and Blackmore Vale Dairy accept small amounts of organic waste. This sentence should be clarified.
6.8	WP40	682036	Dorset Wildlife Trust	Comment	Recycle for Dorset are now collecting organic waste and therefore striving to reduce landfill and drive arisings up the waste hierarchy. In section 6.8 it is stated that Bournemouth and Poole "might" rather than "will" introduce a food collection service. DWT would strongly urge Bournemouth and Poole to introduce this service in an effort to reduce the amount of material ending up in landfill.	Paragraph 7.44 of the Pre-Submission Draft Waste Plan provides up-to-date information on food waste collections.
Table 5	WP16	228734	Environment Agency	Disagree	Table 5 Organic Waste Management Capacity and Need (page 53) Organic wastes namely food waste and green waste have been grouped together in the consideration of capacity and need. The treatment options available for food waste and green waste are not interchangeable, so should perhaps not be considered as one. AD cannot be used to treat green waste and in-vessel composting is arguably less sustainable than AD for food waste.	Noted. Consideration will be given to projecting and planning for food waste and green waste separately. Planning for food waste, wood waste and green waste has been undertaken separately to reflect the differing management methods. See chapter 7 of the Pre-Submission Draft Waste Plan.
Question 12 – Do you have any comments on the need for treatment facilities to manage organic waste? Do you agree that the potential shortfall in organic waste treatment capacity should be dealt with through a criteria based policy?						
Question 12	WP17	228734	Environment Agency	Disagree	Question 12 (page 55) Table 5 shows that there is a projected shortfall in the treatment capacity for organic wastes in Dorset. There is clearly the need for further treatment capacity in Dorset. We wish to ask whether co-digestion of food waste and sewage sludge at existing water company sewage sludge AD plants been considered? There are significant benefits to co-digestion. In-vessel composting is largely being replaced by food waste AD technology perhaps strengthening the case for more AD capacity in the county. There are many benefits of AD over in-vessel composting.	Your suggestion is noted. This has not yet been explicitly considered but opportunities will be investigated as the plan develops. The benefits of AD over in-vessel composting are noted and will be reflected in the Plan.

Question 12	WP73	224810	Campaign to Protect Rural England	Comment	It is important to deal properly with these very large amounts of food waste. The situation is satisfactory at the moment and the industry can probably be expected to develop in line with the changing needs during the period of the Plan.	Noted.
Question 12	WP54	670039	New Earth Group	Comment	Table 5 of the Issues Document suggests that there will be a shortfall in organic waste management capacity over the period 2016-2027 should high capture rates materialise. New Earth considers that the joint authorities should, in the first instance, consider any sites promoted through a call for sites. If no suitable sites are forthcoming then a criteria based approach would seem prudent.	Noted.
Question 12	WP123	815428	Bridport Town Council	Comment	We will be among the last to benefit from doorstep collection for food waste, due to lack of local capacity. Following our desire for local solutions, we would like consideration of a commercial or community bio-digester being located at the new Recycling centre at Broomhills or at least facilitated in the vicinity. We are surprised to see that in 6.2 ...waste from the maintenance of public parks and gardens' included in your expected waste stream - surely all councils now compost all there own green waste? Bridport would love to have its own community composting scheme - if a site could be found. Green waste is a renewable resource and could provide employment, and soil conditioner for homes and food production. With regard to food waste, we should be planning its demise, as current trends indicate a criminal waste of resources. Policies in this area therefore need to be flexible.	Green waste from public parks is composted at a suitable facility, but is still counted in terms of waste arisings. Recycle for Dorset should assist with household food waste recycling. Alongside the rollout of the new scheme is the 'Love Food, Hate Waste' campaign which seeks to educate people about reducing food waste. It is agreed that some flexibility is required and it may be most appropriate for the Waste Plan to include a criteria based policy against which to judge applications for facilities to manage organic waste.
Question 12	WP174	494685	SITA UK	Comment	SITA agree that potential shortfall in organic waste treatment capacity should be dealt with through a criteria based policy. The benefits of renewable energy should be highlighted	Noted. It is agreed that reference to the benefits of renewable energy could be included. Policy 6 'Recovery facilities' requires proposals to provide combined heat and power where practicable. Where gas is produced, the policy requires this to be utilised.

Question 12	WP230	224280	East Dorset Community Partnership	Comment	Q12 A criteria based policy would be fair and transparent.	Noted.
Question 12	WP247	399290	Wiltshire Council	Comment	On the basis of the evidence gathered to date, it would appear clear that the overall capacity deficit across the Plan period is relatively small when compared to other waste streams. As such, and to improve the overall flexibility of the Plan, the suggestion of using a criteria based policy approach to addressing such shortfalls would appear to be appropriate.	Noted.
Question 12	WP202	816619	Highways Agency	Comment	The Agency has no comments to make on this matter.	Noted.
Question 12	WP263	816842	Transition Town Bridport	Comment	Bridport has a problem with seagulls which rip open sacks overnight causing a serious litter problem due mainly to people putting food waste in their rubbish sacks. The solution however is not to give people big wheelie bins, but to get people not to put food in their household waste. So we welcome the arrival (finally) of doorstep food waste recycling but feel that we could do more to educate people about not buying too much, and not throwing food away. In line with our desire for local solutions we would like consideration of a commercial or community bio-digester being located at the new Recycling centre at Broomhills or at least facilitated in the vicinity. If we had a community composting scheme we could cut the amount of green waste being transported out of the area, it could generate employment, and soil conditioner for local food production.	Recycle for Dorset should assist with household food waste recycling. Alongside the rollout of the new scheme is the 'Love Food, Hate Waste' campaign which seeks to educate people about reducing food waste.

Chapter 7 – Residual Waste						
7.1	WP11	805719	Poole Agenda 21	Comment	There might be some potential for further landfill in the areas where mineral extraction has occurred. This should not exceed the original landscape level. Efficient incineration is a sensible option but this must ensure that toxins are not released. The system used in Monaco is a good example.	Your comments are noted. The waste hierarchy ranks waste management options according to what is best for the environment. Disposal of waste to landfill is at the bottom of the hierarchy and waste should be diverted where possible.
7.3	WP175	494685	SITA UK	Comment	Beacon Hill landfill only has 5 years of operational life remaining - not between 7-9 years.	The plan will be amended to reflect this. Paragraph 7.60 of the Pre-Submission Draft Waste Plan explains the up to date position regarding Beacon Hill Landfill site.
7.3	WP155	558166	Somerset County Council	Comment	Reference is made to Dimmer landfill in Somerset in paragraph 7.5 regarding relatively small movements of residual waste. Somerset County Council looks forward to further dialogue with Dorset County Council about cross-boundary matters as the Plan evolves.	Dorset will welcome further discussions with Somerset on cross boundary waste movements as the plan progresses. Further discussions on cross boundary movements have taken place throughout the preparation of the Waste Plan. A summary of these discussions can be found in Background Paper 3 – Cross Boundary Movements of Waste (November 2017).
Table 6	WP291	820726	Hampshire County Council	Comment	7.14 and Table 6 In reference to the statement in para 7.14 and Table 6, we feel it should made clearer about which capacity is in Dorset and which is outside Dorset.	It is agreed that it would be helpful to clarify capacity in Dorset and capacity outside of Dorset either within the Plan or as a supporting paper. Paragraph 7.57 onwards of the Pre-Submission Draft Waste Plan explains that some of Dorset’s waste is exported. Further details can be found in Background Paper 1 ‘Waste Arisings and Projections’.
Key Issue - Residual waste	WP176	494685	SITA UK	Comment	SITA agree with the statement made in para 7.20 - that additional treatment facilities in Dorset should not be ruled out. We acknowledge that given the number of nationally significant landscape and biodiversity designations within the county, identifying potentially suitable sites will be difficult and time consuming.	Your comments are noted.

Key Issue - Residual waste	WP292	820726	Hampshire County Council	Comment	7.20 If a criteria based policy approach is taken forward, we would expect that at the very least an assessment of potentially suitable sites is carried out to show that there are sufficient areas or locations for new waste treatment in future and thus an allocation of areas/sites is not necessary.	Further consideration is needed to assess the need for residual treatment capacity and if necessary assess suitable sites. A detailed site selection exercise has resulted in the allocation of four sites to address the need for new capacity for the management of residual waste. See Pre-Submission Draft Waste Plan for details of site allocations.
Identified Need 7: Facilities for the Managem ent of Residual waste	WP156	558166	Somerset County Council	Comment	Option 1 in the box on "Identified Need 7" refers to rely on landfill sites outside of Dorset. Read in isolation as worded, this is not considered to be an optimal approach to sustainable waste management.	The use of landfill sites outside of Dorset is likely to remain a small part of the overall management of residual waste.
Question 13 – Do you have any comments on the options set out for managing residual waste?						
Question 13	WP18	228734	Environment Agency	Disagree	Option 4: New facilities for the treatment of residual waste including the opportunities to generate heat and power in Dorset' would seem to be the most sustainable option for residual waste. We would ask whether small scale waste to energy plants been considered (less movement of waste around the county)? We would ask whether MBT is sustainable as there is a limited market for the output (Compost Like Output)? Waste legislation only allows the use of CLO as a restoration material for landfills (reducing area of landfill in need of restoration) and under certain circumstances non-agricultural land with a caveat that the land cannot later be used for food production. With this in mind, perhaps there are more sustainable options for residual waste than MBT.	Your comments are noted and will be considered fully as the Waste Plan develops. Consideration will be given for the development of smaller scale waste to energy facilities within the Plan area, particularly if these would satisfy the proximity principle and assist in moving waste up the waste hierarchy. The Pre-Submission Draft Waste Plan allocates four sites to address the need for residual waste management. A flexible approach has been taken to allow for a range of treatment types (where appropriate) to allow for changes and developments in technologies throughout the life of the Waste Plan.

Question 13	WP74	224810	Campaign to Protect Rural England	Comment	Option 1 and option 2 are all very well in the short term but option 3 (new sites) and option 4 (CHP) will certainly become necessary before long.	Your comments are noted.
Question 13	WP55	670039	New Earth Group	Comment	New Earth is concerned that options 1-3 set out within Identified Need 7 are un-ambitious and might serve to frustrate new treatment infrastructure being brought forward to the detriment of the waste hierarchy and proximity principle. It is important to highlight that investment decisions are made having regard to the strategies / opportunities set out within Local Plans and Waste Strategies. New Earth would support option 4 - the provision of new facilities for the treatment of residual waste including the opportunities to generate heat and power in Dorset'. Indeed, as explained in relation to Key Issue 5 above, the grant of planning permission for a LowCEF at Canford in Poole goes some way towards providing a medium - long term solution for Bournemouth, Dorset and Poole. Furthermore it is considered that this will help to free up additional latent capacity within the established operational facilities at Canford over the long term. This is on-top of the reduction in the organic fraction, rightly recognised in para.7.12 of the Issues Document. Whilst latent capacity is recognised within Chapter 12: Methodology for Site Selection, it is omitted from the options set out within Identified Need 7. The optimisation of established residual waste treatment facilities does not feature within the options set out within Identified Need 7 on page 63 of the Issues Document - perhaps it should?	<p>The options set out are just that, options, intended to draw a response from stakeholders. Consideration will be given for the development of smaller scale waste to energy facilities within the Plan area, particularly if these would satisfy the proximity principle and assist in moving waste up the waste hierarchy.</p> <p>Since publication of the Waste Plan Issues Paper, further work has been undertaken to assess the shortfall in capacity for treatment facilities during the Plan period. Given the shortfall, four sites have been allocated to address this need including additional capacity at New Earth Solutions, Canford Magna. The range of sites will allow for suitable sites to come forward to address the identified need building in flexibility both in terms of location and technology.</p>

