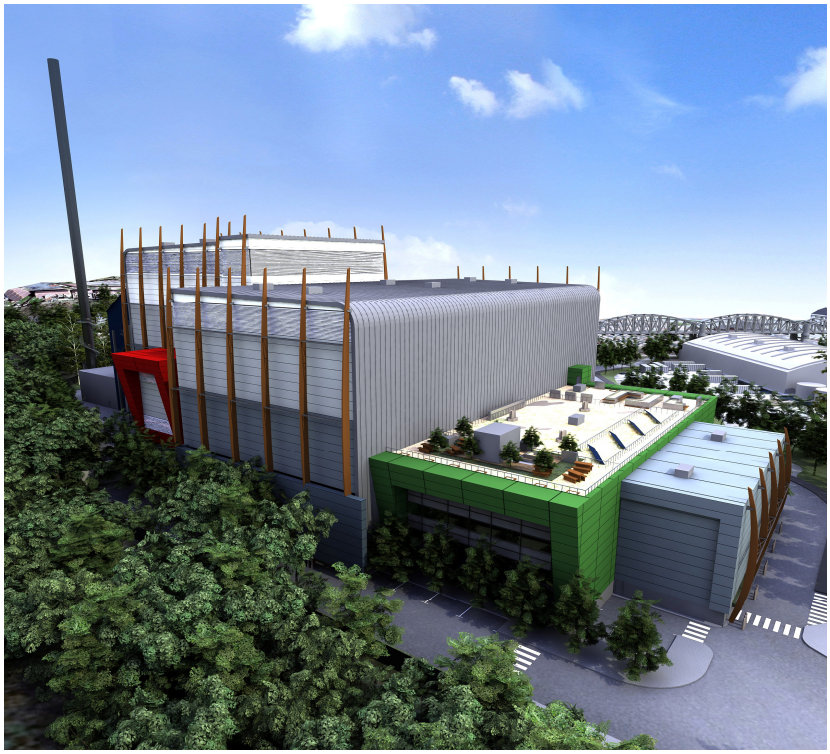
MVV Environment Devonport Ltd

Energy from Waste Combined Heat and Power Facility, North Yard, Devonport

PASS Appendix 7 - Planning Policy Analysis

May 2011



Prepared for

MVV Environment Devonport Ltd

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1 Introduction

The purpose of this document is to provide an analysis of the compatibility of the proposed development of an Energy from Waste Combined Heat and Power Facility (EfW CHP) at North Yard, Devonport with the policies of the existing and emerging development plan and with national planning policy. This document forms Appendix 7 to the Planning Application Supporting Statement (PASS).

A number of supporting documents have been prepared in support of this planning application and these are listed in Table 1. The technical assessments contained within these documents form the evidence base for the consideration of the compatibility of the proposed development with the development plan and the relevant evidence base documents are quoted throughout this document.

Table 1: Planning Application and Supporting Documents

DOCUMENT TITLE	ABBREVIATION
• 1 APP Application Form	
• Planning Application Fee	
• Ownership Certificate	
• Agricultural Holdings Certificate	
• Notices	
• Planning Application Plans (refer to Table 1.1)	
• Planning Application Supporting Statement	PASS
○ Appendix 1 - Design and Access Statement	DAS
○ Appendix 2 – Statement of Community Involvement	SCI
○ Appendix 3 – Climate Change and Sustainability Statement (incorporating BREEAM, WRATE and Energy, Economy and Employment Statements)	CCSS
○ Appendix 4 - Energy, Economy, Employment and Education Benefits Statement	EEEEBS
○ Appendix 5 – Health and Wellbeing Statement	
○ Appendix 6 – Habitats Regulations Assessment	
○ Appendix 7 - Development Plan Analysis	
○ Appendix 8 – Section 106 Heads of Terms	
• Environmental Statement (Volume 1 – Main Text)	ES
• Environmental Statement (Volume 2 – Figures)	
• Environmental Statement (Volume 3 – Appendices)	
• Environmental Statement (Volume 4 – Non-Technical Summary)	

1.1 National Planning Policy, the Development Plan and the Emerging Development Plan

1.1.1 National Planning Policy

Overarching national spatial planning policy is contained in Planning Policy Statement 1, Delivering Sustainable Development (2005) (PPS1). Other national planning policy is generally presented in topic-specific Planning Policy Statements (PPS) and those directly relevant to waste management development are listed below.

- Planning Policy Statement 1 - Delivering Sustainable Development (January 2005)
- Planning Policy Statement 1 Supplement - Planning and Climate Change (December 2007)
- Planning Policy Statement 10 - Planning for Sustainable Waste Management (March 2011)
- Planning Policy Statement 23 - Planning and Pollution Control (November 2004)

Other topic-specific Planning Policy Statements are material to the determination of this planning application. However, these topic-specific policies are addressed in detail primarily in the relevant chapters of the Environmental Statement. The most relevant national planning policy and policy guidance is listed below.

- Planning Policy Statement 4 – Planning for Sustainable Economic Growth (December 2009)
- Planning Policy Statement 5 – Planning for the Historic Environment (March 2010)
- Planning Policy Statement 9 – Biodiversity and Geological Conservation (August 2005)
- Planning Policy Guidance 13 - Transport (March 2001)
- Planning Policy Statement 22 – Renewable Energy (August 2004)
- Planning Policy Guidance 24 - Planning and Noise (October 1994)
- Planning Policy Statement 25 - Development and Flood Risk (March 2010)

1.1.2 The Development Plan

The development plan consists of:

- Plymouth Core Strategy 2006-2021 (adopted April 2007)
- Plymouth Waste Development Plan Document 2006-2021 (adopted 2008)
- Regional Planning Guidance for the South West (RPG 10) (adopted September 2001)

1.1.3 The Emerging Development Plan

The emerging development plan consists of:

- Draft Regional Spatial Strategy for the South West 2006 – 2026

2 National Planning Policy

2.1 National Planning Policy on Waste Management Development

Compliance of the development proposals with national planning policy statements which are of particular relevance to waste management development (as listed in 1.1.1) is considered below.

2.1.1 Planning Policy Statement (PPS) 1: Delivering Sustainable Development (January 2005)

PPS1 sets out the government's objectives for the planning system and national planning policies, including key principles. The key principles are aimed at the delivery of sustainable development, including addressing the causes of climate change, promoting high quality design and efficient use of resources, ensuring that development supports existing communities, ensuring these communities are safe, sustainable and have good access to jobs and key services and protecting and enhancing natural and historic environments.

Of specific relevance to this planning application are the following national planning policy principles (PPS1, 13).

- *"(i)….development plans promote outcomes in which environmental, economic and social objectives are achieved together over time."*
- *"(ii)….development plans contribute to global sustainability by addressing the causes and potential impacts of climate change – through policies which …..promote the development of renewable energy resources and take climate change impacts into account in the location and design of development."*
- *"(iv)….planning policies should promote high quality inclusive design…."*

PPS1 encourages local authorities to recognise the wider sub-regional, regional or national benefits of economic development and consider these alongside any adverse local impacts (paragraph 23). In addition, PPS1 seeks to promote urban regeneration to improve the well being of communities, to provide development in locations which are easily accessible by foot, bicycle or public transport; and encourage the use of vacant and underused previously developed land and buildings.

