

## Chapter 7: The Environment and Resource Management

### Introduction

7.0.1 The Panel considers three main aspects of draft RSS in this Chapter – flood risk, renewable energy and waste management. We also record here our findings on submissions made with regard to Development Policy G which, although appearing in Chapter 3 of draft RSS, is closely intertwined with the subject of renewable energy.

### Flood Risk

Matter 7; 7/1

Policies CO1, CO2, F1

#### *Background*

7.1.1 The draft RSS was prepared prior to the publication of PPS25<sup>1</sup> but flood risk was taken into account when developing the draft RSS. PPS25 establishes a risk-based approach, identifies responsibilities, and advances sequential and exceptions tests for determining the acceptability of development proposals. In particular, it advises that RSS should be informed by Regional Flood Risk Appraisal and should include a broad consideration of flood risk and set out a strategy for managing it. The Regional Flood Risk Appraisal<sup>2</sup>, RFRA, was published in February 2007.

### Issues

7.1.2 The Panel identified the following group of issues on flood risk for discussion at the Examination:

- flood risks, the overall strategy and the LDF process;
- Shoreline and Catchment Management plans;
- coastal towns and tourist facilities;
- safeguarding the natural environment.

### Strategy for managing the risks

7.1.3 The draft RSS identifies strategic areas subject to flood risk. Such areas are also referred to for each of the Study Areas in the Arup Report *South West Draft RSS Urban Extension Evidence Base Review*<sup>3</sup> and the Panel has had regard to them in Chapter 4 of our Report. The Panel considers that, in accordance with the requirement of PPS25, the identification of specific areas and particular risks is more appropriate at the local level. We have taken into account such flood risk assessment as has been carried out in respect of those locations and areas of search identified for development in draft RSS by

<sup>1</sup> Planning Policy Statement 25: *Development and Flood Risk*, DCLG, December 2006.

<sup>2</sup> *Final Flood Risk Appraisal*, SWRA, February 2007.

<sup>3</sup> *South West Draft RSS Urban Extension Evidence Base Review*, Arup, February 2007.

the Panel. These are referred to in the sub-regional sections of the Panel's Report. The DPD process is the appropriate vehicle for assessing Strategic Flood Risk for proposed development.

- 7.1.4 Against that background, the Panel is satisfied that development in the areas we have recommended nor the overall strategy need not be in jeopardy because of flood risk.
- 7.1.5 As with other matters, Local Authorities will need to liaise with each other and other bodies, notably the Environment Agency. In many instances, from information given to the EiP, this is already occurring. This is also an indication that Strategic Flood Risk Assessments can be carried out in the current policy framework.
- 7.1.6 The Panel considers that there is sufficient guidance for the preparation of DPDs in the draft RSS and the RFRA. However, the Panel agrees with the SWRA that it would aid clarity on important flooding issues if the RFRA is referred to in Policy F1 but believes it should go further. It should direct LDDs to have regard to the RFRA. This also requires a reference in paragraph 7.2.21 of draft RSS.

#### **Recommendation 7.1.1**

- Add a bullet point to Policy F1 as in Appendix C: "In preparing their LDDs local authorities should have regard to the Regional Flood Risk Assessment".
- Include a reference to RFRA in paragraph 7.2.21 of draft RSS.

#### **Shoreline Management and Catchment Management plans**

- 7.1.7 Shoreline Management Plans cover the coastline but these are being reviewed (known as SMP2). Catchment Flood Management Plans are also being prepared under guidance from DEFRA. Both these are outside the sphere of the draft RSS. It appears that it may be some time before those Plans receive approval. They are not part of the Statutory Development Plan process and are not subject to public examination.
- 7.1.8 Against that background the Panel considers that the identification of areas where managed realignment of the coast may be acceptable is, for the foreseeable future, more appropriate at the local level, in Local Development Documents and, as the Catchment Flood Management Plans are not available, the Panel offers no comment. Clearly any strategic spatial issues that might arise from either would be for a future review of the RSS.

