

**Matter 4: Recycling, Recovery, Disposal and Other
waste facilities**

**Bournemouth, Dorset and Poole Waste Plan
Examination**

**STATEMENT BY DORSET COUNTY COUNCIL ON
BEHALF OF BOURNEMOUTH BOROUGH COUNCIL
AND THE BOROUGH OF POOLE (THE WASTE
PLANNING AUTHORITIES)**

June 2018



Bournemouth, Dorset and Poole Waste Plan Examination Statement by
Dorset County Council

Background Documents

- WPDCC-24 – Background Paper 1: Waste Arisings & Projections
- WPDCC-25 – Background Paper 2: Waste Plan Site Selection
- WPDCC-56 – Schedule of Proposed Main Modifications (Updated June 2018)

Matter 4 - Recycling, Recovery, Disposal and Other waste facilities

Issue: Whether the policies make adequate provision for sustainable waste management facilities while minimising harm to the environment.

General

51 What provision is made in the BDPWP for improved household recycling facilities in Wimborne?

Policy 5 would enable the consideration of an application for the development of household recycling facilities to serve Wimborne/Ferndown. A search for a suitable site for such a facility was undertaken to address this need, however it was not possible to allocate a specific site as all the shortlisted sites had issues of deliverability. See **WPDCC-25** for details. It is considered that Policy 5 enables permission to be granted should a suitable site emerge, for example as employment land becomes available. See also Matter 3, Question 48.

Policy 5 – Facilities to enable the recycling of waste

52 Should the supporting text include indications as to target recycling rates for the various waste streams?

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.

See also response to Matter 3, Q31.

53 Should Policy 5 also make provision for recycling of inert waste?

No. The BDP Minerals Strategy (adopted May 2015) includes a criteria-based policy for aggregates recycling facilities (Policy RE1).

Policy 6 – Recovery facilities

54 Should policy 6 require that the waste processed by new recovery facilities predominantly arises from the Plan area in order to accord with the proximity principle?

Criterion a of Policy 6 requires that proposals for recovery facilities should both support the delivery of the Spatial Strategy and contribute to meeting the needs identified in the Plan – this would need to be clearly demonstrated through any application. The policy expectation is therefore that proposals would predominantly meet the needs of the Plan area, however some imported waste may be managed due to market forces.

Any proposal would be subject to all relevant policies in the Plan, including Policy 1 which requires proposals to demonstrate adherence to the proximity principle.

For clarity, a modification is proposed to strengthen the text accompanying Policy 6 as follows:

'9.30. 'Applications for recovery facilities should accord with Policy 6. An explanation of how the proposal supports the delivery of the spatial strategy and addresses the needs of the Plan area should be provided. Proposals should also and should show how proposals they will provide for the use of low-carbon energy onsite and offsite, where there is surplus energy generation.'

(MM 9.5, WPDCC56)

Policy 7 – Final disposal of non-hazardous waste

55 Should the policy refer to the need for restoration, aftercare and afteruse in accordance with Policy 23?

This is not considered necessary as the Plan should be read as a whole and reference is made to Policy 23 in paragraph 10.26.

56 Should the last paragraph read “gas should be used as an energy source”?

Yes. See proposed modification **MM10.4, WPDCC56**

Policy 8 – Inert waste recovery and disposal

57 Should criterion (c) also refer to restoration of waste disposal sites?

This could be included to ensure material is not unduly diverted from restoring existing/permitted waste disposal sites. See proposed modification **MM10.5, WPDCC56**

Policy 9 – Special types of waste

58 Does the last paragraph adequately cover requirements for radioactive waste management facilities?

Yes – this is considered to be sufficient for the reasons set out below.

The Waste Planning Authority is not aware of a requirement for any new radioactive waste management facilities outside of possible temporary ones at Magnox Winfrith, and the plan contains a dedicated policy for the site. The Tradebe Inutec facility with its current and historic link in supporting the decommissioning of Magnox Winfrith is set to continue.

It should be noted that, compared to other types of waste, volumes of radioactive waste are small. The management of radioactive waste at the national level is evolving and the Plan is suitably flexible, with clear criteria, to consider the development of a new facility or the extension of the existing facility at Tradebe without being unduly prescriptive.