29 of PPS1 states that in some circumstances, a planning authority may decide in reaching a decision to give different weight to social, environmental, resource or economic considerations. Where this is the case, the reasons for doing so should be explicit and adverse environmental, social and economic impacts should be avoided, mitigated, or compensated for.

The proposed MVV EfW CHP facility contributes to global sustainable development objectives by mitigating the climate change impacts of waste disposal by diversion of waste from landfill, using this waste as a resource to generate renewable energy and heat and realising the potential of vacant and underused previously developed land in the process. The proposals address global as well as local sustainability objectives: by contributing to the wellbeing of local communities through the provision and/or improvement of local facilities; a high standard of sustainable design and landscaping; supporting the local economy and providing local employment opportunities; and by making enhancements to the local environment.

Evidence of compatibility with planning policy can be found in: PASS, D&AS, CCSS and EEEEBS.

2.1.2 PPS1 Supplement – Planning and Climate Change (December 2007)

The PPS1 supplement on climate change states that the government's main objectives are to deliver sustainable development and ensure that spatial planning policies include a full and appropriate response to climate change - through providing for the needs of communities in a manner which secures the highest viable resource and energy efficiency and reduction in emissions and securing new development that minimise vulnerability and provides resilience to climate change (paragraph 9).

Paragraph 10 of PPS1 supplement on climate change sets out decision making principles, including planning for new development to limit carbon dioxide emissions, make good use of opportunities for decentralised and renewable or low carbon energy, minimise future vulnerability and integrate climate change considerations into all spatial planning concerns.

Paragraph 20 requires that local planning authorities should:

"ensure any local approach to protecting landscape and townscape is consistent with PPS22 and does not preclude the supply of any type of renewable energy other than in the most exceptional circumstances".

24 requires that planning authorities should take into account:

"the extent to which existing or planned opportunities for decentralised and renewable or low-carbon energy could contribute to the energy supply of development".

When considering the environmental performance of proposed development, planning authorities should expect new development to (PPS1 Supplement, paragraph 42):

- *comply with adopted DPD policies … for sustainable buildings…;*
- *take account of landform, layout, building orientation, massing and landscaping to minimise energy consumption… and…be planned so as to minimise carbon dioxide emissions through giving careful consideration as to how all aspects of development… support opportunities for decentralised and renewable or low-carbon energy supply;*
- *provide …private open space as appropriate so that it offers accessible choice of shade and shelter, recognising the opportunities for flood storage, wildlife and people provided by multifunctional greenspaces;*
- *give priority to the use of sustainable drainage systems, …and encourage layouts that accommodate waste water recycling;*
- *provide for sustainable waste management; and*
- *create and secure opportunities for sustainable transport … including through –…travel plans,…safe and attractive walking and cycling opportunities including…secure cycle parking and changing facilities; and …provision and management of car parking.*

In addition, planning authorities should also consider the likely impact of proposed development on existing, or other proposed, development, and its renewable or low-carbon energy supply (paragraph 43).

Consultation on draft Planning Policy Statement: Planning for a Low Carbon Future in a Changing Climate, closed on 1st June 2010. It was intended that this PPS would be a further supplement to PPS1. Section LCF1.4 of the draft PPS supplement reads:

"Local planning authorities should assess their area for opportunities for decentralised energy……. Local planning authorities should in particular look for opportunities to secure:

i. decentralised energy to meet the needs of new development;

ii. greater integration of waste management with the provision of decentralised energy;

iii. co-location of potential heat suppliers and users; and,

iv. district heating networks based on renewable energy from waste, surplus heat and biomass, or which could be economically converted to such sources in the future."

In providing for the waste management infrastructure necessary for managing the residual waste generated by the communities of Plymouth City, Torbay, West Devon, Teignbridge and South Hams, the MVV EfW CHP facility secures the highest viable resource and energy efficiency and a substantial reduction in greenhouse gas emissions. By recovering energy from waste at a sufficiently high level of efficiency the facility will generate renewable energy and minimise carbon dioxide from fossil fuel sources associated with the current and future operation of the Naval Base and Dockyard.

In accordance with s 10 and 42 of the supplement, the development will make excellent use of opportunities for renewable or low carbon energy, by exploiting a unique opportunity to deliver CHP by linking into an existing heat distribution network. The unique deliverability benefits that the North Yard site offers, demonstrates careful consideration of how this development can support and exploit future opportunities for renewable or low-carbon energy supply, generated by future growth and diversification of the Dockyard and Naval Base.

The EfW CHP Facility also offers the potential to make a significant decentralised low carbon/renewable energy contribution to new development in Plymouth in the future.

With respect to 20 of the supplement, the high quality design and landscape strategy will achieve an excellent level of design which pays due respect to local landscape and townscape considerations.

The design achieves an excellent rating in terms of its sustainable design and construction credentials (BREEAM Pre-Assessment) and qualifies as a Good Quality CHP scheme. Process systems and building design minimise water consumption, prioritise sustainable drainage systems and address flood mitigation and protection of coastal ecosystems. Sustainable transport objectives are achieved through secure cycle parking and changing facilities, accessibility to the local public transport network and a green travel plan.

Evidence of compatibility with planning policy can be found in: PASS, D&AS, CCSS and EEEEBS and ES Chapter 3.

2.1.3 Planning Policy Statement (PPS) 10, Planning for Sustainable Waste Management (March 2011)

PPS10 sets out government planning policy on waste management. The government's stated overall objective is to protect human health and the environment by producing less waste and by using it as a resource wherever possible.

PPS10 states that the government aims to break the link between economic growth and the environmental impact of waste by moving waste management up the waste hierarchy. Emphasis is placed on the need for positive planning to achieve sustainable waste management (paragraph 2) "…*by providing sufficient opportunities for new waste management facilities of the right type, in the right place and at the right time".*

PPS10 includes a number of key planning objectives, which are summarised below.

- Drive waste management up the waste hierarchy.
- Communities taking more responsibility for their own waste, involving sufficient and timely provision of new facilities.
- Implementation of the national waste strategy and supporting targets.
- The recovery of waste without endangering human health and without harming the environment and enabling waste disposal in one of the nearest appropriate installations.
- Reflecting the concerns of stakeholders in waste management.
- Recognition that the particular locational needs of some waste management facilities, together with the wider environmental and economic benefits of sustainable waste management, are material considerations that should be given significant weight in determining whether proposals should be given planning permission.
- Ensuring sustainable waste management is built into new development.

When identifying potential sites for waste management facilities, PPS10 recommends that Waste Planning Authorities (WPAs) should consider a broad range of locations, including industrial sites, looking for opportunities to co-locate facilities together and with complementary activities (paragraph 20); and give priority to the use of previously developed land. PPS10 also states that planning applications for waste developments on sites that have not been allocated for waste use in the development plan should be considered favourably when consistent with PPS10 and the waste planning authority's Core Strategy (paragraph 24). 25 states that in the case of waste disposal facilities, applicants should be able to demonstrate that the envisaged facility will not undermine the waste planning strategy through prejudicing movement up the waste hierarchy.

The statement identifies that waste management should be considered alongside other spatial planning concerns, such as transport, housing, economic growth, natural resources and regeneration, and the positive contribution that waste management can make to the development of sustainable communities should be recognised (paragraph 4).