#### **Coastal towns and tourist facilities**

- 7.1.9 In view of the range of difference between coastal towns, including their geography and their role and purpose, the Panel considers that, without further evidence (which could not be justified) the RSS should not attempt to give flood related advice regarding those towns. For similar reasons, the Panel takes the same view on tourist facilities. Thus Policy CO2 remains unchanged.

## Safeguarding the natural environment

- 7.1.10 The Panel is aware of the potential tension between safeguarding the natural environment and development where people already live and lead their everyday lives. After hearing views on this matter the Panel is of the view that, currently, the RSS is not in a position to give guidance on the issue.

## Renewable Energy

Matter; 7/2

Policies RE1, RE2, RE3, RE4, RE5, Development Policy G

### *Background*

- 7.2.1 National planning policy for renewable energy is the subject of PPS22. This refers to the Government's current target for 10% of electricity to be generated from renewable resources by 2010, and its aspiration to double this to 20% by 2020. With its Companion Guide, it explains the implications of various kinds of renewable energy projects.
- 7.2.2 In May 2007, the Department of Trade and Industry published the Energy White Paper – *Meeting the Energy Challenge*. It has a focus on ensuring energy and climate security and explains measures proposed both for saving energy and producing energy, and deals also with a range of administrative matters. Among other things, it records that the European Council has set a target for 20% of the EU's energy (for heat and transport as well as from electricity) to be from renewable sources by 2020, and announces the Government's intention to introduce measures, beyond those in the White Paper, for the UK to meet its share of this target.
- 7.2.3 PPS1 sets out the Government's general approach to sustainable development. It is accompanied by three "daughter documents" - *Planning and Climate Change* (a consultation supplement to PPS1), *Building a Greener Future – Towards Zero Carbon Development* and *The Code for Sustainable Homes*. These variously advise on aspects of sustainable construction and on-site renewable energy generation.

### Issues

- 7.2.4 The Panel identified the following groups of issues on renewable energy for discussion at the Examination:
- whether draft RSS contains a coherent strategy to meet renewables targets;
  - whether there should be policy recognition of an impending shortfall against the 2010 target;
  - the implications of the PPS1 "daughter documents" with regard to draft RSS Policy RE5 and Policy G.

## Coherent strategy

- 7.2.5 Revised UK targets deriving from The Energy White Paper will give added significance to draft RSS Policy RE3 (renewable heat targets). However, our consideration is based only on the UK electricity target, there being no regional disaggregation of energy targets or demand in general yet available, or produced in evidence. Care should, however, be taken to avoid confusion over which target (“electricity” or “energy”) is being referred to, a point of some future relevance with regard to the title of Policy RE2.
- 7.2.6 In effect PPS22 does not require draft RSS to meet any particular share of the national electricity target. Rather, it acknowledges that factors such as resource and environment will impact differently in the various regions. Therefore the requirement is to set targets on the basis of an assessment of the region’s renewable energy potential, taking account of environmental, economic and social impacts.
- 7.2.7 PPS22 advises that the targets should be expressed as the minimum amount of “installed capacity”, expressed in megawatts (MW). Expression in this way is significant because the actual amount of electricity generated often falls well short of the rated ability (or capacity) of generators to supply power, which manufacturers normally measure in standard conditions that often may not be replicated in practice. For this and other reasons, PPS22 further advises that targets may additionally be expressed in terms of the percentage of electricity consumed or supplied. It further cautions that because off-shore renewable energy projects are not covered by the land-use planning system, electricity from this source is not to be used as a justification for setting lower targets for onshore projects.
- 7.2.8 The targets in draft RSS Policies RE1, RE2 and RE3 have been derived from exhaustive work under the banners of REvision 2010<sup>4</sup> and REvision 2020<sup>5</sup>, these being projects funded by Government Office for the South West in partnership with the South West Regional Assembly. Both sets of REvision work have involved extensive consultation with stakeholders. In essence, Policy RE1 sets out the resulting “installed capacity” targets for onshore renewables, with the various Counties having agreed to the disaggregated figures in the light of broad analysis of potential environmental, economic and social impacts. The cumulative onshore total for 2020 has been derived in similar fashion. The Panel finds both of these acceptable, and in line with PPS22 advice. However, three modifications are, in the Panel’s view, required to this Policy in the interests of clarity rather than substance.
- 7.2.9 The first is to delete the words “installed generating capacity” and replace them with the words “installed capacity” together with additional text in paragraph 7.3.3 to make absolutely clear the important distinction between installed capacity and the amount of electricity generated. The second is to affirm that the 2020 target absorbs the 2010 target and is not additional to it (this may be implied from paragraph 7.3.6, but is not explicit). The third is to delete the last sentence of the Policy referring to offshore capacity. That is not policy, and it is also potentially misleading. What that sentence is actually saying is that if the Policy RE1 on-shore installed *capacity* targets are taken together with the off-shore installed *capacity* targets set out in Policy RE2, the region