The final paragraph of Policy 9 in part reflects the fact that nuclear waste management is by its nature a highly specialised process with limited treatment options available nationally. Such facilities tend to be subject to nuclear licensing requirements and/or specific control from other regulators such as the Office for Nuclear Regulation and the Environment Agency. Higher activity wastes are usually managed by transit (once safely packaged) to suitable facilities at Sellafield, while intermediate level waste (ILW) is planned for storage at a purpose-built facility at the Magnox site in Harwell, Oxfordshire. National policy with regard to low level nuclear waste seeks to minimise unnecessary diversion of waste to the national low-level waste repository (LLWR) at Drigg, Cumbria, if there are better alternatives for treatment or disposal (essentially to conserve the capacity and lifetime of this facility). As regards lower level wastes there are various options.

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The national strategy for low level waste, produced by the Department for Energy and Climate Change, states the following:

'The management of LLW on a nuclear site should be undertaken as part of a wider integrated framework for optimised waste management. The specific activity of LLW spans several orders of magnitude, which can influence how the waste is managed. Not all LLW can be safely disposed of at the LLWR; conversely some Higher Activity Waste (HAW) may be better managed within a LLW facility. Thus there are synergies between HAW policy and the LLW strategy which could be enabled by managing wastes using disposability assessment, as opposed to radiological classifications. Government will work with the Regulators, the NDA and waste producers to determine the practicalities and feasibility of adopting such an approach. The strategy requires waste producers to manage their wastes in accordance with the waste hierarchy; which considers and utilises a range of methodologies to optimise waste management processes and make best use of existing assets. Thus the waste hierarchy is central to decision making in identifying the most advantageous option for LLW management' (UK Strategy for the Management of Solid Low Level Waste from the Nuclear Industry, DECC, February 2016) .

The Nuclear Decommissioning Authority (NDA) is responsible for national strategies for decommissioning of nuclear sites and management of nuclear waste. The NDA Strategy states that:

'Our strategy for managing solid LLW, which includes very low level waste (VLLW), is to implement the UK Nuclear Solid Low Level Wastes Strategy, which focuses on preserving capacity at LLWR by diverting materials to alternative management routes in accordance with the Waste Hierarchy. The successful delivery of this strategy will provide capability and capacity to manage LLW for many decades' (NDA Strategy, 2016, p.61).

Some very low-level waste streams can be diverted to suitably licensed landfill sites such as Kings Cliffe in Northamptonshire and Chapelcross in Scotland (neither of which is at capacity). An existing VLLW and LLW incinerator is also located within proximity at Fawley in Hampshire. This illustrates the fact that facilities designed to treat radioactive waste (thereby reducing the bulk of material that needs to be disposed of) can have an important role to play locally, but also may function as a regional or national resource. In the case of Dorset, Tradebe Inutec (currently part of the nuclear licensed site but seeking an independent license) has a key role in supporting the treatment of nuclear waste streams arising from the Winfrith decommissioning programme which in itself helps to minimise the amount of waste that needs to be disposed of elsewhere. However, it is feasible that it will have specialist capabilities that are unavailable elsewhere to allow selective treatment of waste not arising from Winfrith (thereby potentially meeting a national need). To do so would accord with national radioactive waste policy even though, on initial examination, it might appear not to accord with the proximity principle, unless viewed in a national context.

The wording of the final paragraph of Policy 9 is intended to allow proper consideration to be given to such circumstances so that the Plan prioritises self-sufficiency (i.e. treatment of waste arisings in Bournemouth, Dorset and Poole) whilst also acknowledging that other industry-specific requirements relating to nuclear waste should also have regard to national policies on such matters. This is considered to offer sufficient flexibility without undermining the requirement to demonstrate the case for treatment of waste arising from outside of the plan area in accordance with the criteria in the policy (to ensure it does not compromise the self-sufficiency argument or lead to unacceptable impacts).

Policy 10 - Decommissioning and restoration of Winfrith Nuclear Licensed Site

59 Would highway improvements be needed to facilitate access via Dorset Innovation Park?

It is not anticipated that any significant highway improvements will be necessary. The highway network is currently in place through the innovation park as a legacy from when the innovation park formed part of the wider nuclear estate. As this was a 'private' estate road it was not public highway. However, the innovation park has recently been purchased by Dorset County Council and Purbeck District Council and so should not require formal adoption as highway (although this would be feasible to achieve if necessary).