The MVV EfW CHP facility contributes to the government's sustainable waste management objectives by moving waste management up the waste hierarchy, helping to implement national and regional targets for diversion of waste from landfill. The facility will deal with residual waste only, and therefore will not prejudice movement of waste up the waste hierarchy.

The site location enables waste disposal in one of the nearest appropriate installations to the South West Devon communities it will serve. It is also a suitable use of previously developed industrial land, and has the opportunity to locate with complementary activities, in terms of finding a viable customer for the heat and electricity generated by the facility. Although not located on a site allocated for waste use in the development plan, the proposals are consistent with PSS10 and the Plymouth Core Strategy, as is further demonstrated below.

The proposals recognise the positive contribution that waste management can make to the development of sustainable communities (4.), not only by managing waste in a sustainable way, but by providing a major boost to both the local community and the economy, through provision of community resources such as the visitor/education facility and roof terrace, improvements to local biodiversity, improvement of informal open space and the provision of local employment, business and training opportunities. These positive contributions will be delivered because of the location of the Facility at North Yard and these particular locational needs should be given significant weight in the determination of the planning application.

The ES and other supporting assessments submitted with the planning application demonstrate that the proposed development will not endanger human health or harm the environment.

Evidence of compatibility with planning policy can be found in: PASS, D&AS, CCSS and EEEEBS and ES Chapter 3.

2.1.4 Planning Policy Statement 23: Planning and Pollution Control

PPS23 addresses pollution control as it relates to spatial planning. The policy focus of PPS23 is on the protection of the environment and human health from pollution arising from development. PPS23 also deals with the relationship between the planning and pollution control regimes, stating that the controls under both regimes should complement rather than duplicate each other; pre-application discussions should involve representatives from both regimes; and applications for planning permission and Environmental Permits should be submitted in parallel where it is efficient to do so.

The overall aim of planning and pollution control policy is to ensure the sustainable and beneficial use of land (and in particular encouraging reuse of previously developed land in preference to greenfield sites). Within this aim, polluting activities that are necessary for society and the economy should be so sited and planned, and subject to such planning conditions, that their adverse effects are minimised and contained to within acceptable limits. Opportunities should be taken wherever possible to use the development process to assist and encourage the remediation of land already affected by contamination (paragraph 26). The PPS refers (at paragraph 18) to the Government's objectives for contaminated land which are set out in DETR Circular 02/2000, Contaminated Land. As well as identifying and removing unacceptable risks to human health and the environment and seeking to bring damaged land back into beneficial use, the Circular also seeks to ensure that the cost burdens faced by individuals, companies and society as a whole are proportionate, manageable and economically sustainable.

The impacts of the proposed development with respect to ground and groundwater contamination have been assessed and findings are presented in Chapter 10 of the ES – Contamination – Land and Water Quality. The assessment concluded that, provided appropriate mitigation measures are employed during each phase of the development, the proposed development will not pose an increased risk to human health or the environment.

In addition, Chapter 11 of the ES examines potential impacts on Hydrology, Hydrogeology and Flood Risk, including potential chemical / effluent pollution events. A number of potential impacts on the surface water and groundwater receptors are identified but can be successfully mitigated by employing appropriate construction techniques and good design principles.

Chapter 13 of the ES assesses the potential impact of the Facility on air quality and concludes that there significant adverse effects are unlikely. ES Chapter 18 addresses Health and Wellbeing effects and concludes that overall, the incorporated mitigation measures within the design of the proposed EfW CHP facility, taken together with other developments in the local area, can be reasonably considered to have a positive effect on the core protective factors for mental well-being.

The EfW CHP Facility also requires an Environmental Permit to operate. An application for an Environmental Permit will be made to the Environment Agency and the Agency will be a consultee on the planning application. In this way, the planning and Environmental Permit

regimes will work closely together, but without duplication, to ensure that the Facility will operate within established parameters.

2.2 Other Relevant National Planning Policy

A number of other topic-specific Planning Policy Statements are material to the determination of this planning application and are addressed in detail in the relevant chapters of the Environmental Statement. The most relevant national planning policy and policy guidance is considered below.

2.2.1 Planning Policy Statement 4: Planning for Sustainable Economic Growth (December 2009)

PPS4 'Planning for Sustainable Economic Growth' sets out the Government's overarching objective of achieving sustainable economic growth. The statement emphasises that planning must help build prosperous communities including through improving the economic performance of areas, promoting regeneration and delivering more sustainable patterns of economic development.

Policy EC2: Planning for Sustainable Economic Growth seeks to make the most efficient and effective use of land, prioritising previously developed land which is suitable for re-use and, reflecting the different location requirements of businesses, including site size, quality, access and proximity to markets, and locally available workforce. It also seeks to locate developments which generate substantial transport movements in locations that are accessible, avoiding congestion and preserving local amenity as far as possible.

Policy EC10: Determining planning applications for economic development states that all planning applications for economic development should be assessed in terms of their ability to limit carbon dioxide emissions and minimise vulnerability to climate change and consideration should be given to the impact on economic and physical regeneration in the area including the impact on deprived areas and social inclusion objectives and the impact on local employment.

In ES Chapter 17, the proposed development has been assessed as having a beneficial impact on Plymouth and the South West's economies, through a range of positive effects including the generation of new employment (total net additional employment estimated at 232 jobs per year during construction and 40 permanent jobs at the Facility), supply chain benefits on the Plymouth economy, increased local income, cost savings to businesses, households and the MoD through operational savings and reduction in carbon dioxide emissions, and contributions to wider carbon saving targets at the regional and national level. The diversion of waste from landfill is expected to save the SWDWP partners in the order of £60 million. The proposed development will also have beneficial impacts on employment by bringing a site into operation which is well located in terms of proximity to the market (for heat and electricity) and the locally available workforce. The use will intensify employment numbers on the site relative to the last existing use and has good access to the principal road network.

Evidence of compatibility with planning policy can be found in: ES Chapter 17, PASS, CCSS and EEEEBS.

2.2.2 Planning Policy Statement 5 – Planning for the Historic Environment (March 2010)

PPS5 sets out the importance of planning decisions being based on an understanding of the nature, extent and significance of heritage assets (Policy HE8). Although the presumption is in favour of the conservation of designated heritage assets, there is a balance to be struck between enhancing the significance of an asset and delivering public benefits arising from development (Policy HE9).

Consideration of development affecting the setting of heritage assets is outlined in Policy HE 10. Local authorities should be favourable toward applications that preserve those elements of the setting that enhance the significance of the asset and opportunities for changes which enhance or better reveal the significance of a heritage asset should be taken, as a public benefit and part of the process of place-shaping.

Chapter 9 of the accompanying ES presents an assessment of the potential effects of the proposed development on Cultural Heritage assets. The assessment concludes that (with appropriate mitigation) the proposed development would have a minimal impact on a limited number of historic features. Given the benefits of the proposed development, it is considered that the minimal impact on historic features would not be unacceptable and that the comprehensive landscaping scheme will minimise as far as possible effects on the setting of archaeological, built heritage and historic landscape features.

2.2.3 Planning Policy Statement 9 – Biodiversity and Geological Conservation (August 2005)

PPS9 and the accompanying explanatory notes provided in Government Circular 06/05 set out planning policies on the protection of biodiversity and geological conservation. Circular 06/05 highlights that *"development proposals provide many opportunities for building-in beneficial biodiversity … as part of good design. When considering such proposals, local planning authorities should maximise such opportunities in and around developments"*.