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<sup>4</sup> *Revision 2010 - Empowering the Region.*

<sup>5</sup> *Revision 2020 - South West Renewable Electricity, Heat & On Site Generation Targets for 2020*, Final Report, GOSW and SWRA.

would be able to meet its proportionate share of the UK demand or *generation* targets. This in fact requires a rather more complicated calculation because it involves estimating the region's current share of the latter target, projecting that forward to 2010 and 2020 and then converting it into an installed capacity target using a range of conversion rates known as "load factors". The calculation is further complicated by various other assumptions, including about the performance of Policies G and RE5 during the respective periods. The impact of these policies, it is suggested, might more than off-set the implications of DCLG 2003 levels of household growth. The Panel was informed that this calculation has been carried out as part of REvision2020, with the coincidental finding that actual output from installed on- and off-shore capacity would meet 20% of expected demand at that date. In simple terms, however, policy should express the capacity targets and leave conjecture about the proportion of forecast future electricity demand that might be generated from a range of sources to supporting text (where it can also be more clearly explained).

- 7.2.10 In the light of these points, and the PPS22 exhortation to treat of-shore generation separately, it is the Panel's view that it would be better for Policy RE1 to deal with targets for on-shore generation capacity, and for Policy RE2 to deal with targets for off-shore generation capacity. Paragraph 7.3.4 should accordingly be transferred to supporting text for Policy RE2 and absorb the last paragraph of draft RSS Policy RE1, while also making passing reference to the assumptions that have been taken into account in making the 20% claim. This, in the Panel's view, would then represent a coherent and clearly expressed strategy to meet the region's contribution to the UK's current renewable electricity target while distinguishing between capacity and generation and on-and off-shore projects as PPS22 requires.
- 7.2.11 Turning briefly to the subject of monitoring, it would be beneficial if this could cover both the installed capacity targets and the generation targets. The latter, in particular, would give a more accurate picture of actual, rather than theoretical, performance and enable the veracity of the various underlying assumptions to be checked in readiness for future review beyond REvision2020. The Panel acknowledges, however, that there is no requirement to include a figure (or even a percentage) for electricity consumed or supplied and that collation of information about generation for monitoring purposes may fall foul of commercial secrecy. Further work in this area might contribute to the Annual Monitoring Report, but is not therefore a subject on which we make a recommendation with regard to draft RSS, its practicability being uncertain.

### **Recommendation 7.2.1**

- Modify Policy RE1 in accordance with Appendix C.
- Make consequential modifications to paragraph 7.3.3 to include:
  - clarification of the difference between "installed capacity" and actual electricity generation; and
  - affirmation that the 2020 target absorbs the 2010 target and is not additional to it.
- Transfer paragraph 7.3.4 to supporting text for Policy RE2, deleting from paragraph 7.3.4 the words "... and could play a significant part in achieving the 20% renewable energy target by

2020" and replacing with "... and provided on-shore capacity targets are met, could in combination with other policy initiatives (including those like Policy G concerned with energy conservation) play a significant part in achieving 20% of the Region's electricity generation from renewable sources by 2020, in alignment with UK aspirations."