Dorset Innovation Park is now an enterprise zone with ambitious plans for new investment and business opportunities and the site will already benefit from 'highway credits' in terms of previous established use levels. Consequently, only when traffic levels reach a certain threshold would there be a requirement to consider improvements to infrastructure. This might focus on alternatives to the private car, for example, if the uses are more people-intensive (B1a uses) and proximity of Wool railway station (on the Waterloo to Weymouth line) could facilitate this. Levels of traffic associated with decommissioning of Winfrith have yet to be established as this will depend upon the details of the final restoration plan. The railway sidings could feasibly be used for the transportation of some waste, although this is dependent upon logistical and cost implications and is likely only to manage a modest proportion of the waste stream. It is anticipated that much of the demolition waste could feasibly be retained on-site as part of void filling and general landscaping, thereby minimising traffic. Alternatively, in a scenario where all material is disposed of off-site there may need to be some consideration of potential highway impacts and mitigation measures. However, this is considered unlikely.

60 What are the advantages of using this route as opposed to Gatemore Road?

The decommissioning of Winfrith has already been established in principle with the granting of the original planning permission for the nuclear research facility in the 1950s. This is not conditional upon access being secured through the innovation park, but having the option to use this route would offer greater flexibility in managing decommissioning traffic. The main benefit arising from this would principally be the alleviation of potential traffic impacts arising from decommissioning of Winfrith upon a small number of residential properties on Gatemore Road. It could also allow for the possible segregation of traffic heading in either an east or west direction (or even one-way flows) to improve efficiency of movement on the A352. For this reason, the aspiration has been included in Policy 10 to aid future discussions between Magnox, the innovation park and the highway authority.

61 Which European habitat would potentially be affected by development and how close is this to the site?

There are three 'layers' of Natura 2000 site designations both in and adjacent to the licensed nuclear site. These designations exclude the footprint of buildings but incorporate open landscape areas within the site, as well as to the south (in and around Blacknoll Hill) and on the western side of Gatemore Lane (Winfrith Heath Nature Reserve and Winfrith and Tadnoll Nature Reserve). These areas are designated as:

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- Dorset Heathland Special Protection Areas under the provisions of the EU Directive on the conservation of wild birds (Birds Directive);
- Dorset Heaths Special Areas of Conservation under the provisions of the EU Habitats Directive; and
- Dorset Heathlands Ramsar sites under the provisions of the Ramsar Convention on Wetlands of International Importance.

The principles of the preferred restoration approach as expressed by the Nuclear Decommissioning Authority and Magnox as its operative agent is to restore the site to a heathland landscape with public access. Given that much of the site is already designated this will require great care in avoiding likely significant effects and ensuring that restored areas are of suitable soil and landscape types to conserve and enhance these habitats. It will also require consideration of on-going management responsibilities. The restoration programme for which the NDA is ultimately responsible will require Habitat Regulations Assessment and Environmental Impact Assessment and this is programmed into the decommissioning timetable. Magnox maintain regular dialogue and engagement with Natural England and the relevant local planning authorities covering the site (Purbeck District Council and Dorset County Council). Any aspects of decommissioning that require planning permission will need to comply with Policy 18 of the Waste Plan which states that development must not adversely affect the integrity of internationally designated habitats.

62 Please explain the acronyms in the text (HAW, LLW, VLLW).

Higher activity waste (HAW), low level waste (LLW) and very low-level waste (VLLW) are explained in paragraph 11.22 of the Plan and full definitions are available in Background Paper 1 (**WPDCC24**). It is proposed to write these terms in full in this section. It is intended that these changes will be additional modifications.

Policy 11 – Waste water and sewage treatment works

63 Should the policy refer to the relevant insets?

It is not considered necessary to refer to the insets in Policy 11 because the policy applies to proposals on both allocated and unallocated sites. Policy 3 makes specific reference to Insets 12 and 13 being allocated for expansion of sewage treatment works (modifications are proposed to remove reference to Inset 12 throughout the Waste Plan, see **AS12.1 WPDCC56**).

To provide clarification, paragraphs 11.51-11.52 cross refer to Policy 3.