The PPS adopts a sequential approach to preventing harm to biodiversity and geological conservation interests, based on avoidance, mitigation, compensation and finally refusal.

The Government's objectives are (PPS9, pg 4):

"***to promote sustainable development****: ensuring that biological and geological diversity are conserved and enhanced as an integral part of social, environmental and economic development, so that … decisions about the development and use of land integrate biodiversity and geological diversity with other considerations.*

to conserve, enhance and restore the diversity of England's wildlife and geology*: sustaining, and where possible improving, the quality and extent of natural habitat and geological and geomorphological sites; the natural physical processes on which they depend; and the populations of naturally occurring species which they support.*

to contribute to … urban renaissance by*: enhancing biodiversity in green spaces and among developments so that they are used by wildlife and valued by people, recognising that healthy functional ecosystems can contribute to a better quality of life and to people's sense of well-being; and ensuring that developments take account of the role and value of biodiversity in supporting economic diversification and contributing to a high quality environment."*

An assessment has been undertaken of the likely impacts of the proposed EfW CHP facility on ecology and nature conservation and the results of this assessment are reported in Chapter 7 of the ES. Assuming that the habitat creation, mitigation measures and surveys specified are carried out in advance and/or as part of future works (as applicable), the residual adverse effects on biodiversity are not expected to be significant. There are also expected to be beneficial effects on biodiversity as a result of the ecological enhancements proposed for Blackies Wood and the replacement of a culverted watercourse crossing with a new clear span bridge.

These enhancements are consistent with the national policy requirements to conserve, enhance and restore the diversity of England's wildlife and contribute to urban renaissance by enhancing biodiversity in green spaces and among developments so that they are used by wildlife and valued by people. The role of Blackies Wood and the watercourse in educational site visits to the facility will further enhance this contribution.

2.2.4 Planning Policy Guidance 13 Transport (March 2001)

The objectives of PPG13 are to integrate planning and transport at the national, regional, strategic and local level in order to promote: more sustainable transport choices for people and freight; accessibility to jobs, shopping, leisure facilities and services by public transport, walking and cycling and reduce the need to travel, especially by car.

Employment generating development should offer a realistic choice of access by public transport, walking, and cycling (paragraph 26). Where developments will have significant transport implications, transport assessments should be prepared and submitted (paragraph 23). For major proposals, the assessment should illustrate accessibility to the site by all modes and the likely modal split, details of proposed measures to improve access by public transport, walking and cycling, to reduce the need for parking associated with the proposal and to mitigate transport impacts. Where appropriate, a travel plan should be included.

Freight movement restrictions can have the effect of exacerbating congestion during peak times, increasing local pollution, and discouraging further investment (paragraph 46). Therefore in regulating freight movements, there is a need to strike a balance between the interests of local residents and those of the wider community, including the need to protect the vitality of urban economies, local employment opportunities and the overall quality of life in towns and cities.

A traffic and transport assessment (TA) has been undertaken and is included at Appendix 12.1 of ES Chapter 12. Chapter 12 of the ES considers the environmental effects of traffic and transport generated by the proposals.

As an employment generating development, the site offers realistic choice of access by public transport, walking and cycling, with secure cycle parking and changing facilities' provided as part of the development, and access to bus stops within walking distance. The proposed development site benefits from direct access to the principal road network and good onward access to the trunk road network.

As a freight generating development, there is a need to take into account the wider beneficial impacts of the MVV EfW CHP facility on protecting the vitality of the urban economy (by providing for disposal of commercial and industrial waste and the generation of local employment opportunities) and the overall improved quality of life for rate payers within Plymouth, Torbay, West Devon, Teignbridge and South Hams provided by sustainable waste management services, (when considering the localised transport impacts).

2.2.5 Planning Policy Statement (PPS) 22, Renewable Energy (August 2004)

Increased development of renewable energy resources is identified as vital to facilitating the delivery of the Government's commitments on both climate change and renewable energy. Positive planning which facilitates renewable energy developments is seen as contributing to all four elements of the Government's sustainable development strategy (page 6, The Government's Objectives):

- social progress which recognises the needs of everyone – by contributing to the nation's energy needs;
- effective protection of the environment – by reductions in emissions of greenhouse gases and thereby reducing the potential for the environment to be affected by climate change;
- prudent use of natural resources – by reducing the nation's reliance on ever diminishing supplies of fossil fuels; and,
- maintenance of high and stable levels of economic growth and employment – through the creation of jobs directly related to renewable energy developments, but also in the development of new technologies.

The wider environmental and economic benefits of all proposals for renewable energy projects, whatever their scale, are material considerations that should be given significant weight in determining whether proposals should be granted planning permission (paragraph 1.iv). Development proposals should demonstrate any environmental, economic and social benefits as well as how any environmental and social impacts have been minimised through careful consideration of location, scale, design and other measures (paragraph 1.viii).

The MVV EfW CHP generates renewable energy and heat as a result of recovery of energy from waste, contributing to the nation's energy needs and reducing greenhouse gas emissions arising from disposal to landfill, and the use of natural gas/oil in the Naval Base heating system. This represents a prudent use of resources, reducing reliance on fossil fuels and creating substantial direct local and sub-regional benefits by contributing to economic growth and employment. These wider benefits of renewable energy generation are set alongside a number of measures to minimise local impacts of the development, including careful orientation of buildings on site, a high standard of design and comprehensive landscaping.

Supporting evidence for this assessment of compatibility with planning policy can be found in: PASS, CCSS and EEEEBS.

2.2.6 Planning Policy Guidance 24 - Planning and Noise (October 1994)

Planning Policy Guidance 24 (PPG24) guides local authorities in England on the use of their planning powers to minimise the adverse impact of noise when determining planning applications.

The PPG recognises that much of the development which is necessary for the creation of jobs and the construction and improvement of essential infrastructure will generate noise (paragraph 10) and that the planning system should not place unjustifiable obstacles in the way of such development. Nevertheless, local planning authorities must ensure that development does not cause an unacceptable degree of disturbance.

Measures to control the source of, or limit exposure to, noise, should be proportionate and reasonable. They may include engineering measures to reduce or contain noise at point of generation, protection of surrounding noise-sensitive buildings, addressing layout by

appropriate separation distances or screening, or administrative measures, which include limiting operating hours, activities or specifying noise limits (paragraph 13).

There will be circumstances when it is acceptable - or even desirable in order to meet other planning objectives - to allow noise generating activities on land near or adjoining a noise-sensitive development. In such cases, local planning authorities should consider the use of conditions or planning obligations to safeguard local amenity (paragraph 18). Care should be taken to keep the noisiest activities away from the boundary or to provide for measures to reduce the impact of noise.

Chapter 14 of the Environmental Statement provides an analysis of Noise and Vibration associated with the MVV EfW CHP facility. Although the proposed development is a noise generating activity, given the wider need for a sustainable waste management solution for the SWDWP area, the location of the facility is considered acceptable insofar as it is located near to noise sensitive residential development. Conditions to safeguard local amenity will be employed and care has been taken to reduce the impact of noise by containment of tipping and waste combustion processes within the building, and by orientation of the building so as to locate the noisier activities away from the boundary closest to residential areas.