Question 13	WP124	815428	Bridport Town Council	<p style="writing-mode: vertical-rl; transform: rotate(180deg);">Comment</p> <p>To be sustainable, we should not export our waste. It would, if nothing else, send completely the wrong message. We need to deal with our own "mess". We need to embrace technology and use cleaner waste to energy systems, which have inert ash, which for example can be bonded to produce insulation bricks. Where there is a hole in the market, we need to develop industries that can benefit from the opportunities.</p>	<p>Your comments are noted. It is agreed that we should aim for self sufficiency but there are exceptions, such as where facilities in adjoining authorities are in very close proximity with good transport links and for certain specialist wastes.</p> <p>Since publication of the Waste Plan Issues Paper, further work has been undertaken to assess the shortfall in capacity for treatment facilities during the Plan period. Given the shortfall, four sites have been allocated to address this need. The range of sites will allow for suitable sites to come forward to address the identified need building in flexibility both in terms of location and technology.</p>
Question 13	WP197	816638	Devon County Council	<p style="writing-mode: vertical-rl; transform: rotate(180deg);">Comment</p> <p>In line with paragraph 17 of PPS 10, waste planning authorities should identify in development plan documents sites and areas suitable for new or enhanced waste management facilities for the waste management needs of their areas. In this context Dorset County Council should aim to deliver adequate capacity to achieve self-sufficiency in waste management, and therefore option 4 is supported (and option 3 if there is a need for non-hazardous landfill capacity).</p>	<p>Your comments are noted</p> <p>The Pre-Submission Draft Waste Plan includes four sites have been allocated to address the need for residual waste management and ensure that Dorset seeks to achieve self sufficiency. The range of sites will allow for suitable sites to come forward to address the identified need building in flexibility both in terms of location and technology.</p>

Question 13	WP177	494685	SITA UK	<p>Comment</p> <p>A criteria based policy for dealing with any applications for residual waste treatment is supported. A policy that sets a recovery target / limit should be avoided as this can lead to a situation where facilities are consented but never built, thus preventing other fundable technologies/facilities coming forward SITA consider that 'Option 4' (a combination of landfill outside of Dorset, existing treatment facilities within and outside of Dorset, investigating additional landfill void space in Dorset and new treatment facilities) should be applied. Positive encouragement needs to be given to alternative forms of waste transportation such as rail and sea transportation for out of county recovery. A Regional recovery facility could play a role in processing Dorset, Poole or Bournemouth's material in the short to medium term. SITA UK also currently exports RDF to treatment facilities on the continent as well as SRF to cement kilns as alternative fuels for the next 25 years. There may be option to produce similar fuel products from the Authorities residual waste at nominated transfer/processing points sites and potential to use sustainable forms of transport such as rail and sea.</p>	<p>Your support is noted. We will need to consider whether policy guidance should set a recovery target, however we would bear in mind that waste technologies are developing rapidly and we would want to ensure that our Plan remains flexible to react to changing circumstances. It is also agreed that encouragement should be given to alternative forms of waste transportation, and the Waste Planning Authority would be keen to hear from the waste industry about potential opportunities.</p>
Question 13	WP231	224280	East Dorset Community Partnership	<p>Comment</p> <p>Again, a criteria based approach would seem appropriate but pressure must be brought to bear on manufacturers to reduce residual waste (ie prevent) that is forced on the general public through inappropriate packaging.</p>	<p>Your comments are noted. It is agreed that waste prevention and reduction is important and to be encouraged in line with the waste hierarchy. However, the role of the waste plan is primarily to make provision for facilities for the waste that is arising and to ensure that appropriate provision is made to move waste up the hierarchy. Consideration will be given to including policy or at least reference to the Waste Planning Authority's commitment to maximising waste prevention and re-use through promoting strategies with this aim and encouraging developments that involve the preparation of materials for re-use. Facilities to enable reuse of waste can be encouraged through the Waste Plan to an extent and specifically could be referred to in the provision of Household Recycling Centres, many of which across Dorset host such facilities.</p>

Question 13	WP248	399290	Wiltshire Council	Comment	Please see response to previous questions in terms of the assumptions and links to overall capacity requirements. However, in terms of the options presented for consideration, it is likely that a combination of approaches may be required in order to offer flexibility to manage waste arisings. Clearly, if reliance on facilities outside of Dorset forms the 'preferred option', or the basis of a combined 'preferred option', there will be a need to carefully consider sub-regional capacity constraints through further dialogue.	It is agreed that a combination of the options is likely to offer most flexibility throughout the plan period.
Question 13	WP203	816619	Highways Agency	Comment	We note the uncertainties around methods of dealing with residual waste during the plan period, set against a context of landfills within the county with limited lifespans and the implications of transporting waste out of the county. No clear proposals have come forward at this stage. The Agency reserves judgement until clear proposals come forward and will assess their merits on the basis of evidence supplied on transport impact on the trunk road network.	Your comments are noted.
Question 13	WP264	816842	Transition Town Bridport	Comment	Sustainability means that we should be reducing our waste so that we can handle it all within our community.	Your comments are noted.
Question 13	WP277	817412	Sherborne Town Council	Comment	In 10.20 it is accepted that 'waste treatment facilities can provide opportunities for the generation of renewable heat and power' and that each will be encouraged, whereas 'disposal to landfill' is 'the last resort'. But we could find little reference to any future plans for the generation of energy and heat from residual waste in Dorset: there was just mention of this in Slough (7.8) with elsewhere in the South of England being possible in the future, after all recycling methods have been explored. Under Need 7, possible Option 4 includes 'new facilities for the treatment of residual waste, including the opportunities to generate heat and power in Dorset.' We would endorse the latter in answer to q13.	Your comments are noted.

Chapter 8 – Inert Waste

8.1	WP27	197914	Raymond Brown	Agree	Chapter 8: The recognition that there will be an ongoing requirement for inert waste disposal at quarry sites is supported. There will also be an ongoing requirement for Aggregates Recycling Facilities at minerals and landfill sites.	Noted.
8.1	WP273	197579	Resident	Comment	Chapter 8 Inert Waste - Identified Need 8 1. The north and west of the county would be best served by a mobile recycling machine, taking the machine to the waste and not the waste to the machine. The current procedure of locating a mobile inert recycling machine in a static mode at Redbridge Quarry and tens of hgvs driving long distances on round journeys between the location of the waste and the static mobile recycling machine at Redbridge is demonstrably inefficient. Recommendation 5 - inert recycling in the north and west of the county 2. I recommend that the Waste Plan emphasises that the mobile recycling plant be taken to the inert material source in the north and west of the county to save on hgv movements, diesel, and greenhouse gases, rather than multiple hgvs driving the material to a static site.	Whilst this seems sensible, in practical terms it is most likely that where there is a need for inert recycling a temporary planning permission would need to be granted to facilitate cost effective operations.
Question 14 – What do you think about the concept of localised facilities for dealing with inert materials? Are you aware of any specific needs or constraints to existing capacity? Are there any specific sites that you think should be considered for inert waste disposal?						
Question 14	WP19	228734	Environment Agency	Agree	Question 14 We believe it is a good concept to deal with inert waste locally.	Noted.
Question 14	WP28	197914	Raymond Brown		Question 14: The company has nominated two sites for inclusion in the Minerals Sites Plan at Binnegar (AS01) and Parley Court Farm (AS11). The Parley Court Farm site includes landfill restoration, whilst the importation of inert recovery materials for the restoration at Binnegar is an option under consideration. Both of these proposals therefore need to be taken into account in the preparation of the Waste Plan and also treated as waste site nominations if appropriate.	We are aware of the mineral site proposals. As proposals for new inert recycling facilities will be considered against policies in the Minerals Core Strategy, any site allocations would most appropriately be located within the Mineral Sites Plan. We will liaise with you further on this matter.

Question 14	WP75	224810	Campaign to Protect Rural England	Comment	Again, it is important to recycle and re-use everything possible. Local facilities throughout the County will help a lot. They will contribute to the Proximity Principle, and it is quite expensive to transport these heavy inert materials very far.	It is the intention that policy in the Waste Plan would facilitate this. Facilities for recycling waste will be supported in accordance with Policy 5 'Facilities to enable the recycling of waste' of the Pre-Submission Draft Waste Plan.
Question 14	WP90	558509	North Dorset District Council	Comment	North Dorset District Council supports the principle of sustainability but is unable to suggest any suitable sites in the north of the District for inert infill. There are currently three quarries in the District and all are active.	Noted.
Question 14	WP125	815428	Bridport Town Council	Comment	We approve the localised use of inert material. Bridport Town Council already practices recycling of building materials within its sites and activities.	Noted.
Question 14	WP135	491096	D.K. Symes Associates	Comment	Leading on from the answer to Q6 I believe there should be positive support to 'use' residual inert waste for restoration of mineral workings. This is in part referred to at paragraph 8.4 and 8.11 and this 'restoration' use should be recognised as moving waste up the hierarchy. The plan should also recognise that a substantial proportion of CDE waste (and in particularly Excavation material) is not suitable for recycling due to its generally cohesive nature. This Excavation material arises from both new build as Greenfield sites as well as re-development through basement construction, and caution is advised on expecting a noticeable increase in turning this material into recycled aggregate. In terms of existing capacity, if the inert recycling facilities are not co-located with a reclamation site (rather than a landfill) then the residual material has to be removed from site. If recycling can take place on sites that need/use the residual material this should be preferred as it reduces unnecessary lorry movements and makes best use of all of the inert waste stream. This approach should be reflected in the Plan by positively supporting the location of inert recycling activities in active mineral workings that require residual inert material for restoration, regardless of existing capacity.	The Plan recognises that there will be a continued need for inert landfill due to the fact that not all CDE waste can be recycled. Further clarification on this matter can be included. Policy within the Minerals Strategy (Policy RE1) encourages the development of aggregates recycling facilities that are near to the source of material to be recycled and in locations favourable to the production of recycled aggregates (for example industrial locations, existing active quarries or waste sites, urban fringe and brownfield sites). Chapter 10 of the Pre-Submission Waste Plan acknowledges the need for inert landfill and supports the recovery of inert waste in quarry restoration.

Question 14	WP178	494685	SITA UK	Comment	What do think about the concept of localised facilities for dealing with inert materials SITA support the concept of localised facilities Are you aware of any specific needs or constraints to existing capacity? Are there any specific sites that you think should be considered for inert waste disposal? Binnegar Quarry (future extraction area - as detailed in Minerals Allocation Plan) could be considered as an option for inert waste disposal	Noted, further consideration will be given to this proposal. The Pre-Submission Draft Waste Plan acknowledges the use of inert materials for restoration of permitted mineral sites. This would include Binnegar Quarry.
Question 14	WP232	224280	East Dorset Community Partnership	Comment	Q14 As we have said in our response to the Minerals Sites consultation, it is a total nonsense to extract minerals from one site to fill a void in another simply because there is inadequate waste resource. It flies in the face of sustainability. We would support criteria based approach as suggested in para 8.14.	Noted. However, there is a need for inert landfill capacity to accommodate construction, demolition and excavation waste that cannot be recycled due to its cohesive nature. A criteria based approach is likely to be most appropriate and your support is noted. Policy 8 'Inert waste recovery and disposal' of the Pre-Submission Draft Waste Plan supports the recovery of inert waste. The policy contains a series of criteria including to ensure that all appropriate materials have been removed for recycling prior to disposal/recovery.
Question 14	WP249	399290	Wiltshire Council	Comment	The concept of localised facilities to manage inert waste arisings close to the main centres of population represents a sustainable option for the Waste Plan as it would address actual / forecast shortfalls in local capacity; and meets the policy opportunities presented through the Minerals Core Strategy (RE1).	Noted.
Question 14	WP204	816619	Highways Agency	Comment	The Agency is, in principle, content with the concept of localised facilities for dealing with inert materials. They should be subject to methodology for site selection to ensure that traffic and transport issues are dealt with satisfactorily. The Agency has no comments to make in relation to the second and third questions.	Proposals would be subject to transport assessment where necessary at the application stage. Policy in the Waste Plan will need to provide the appropriate framework for this.
Question 14	WP265	816842	Transition Town Bridport	Comment	We approve the local use of inert material. Builders should be forced to reuse material far more than they do	Noted.