### Shortfall against 2010 target

- 7.2.12 Comparison of the Policy RE1 2010 County targets against installed (rather than "in the pipeline") capacity to date indicates considerable under-performance, only Cornwall having met over 60% of its target and the remainder of region varying between about 10-30%<sup>6</sup>. Given that permissions would need to be in place by early 2008 in order to ensure installation by 2010, it is clear that the Regional target will inevitably be missed. In the light of the fact that the 2010 target is intended by PPS22 to reflect environmental, social and economic capacity rather than to respond in direct proportion to the national electricity requirement, the Panel questioned whether a lower target should be set to reflect the likely 2010 outcome. However, we found no support for this, with participants concurring that the target should maintain high aspirations, not least to attract the potential economic benefit of technological innovation and investment.
- 7.2.13 Given this enthusiasm in the Region to be at the forefront of renewable energy production, we found precise reasons for the impending shortfall difficult to identify, with some participants saying that there had been a lack of suitable proposals coming forward, while others cited planning difficulties. Whatever the case may be, it is clear from PPS1, its consultation "daughter documents" and the Energy White Paper that the Government attaches considerable importance to the development of renewable energy supplies in the interests not only of promoting sustainable development, but also in terms of ensuring continuity, diversity and security of supply, and distributional efficiency. While failure to deliver on the 2010 target would not result in capacity permanently being foregone (because any shortfall may be made up in meeting the 2020 target), the Panel is therefore concerned that a similar or greater shortfall could still be manifest in 2020. On that point, we were advised that momentum is now building and that there is considerable optimism in the Region that the present 2020 target would be met. Indeed, a good deal of preparatory work has been carried out through the Revision 2010 and 2020 projects, which now needs to be matched by active engagement of operators in the formulation of criteria based policies and site identification at LDF level, taking account of draft RSS Policy RE4.
- 7.2.14 Against that background, we do not see different or tighter targets as an answer to present under-performance. While an interim target for 2015 of 15% was suggested by some participants, there is no requirement in PPS22 for this and such a figure would not recognise slow progress in early years and faster progress in later years. Rather, we consider that it is for those charged with responsibility for the determination of planning applications and appeals to ensure that future progress towards meeting the extant targets, derived from the careful Revision 2010 and 2020 work, is henceforth suitably made. In particular, we consider that incorporation of a renewable electricity/energy trajectory in the Annual Monitoring Report would clearly identify extant and impending

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<sup>6</sup> SWRA response to Panel Information Note B and 2006 Annual Monitoring Report.

shortfalls and enable appropriately balanced decisions to be made. Such an approach would also be more likely to ensure expeditious progress than embarking upon a further round of target review. However, the Annual Monitoring Report is not for the Panel's consideration, and there are no figures available to the Panel on which to recommend modification of draft RSS as an alternative. We recommend only deletion of Map 7.6, which reflects assumptions in Revision 2010 and is not intended as policy for apportionment. The technology is evolving rapidly and, as such, the map is now passé.

### Recommendation 7.2.2

- Delete Map 7.6.

### Implications of PPS1 daughter documents with regard to draft RSS Policy RE5 and Policy G

7.2.15 Both Policy G and Policy RE5 are supportive of the Government's climate change agenda and closely inter-related, so it is convenient to deal with them together in this Chapter of our report. Each tackles aspects of energy conservation, albeit from different directions. In essence, Policy G is concerned with building construction, while Policy RE5 is concerned with on-site renewable energy generation. The Panel's attention was drawn to the South West "Energy Hierarchy" – to reduce energy demand through energy efficiency and low energy design, before meeting the remaining demand firstly from renewable energy and then from fossil fuels or grid electricity – which explains the relationship between the two policies in simple terms and also expresses the Region's own priorities. Partly for clarification reasons and partly to avoid any implication that Policy RE5 would relate only to new housebuilding, SWRA produced revised versions of both Policies G and RE5 for the Examination<sup>7</sup> and our consideration is based on these revisions.