2.2.7 Planning Policy Statement 25 - Development and Flood Risk (March 2010)

PPS25 aims to ensure that flood risk is taken into account at all stages in the planning process, to avoid inappropriate development in areas at risk of flooding and to direct development away from areas at high risk. PPS25 states that an FRA must be undertaken for all developments in Flood Zones 2 or 3, or for all sites greater than 1 hectare in area. An FRA is required to highlight and assess the significance of flooding to the proposed development as well as the risk to third parties arising from the development.

In general, site development reduces the permeability of a site, increasing the volume and rate of runoff, and potentially increasing flood risk to third parties. Therefore appropriate drainage arrangements are required for new developments to ensure that flood risk to others is not increased.

Annex F of PPS25 promotes the use of Sustainable Drainage Systems (SuDS) in new development to ensure volumes and peak flow rates of surface water leaving a developed site are no greater than the rates prior to the proposed development, unless specific off-site arrangements are made and result in the same net effect.

Chapter 11 of the Environmental Statement provides an assessment of the flood risk associated with the proposed development. This assessment is supported by a Level 2 and Level 3 Flood Risk Assessment (Appendix 11.1) which demonstrates that the proposed EfW CHP facility built development site is located within Flood Zone 1, land considered to have a low risk of flooding. An area of the onsite access road is located within Flood Zone 2, but with implementation of proposed mitigation the risk of flooding posed to the access road would be low.

The upstream impact on flood levels resulting from the replacement of two existing access bridges (over the Weston Mill Stream) with a single open span bridge has been assessed and is considered to have a negligible impact on flood levels upstream or downstream of the site.

As the proposed development will result in an increase in the hardstanding area on site compared with existing conditions, surface water runoff from the site will increase. A surface water drainage strategy (incorporating SuDs) has been developed to ensure surface water generated on site does not pose a flood risk to the development and third parties off site.

3 Regional Planning Guidance for the South West (RPG 10)

3.1 Policy VIS1: Expressing the Vision

Policy VIS 1: Expressing the Vision

The vision of RPG is to:

• Promote a sustainable development pattern and set out a sequential approach to the location of development.

• Minimise the need to develop on greenfield sites and to travel.

• Develop an integrated approach to urban and rural areas eg policies to promote development on previously developed land will not only benefit urban areas: by easing pressures on rural development, they will also help to secure the future of the countryside.

• Concentrate growth at the Principal Urban Areas (PUAs) and other designated centres of growth.

• Recognise the different roles of appropriate development in market towns, and key villages in rural and coastal locations, as places where development will be favoured locally.

The proposed development is in accordance with policy VIS1, as the EfW CHP facility will be located primarily on previously developed land; within Plymouth (a PUA), where the largest amount of waste arises - minimising the distance that waste is required to transport waste and reducing the need to develop on greenfield land.

Supporting evidence for this assessment of compatibility with planning policy can be found in: PASS, ES Chapter 5, ES Chapter 12.

3.2 Policy VIS2: Principles for Future Development

Policy VIS 2: Principles for Future Development

Local Authorities in their development plans and other agencies in their plans, policies and programmes, should:

• seek the development of suitable previously developed urban land (or buildings for re-use or conversion) and other appropriate sites in urban areas as a first priority for urban-related land uses; authorities and all agencies involved should examine critically the potential of the urban areas to accommodate new development;

• seek a balance of land uses in urban localities:

† by promoting mixed-use development and, where sites are smaller, through complementary land allocations over a wider urban area;

† including a mix of housing types, retail, business and commercial development, industry, education, social and cultural facilities, leisure, sport, recreation and open space uses;

• ensure that land is used efficiently in both urban and rural locations, with well designed development taking place at as high a density as possible commensurate with a good

living and working environment, and by carrying out a rigorous reappraisal of policies on development in order to achieve increasing density, ensure good design and reduce parking requirements;

• make adequate provision for all land uses, including those with large space requirements, the development needs of new or expanding firms and those unable to be accommodated within urban areas;

• meet the economic and social needs of rural communities;

• promote the provision and enhancement of networks for walking, cycling and public transport and ensure that development which generates large amounts of movement is well served by sustainable transport networks;

• conserve and enhance environmental assets and promote a good quality of design, including good building design, quality landscape and urban spaces and a mixture of complementary uses;

• reduce and minimise flood risk to people and properties and take fully into account issues of water supply and treatment infrastructure.

The proposed development is in accordance with Policy VIS2 as the EfW CHP facility is located in an appropriate urban area, largely on previously developed land and represents an efficient use of previous industrial land, given the opportunities for CHP arising from the location. The development also benefits from a suitably high standard of design, a comprehensive and high quality landscaping scheme and flood mitigation measures to minimise flood risk to people and properties. Treatment infrastructure will ensure there are no adverse impacts on water resources.

Supporting evidence for this assessment of compatibility with planning policy can be found in: PASS, DAS, CCSS, EEEEBS and ES Chapter 5.

3.3 Policy RE5: Management and Transportation of Waste

Policy RE5: Management and Transportation of Waste

In order to achieve sustainable waste management (the Best Practicable Environmental Options) in the region, waste planning, disposal and collection authorities, the Environment Agency and waste management and water companies should cooperate to:

• Establish a mix of waste recovery methods e.g. recycling, composting, energy recovery etc, regionally and sub-regionally, that will reduce reliance on landfill and will avoid creating over-reliance on any one method or facility.

• Pursue the following regional targets:

Recycle or compost at least 30% of household waste by 2010; and, 33% by 2015.

Recover value from 45% of municipal waste by 2010; and 67% by 2015.

Reduce landfilling of biodegradable municipal waste to 75% of the 1995 production level by 2010; and, 50% by 2013.

Reduce landfilling of industrial and commercial waste to 85% of the 1998 level by 2005.

• Give priority to the provision of waste management facilities that will recover value from waste at or near the PUAs. Those facilities should take account of waste management

requirements in the PUA (s) concerned and its neighbouring county areas and should be planned to contribute to the achievement of the regional targets above, in respect of the urban area(s) and its hinterland.

• Ensure that sub-regional requirements are taken into account in structure and waste local plans and in waste planning decisions. Structure or (where appropriate) waste local plans should propose targets for the provision of value recovery capacity among participating waste planning authorities. Provision at PUAs and at other urban areas should take the waste management requirements of their neighbouring county areas into account.

The proposed development will be in accordance with and support the objectives of Policy RE5 as it will provide a sub-regional facility located in the Plymouth PUA to recover energy (in the form of electricity and heat) from residual municipal waste. The proposed development will not compromise efforts to achieve or surpass RPG recycling and composting targets and will also make a substantial contribution to the targets for diverting waste from landfill and recovering value from waste within the PUAs at the regional level.

Supporting evidence for this assessment of compatibility with planning policy can be found in: PASS, EEEEBS and ES Chapter 3.

3.4 Policy RE 6: Energy Generation and Use

Policy RE 6: Energy Generation and Use

Local authorities, energy suppliers and other agencies should:

• support and encourage the region to meet the national targets for:

• a 12.5% reduction in greenhouse gas emissions below 1990 levels by 2008-2012 and a 20% reduction (from 1990 levels) in carbon dioxide emissions by 2010;

• a minimum of 11-15% of electricity production to be from renewable energy sources by 2010.