Chapter 9 – Other Wastes and Facilities						
9.1	WP141	764711	W&S Recycling Services	Comment	Chapter 9 should also refer to waste electrical and electronic recycling (WEEE) for which appropriate sites will be necessary within the plan area. The Mannings Heath site includes provision not only for a MRF but also an area for WEEE recycling.	Your comments are noted Due to the specific requirements for the management of this waste and the cost of establishing such facilities, operations generally have a wider than local catchment area. Policy 9 ‘Special types of waste’ contains criteria for dealing with applications for the management of hazardous waste including WEEE.
9.1	WP274	197579	Resident	Comment	Chapter 9 - burning of industrial waste. 1. The Waste Plan makes no mention of the burning of industrial waste. As you will be aware I have reported to DCC for about 14 years the almost weekly burning of industrial waste by Crooks at Redbridge, even on 25 December. Each burning usually lasts at least 2 days and is totally unaffected by snow, ice or heavy consistent rain. The fires produce obnoxious smelling and highly carcinogenic smoke. Recommendation 6 - burning of industrial waste. 2. I recommend that a new heading, Burning of Waste be added to Chapter 9 (Other Wastes and Facilities). The explanatory paragraph should state that the burning of waste is strictly not permitted due to release of copious amounts of greenhouse gases and highly carcinogenic fumes.	Your comments are noted. The Pre-Submission Draft Waste Plan does not support the disposal of waste through incineration.
9.1	WP205	816619	Highways Agency	Comment	The Agency has no comments to make on this chapter.	Noted

9.9	WP20	228734	Environment Agency	Comment	Section 9.9 (page73) A biomass plant has also recently been permitted at the Parley site to treat the residual wood once recycled.' Section 9.9 should be amended to reflect that we have not granted an Environmental Permit for a biomass plant at Parley and it cannot be assumed that we will. We wish to raise the following points relating to this site: 1. The EA have not received a permit application for an AD facility at this site. 2. An assessment of the potential environmental impact of this operation is yet to be made.	Your comments are noted and the development of the biomass plant will be monitored and the plan updated as necessary.
9.9	WP293	820726	Hampshire County Council	Comment	9.10 There is a reference to wood recycling capacity increasing once a biomass plant becomes operational. We believe references to biomass would fit better under the term 'recovery' rather than 'recycling' and so this site would not contribute to an increase in wood recycling capacity.	Your comments are noted. Clarification will be sought to confirm if the development of the biomass plant will increase recycling capacity. The plan will be amended as necessary. Chapter 7 of the Pre-Submission Waste Plan provides an update on the capacity for recycling/recovery of wood waste. Depending on the nature of facilities coming forward, applications would be dealt with in accordance with Policy 5 'Facilities to enable the recycling of waste' or Policy 6 Recovery facilities'.
9.12	WP8	791392	Northamptonshire County Council	Agree	LLW - agree with approach set out in para 9.20.	Your support is noted.

9.12	WP61	814583	NuLeAF	<p data-bbox="716 1204 750 1276">Agree</p> <p data-bbox="750 151 1489 1284">NuLeAF (the Nuclear Legacy Advisory Forum) is a Special Interest Group of the Local Government Association (LGA). NuLeAF is supported by 110 local authorities and 3 national park authorities across England and Wales. Our membership includes Dorset County Council and Purbeck District Council. Our remit encompasses all aspects of the management of the UK's nuclear waste legacy, including spent nuclear fuel and waste management from prospective new nuclear generating capacity. Our primary objectives are: to provide a mechanism to identify, where possible, a common, local government viewpoint on nuclear legacy management issues; to represent that viewpoint, or the range of views of its member authorities, in discussion with national bodies, including Government, the NDA and the regulators; to seek to influence policy and strategy for nuclear legacy management in the interests of affected communities; and to develop the capacity of its member authorities to engage with nuclear legacy management at a local level. In relation to section 9.12-9.20 on Radioactive Waste we would offer the following comments: We welcome the inclusion of specific guidance on radioactive waste within the revised waste plan. NuLeAF has been pressing for the adoption of appropriate local guidance in the waste plans covering areas with radioactive waste arisings or management facilities. In particular we welcome Section 9.20 with its emphasis on the development of a criteria based policy to guide the approach of the WPA towards LLW disposal; also the need to address the Duty to Co-operate with those planning authorities in receipt of ILW and LLW from Winfrith, ensuring that Dorset's approach is compatible with recipient authorities. NuLeAF has recently prepared guidance on the Duty to Co-operate and radioactive waste management which is available at our website www.nuleaf.org.uk Finally we welcome the fact the section covers not just radioactive waste from the nuclear industry but also non-nuclear radioactive wastes and NORM. We believe all radioactive wastes should be managed in a joined up fashion.</p>	Your support is noted.
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9.12	WP105	815583	Research Sites Restoration Ltd	Comment	RSRL welcomes the intention of the County Council to include the management of radioactive waste as a topic in the forthcoming draft Waste Plan. The description in paragraphs 9.12 - 9.20 provides the context for such a policy and is an appropriate summary of the current position with regard to radioactive waste insofar as it relates to RSRL. The suggestion of a criteria based policy to set out the approach to the disposal of low level waste is supported and RSRL would welcome the opportunity to contribute to the development of this policy.	Your helpful comments are noted and the Waste Planning Authority would welcome the involvement of RSRL during the development of a criteria based policy.
9.12	WP104	791327	Cumbria County Council	Comment	Thank you for giving Cumbria County Council the opportunity to comment on your Mineral Sites Plan and the Waste Plan Issues Paper. At this time, we have no concerns or issues arising from your drafts and we are pleased to see that the disposal of radioactive waste is being considered. We would be grateful if you could keep us informed of your progress.	Your helpful comments are welcomed
9.12	WP157	558166	Somerset County Council	Comment	Paragraph 9.14 would benefit from clarification - especially making clear that the GDF is part of a separate process being spearheaded by central Government. It is unlikely that this facility will be available in the lifetime of the Dorset plan, so that might be worth making clear (as then possibility of an application for an interim storage facility coming forward is increased) This section might also mention that spent fuel is another part of the radioactive waste arising, but dealt with centrally. Additionally, mention of the radioactive waste inventory (for small sources such as military and medical) might be useful - also some text about what these facilities do with their waste currently. Further engagement with the Environment Agency is recommended about the permitting / acceptance of VLLW into landfills to ensure maximum clarity on this topic; and further explanation of the LLW national repository would be helpful. A policy just relating to radioactive waste is strongly supported; should further information be required, we would recommend contacting NuLeAF(an LGA organisation) - http://www.nuleaf.org.uk/ Â	Your comments are noted and consideration will be given to updating the Plan. The Pre-Submission Draft Waste Plan contains an updated section on Radioactive waste including Policy 9 'Special types of waste' which would be used to assess applications for radioactive waste facilities.

9.23	WP91	558509	North Dorset District Council	Agree	North Dorset District Council are pleased to see that Gillingham has been identified as a town where expansion to the towns sewage treatment works is required to accommodate anticipated growth.	Your support is welcomed. Land has been included in the Pre-Submission Draft Waste Plan for expansion of the Gillingham STW.
9.23	WP111	229404	Wessex Water	Comment	9.23 - 9.25 It is important that the waste planning recognises that the growth in population will require further investment in waste water treatment and the capacity required. This investment may be required for reasons of increased capacity or higher standards of treatment to improve water quality. 9.25 Refers to land for future extensions There are no immediate needs for additional land, however it should be acknowledged that future extensions to accommodate plant and apparatus should be considered under safeguarding arrangements.	Your comments are noted.
9.26	WP92	558509	North Dorset District Council	Agree	The emerging North Dorset Local Plan Part 1 states that adequate space for the storage of recyclables and bins will be required in line with the latest guidelines produced by the Dorset Waste Partnership. Through the Master Plan Framework for the southern extension in Gillingham North Dorset District Council are keen to include on-site treatment facilities such as community composting on the site.	Your comments are welcomed.
9.26	WP233	224280	East Dorset Community Partnership	Comment	Waste from New Developments (para 9.30) Policy ME4 of the Christchurch and East Dorset Core Strategy establishes the requirement for sustainable development in new developments, including energy efficiency and minimising waste. Provision of on-site facilities for New Neighbourhoods and new/extended employment sites could enhance recycling, reduce fly-tipping and reduce "trips to tip" miles.	Your comments are noted.
Chapter 10 – Development Management & Safeguarding						
10.1	WP100	815324	Melbury Abbas and Cann Group Parish Council	Comment	Air quality is an important issue to be considered when locating processing facilities but is also important when using restricted roads where the Heavy Goods Vehicles having difficulty manoeuvring are stationary for long periods.	Your comments are noted

10.1	WP112	229404	Wessex Water	Comment	<p>We note the need for planning policies upon which to judge applications for waste development. We would wish to see policy support within the Waste Plan for the provision of essential infrastructure development which is necessary to supply existing customers, service proposed developments and meet targets associated with national and European Directives (for example, the Water Framework Directive), Provision of such infrastructure is critical to meeting national public health and environmental commitments and demonstrates compliance with the three key strands of sustainable development as set out in the NPPF.</p>	<p>It is intended that a policy on sewage treatment works will be included in order to provide criteria against which applications for new or extended facilities can be judged. We would welcome further discussion on this policy and the targets to which you refer.</p> <p>Policy 11 'Waste water and sewage treatment works' of the Pre-Submission Draft Plan provides criteria against which applications for new or extended facilities can be judged. Wessex Water have been involved in the drafting of this policy.</p>
10.1	WP142	764711	W&S Recycling Services	Comment	<p>The topics set out generally provide an appropriate basis for development management of future development proposals. Additional matters that should be included relate to the economic benefits of proposals, including job creation and reduction in landfill tax payments. Alongside this the environmental benefits of waste management should also be recognized. The need for operational requirements to be achieved alongside a recognition that over the plan period the waste management industry will need to adapt to changing markets and changes to the regulatory framework should be recognized.</p>	<p>The economic benefits of waste developments are acknowledged and consideration will be given to how and where this should be covered in the waste plan.</p> <p>The Pre-Submission Draft Waste Plan contains various references to the economy including within the Vision for Sustainable Waste Management and Objective 1. Paragraph 3.17 and 3.18 refer specifically to the importance of the circular economy.</p>
10.6	WP214	197703	New Forest National Park Authority	Comment	<p>In light of the statutory protection afforded to National Parks as outlined above, the Authority considers it essential that impacts on the National Park should be included as one of the main 'Guiding Principles' that should be considered when assessing waste development proposals and in particular impacts on the following;</p>	<p>It is agreed that potential impacts on the New Forest National Park from waste developments would need to be taken into account. In this context, potential impacts are most likely to be related to transportation of waste and so should be addressed accordingly.</p>