### Policy G

7.2.16 All of the PPS1 "daughter documents", except for the *Code for Sustainable Homes* were at the time of the EiP consultative, the Code itself being voluntary. The main point of concern among participants representing the development industry was that draft RSS Policy G effectively proposes making the voluntary code mandatory and advancing at a faster rate than *Building a Greener Future* (and on-going discussions with building industry at national level) provides for. Because (amended) Policy G would be applicable to all building work (including refurbishments), it would also apply to a wider range of development.

7.2.17 Nonetheless, the Panel was advised by GOSW that the extant and emerging guidance does not seek to prevent LPAs setting higher standards if these can be achieved locally, or progressing more quickly than the Government's agenda. In that context, it seems to Panel that there is merit in having a single regime that applies across the region as a whole, rather than a fragmentary approach with each individual LPA setting its own and potentially different standards. Standards higher or lower than those in Policy G may

<sup>7</sup> SWRA statement on Matter 1/3, appendix 1.

result from the on-going consultation exercise on national policy, but this is a rapidly evolving area of construction technology and the Region wishes to position itself at the forefront of energy conservation. We therefore find no reason to include any end-date or other precaution in the Policy, or to make significant revision to it. However, while (amended) Policy G requires adherence to BREEAM standards, there is no such standard for certain types of buildings (medical buildings, for example) so minor modification is necessary to acknowledge this, in addition to the revised supporting text advanced by SWRA in explanation of the policy.

### **Recommendation 7.2.3**

- Modify Policy G in accordance with Appendix C.
- Substitute text in Appendix 1 to RPB statement on Matter 1/3 for that in draft RSS at paragraph 3.7.7.

### **Policy RE5**

7.2.18 Turning to Policy RE5, paragraph 7 of *Planning and Climate Change* says that substantial new development (not just dwellings) should be expected to consider and take into account the potential for decentralised energy supply systems based on renewable and low carbon energy. It is important, however, to recognise that energy efficiency (Policy G) and renewable energy generation (Policy RE5) are not same thing – the objective of the first is to minimise energy use, while the objective of the second is to facilitate the shift away from fossil fuels. Both could thus be pursued independently, but the first sentence of Policy RE5 makes clear that both will be required from “larger scale developments” (as defined in the draft RSS glossary). This “combined” approach is contradicted by the revised supporting text<sup>8</sup>, which implies a “sequential” approach deriving from the Region’s energy hierarchy. The Panel understands from revised supporting text for Policy G<sup>9</sup> that the reason for this is that a contribution from both sources (as well as low carbon technologies) would be needed to achieve zero carbon development. From the discussion at the Examination, the “combined” approach would also seem to be advanced in support of the wider objective of encouraging innovation and investment in the renewables sector, which a number of stakeholders (including SWERDA and agricultural interests) were keen to promote. This should be explained more clearly in supporting text. The glossary additions proposed by SWRA, included in our appendix C (vii), should also be made.

7.2.19 The Panel also notes concern that Policy RE5 may have unforeseen consequences (for example whether the preferred outcome would be a single large turbine/generator within or alongside an urban extension, or a multitude of micro-installations at each individual property). This, however, is a matter for master planning (Policy D), local policy formulation and local development control decision making to resolve.

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<sup>8</sup> SWRA statement on Matter 1/3, appendix 1, paragraphs 7.3.10 and 7.3.11.

<sup>9</sup> SWRA statement on Matter 1/3, appendix 1, paragraph 3.7.7.

**Recommendation 7.2.4**

- Modify Policy RE5 in accordance with Appendix C.
- Substitute text in Appendix 1 of SWRA statement on Matter 1/3 for that in draft RSS at paragraphs 7.3.10 and 7.3.11, inserting within paragraph 7.3.10 clarification of the reason for the expectation in Policy RE5 that developments will be expected to incorporate on-site renewable energy, when the Region's energy hierarchy suggests that energy efficiency is the first priority.