• encourage and promote the greater use of renewable energy sources, including community-based projects, such as Combined Heat and Power and Community Heating and their integration into more energy efficient new build or redevelopment proposals;

• have full regard to the recommendations and detailed background information contained in the report "" (GOSW APRIL 2001).

Development Plans should:

• specify the criteria against which proposals for renewable energy projects will be assessed, balancing the benefits of developing more sustainable forms of energy generation against the environmental impacts, in particular on national and international designated sites;

• promote energy conservation measures through policies guiding the design, layout and construction techniques of new development proposals.

The proposed development will help to reduce greenhouse gas emissions by diverting waste from landfill, reducing the distance it is necessary for waste to travel for disposal and displacing high carbon sources of electricity. The proposed CHP facility will generate low carbon

electricity and provide heat to the Devonport Naval Base. The proposed development will therefore make a positive contribution to achieving the objectives set out by Policy RE 6.

Supporting evidence for this assessment of compatibility with planning policy can be found in: PASS, CCSS and EEEEBS.

4 Draft Regional Spatial Strategy for the South West 2006 – 2026

4.1 Policy SD1 - The Ecological Footprint

SD1 The Ecological Footprint

The region's Ecological Footprint will be stabilised and then reduced by:

• Ensuring that development respects environmental limits

• Requiring the wise use of natural resources and reducing the consumption of key resources such as energy, water and minerals

• Building a sustainable, low carbon and low resource consuming economy which can be secured within environmental limits to bring prosperity and well-being to all parts of the region

• Requiring sustainable construction and design as the norm in all future development and when opportunities arise, improving the region's existing building stock in line with current best practice

• Minimising the need to travel by better alignment of jobs, homes and services, reducing the reliance on the private car by improved public transport and effective planning of future development, and a strong demand management regime applied in the region's main centres in particular

• Requiring a shift towards the more sustainable modes of transport

• Meeting national and regional targets relating to renewable energy, resource consumption/extraction and waste production/recycling Local authorities, regional agencies and others will include policies and proposals in their strategies, plans and programmes to assess how all new developments, regeneration areas and major refurbishments contribute to stabilising and reducing the region's ecological footprint

The proposed development will respect environmental limits and will make a positive contribution to the creation of a sustainable, low carbon economy, consistent with Policy SD1, through:

- reducing the consumption of key resources including water (through recycling of waste water) and minerals (bottom ash will be recycled as a construction aggregate and waste metals will be recycled);
- implementing sustainable design and construction principles and achieving a BREEAM rating of 'Excellent'; and
- managing waste close to where it arises, thereby reducing the distances waste is required to travel;
- reducing reliance on the private car for commuting, by providing secure cycle parking facilities; and
- the recovery of electricity and heat from residual municipal waste, generating low carbon renewable energy and contributing to national and regional renewable energy targets.

Supporting evidence for this assessment of compatibility with planning policy can be found in: PASS, CCSS and EEEEBS and ES Chapter 6.

4.2 Policy SD2 - Climate Change

SD2 Climate Change

The region's contribution to climate change will be reduced by:

• Reducing greenhouse gas emissions at least in line with current national targets, i.e. by 30% by 2026 (compared to 1990 levels)

• Following the principles outlined in SD1 The region will adapt to the anticipated changes in climate by

• Managing the impact of future climate change on the environment, economy and society

• Identifying the most vulnerable communities and ecosystems given current understanding of future climate change and provide measures to mitigate against these effects

• Avoiding the need for development in flood risk areas and incorporating measures in design and construction to reduce the effects of flooding

• Recognising and putting in place policies and measures to develop and exploit those opportunities that climate change will bring

• Requiring 'future proofing' of development activity for its susceptibility to climate change

• Improving the resilience and reliability of existing infrastructure to cope with changes in climate and in the light of future demand. It will be a priority for the places identified in Section 3 to determine potential future climate change impacts and plan ways in which key services and infrastructure needs to adapt. All Local Authorities in their LDDs will need to demonstrate how they intend to contribute towards the required 60% cut in CO^2 emissions by 2050 and how they intend to identify and respond to the potential impacts of climate change in their area.

The proposed development will contribute to the reduction of greenhouse gas emissions by diverting residual waste from landfill and by generating low carbon electricity and heat, reducing reliance on high-carbon alternatives. The development proposals have also taken full consideration of the identified flood risk and appropriate mitigations have been made, including addressing the impacts of climate change (for example by raising site levels), as outlined in ES Chapter 11 Hydrology, Hydrogeology and Flood Risk.

Supporting evidence for this assessment of compatibility with planning policy can be found in: PASS, CCSS and EEEEBS.

4.3 Policy SD3 - The Environment and Natural Resources

SD3 The Environment and Natural Resources

The region's environment and natural resources will be protected and enhanced by:

• Ensuring that development respects landscape and ecological thresholds of settlements

• Reducing the environmental impact of the economy, transport and development

• Positively planning to enhance natural environments through development, taking a holistic approach based on landscape or ecosystem scale planning

• Planning and design of development to reduce pollution and contamination and to maintain tranquillity

• Positive planning and design to set development within and to enhance local character (including setting development within the landscape of the historic environment), and bringing historic buildings back into viable economic use and supporting regeneration

• Contributing to regional biodiversity targets through the restoration, creation, improvement and management of habitats

The proposed development has been designed to take account of its surroundings and minimise impact on the historic and natural landscape and associated environmental features. The design evolution and principles in this respect are explained in the accompanying DAS (PASS Appendix 1). Extensive mitigation measures (as set out in Chapter 10 and 11 of the ES) will ensure there is no risk of pollution or contamination arising from the development. Proposals to improve and restore local habitats (Blackies Wood, adjacent watercourse) are included as part of the development and described in Chapter 7 of the ES.

4.4 Policy SD4 – Sustainable Communities

SD4 Sustainable Communities

Growth and development will be planned for and managed positively to create and maintain Sustainable Communities throughout the region by:

• Realising the economic prosperity of the South West and reducing disparity

• Setting a clear vision and strategy to meet the diverse needs of all people in existing and future communities, based on the role and function of cities, towns and villages and their local character and distinctiveness

• Linking the provision of homes, jobs and services based on role and function so that cities, towns and villages and groups of places have the potential to become more self contained and the need to travel is reduced

• Promoting a step change in public transport, taking steps to manage demand for travel, and promoting public transport 'hubs' and access to them

• Encouraging business activity and particularly small businesses and their contribution to the region's prosperity, including through promoting regional sourcing

• Making adequate and affordable housing available for all residents, including the provision of a range and mixture of different housing types to accommodate the requirements of local communities

• Making the best use of existing infrastructure and ensuring that supporting infrastructure is delivered in step with development

• Investing in and upgrading cultural facilities, including their marketing and management

• Creating healthy, safe and secure places to live, for example by following Lifetime Homes and Secure by Design principles

• Providing homes which are adaptable to the changing needs of individuals and provide an opportunity for live/work space

• Delivering a step change in the quality of urban living

• Providing networks of accessible green space for people to enjoy

• Supporting social and economic progress by enhancing education, skills development and training

The MVV EfW CHP proposals will make best use of existing infrastructure (Naval Base Steam System), contribute to enhancing education, skills development and training - through the provision of visitor education facilities and apprenticeships for local people, contribute to the local economy through direct employment and positive multiplier effects on the local economy, and help to meet the needs of Plymouth city, allowing it to become more self-contained and reducing the distance that waste will travel to be managed. The development proposals are therefore consistent with policy SD4.