10.8	WP101	815324	Melbury Abbas and Cann Group Parish Council	<p>Comment</p> <p>'Waste management facilities can be significant generators of traffic and impact on our highway network' 'Use of the strategic road network, comprising trunk roads and other primary routes, should be encouraged for HGVs since such routes are more able to satisfactorily accommodate such traffic' The above two comments are contained within paragraph 10.8 of the draft plan. These comments are supported as the C13 in North Dorset which twists and turns through the village of Melbury Abbas has many pinch points where vans have trouble passing cars and two HGVs meeting in the village cause numerous hold ups throughout the day. In passing each other damage is caused on a regular basis to garden walls, gateways, street furniture, verges, banks and trees. HGVs manoeuvring at one point using a private drive have fractured a water main four times. It has been repaired three times by Wessex Water who then said it could effect no further repairs. The householders Insurance Company paid on the fourth occasion but this beleaguered member of the community is wondering who pays next time! The road is used as a rat run by HGVs trying to save time and around two miles in distance, the national speed limit for this road is 40 mph for HGVs but they save time by exceeding this by as much as 55%. One of the regular daily offenders are 'The Dorset Waste Partnership' ! The correct way of addressing this problem would be to follow the comments above and support the Managing Work Related Road Risk (WRRR) initiative, to which a large number of responsible hauliers subscribe, and instruct its drivers to use the A350, the 'Primary Route'. Section 85 of the Countryside and Rights of Way Act 2000 places a legal duty on all relevant authorities to ' have regard to' the purpose of conserving and enhancing the natural beauty of the AONB in exercising or performing any functions affecting land in the area. The Dorset Waste Partnership is a relevant Authority. Melbury Abbas is within the Cranborne Chase and West Wiltshire Downs Area of Outstanding Natural Beauty. The A350 is wider than the C13 throughout its length and is a superior quality road. Our Parish covers a section of the A350 where it narrows but it is still wider than sections of the C13.</p>	<p>Your support is noted. Traffic and access will be a key consideration when we are considering new waste facilities in Dorset.</p>
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10.8	WP215	197703	New Forest National Park Authority	Comment	Reducing the impacts of traffic associated with waste management facilities on roads through areas bordering the waste plan area, including the New Forest National Park should be a key 'Guiding Principle.' Lyndhurst for example has been identified as an Air Quality Management Area and additional traffic impacts associated with waste development proposals should be properly assessed.	Your comments are noted. Traffic associated with waste development is a very important issue. A comprehensive Transport Assessment (TA) will be required with any planning application where a development is likely to have significant transport and related environmental impacts. This would include consideration of the potential cross-boundary impacts and cumulative impacts of the development with other local developments and how these can be minimised.
10.13	WP83	815029	Resident	Comment	I strongly disagree to running recycling centres in Rural locations 24 hours a day	Your comments are noted. Applications for facilities to operate 24 hours a day will need to be considered on their merits with consideration given to all impacts such as additional lorry movements, noise and light pollution.
10.14	WP179	494685	SITA UK	Comment	Para 10.14 - SITA supports the co-location of waste management facilities as this approach can help to reduce vehicle movements/mileage across the county as well as CO2 emissions and local amenity issues.	Your support is noted.
10.24	WP113	229404	Wessex Water	Comment	10.24 & 10.35 Treatment works are often located within green belt and areas within open countryside and we would wish to see linked policies associated with necessary and sensitive development at these sites.	Your comments are noted
10.24	WP216	197703	New Forest National Park Authority	Comment	Proximity to and impacts on the National Park purposes and its setting, should be included as one of the criteria used to assess whether the proposal would have any impact on a designated landscape.	Your comments are noted
10.26	WP41	682036	Dorset Wildlife Trust	Comment	Recycle for Dorset are now collecting organic waste and therefore striving to reduce landfill and drive arisings up the waste hierarchy. In section 6.8 it is stated that Bournemouth and Poole "might" rather than "will" introduce a food collection service. DWT would strongly urge Bournemouth and Poole to introduce this service in an effort to reduce the amount of material ending up in landfill.	It is understood that Bournemouth have now introduced a food waste collection service. Further discussions are needed to clarify whether Poole will introduce food collections during the plan period. Paragraph 7.44 of the Pre-Submission Draft Waste Plan provides up-to-date information on food waste collections.

10.26	WP84	815029	Resident	Agree	I agree so surely recycling centres should be on industrial estates where good transport networks exist and usually they are already brownfield sites not on quarries which should be returned to their natural state after quarrying has finished	Your comments are noted, it is acknowledged that recycling operations can be located on industrial estates and these can often be benefits of this type of location.
10.26	WP217	197703	New Forest National Park Authority	Comment	Again, whilst mention is made here of the need to protect Dorset's important habitats there is no mention of the requirement to assess the potential impacts that a development proposal may have on the National Park's network of Natura 2000 sites and the document should be amended accordingly. It is noted that the 'Guiding Principles' for development are further set out in a summary table (Table 8 pages 98 -101). The Authority is of the opinion that the table should be amended to reflect our comments as set out above on Traffic and Access; Landscape and Visual Intrusion; Air emissions including dust; and Nature Conservation.	It is agreed that the section related to nature conservation should also cover effects on habitats in neighbouring authorities. The methodology for site selection could also refer to the National Park and/or neighbouring authorities as relevant. Paragraph 12.83 of the Pre-Submission Draft Waste Plan refers to effects on '...neighbouring authority areas..'
10.31	WP282	819977	Natural England	Comment	Emissions/Air Quality We welcome the inclusion of the sentence 'Proposals should demonstrate that emissions can be mitigated to an acceptable level having regard to the proximity of sensitive receptors' in paragraph 10.32 and in Table 10, under the Air emissions, including dust heading, 'The proximity to sensitive receptors and surrounding land uses and the extent to which adverse emissions can be controlled will also be considered'. This will ensure that there are site selection criteria in place to ensure the protection of nature conservation sites which are sensitive to emissions such as ammonia and nitrogen oxide.	Your support is noted.

10.33	WP21	228734	Environment Agency	Comment	Section 10.33 (page 85) We wish to point out that enclosing a waste management operation does not always mitigate against odours unless: Â· the operation is well managed Â· the building is well sealed perhaps with an airlock for vehicle entry · there is air management with the appropriate number of air changes per hour and Â· the odour abatement is appropriately sized and maintained. Sometimes enclosing a waste management operation can exacerbate odour issues (if the building is poorly designed or operated) as pulses of odour can be more offensive to the human senses than a fairly constant lower level of odour. Poorly run or badly designed AD plants can cause odour issues.	Your helpful comments are noted and the text in the Plan can be worded accordingly to reflect concerns. Paragraph 12.42 of the Pre-Submission Draft Waste Plan explains the issue of odour from waste management facilities. Text refers, as suggested to buildings being well sealed and the installation of air management and odour abatement systems.
10.35	WP114	229404	Wessex Water	Comment	Wessex Water supports the use of buffer zones and development management policies to ensure that the quality and amenity of life is not compromised by developing close to existing treatment works.	Your support is noted.
Question 15 – Do you think that the topics set out provide a comprehensive and appropriate basis for the development management policies? Do you think there are additional matters that should be considered in the determination of waste planning applications?						
Question 15	WP76	224810	Campaign to Protect Rural England	Comment	THIS QUESTION IS REALLY QUITE IMPORTANT. The generation of excessive traffic, especially the large lorries, is quite the most difficult and contentious matter surrounding all of these proposed mineral extractions. The narrow twisting roads in the more rural parts of the County, especially in the Area of Outstanding Natural Beauty, are just not capable of taking all this extra heavy traffic. The road surfaces and verges have already been badly damaged and the presence of these heavy vehicles on these roads is intimidating and downright dangerous to motorists, and especially to horse riders and cyclists. Some of the roads which I cycle along in the Isle of Purbeck are designated cycle tracks and yet are still used by the gargantuan ball clay lorries and sand and gravel lorries. Even the Sustran National Cycle Route no 2 has these big lorries weaving amongst the cyclists. See sections 10.8 and 10.9 and also sections 10.10 to 10.12.	Your comments are noted. Consideration of traffic generation associated with waste facilities has been considered when assessing sites for allocation in the Waste Plan. In addition, Policy 12 ‘Transport and access’ of the Pre-Submission Waste Plan ensures proposals for waste management facilities fully consider impacts associated with traffic generation.

Question 15	WP35	682036	Dorset Wildlife Trust	<p style="writing-mode: vertical-rl; transform: rotate(180deg);">Comment</p> <p>Under Environmental Issues, Design and Sustainable Construction, a new paragraph should be added, titled along the lines of "awareness on prevention and re-use". This should ensure that existing and new Household Recycling Facilities (HRF)/ Waste Management Centres (WMC) are required to display interpretation boards that actively inform householders on measures that they can take to "prevent and re-use".</p>	<p>It is agreed that the plan should do what it can to prevent and reduce waste. Consideration will be given to the inclusion of a new paragraph to ensure that facilities open to the public display interpretation boards, however it is thought that in practice facilities already do this.</p> <p>Policy 5 ‘Facilities to enable the recycling of waste’ includes a criteria to ensure proposals for HRC’s display interpretation boards to inform householders on measures to prevent and reuse materials.</p>
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<p>Question 15</p>	<p>WP56</p>	<p>670039</p>	<p>New Earth Group</p>	<p>Comment</p>	<p>The topics presented in chapter 10 provide a good starting point. However, New Earth considers that there are three areas that need further attention: 1. Economic benefits. The wider economic benefits of waste management development and its operation need to be attributed greater weight within the Development Management policies. The landfill tax escalator has re-shaped the market. It should be recognised that on-going reliance on landfill has a profound financial impact upon local authorities (as waste collection and waste disposal authorities) and local businesses. The opportunity for local authorities to retain a higher proportion of Business Rates from renewable energy schemes should also be recognised, alongside job creation. In line with the priorities of the LEP it is considered that Development Management policies should also recognise and encourage research and development activities within the sphere of waste management, often entailing advanced engineering. New Earth welcomes the support provided by Borough of Poole for its Canford R&D facility, but believes that active encouragement should be expressed in the Plan. 2. Recognising the needs of industry and operational requirements. There is general acceptance that waste management facilities are an essential part of an area's infrastructure. The design and operation of facilities is shaped not just by planning considerations, but by the need to meet client expectations, the need to achieve operational efficiencies and comply with other regulatory regimes (including Building, Environmental Permitting, Health and Safety, and in the case of residual and food waste facilities Animal By-Product requirements). As you will appreciate, none of the above considerations are static and there is a need for constant innovation, adaptation and alteration. This can manifest itself in physical and / or operational changes that impinge upon land use planning. This might be summed up as 'recognising the needs of the industry and ensuring that we have a network of waste management facilities that are fit for purpose' in the guiding principles. It would be helpful if the Plan could include a policy that looked to positively enable ongoing adaptation where this would lead to operational efficiencies or is required owing to other regulatory changes. 3. Increasing synergy and integration</p>	<p>Your helpful comments are noted and will be considered further.</p> <p>The Pre-Submission Draft Waste Plan contains various references to the economy including within the Vision for Sustainable Waste Management and Objective 1. Paragraph 3.17 and 3.18 refer specifically to the importance of the circular economy. Economic benefits are also referred to, as appropriate, within the development management chapter.</p> <p>The need for 'fit for purpose' waste facilities is recognised in the vision and Objective 3 of the Waste Plan.</p> <p>Co-location of waste operations with complementary facilities is supported through the Waste Plan, through Policy 2 'Integrated waste management facilities' and Policy 6 'Recovery facilities'.</p>
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					with mainstream industries. New Earth welcomes the recognition given to 'resource recovery parks' in paragraph 10.14 of the Issues Document, but feel that recognition needs to be given to complementary industries sitting outside of the waste sphere. For instance, the manufacture of industrial gasses for on-site use or onward distribution, manufacture of fuels for on-site use or onward distribution (possibly via the gas network), the generation of heat and / or electricity and its use on-site or distribution via existing / new networks, other complementary processes and supply chains. Heat in particular will not travel far, and private wire arrangements can minimise electrical transmission losses. Otherwise the co-location of complementary process and supply chains can help minimise transport movements and travel distances. New Earth appreciates that the remit of the Plan is confined to waste management use, but in the spirit of true spatial planning the Plan should look to link in to existing and future Local Development Documents. New Earth believes that this is best expressed through a Development Management policy that supports the principle of exploiting such opportunities.	
Question 15	WP93	558509	North Dorset District Council	Agree	North Dorset District Council support the guiding principles identified.	Your support is noted.
Question 15	WP126	815428	Bridport Town Council	Comment	We are happy that the full range of Environmental checks and balances are applied. It is crucial though that they are robust in design, fairly and reasonably applied and rigorously controlled.	Your support is noted.
Question 15	WP180	494685	SITA UK	Comment	SITA agree that the topics set out are comprehensive and appropriate	Your support is noted.