**Waste**

Matter 7; 7/3

Policies W1, W2, W3, W4

***Background***

7.3.1 PPS10 sets out National planning policy for sustainable waste management. This says that RSS should contain a concise strategy for waste management looking forward for a 15-20 year period. It also includes advice on waste requiring management and on identifying a pattern of waste management facilities (leaving site identification to the LDF process). *The Waste Strategy for England* was published by DEFRA in May 2007. Among other things, this:

- supports efforts to reduce, re-use and recycle waste, and recover energy from waste;
- aims to drive the reduction of waste and diversion from landfill;
- targets action on materials, products and sectors with the greatest scope for improving environmental and economic outcomes; and
- stimulates investment in collection, recycling and recovery infrastructure, and markets for recovered materials.

**Issues**

7.3.2 The Panel identified the following group of issues on waste for discussion at the Examination:

- the implications of future household and economic growth, and reflection of waste hierarchy;
- with particular regard to Policy W1, whether there is adequate identification of capacity shortfalls;
- with particular regard to Policy W2, whether the guidance for broad areas of search is adequate;
- with particular regard to Policy W3, whether there is a need for clearer guidance on handling Hazardous Waste.

## Implications of future household and economic growth, and reflection of waste hierarchy

- 7.3.3 The Panel was informed that the apportionments in draft RSS Appendix 2 are drawn directly from *Waste to Resource* (the Region's Waste Strategy) and have been comprehensively researched, based on robust forecasts of population and economic growth. Although formulated under the *National Waste Strategy 2000*, which has now been overtaken by the *Waste Strategy for England 2007*, the effect on assumptions made in compiling the apportionments are small. Domestic waste, in any event, amounts to well under half of the total waste handled by the Region, so even with levels of household growth presaged by DCLG 2003/2004 projections there is no evidence base on which to suggest need for revision.
- 7.3.4 As Policy W1 avers, the apportionments are only for indicative purposes and appropriately show the Region's intentions for moving from waste disposal to waste treatment over the period to 2020. Apportionments have been given on a County-by-County basis because that is the way in which the data is collated. The Panel accepts that to re-work Appendix 2 on the basis of Waste Planning Authorities would involve considerable work for relatively little overall benefit. Whatever the case may be, however, the Panel is of the view that Tables 1 and 2 of Appendix 2 should be expressed as policy in draft RSS, not simply as background material annexed to it.
- 7.3.5 It was suggested to the Panel that because Table 1 of Appendix 2 sets maximum levels for secondary treatment, it might have the effect of sending more waste to landfill than is achievable or was intended. We also acknowledge that energy recovery from waste is not necessarily incompatible with higher rates of recycling. For these reasons, even though Landfill Tax will inevitably drive down the amount of waste sent to landfill, we are of the opinion that Policy W2 should affirm more clearly that disposal to landfill is the least preferred option in the waste hierarchy (a point that we incorporate in our recommendation 7.3.3 below), and that the word "maximum" should be deleted from the secondary treatment column of Table 1. This would still enable priority to be given to re-use, recycling and composting before energy recovery.

### Recommendation 7.3.1

- Modify Policy W1 in accordance with Appendix C, to include Tables 1 and 2 from draft RSS Appendix 2.
- Delete the word "maximum" from the heading to the secondary treatment column of Table 1.

## Policy W1 – Identification of capacity shortfalls

- 7.3.6 We heard that work is on-going with the Environment Agency to identify existing capacity shortfalls for waste handling across the Region. Until that work is completed, it is thus effectively left to Local Waste Development Frameworks to identify the need for, and plan the network of, new waste sites. Participants also pointed out that by 2020, all waste handling capacity in the Region would in every likelihood be new, with most recycling and treatment facilities by then being in commercial ownership. Further,

reference was made to the absence of any single agency responsible for co-ordinating the provision of industrial and commercial waste facilities. There may therefore be both short and long term difficulties in ensuring the establishment of new facilities in sufficient number and suitable locations to handle any capacity shortfalls. The Waste Authorities nonetheless said that they have reasonable knowledge of what facilities currently exist in their individual areas, so they can at least begin their waste planning from that base point having regard to Policy W2 criteria. While far from ideal, there is nothing that we can recommend with regard to Policy W1 to better address the situation on the limited information currently available.