Supporting evidence for this assessment of compatibility with planning policy can be found in: PASS, D&AS, CCSS and EEEEBS.

4.5 Development Policy A - Development at the Strategically Significant Cities and Towns (SSCTs)

Development Policy A

Development at the Strategically Significant Cities and Towns (SSCTs)

The primary focus for development in the South West will be those places which offer the greatest opportunities for employment, and the greatest levels of accessibility by means other than car to cultural, transport, health, education and other services. These SSCTs, identified on Map 3.1 and in Table 3.1 below, will continue to have regionally and sub-regionally important functions and potential, and play critical roles in delivering development in the period to 2026.

Provision will be made to maintain and enhance the strategic function of these SSCTs through the development of a wide range of commercial and public services, community and cultural facilities and non-car links to the communities they serve.

For these SSCTs, specific Policies are set out, in Section 4, on the scale of development to be planned for and the strategic investment in infrastructure and other facilities necessary both to support that development and enhance their strategic role. In total, provision will be made to deliver about 200000 jobs and provide at least 15,125 dwellings per annum over the period 2006 to 2026.

The proposed development is a commercial and public service/facility which will help to maintain and enhance the strategic function of Plymouth through employment and energy benefits and is therefore appropriately located within Plymouth, a SSCT, in accordance with Development Policy A.

Supporting evidence for this assessment of compatibility with planning policy can be found in: PASS, EEEEBS and ES Chapter 5.

4.6 Development Policy E - High Quality Design

Development Policy E

High Quality Design

Developers, local authorities and public agencies should ensure that all development in rural and urban settings delivers the highest possible standards of design, both in terms of urban form and sustainability criteria. All new, replacement and refurbished public buildings should be designed to have multiple uses as far as possible.

The development proposals have gone through an extensive and considered design evolution process, in consultation with Plymouth City Council, the local community and design advisors, including CABE, in order to achieve a high quality building that is responsive to its setting and environment. The design rationale and its evolution are explained in the DAS (PASS Appendix 1). The sustainability credentials of the scheme are demonstrated by the BREEAM Pre-Assessment rating of 'Excellent' and are further described in the Climate Change and Sustainability Statement (PASS Appendix 3). Although elements of design can be subjective, it is clear from the rationale for the chosen design and the process by which the design has evolved, as described in the DAS, that the development proposals accord with Development Policy E.

4.7 Development Policy H - Re-using Land

Development Policy H

Re-using Land

Local authorities will ensure that the full potential of previously used land is taken into account in providing for new development, whilst recognising that previously developed land may not always be in the most sustainable locations that development may not necessarily always be the most sustainable land use. For the region as a whole the aim should be to achieve at least 50% of new development on previously developed land (including the conversion of existing buildings).

The proposed development will be located mainly on previously developed land and therefore is in accordance with Development Policy H.

4.8 Policy RE1 - Renewable Electricity Targets: 2010 and 2020

RE1 Renewable Electricity Targets: 2010 and 2020

Local Development Documents will include positive policies to enable the achievement of the following targets:

By 2010 a minimum target of 509 to 611 MWe installed generating capacity, from a range of onshore renewable electricity technologies in the following broad distribution:

Sub-region Installed Electricity	*Generating Capacity (MWe)*
Former Avon	*35-52*
Gloucestershire	*40-50*
Wiltshire	*65-85*
Somerset	*61-81*
Devon	*151*
Dorset	*64-84*

Cornwall	*93-108*
Total	*509-611*

By 2020 a minimum target of 850 MWe installed generating capacity from a range of onshore renewable electricity technologies.

This onshore target, together with offshore renewable electricity capacity, will help to provide at least 20% of the region's electricity demand by 2020.

The proposed development has the capacity to generate a maximum of about 22.5MWe of renewable electricity, therefore making a positive contribution to the achievement of the targets set by policy RE1. Evidence of compatibility with planning policy can be found in: PASS and EEEEBS.

4.9 Policy RE3 - Renewable Heat Targets

RE3 Renewable Heat Targets

LDDs will include positive policies to enable the achievement of the following targets by the use of appropriate resources and technologies:

Timescale Installed Thermal	*Capacity (MWth)*
2010	*100*
2020	*500*

The EfW CHP Facility has the capacity to generate a maximum of about 22.5MWe of renewable electricity. With the EfW CHP facility in operation, the savings achieved in the North Yard and FAC heating systems will amount to 82,200,000 kWh per annum of natural gas for heating, therefore making a positive contribution to the achievement of the target set out in policy RE3.

Supporting evidence for this assessment of compatibility with planning policy can be found in: PASS and EEEEBS.

4.10 Policy RE9 - Air Quality

RE9 Air Quality

The impacts of development proposals on air quality must be taken into account and local authorities should ensure, through LDDs, that new development will not exacerbate air quality problems in existing and potential AQMAs.

Chapter 13 of the Environmental Statement assesses the likely impact of the proposed development on air quality and concludes that the combined impact of emissions to air from the EfW CHP facility stack and operational traffic would not result in any significant effect at air quality sensitive receptors. Taking into account available information on background concentrations within the modelled domain, predicted operational concentrations of the modelled pollutants would be within the assessment criteria for the protection of human health. Emissions from the proposed EfW CHP facility would not result in a significant impact on annual mean NO2 concentrations within AQMAs in Plymouth or elsewhere and no significant impacts are predicted on designated ecological sites (SACs, SPAs and SSSIs), with regards to direct toxic effects (NOX, SO2, NH3 and HF) and deposition (acid and nutrient nitrogen).

4.11 Policy W1 - Provision of Waste Sites

W1 Provision of Waste Sites

Waste Planning Authorities will make provision in their Waste Development Frameworks for a network of strategic and local waste collection, transfer, treatment (including recycling) and disposal sites to provide the capacity to meet the indicative allocations for their area shown in Appendix 2, for 2010, 2013 and 2020.

The proposed development is a response to the need for a strategic sub-regional waste management facility to manage residual municipal waste arising from the South West Devon Waste Partnership (SWDWP) area. As such, the facility will contribute to the achievement of targets set out by Policy W1. Supporting evidence for this assessment of compatibility with planning policy can be found in: PASS and ES Chapter 3.

4.12 Policy W2 - Waste Facilities and the Waste Hierarchy

W2 Waste Facilities and the Waste Hierarchy

Provision of waste facilities will take account of the following waste hierarchy:

• Waste should be managed on the site where it arises, wherever possible (waste minimisation), and

• Waste that is not managed at its point of arising should be managed according to the proximity principle In all areas, identification of sites for facilities will take account of the following:

• Established and proposed industrial sites, in particular those that have scope for the co-location of complementary activities, such as proposed resource recovery parks, and

• Other previously developed land, including use of mineral extraction and landfill sites during their period of operation for the location of related waste treatment activities

For SSCTs and other named settlements in Section 4, the location of new waste management or disposal facilities should accord with the following sequential approach:

- *Within*
- *On the edge of, and/or*
- *In close proximity to (ie within 16 kilometres) of the urban area primarily served by the facility*

For rural areas and smaller towns there should be provision of:

• A network of local waste management facilities concentrated at, or close to, centres of population identified through Development Policy B, and/or

• An accessible network of strategic waste facilities Major sources of waste arising in rural areas will be treated locally, unless specialised facilities are required.