Question 15	WP250	399290	Wiltshire Council	Comment	The list of topic themes for future policy appears to be comprehensive and well researched. At this stage, we have no further comments to make on the proposals.	Noted.
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<p>Question 15</p>	<p>WP206</p>	<p>816619</p>	<p>Highways Agency</p>	<p>Comment</p> <p>In terms of the paragraphs on traffic and access, the Agency agrees that waste management facilities can be significant generators of traffic and that the impact on the highway network is an important consideration in assessing the acceptability of proposed waste developments. The text does not make it clear which routes form the trunk road network in the county, or that these roads are the responsibility of the Highways Agency, rather than the three respective local highway authorities in the plan area. This could be rectified. The Agency accepts that use of trunk roads and other primary routes, along with county distributor roads, is probably to be encouraged for transporting waste over longer distances in preference to lower class routes. The Agency is aware of the county freight network map to help drivers find appropriate freight routes in the county. However, it is not a given that 'such routes are more to be able to satisfactorily accommodate such traffic' [sic] as much of the trunk road network suffers congestion and many junctions have capacity problems which could be exacerbated by traffic generated from waste proposals. Development management policies covering transport issues should take account of the policy set out in DfT Circular 02/2013. The Agency agrees that the following points are important considerations in determining the acceptability of proposals: The capacity of existing and potential transport infrastructure to support the sustainable movement of waste; · the suitability of the road network and the extent to which access would require reliance on local roads; and · the opportunities to encourage use of alternatives transport modes to road transport. These points should however be revised to make clear that development proposals will be assessed and only permitted where: safe access to the site can be provided, including appropriate routes to the strategic road network; and appropriate transport improvements are secured to overcome unsatisfactory transport conditions created or exacerbated by the development. Draft development management policy DM8 in the Bournemouth, Dorset & Poole Minerals Strategy offers a suitable template for the policy wording.</p>	<p>Your comments will be helpful as we draft suitable policy guidance on traffic and access.</p> <p>The traffic and access section has been expanded to provide guidance to applicants on the in relation to the transportation of waste. This includes a map showing the Dorset Advisory Lorry Route and text explaining which roads are the responsibility of Highways England. The important considerations in determining the acceptability of proposals, set out, are included in the text and, where appropriate Policy 12 'Transport and access'.</p>
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Question 15	WP223	816730	Broadmayne Parish Council	Comment	The document rightly recognises that traffic and access are key issues in the development of waste facilities. Broadmayne PC urges the county council to have particular regard to villages such as Broadmayne which are bisected by A roads. Use of the A352 through Broadmayne - much of which has no footway - by heavy vehicles already makes life difficult for residents.	Your comments are noted.
Question 15	WP266	816842	Transition Town Bridport	Comment	Environmental audits are crucial to all processes but they need to be rigorous, fully monitored and enforced.	Noted.

Question 15	WP280	819977	Natural England	Comment	<p>We recommend the addition of consideration of soils in the determination of waste planning applications. Soil and Agricultural Land Quality The Waste Plan should give appropriate weight to the roles performed by the area's soils. These should be valued as a finite multi-functional resource which underpin our wellbeing and prosperity. Decisions about development should take full account of the impact on soils, their intrinsic character and the sustainability of the many ecosystem services they deliver, for example: 1. Soil is a finite resource that fulfils many important functions and services (ecosystem services) for society; for instance as a growing medium for food, timber and other crops, as a store for carbon and water, as a reservoir of biodiversity and as a buffer against pollution. It is therefore important that the soil resources are protected and used sustainably. The Natural Environment White Paper (NEWP) 'The Natural Choice: securing the value of nature' (Defra , June 2011), emphasises the importance of natural resource protection, including the conservation and sustainable management of soils, for example: A Vision for Nature: 'We must protect the essentials of life: our air, biodiversity, soils and water, so that they can continue to provide us with the services on which we rely' (paragraph 2.5). Safeguarding our Soils: Soil is essential for achieving a range of important ecosystem services and functions, including food production, carbon storage and climate regulation, water filtration, flood management and support for biodiversity and wildlife' (paragraph 2.60). 'Protect best and most versatile' agricultural land' (paragraph 2.35). 2. The conservation and sustainable management of soils also is reflected in the National Planning Policy Framework (NPPF), particularly in paragraphs 109 and 112. When planning authorities are considering land use change, the permanency of the impact on soils is an important consideration. Particular care over planned changes to the most potentially productive soil is needed, for the ecosystem services it supports including its role in agriculture and food production. Plan policies should therefore take account of the impact on land and soil resources and the wide range of vital functions (ecosystem services) they provide in line with paragraph 17 of the NPPF, for example to: Safeguard the long term capability of best</p>	<p>Your helpful comments are welcomed and will be considered further in the development of a policy on the protection of soils and Agricultural Land.</p> <p>Policy 16 'Natural resources' of the Pre-Submission Draft Waste Plan covers the protection and improvement of soils and agricultural land.</p>
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and most versatile agricultural land (Grades 1, 2 and 3a in the Agricultural Land Classification) as a resource for the future. To avoid development that would disturb or damage other soils of high environmental value (e.g. wetland and other specific soils contributing to ecological connectivity, carbon stores such as peatlands etc.) and, where development is proposed. Ensure soil resources are conserved and managed in a sustainable way. 3. To assist in understanding agricultural land quality within the plan area and to safeguard 'best and most versatile' agricultural land in line with paragraph 112 of the National Planning Policy Framework, strategic scale Agricultural Land Classification (ALC) Maps are available. Natural England also has an archive of more detailed ALC surveys for selected locations. Both these types of data can be supplied digitally free of charge by contacting Natural England. Some of this data is also available on the www.magic.gov.uk website. The planning authority should ensure that sufficient site specific ALC survey data is available to inform decision making. For example, where no reliable information was available, it would be reasonable to expect that developers should commission a new ALC survey, for any sites they wished to put forward for consideration in the Local Plan 4. General mapped information on soil types is available as 'Soilscapes' on the www.magic.gov.uk and also from the LandIS website <http://www.landis.org.uk/index.cfm> which contains more information about obtaining soil data. 5. Some of the most significant impacts on soils occur as a result of activities associated with construction activity. A Code of Practice has been developed by Defra to assist anyone involved in the construction sector to better protect the soil resources with which they work and in doing so minimise the risk of environmental harm such as excessive run-off and flooding. The aim is to achieve positive outcomes such as cost savings, successful landscaping and enhanced amenity whilst maintaining a healthy natural environment. We advise that this code is used as part of addressing soils in development plan policies. For further information see <http://www.defra.gov.uk/publications/2011/03/27/construction-cop-soil-pb13298/>

Question 16 – Do you have any comments on how the Waste Plan should safeguard waste management facilities?						
Question 16	WP22	228734	Environment Agency	Comment	<p>It is critical that contingency plans exist for alternative waste operators in the event that current arrangements are not available e.g fire on site. It may be better not to have the majority or all of waste going to one site and / or company within the county in terms of contingency. You should consider carefully the risk associated with this, and address this within your Waste Plan. We believe that through your Waste Plan, you should also be mindful of your Duty of Care to ensure that all waste produced within the county is handled, treated, recovered and disposed of in a manner that minimises the risk to the environment and to local communities living and working in the vicinity of waste management sites. The development of communications within local waste partnerships may assist you to establish where contingency arrangements and capacity gaps exist, and verify data used as evidence to establish contingency and capacity and Duty of Care obligations. We would welcome being involved in any proposed discussions. Using channels of communication between waste partnerships will contribute to the Duty to Co-operate.</p>	<p>Your comments are noted. The issue of contingency plans will be discussed with the waste partnership.</p> <p>This issue has been discussed with the waste management authorities. A network of sustainable waste facilities with spare capacity, particularly for storing waste, in the event of an emergency will provide contingency arrangements. The Plan has allocated four sites to provide additional and new capacity for the engagement of residual waste. The allocations are intended to be flexible, they would allow a range of scales of waste facilities to come forward during the Plan period.</p> <p>The development management policies provide an appropriate framework to ensure that sites coming forward minimise impacts on the environment and local communities.</p>
Question 16	WP77	224810	Campaign to Protect Rural England	Comment	<p>It is important to safeguard the Waste Plan management facilities throughout the life of the Plan from 2014 until 2030 and BEYOND that date.</p>	<p>Plans should only contain policies which can be delivered during the life of the plan. However, subsequent reviews of the plan will be able to maintain safeguarding policies where these are justified. The Waste Planning Authority will consider very carefully any non-waste development either on an existing waste site, on sites allocated for waste uses and development encroaching on these sites.</p>
Question 16	WP57	670039	New Earth Group	Agree	<p>New Earth supports the proposed approach to safeguarding, as set out in paragraphs 10.37-10.39 of the Issues Document.</p>	<p>Your support is noted</p>

Question 16	WP94	558509	North Dorset District Council	Agree	North Dorset District Council supports this policy approach.	Your support is noted
Question 16	WP127	815428	Bridport Town Council	Comment	Domestic dwellings should never be given planning consent so close to existing industrial sites that there would be an immediate conflict.	<p>Planning applications for residential development are a matter for local planning authorities but they must have regard to adopted Waste Plans in reaching their decision. The Waste Planning Authority will consider very carefully the inclusion of policies to deter residential (or any other) development which may compromise existing or future planned waste facilities, including any non waste development encroaching on either existing or allocated waste sites.</p> <p>Chapter 13 of the Pre-Submission Draft Waste Plan contains guidance on which waste management facilities will be safeguarded. Waste consultation areas have also been designated around waste sites to ensure that the WPA is consulted on non-waste development within 250m of safeguarded waste facilities. This will enable the WPA to suggest mitigation to reduce conflict between the waste facility and the new development.</p>
Question 16	WP143	764711	W&S Recycling Services	Comment	We welcome recognition, at paragraphs 10.37 to 10.39 of the need to safeguard existing and allocated sites for waste management. However, we believe that this should also be extended to site with planning consent for waste management so as to ensure that the impact proposals in the vicinity of such sites can be assessed.	<p>Noted. This will be considered as part of the Plan's preparation.</p> <p>The Pre-Submission Draft Waste Plan seeks to safeguard Permitted, undeveloped waste facilities. For more information see Chapter 13 and Policy 24 'Safeguarding waste facilities'.</p>

Question 16	WP181	494685	SITA UK	Comment	SITA agree that existing sites should be safeguarded. SITA would like to see that in addition to being safeguarded for their existing uses but also for potential future changes needed to assist movement of waste treatment and handling up the waste hierarchy.	Your comments are noted.
Question 16	WP251	399290	Wiltshire Council	Comment	The need to safeguard waste facilities and land required for such uses is critical to the success of the Waste Planning Authority in meeting the demands associated with the long-term management of waste. As such, the approach outlined is to be supported. Within a two-tier authority area, it will be vital to ensure that district authorities fully understand the implications of such a policy and are live to the need to consult on non-waste related development proposals that may impact on safeguarded land. From experience, this requires a process of education and constructive dialogue that needs to be developed as early as possible during the preparation of plans.	Your support is noted.
Question 16	WP207	816619	Highways Agency	Comment	The Agency has no comments to make on this matter.	Noted
Question 16	WP267	816842	Transition Town Bridport	Comment	Domestic dwellings should never be given planning consent so close to existing industrial sites that there would be an immediate conflict.	The Waste Planning Authority will consider very carefully any non waste development encroaching on either existing or allocated waste sites. Chapter 13 of the Pre-Submission Draft Waste Plan contains guidance on which waste management facilities will be safeguarded. Waste consultation areas have also been designated around waste sites to ensure that the WPA is consulted on non-waste development within 250m of safeguarded waste facilities. This will enable the WPA to suggest mitigation to reduce conflict between the waste facility and the new development.