- 7.3.7 Certain aspects of waste planning, including the scale and distribution of the facilities required to handle the Policy W1 levels of waste (such as waste recovery parks, referred to in Policy W2) may, however, require joint working across Local Planning Authority boundaries. The Panel agrees that provision for this should be included in Policy W1, as it would not be covered by our recommended modification of Policy J. We have embraced this in our recommendation 7.3.1 above. Our ensuing recommendation accordingly deals only with consequential modification of supporting text.

### **Recommendation 7.3.2**

- Make reference in paragraph 7.4.5 to the fact that joint working may be needed for certain aspects of waste planning, including the scale and distribution of facilities, such as “waste recovery parks”.

### **Policy W2 – Adequacy of guidance for broad areas of search**

- 7.3.8 Policy W2 was criticised by some participants for adhering to the “proximity principle” even though this is no longer included in national policy guidance. However, given the size of the Region and the need to minimize the environmental and economic costs of transport, the Panel considers that draft RSS takes an appropriate approach in seeking to have waste treated as close as possible to where it is derived. This is the more so now that requirements for waste treatment are putting greater emphasis on facilities within, or close to, urban areas compared with past patterns of moving waste from urban to rural areas for disposal by landfill. These reasons for departure from national guidance should be given in supporting text (see recommendation below).
- 7.3.9 Policy W2 proposes that the main locations for waste handling and treatment facilities should thus be associated with the SSCTs and follow a “search sequence” – effectively within, or failing that, at the edge of and, failing that, within 16 km of the SSCTs. The latter figure apparently derives from analysis of how far people are likely to transport their own refuse to a suitable handling facility. We find this dimension too prescriptive for policy, however, (especially for those SSCTs that are girdled by Green Belt) and recommend (below) that it be transferred to supporting text, where it can be expressed in more indicative fashion.
- 7.3.10 The Policy then moves on to deal with provision in rural areas. While such provision is necessary and appropriate, we find the draft RSS formulation unsuitable because it lacks clarity with regard to the relationship between rural provision and that associated with

the SSCTs. In effect there is a need for a linking sentence between the two to make clear that provision in rural areas is only appropriate where SSCT provision cannot suitably meet rural needs. That would make the last bullet point of the Policy superfluous. There is also a need to make clear that the two preferred locations stated earlier in the Policy (namely existing industrial sites and previously developed land) apply both to SSCTs and to rural areas. While the Panel notes concerns expressed by some about difficulties of locating treatment plant on some employment sites, this is primarily a development control matter. Otherwise, the Panel supports the general approach, and we recommend only re-structuring of Policy W2 to address the points on clarity.

### **Recommendation 7.3.3**

- That Policy W2 be modified in accordance with Appendix C.
- Include in paragraph 7.4.5 an explanation of why the “proximity principle” is applicable to the South West Region.
- Transfer the reference to 16km from Policy W2 to paragraph 7.4.8, expressed as an indicator of the meaning of “close proximity”.

### **Policy W3 Hazardous Waste**

7.3.11 At present there are two hazardous waste sites in the SW Region – one near Swindon and one at Gloucester. Permission for the latter is due to expire and a degree of uncertainty therefore prevails over its future. Neither exist for any reason other than historical accident, and while both may be reasonably well sited to meet needs generated from surrounding regions, they are not well located relative to the western peninsula of the south west region.

7.3.12 Although participants referred to a growing need to deal with APC waste from energy recovery plant and incinerators, the present hazardous waste stream represents a very small proportion of overall waste (about 1.5% of SW total). It would not therefore be commercially justifiable to seek the establishment of facilities within each County or to promote some other network of sites for the Region as a whole. Essentially, such waste is handled through a national network of sites rather than regionally and, as such, it is a matter for national rather than regional planning to address. The Panel acknowledges that Policy W3 is vague and perhaps excessively reliant on existing sites which may not represent the best locations regionally or nationally. However, there is inadequate data on which to give any greater guidance than is already in draft RSS. The Panel accordingly finds that Policy W3 should be retained without modification at this stage as part of the contribution to the national planning framework.