Chapter 11 – Vision and Objectives

Question 17 – Do you think the vision is clear and appropriate?						
Question 17	WP36	682036	Dorset Wildlife Trust	Comment	We believe that the word "prevention" should be included in the vision. See paragraph under prevention and re-use heading for explanation.	Your suggestion will be considered, however there are limited opportunities for the Waste Planning Authority to prevent waste. The vision contained in the Pre-Submission Draft Waste Plan refers to 'waste prevention' as suggested. This is also referred to within Objective 1.
Question 17	WP58	670039	New Earth Group	Agree	Yes, New Earth supports the proposed vision for waste management in Dorset, as set out in the Issues Document. New Earth particularly welcomes the recognition given to 'delivery partners' and the economic benefits of sustainable waste management. As highlighted above, this needs to be reflected in the Development Management policies.	Your support is noted.
Question 17	WP78	224810	Campaign to Protect Rural England	Agree		Noted
Question 17	WP128	815428	Bridport Town Council	Comment	As a Vision, we would like to see the following additional wording (shown in red) included: By 2030, we will have worked with the community and delivery partners to achieve a sustainable waste management infrastructure that deals with existing and planned growth in Bournemouth, Dorset and Poole. We will have helped the population of Dorset to move significantly towards our aim of a Zero Waste Dorset by cutting our overall waste production and halving our requirement for residual waste disposal. This will maximise the environmental, social and economic benefits of sustainable resource management for the residents of Bournemouth, Dorset and Poole. Our innovative and effective network of waste management facilities will have pushed waste management up the waste hierarchy and maximised the reuse of waste as a resource. Waste management facilities will be flexible, appropriately sized, located, designed and operated to minimise impacts on climate change, local amenity, and the natural and built environment whilst meeting the needs of communities and businesses.	Your comments are noted and will be considered, however opportunities for the Waste Planning Authority to prevent waste are limited.

Question 17	WP144	764711	W&S Recycling Services	Comment	W&S Recycling supports the proposed vision for waste management in Dorset. It welcomes the recognition of the need to work with the community and delivery partners.	Your support is noted.
Question 17	WP182	494685	SITA UK	Comment	Consider setting targets, dates, milestones etc by when certain elements of the vision will be achieved - rather than "by 2030" Objective 9 should also make it clear that it considered built operational capacity (not consented capacity).	Consideration will be given to how more specific targets and milestones could be incorporated into the vision. However, it is thought that this might become quickly out of date and make the plan inflexible to changing circumstances.
Question 17	WP234	224280	East Dorset Community Partnership	Comment	The revised Waste Framework Directive uses the word "Prevent" as the prime target and, as stated in para 2.3 is a legal requirement. We suggest that this should be writ large in the Vision. Let's not stop part way up the hierarchy! We suggest amending para 2 to read "...will have pushed waste management up the waste hierarchy and maximised the prevention and reuse of waste ..."	Your comments are noted and will be considered in the context of the limited opportunities the Waste Planning Authority has to prevent waste. The vision contained in the Pre-Submission Draft Waste Plan refer to 'waste prevention' as suggested. This is also referred to within Objective 1.
Question 17	WP252	399290	Wiltshire Council	Comment	The proposed 'vision' appears to be clear and precise. It isn't clear why the statement appears at the end of the Issues Report, but it is assumed that this will be addressed in the next draft of the Waste Plan.	Your support is noted. Given that this paper examined the issues and the vision arose from the consideration of issues it appeared at the end of the plan. The vision in the draft plan will appear up front. The Vision and Objectives appear towards the front of the Pre-Submission Draft Waste Plan.
Question 17	WP208	816619	Highways Agency	Comment	The Agency would like to see mention of minimising impacts on the road network included in the vision.	Your suggestion is noted and will be fully considered. The vision contained in the Pre-Submission Draft Waste Plan makes reference to 'minimise impacts on the local road network' as suggested.

Question 17	WP268	816842	Transition Town Bridport	Comment	We are disappointed with your Vision. Zero waste or working towards Zero Waste should be within your Vision, should advise your Targets which should be your main Objective.	Your comments are noted and will be considered. The vision has been strengthened with reference to the 'circular economy' and waste prevention. However, there is only so much the Waste Plan can do. It is considered that working towards Zero waste is outside of the scope of the Waste Plan.
Question 17	WP276	817412	Sherborne Town Council	Comment	Sherborne Town Council is glad to read the Vision (11.1), especially that 'Waste Management Facilities will be flexible, appropriately sized, located, designed and operated to minimise impact on climate change, local amenity and natural and built environment, whilst meeting the needs of communities and businesses.'	Your support is noted.
Objective 8	WP278	817412	Sherborne Town Council	Comment	Objective 8 'to facilitate the reduction in waste transportation' is essential, but as many maps show, there is little waste treatment in the proximity of Sherborne. This present Waste Management Centre is deemed inadequate in size, so that it will be left as a Household Recycling Centre, but the transfer part moved, as is recommended along the A3030 or 357 to serve Blandford too. (Maybe just North of Newtown would be suitable, as part of that industrial estate, but anywhere along that road cannot fail to increase road traffic, especially at peak times of the year). Onsite management of waste, perhaps an anaerobic digester, or biomass, would reduce this pressure.	Your comments are noted. Discussions with Dorset Waste Partnership have determined that the Sherborne WMC adequately serving the community it is designed to serve. There are other priorities, elsewhere in Dorset for new facilities, improvements to existing facilities. Allocation of a new site for a transfer station in the vicinity is unlikely to be deliverable during this Plan period.
Objective 9	WP279	817412	Sherborne Town Council	Comment	Objective 9 stresses working towards self-sufficiency. Since the present co-mingled recyclables are sent to Kent (where the contract runs out soon), there is a clear priority to plan for such a provision in Dorset before the whole county has its unsorted waste collected, even though a Materials Recycling Facility might not be of optimum size. Although the principle of proximity unquestionably locates most treatment facilities near the largest conurbation, Sherborne would appreciate any viable scheme which would reduce road transport near here, that is in accord with the Waste Hierarchy (2.3).	Your comments are noted.
Question 18 – Do you think the draft strategic objectives are appropriate and deliverable?						

Question 18	WP79	224810	Campaign to Protect Rural England	Comment	Yes, probably.	Noted
Question 18	WP37	682036	Dorset Wildlife Trust	Comment	We believe that the word "prevention" should be included in objective 1. See paragraph under the "prevention and re-use" heading for explanation.	Your comments are noted and will be considered in the context of the limited opportunities for the Waste Planning Authority to prevent waste. The vision contained in the Pre-Submission Draft Waste Plan refer to 'waste prevention' as suggested. This is also referred to within Objective 1.

<p>Question 18</p>	<p>WP59</p>	<p>670039</p>	<p>New Earth Group</p>	<p>Agree</p> <p>Overall New Earth believes that the draft strategic objectives are appropriate and deliverable, however, in some instance deliverability can be enhanced through the more detailed policies of the Plan, as set out in the above responses. Objective 1 - New Earth supports this objective, but would point out that its deliverability will depend on the selected approach to managing residual waste - i.e. the ability to divert waste away from disposal; (see response to Q13). Objective 2 - New Earth welcomes the importance afforded to viewing waste as a resource. New Earth believes that the associated economic benefits can be maximised. Objective 3 - New Earth supports this objective and believes that a suitable network of facilities is capable of being delivered. Objective 4 - New Earth welcomes the recognition given to the role of emerging technologies. It is considered, however, that deliverability could be enhanced through additional Development Management policies (see response to Q15) Objective 5 - New Earth supports this objective and believes that it is capable of being delivered insofar as the Plan and waste management affects the Bournemouth Dorset and Poole's natural resources, environmental, cultural and economic assets and tourism. Should this objective not refer to Bournemouth, Dorset and Poole' rather than the County'? Objective 6 - New Earth supports this objective and believes that is capable of being delivered insofar as the Plan and waste management affects the character and amenity of the local area and the health and well being of the local people. Objective 7 - New Earth welcomes this objective and believes that the Plan has significant potential to assist in adopting to, mitigating and providing resilience to climate change. Objective 8 - New Earth supports this objective and believes that a reduction in vehicle movements and journey lengths can be delivered. Objective 9 - New Earth welcomes this objective and the pragmatic approach adopted. Objective 10 - New Earth supports this objective, but would respectfully suggest that encouragement might be given to co-location with complementary uses and/or enabling infrastructure for heat, gas and / or electricity distribution (see response to Question 15).</p>	<p>Your comments and support for the objectives are noted. It is agreed that they will be enhanced through detailed policies in the Plan.</p>
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Question 18	WP129	815428	Bridport Town Council	Comment	Generally yes, but we would want to see something added along the lines of "To work towards Zero Waste by educating and encouraging householders and businesses to reduce their waste by smarter purchasing, better resource management, repairing, reusing and recycling. " It is felt that the strategy needs more emphasis on changing behaviour to reduce waste.	Your comments are noted and consideration will be given to your suggestion in the context of the limited opportunities for the Waste Planning Authority to prevent waste.
Question 18	WP145	764711	W&S Recycling Services	Comment	W&S Recycling broadly supports the objectives identified but wishes to ensure that it is recognized that in some instances a balance may need to be struck between objectives.	Your support is noted and comments noted.
Question 18	WP183	494685	SITA UK	Comment	Yes. SITA considers the objectives appropriate and deliverable	Your support is noted
Question 18	WP209	816619	Highways Agency	Comment	The Agency welcomes the clause in Objective 8 relating to promoting sustainable movement of waste. Redrafting the objective to seeking to facilitate a net reduction in the total miles waste is transported might help to give the objective more precision.	Your support is noted.
Question 18	WP236	224280	East Dorset Community Partnership	Comment	Q18 "Prevention" should be included in Objective 1.	Your comments are noted and consideration will be given to your suggestion in the context of the limited opportunities for the Waste Planning Authority to prevent waste. The vision contained in the Pre-Submission Draft Waste Plan refer to 'waste prevention' as suggested. This is also referred to within Objective 1.
Question 18	WP253	399290	Wiltshire Council	Comment	At this stage, the proposed objectives for the Waste Plan would appear to be appropriate. The degree to which they will deliver anticipated outcomes remains to be seen, but they certainly represent a good balance between encouraging sustainable waste management solutions to deliver European / National policy drivers; and ensuring the impact of such development does not lead to adverse environmental effects on the Plan area (people, places and natural environment).	Your support is noted

Question 18	WP198	816638	Devon County Council	Comment	It is suggested that Objective 1 should seek to achieve the management of waste at the highest feasible level of the waste hierarchy, rather than just moving it up the hierarchy. As worded, the objective implies that the diversion of waste from landfill to recovery is sufficient, rather than aiming to achieve the reuse, recycling and composting of this waste in the first instance.	Your comments are noted Objective 1 of the Pre-Submission Draft Waste Plan has been strengthened, as suggested, to ensure waste is managed at the highest feasible level of the waste hierarchy.
Question 18	WP269	816842	Transition Town Bridport	Comment	Objectives - See Q17 What we need is not a 'Waste Strategy' but a 'Resource Strategy'. If we are to become sustainable and resilient we have to manage all our resources and we believe Local Government should take a lead and has a key role in taking their populations with them.	Your comments are noted.
Question 18	WP281	819977	Natural England	Comment	The current objectives fail to incorporate any specific reference to landscape and we feel that this could be rectified by inclusion in either objective 5 and 6.	Noted Objective 4 of the Pre-Submission Draft Waste Plan refers to safeguarding and enhancement of the landscape.
Chapter 12 – Methodology for Site Selection						
12.1	WP210	816619	Highways Agency	Comment	The Agency is content with the guiding principles set out in Table 7 of the consultation document. Traffic and access is considered as a social issue in Table 8. Mention should be made of preparing a TA in line with the GTA. The table should make clear that advice will be sought from the County Council or the Highways Agency, or both, as appropriate on matters of transport development control.	Your support is noted. It is suggested that a reference to the need for a Transport Assessment to accompany a planning application could be made in the development management section of the Plan.

<p>14.1 11</p>	<p>WP220</p>	<p>816695</p>	<p>Dorset AONB Partnership</p>	<p>Comment</p> <p>With regard to the Waste Plan Issues Consultation, I herein provide focussed comments from the Area of Outstanding Natural Beauty (AONB) Team. Overall, we welcome the production of the paper as a basis for discussing future waste needs across the County. In this response I will focus on the principles of site selection and those individual proposals that are outlined, where issues of siting and design may affect the landscape and visual qualities of the AONB. Principles of site selection: I consider that the overall approach is likely to be appropriate, in terms of ensuring regard for the natural beauty of the AONB. The guiding principles for site selection, outlined in table 7 on p.97, have the potential to minimise effects on the AONB. For example, the Proximity and Co-location principles may serve to locate new facilities across fewer sites that are closely associated with the existing pattern of development, where possible placing new sites on industrial estates or brownfield land. Although the use of such sites will not guarantee that effects on the AONB are minimised, the broad principle is supported. I note that the document recognises the potential for cumulative effects to arise from co-location of facilities and I would support careful consideration of this issue, alongside the consideration of cumulative effects in combination with nearby existing developments (e.g. within industrial estates). The AONB team welcomes the opportunity to provide comments on individual proposals as the site selection process progresses. In doing so we will make reference to the siting and design guidelines contained within the AONB's Landscape Character Assessment [1] and the policies of our Management Plan [2]. Judgements on effects will be made in accordance with established guidelines [3]. It is recommended that the Council engage in-house landscape specialists in the site selection process, to ensure that landscape and visual considerations are addressed at an early stage. Â [1] Conserving Character Landscape Character Assessment & Management Guidance for the Dorset AONB , Dorset AONB Partnership, 2008 [2] A Framework for the Future: Dorset AONB Management Plan 2009-2014 , Dorset AONB Partnership, 2009. Updated plan to be published March 2014 [3] Guidelines for Landscape & Visual Impact Assessment , Third Edition, Landscape Institute, 2013</p>	<p>Your general support is welcomed and the waste planning authority welcomes continued involvement from the AONB team as we progress through the site selection process.</p>
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Stage 1: Methods of Site Identificati on	WP146	764711	W&S Recycling Services	Comment	We consider that the sieve search should include both absolute and discretionary criteria.	Consideration will be given to what constitutes an absolute constraint.
Table 8	WP147	764711	W&S Recycling Services	Comment	Noise and vibration issues should also include consideration of the proximity to sensitive receptors, and the ability to mitigate potential impacts.	Agree.
Table 10	WP23	228734	Environment Agency	Comment	We welcome that Protection of Water Resources and Nature Conservation are included in Table 10, as issues to be addressed when considering potential waste sites. We would be happy to work with you on the assessment of the waste sites. We would welcome early discussion with your team on what would be assessed in your Strategic Environmental Impact Assessment (SEA).	Your support and comments are welcomed.
Table 10	WP42	682036	Dorset Wildlife Trust	Comment	DWT would like to be consulted on any waste site that will impact on Sites of Nature Conservation Interest. We would like to see this written in the Nature Conservation section of Environmental Issues. Air Quality The impacts on air quality resulting from development and the knock on effects for designated habitats should be explicated stated in the methodology for site selection. In particular how the emission of nitrogen oxides and ammonia can have an adverse impact on habitats such as heathland through nutrient enrichment. Any planning application for a development that would result in air quality issues for a designated site would have to be subject to Habitats Regulations Assessment.	It is hoped that the next consultation on the Waste Plan will include site options. The Waste Planning Authority will welcome input from DWT on these options.
Question 19 – Do you agree with the requirements for different types of facilities set out in Table 11?						
Question 19	WP80	224810	Campaign to Protect Rural England	Comment	These Guiding Principles and other issues seem reasonable but CAREFUL and DETAILED consideration must be given to traffic, especially heavy lorries, on minor roads.	Noted, although the level of detail will need to be appropriate for inclusion in a development plan.

<p>Question 19</p>	<p>WP60</p>	<p>670039</p>	<p>New Earth Group</p>	<p>Agree</p> <p>The site considerations set out under table 11 appear appropriate but a more exhaustive criteria is required. It is considered that site thresholds should be 'indicative' not absolute, as it is New Earth's experience that site shape, configuration and topography can be equally important. New Earth would also suggest that a foot note should be included to the effect that the site size thresholds might not be appropriate when considering the identification of land adjacent to existing operational facilities. This is owing to the fact that the ratio between capacity and footprint alters when looking at potential extensions owing to the opportunity to make use of established infrastructure such as existing access roads, weighbridges and site welfare and office facilities. In reflecting upon the proposed sieving process, New Earth would suggest drawing distinction between absolute constraints, such as SSSI's and discretionary constraints, which will need to be evaluated on a site by site basis. New Earth is most familiar with treatment facilities so would make the following observations: Given that consent exists at Canford for a facility employing Advanced Thermal Conversion technology, it is respectfully suggested that this be added to the 'includes list' under Treatment facilities. It is considered that 'scope for connection to the grid may be necessary & / or heat receptors' should be explicitly included under the key physical and operational requirements for Energy from Waste. It is respectfully suggested that proximity to the source of waste arisings / main centres of population should be a requirement.</p>	<p>Your helpful comments are noted and will be considered during preparation of the Plan.</p> <p>Many of the issues raised have been included within policy and guidance of the Pre-Submission Draft Waste Plan.</p>
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Question 19	WP148	764711	W&S Recycling Services	Comment	W&S Recycling consider that the requirements set out in Table 11 are broadly appropriate. However, experience suggests that site size can be variable, based on a range of factors but particularly where several facilities are located together. W&S Recycling welcomes the recognition of the benefits that the provision of split levels sites can bring to the operation and management of household recycling centres and waste management centres/waste transfer stations. Such sites can operate in an efficient way and provide a safe means of bringing traffic onto such sites. Consideration should be given on such sites to the inclusion of a trade waste facility, which would be of benefit to waste management in the county.	Your helpful comments are noted.
Question 19	WP184	494685	SITA UK	Comment	The physical and operational requirements set out for the different types of facilities seem appropriate.	Your support is noted.
Question 19	WP254	399290	Wiltshire Council	Comment	The list of site requirements in Table 11 appears to be well researched and suitable for use as a basis for identifying site options.	Your support is noted.
Question 19	WP211	816619	Highways Agency	Comment	The Agency has no comments to make on the appropriateness of the requirements for facilities outlined in the table. However, it welcomes the reference to the HRCs generating high numbers of vehicles at peak times of year and weekends.	Noted
Chapter 13 – Waste Site Nominations						
13.1	WP212	816619	Highways Agency	Comment	The Agency does not wish to nominate any potential sites for inclusion in the waste plan.	Noted

	WP186	494685	SITA UK	Comment	See site nomination form for details regarding Blandford WTS & HWRC Possible WTS - Bulky Waste	<p>Further consideration is needed as to the most appropriate means of dealing with existing waste management sites through the plan. Where sites are considered strategic and/or where opportunities for expansion have been highlighted, it is likely that consideration will be given to allocating them in the Plan, subject to consideration of the issues highlighted in the site selection methodology.</p> <p>The Pre-Submission Draft Waste Plan contains a list site allocations that are considered to best address the identified waste management needs.</p>
	WP187	494685	SITA UK	Comment	See site nomination form for details regarding Mannings Heath Transfer Station Potential new developmenyt - MRF Co mingled dry recylables/food waste circa 100,000tpa	<p>Further consideration is needed as to the most appropriate means of dealing with existing waste management sites through the plan. Where sites are considered strategic and/or where opportunities for expansion have been highlighted, it is likely that consideration will be given to allocating them in the Plan, subject to consideration of the issues highlighted in the site selection methodology.</p> <p>The Pre-Submission Draft Waste Plan contains a list site allocations that are considered to best address the identified waste management needs.</p>

	WP188	494685	SITA UK	Comment	<p>See site nomination form for details regarding Binnegar Environmental Park Potential new development - MRF Bulking up facility 80,000t capacity</p>	<p>Further consideration is needed as to the most appropriate means of dealing with existing waste management sites through the plan. Where sites are considered strategic and/or where opportunities for expansion have been highlighted, it is likely that consideration will be given to allocating them in the Plan, subject to consideration of the issues highlighted in the site selection methodology. The principle of the co-location of waste facilities can be encouraged through the plan.</p> <p>The Pre-Submission Draft Waste Plan contains a list site allocations that are considered to best address the identified waste management needs.</p>
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	WP224	791335	Alliance Planning	Comment	<p>Eco Sustainable Solutions Ltd (Eco) is a local Dorset-based company which has long been a leader in the development of sustainable waste management that treats waste as a resource in the production of a range of sustainable recycled products. Eco has historically been involved in the development of high quality processing that enables recycled products to achieve new markets and have developed an integrated product range that has supplied many well-known projects. Eco employs over 50 people in the UK at their site at Chapel Lane, Parley and at other key locations within Dorset. The company actively seeks to minimize the effects of its operations on the environment and local communities and works with local groups to reflect their part as a local employer and part of the community. In recent years, Eco have pioneered the development of renewable and low carbon energy installations on their sites. In 2011, Eco obtained planning permission from Dorset County Council for the development of a Bio-Energy Facility at the Parley site for the processing of waste wood to generate electricity and heat (Planning Ref: 8/11/0268). The planning permission for the Bio-Energy Facility was recently varied to provide for amendments to the design of the buildings and plant and an increase in the permitted throughput from 25,000 to 30,000 tonnes per annum (Planning Ref: 8/13/0404). The construction of the Bio-Energy Facility is planned for commencement in 2014 and the project will have a generating capacity of up to 4MW of electricity for exportation to the local distribution network, which forms part of the National Grid. In September 2013, Dorset County Council also granted planning permission for the development of an Anaerobic Digestion (AD) Facility at the Parley site (Planning Ref: 8/12/0354). The approved AD Facility will generate biogas for the local natural gas distribution network. Eco completed the development of a similar AD Facility at their site in Piddlehinton in 2012. Chapter 13 of the Issues Paper sets out that the next stage of the Waste Plan will include the assessment of sites with potential for new or expanded waste management facilities and invites site specific proposals to be put forward. Eco operate a variety of waste management and recycling activities at their three sites at Parley, Piddlehinton and Weymouth. It is submitted that each</p>	<p>Further consideration is needed as to the most appropriate means of dealing with existing waste management sites through the plan. Where sites are considered strategic and/or where opportunities for expansion have been highlighted, it is likely that consideration will be given to allocating them in the Plan, subject to consideration of the issues highlighted in the site selection methodology. The principle of the co-location of waste facilities will be encouraged through the plan.</p> <p>The Pre-Submission Draft Waste Plan contains a list site allocations that are considered to best address the identified waste management needs.</p>
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				<p>of the three sites should be recognised in terms of their existing and permitted facilities. It is further submitted that the new Waste Plan should recognise the potential of the site at Parley to grow and evolve during the period of the new Bournemouth, Dorset and Poole Waste Plan. The site at Parley is consistent with the spatial vision and strategic objectives of the Issues Paper. We have therefore completed the Waste Site Nomination Proforma, which is attached under Appendix A of this document. An OS plan indicating the site and the access arrangements is attached under Appendix B. Eco's Facility at Parley Eco's existing and permitted waste management and recycling facility at Parley comprises 11.6 ha and lies within the urban fringe of the Bournemouth, Christchurch and Poole conurbation. It is situated immediately north of Bournemouth Airport and the associated employment area. The site contains green waste composting operations, soils and aggregate recovery and recycling, wood recovery and processing, as well as associated operations, including the production, storage, bagging and dispatch of associated products. Planning permission was granted by Dorset County Council in July 2011 for the development of a Bio-Energy Facility in the south-eastern corner of the existing site for the generation of electricity and heat through a thermal process using wood from existing wood recycling operations (Planning Ref: 8/11/0268). The eastern part of the existing and permitted site was approved for the development of an AD Facility under Planning Ref: 8/12/0354. Eco currently have plans to provide for a comprehensive upgrade of the existing and permitted site to provide for environmental improvements and enhance efficiency across the site. The proposals are currently the subject of an EIA Scoping Request to Dorset County Council (Ref: PL\1588\13) and will include a small extension of 3.04 ha to the existing and permitted development site. This area comprises part of the former restored quarry to the east of the site. The prospective development will comprise the reconfiguration of existing and consented development, introduction of new plant and processes and an increase in permitted throughput. In this regard, the prospective development will comprise of the revision of the following existing or consented processes and facilities: A the relocation and reconfiguration of the existing</p>	
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				<p>soils recycling area, aggregates area and wash plant and silt lagoon; Â the relocation and revision of the permitted Anaerobic Digestion Facility, including revised digestate storage (now in tanks rather than covered lagoon); the upgrade of existing Green Waste Composting; the conversion of the existing IVC barn for clean biomass production (currently undertaken in the open); the conversion of the existing IVC clamps to wood drying units and a revised clean wood animal bedding processing area; a relocated treated wood biomass production area (now adjacent to the permitted Bio-Energy Facility). the permanent use of the new Road Sweeping and Gulley Waste Recycling Plant (recently consented for a temporary period 12 months under Planning Ref: 8/13/0403); It is intended that the prospective development will also include the following new processes and facilities: a new Solid Recovered Fuel Processing Plant; Â an increase in the overall waste throughput capacity at the site from the currently permitted 210,000 tonnes per year to 266,000 tonnes per year; the provision of a comprehensive landscaping scheme, including landscape screening bunds along the northern and eastern site boundaries, as well as native tree and shrub planting. The proposals are intended to respond to feedback from Dorset County Council, Natural England, Bournemouth Airport and local residents that have sought improved environmental control, including odour and other emissions. The comprehensive development proposals are intended to provide for the complete modernisation of the various processes on the site. The proposals will represent a significant investment in the comprehensive updating of existing processes, to provide a state of the art, sustainable energy and waste management park. 2.1.11 Planning permission was recently granted by Christchurch Borough Council for the development of two phases of a solar energy park on lands surrounding Eco's facility (Planning Ref: 8/12/0512 and 8/13/0332). Having regard to the renewable and low carbon energy activities being promoted by Eco, it is clear that the facility at Parley represents a strategic site, which we consider should be allocated within the new Waste Plan. CONCLUSION It is submitted that Eco's three sites at Parley, Piddlehinton and Weymouth should be recognised in terms of their existing and permitted facilities.</p>	
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					<p>It is further submitted that the new Waste Plan should recognise the potential of the site at Parley to grow and evolve during the period of the new Bournemouth, Dorset and Poole Waste Plan. The site at Parley is consistent with the spatial vision and strategic objectives of the Issues Paper. The comprehensive development plans that Eco are progressing are intended to provide for the complete modernisation of the various processes on the site. The proposals will represent a significant investment in the comprehensive updating of existing processes, to provide a state of the art, sustainable energy and waste management park. In conclusion, we would respectfully request that you consider our comments in preparing the Draft Waste Plan for Bournemouth, Dorset and Poole. See Waste Site Nomination Form - Proposed Reconfiguration of Existing and Consented Development, including introduction of new processes.</p>	
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	WP275	197579	Resident	<p>Appendix 3 Table 13 (page 120)-Winfrith Mechanical Biological Treatment facility 1. The Review of the Winfrith Mechanical Biological Treatment facility states that Further review required into potential opportunities through the development of the Waste Plan, if there is a need for a waste facility in this area. 2. The inclusion of this site and its Mechanical Biological Treatment plant was described as a key feature of the 2006 Waste Plan at the Public Inquiry, despite very strong opposition from Winfrith Newburg residents and others. I attended the Public Inquiry. 3. The 2006 Waste Plan considered that it was important to also have a Mechanical Biological Treatment plant on land at Bournemouth Airport. The landowner now does not wish to see site allocated in the Waste Plan. 4. It is not stated in the Waste Plan why 2 treatment plants that were considered vital in 2006 were subsequently considered to not be needed. 5. If 2 specialised treatment plants, considered to be crucial in 2006 are subsequently dropped, is there a possibility that there are treatment plants in the 2013 Waste Plan which may also subsequently be dropped? Recommendation 7 - Winfrith Mechanical Biological Treatment facility. 6. I recommend that the Plan provide an explanation why the Winfrith Mechanical Biological Treatment plant has never been built. 7. An explanation should also be given why 2 specialised treatment plants were considered vital in 2006 and shortly after dropped. 8. It may be that the logic which led to the dropping of the two Mechanical Biological Treatment facilities if applied the draft Waste Plan may highlight some potential problems.</p>	<p>The review of the Waste Plan will be based on a sound understanding of current facilities and current and projected waste arisings during the plan period. Sites will be allocated to meet the identified needs.</p>
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Appendix 3 – Review of Sites Allocated in the Waste Local Plan (2006)

Table 13	WP24	228734	Environment Agency	<p>Comment</p> <p>The Waste Team based in our Blandford office would be happy to provide comments on the suitability of any existing site in terms of infrastructure.</p>	<p>Your comment is noted and input from the EA on the suitability of sites would be welcomed.</p>
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Table 13	WP43	197443	Christchurch Borough Council	<p>Thank you for consulting Christchurch Borough Council on the Mineral Sites Plan (Consultation December 2013) and the Waste Plan (Issues Consultation, December 2013). The Council wishes to make the following representations which have been agreed by lead members of Christchurch Borough Council. The Council welcomes the review of sites allocated in the Waste Local Plan (2006). This plan allocated land in the Airport North West Business Park for a Mechanical Biological Treatment plant with Refuse derived Fuel. The Council welcomes the following review statement which implies support for de-designation of the site, 'Site unlikely to be deliverable. Landowner has indicated it does not wish to see site allocated in the Waste Plan'. The Christchurch and East Dorset Core Strategy has now reached examination stage and consultation has recently closed on a Schedule of Main Modifications to the Submitted Core Strategy. It is anticipated that the Core Strategy will be adopted in April 2014. The Airport Business Park forms part of the strategic allocation in Policy BA2. Policy BA2 sets out the strategy for the Airport Northern Business Parks which are allocated primarily for employment uses (B1, B2 and B8 use classes). Policy BA2 allocates 60ha of employment land for employment development within the Airport Northern Business Parks. Core Strategy Policy KS5 identifies a requirement for 80ha of employment land to come forward in Christchurch and East Dorset over the plan period to 2028 which includes 30ha at the Airport. This supply of employment land also performs an important function in contributing towards the requirements of the Bournemouth and Poole SSCT identified in the Bournemouth and Poole Workspace Study (2012). The area that was proposed for an MBT plant in the Bournemouth, Dorset and Poole Waste Local Plan (2006) is located within the Airport North West Business Park. De-designation of the existing allocation in the adopted Waste Local Plan would help to facilitate the implementation of the Vision for the Bournemouth Airport (Policy BA1) and Policy BA2 which sets out the allocation and strategy for Bournemouth Airport Business Park. At an Airport Liaison Meeting on 15 January 2013 Manchester Airports Group (MAG) indicated that they would like to</p>	<p>Your comments are noted.</p> <p>Further discussions have been undertaken with Christchurch Borough Council throughout the preparation of the Waste Plan on the identification of waste needs and sites options.</p>
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					<p>In between these detailed discussions MAG has held talks with numerous companies, large and small, and the single factor that reappears as a barrier is the lack of commercial certainty over a reasonable amount of waste over a reasonable period of time to underwrite the significant investment required in any new plant despite the adjacent business park and airport providing a strong single market for any power produced. MAG concludes that there is no current interest from waste operators and the allocation continues to be a barrier to the development of this land. This is why MAG would seek to develop it for uses similar to those consented by the Outline consent for the 42k sqm uplift in floor-space at the Business Park rather than continue to be allocated for an un- implementable use. Christchurch and East Dorset Councils and MAG consider that this site is immediately available for employment development, subject to planning consent and support the de-designation of this site from the Waste Plan. It is also concluded from the review of existing allocations in the current Waste Plan consultation that the existing allocation is unlikely to be pursued in the new plan.</p>	
Table 13	WP95	815077	Resident	Agree	<p>The above plan allocated land at in the North West Business Park of Bournemouth International Airport in the Parish of Hurn, for a Mechanical Biological Treatment Works with Refuse Derived Fuel. Table 13 of Appendix 3 regarding this land, states - "site unlikely to be deliverable. Landowner has indicated it does not wish to see site allocated in the Waste Plan" Hurn Parish Council supports the opinion of the landowner, and agree that the site is no longer appropriate for designation in the Waste Plan. This land is better suited for employment use in line with the rest of the North West Business Park.</p>	<p>Your comments are noted</p> <p>This site has not been included in the Pre-Submission Draft Waste Plan as an allocated site for the development of a future waste management facility.</p>

Table 13	WP131	815969	The Lulworth Estate	Comment	<p>Any review of the proposed site at Winfrith for a Micobiological Treatment Plant should take account of the fact that the Landowner will have changed by the time this review has been completed. The Lulworth Estate has been attempting to finalise an agreement with the Nuclear Decommissioning Authority since 20055 under the Crichel Down Rules and it is likely that this will be completed by 31st March 2014. The Lulworth Estate would be keen to explore the possibility of siting such a plant at Winfrith.</p>	<p>Your comments are noted</p> <p>Land at Winfrith has been considered for allocation in the Pre-Submission Draft Waste Plan. It has not been possible to identify a specific site for the development of a waste facility. However, this site should be re-visited in the future when the future of the Winfrith site is better known.</p>
Table 13	WP102	815077	Hurn Parish Council	Comment	<p>The plan previously allocated land at in the North West Business Park of Bournemouth International Airport in the Parish of Hurn, for a Mechanical Biological Treatment Works with Refuse Derived Fuel. Table 13 of Appendix 3 regarding this land, states - "site unlikely to be deliverable. Landowner has indicated it does not wish to see site allocated in the Waste Plan" Hurn Parish Council supports the opinion of the landowner, and agree that the site is no longer appropriate for designation in the Waste Plan. This land is better suited for employment use in line with the rest of the North West Business Park.</p>	<p>Your comments are noted</p> <p>This site has not been included in the Pre-Submission Draft Waste Plan as an allocated site for the development of a future waste management facility.</p>