The proposed development is fully in accordance with Policy W2 with respect to both proximity to arisings and the sequential approach to the location of waste facilities in SSCTS. The facility will manage residual municipal waste from an industrial site within Plymouth, the area with the largest proportion of arisings in the SWDWP area. The proposed development is also situated

largely on previously developed land, adjacent to complementary industrial activities (i.e. a major user of process heat) within the Strategically Significant City of Plymouth.

Supporting evidence for this assessment of compatibility with planning policy can be found in: PASS, ES Chapters 3 and 5.

4.13 Policy W4 - Controlling, Re-using and Recycling Waste in Development

W4 Controlling, Re-using and Recycling Waste in Development

All proposals for larger-scale development should include as part of the planning application a report comprising an audit of waste materials on site and proposals for how waste will be managed over the lifetime of the development.

An Outline Site Waste Management Plan for the proposed development has been prepared in accordance with this policy, and is included as Appendix 15.1 of the Environmental Statement.

4.14 Policy ENV4 Nature Conservation

ENV4 Nature Conservation

The distinctive habitats and species of the South West will be maintained and enhanced in line with national targets and the South West Regional Biodiversity Action Plan. Local authorities should use the Nature Map to help map local opportunities for biodiversity enhancement in LDDs, taking into account the local distribution of habitats and species, and protecting these sites and features from harmful development. Priority will be given to meeting targets for maintenance, restoration and recreation of priority habitats and species set out in Appendix 1, focusing on the Nature Map areas identified in Map 7.3. Proposals which provide opportunities for the beneficial management of these areas and habitats and species generally, should be supported, including linking habitats to create more functional units which are more resilient to climate change.

An assessment has been undertaken of the likely impacts of the proposed MVV EfW CHP facility on ecology and nature conservation and the results of this assessment are reported in Chapter 7 of the Environmental Statement. Adverse effects on habitats and nationally protected and important species are not expected to be significant once the habitat creation, mitigation measures and surveys which are proposed as part of the development are implemented. Beneficial effects on biodiversity will result from the ecological enhancements and management proposals for Blackies Wood and the replacement of a culverted watercourse crossing with a new clear span bridge. The proposed development thus meets the policy requirements to maintain and enhance the South West's priority habitats and species.

5 Plymouth Core Strategy 2006-2021

5.1 Policy CS01 - Development of Sustainable Linked Communities

Policy CS01

Development of Sustainable Linked Communities

The Council will improve the sustainability of the individual communities and neighbourhoods in the city through allocating sites for development and considering proposals for development in terms of the extent to which they:

1. Contribute to meeting the needs of the neighbourhood, helping to support a sustainable linked community.

2. Deliver development of an appropriate type, form, scale, mix and density in relation to its location relative to the neighbourhood's centre.

3. Safeguard and capitalise on the local environment, including the need to deliver effective and sustainable use of resources.

4. Contribute to promoting a positive sense of place and identity.

5. Contribute to creating a well connected, accessible, inclusive and safe community.

The proposed development will improve the sustainability of Devonport Dockyard, not only through the provision of low carbon electricity and heat, but also by providing a catalyst for further development.

The proposed development will also make use of previously developed land and make a contribution to addressing the needs of the nearby neighbourhoods of Barne Barton, Kings Tamerton and Weston Mill, Keyham and beyond, through the provision of employment opportunities, an educational facility (visitor and community facilities within the Administration Block) and enhancement of and access to informal public open space and a biodiversity resource – contributing to the achievement of these important aspirations for development of this area, as identified in the emerging Sustainable Neighbourhoods DPD.

Supporting evidence for this assessment of compatibility with planning policy can be found in: PASS, DAS, CCSS and EEEEBS.

5.2 Policy CS02 - Design

Policy CS02

Design

New development should be well designed to respect the character, identity and context of Plymouth's historic townscape and landscape and in particular Plymouth's unique waterfront, its moorland setting and the settlement pattern.

New development should also:

1. Promote the image of the city, through enhancement of international, city and local gateway locations and key approach corridors.

2. Protect important local and longer-distance views.

3. Contribute positively to an area's identity and heritage in terms of scale, density, layout and access.

4. Be flexible to respond to future social, technological and economic needs.

5. Be easy to get to and move through and around, providing recognisable routes, interchanges and landmarks that are well connected to public transport, community facilities and services of individual communities and neighbourhoods in the city.

6. Have public and private spaces that are safe, attractive, easily distinguished, accessible and complement the built form.

7. Incorporate car parking that is integrated with the existing public realm and other pedestrian and cycle routes.

8. Ensure a balanced mix of uses that work together and encourage sustainable living.

9. Provide active ground floor frontages where located in the City Centre, local or district centres.

10. Be accessible to all users.

11. Be safe, uncluttered, varied and attractive.

The development proposals have gone through an extensive and considered design evolution process in consultation with Plymouth City Council, the local community and design advisors, including CABE, in order to achieve a high quality building that is responsive to its setting and environment.

The design responds to the principles set out in the Adopted Design SPD and all appropriate access and safety considerations. The design rationale and its evolution is explained within the Design and Access Statement (PASS Appendix 1) and the proposed design is a striking and iconic landmark building which responds to the context of the Dockyard and strategic views within the City.

The building design and landscape strategy aims to mitigate impacts on local and longer-distance views arising from a building of this scale. ES Chapter 8 concludes that, although there will be some localised adverse impacts on views, the design and landscaping details are sufficient to overcome these.

5.3 Policy CS03 - Historic Environment

Policy CS03

Historic Environment

The Council will safeguard and where possible, enhance historic environment interests and the character and setting of areas of acknowledged importance, including scheduled ancient monuments, listed buildings (both statutory and locally listed), registered parks and gardens, conservation areas and archaeological remains.

Chapter 9 of the accompanying ES assesses the likely impact of the proposed development on the historic environment. The assessment concluded that there would be no direct impacts on known archaeology in the study area and very limited scope for direct impact on areas of potential archaeology. The proposed development has been assessed as having an effect of moderate adverse significance on the setting of four Scheduled Monuments and four Grade II Listed structures and minor adverse effects on three Registered Parks and Gardens and the

setting of three Grade II Listed structures. There may be a limited visual impact on the setting of the historic landscape but this is in keeping with the current built environment in the area.

However the proposed development incorporates a comprehensive landscaping scheme which will minimise as far as possible effects on the setting of archaeological, built heritage and historic landscape features. The proposed development site is also well placed at the northern end of Devonport naval dockyard, as it is partially screened by natural topography to the north and west and by the built environment to the east and south, including the railway embankment and viaduct. This location will help to mitigate landscape setting issues.

5.4 Policy CS04 - Future Employment Provision

Policy CS04
Future Employment Provision

The Council will support a step-change in the performance of Plymouth's economy through:

6. Supporting the future expansion or redevelopment of military establishments for operational purposes.

7 Supporting the development of Plymouth's learning infrastructure such that is adds greater value to the city's economic development.

9. Promoting local labour agreements with developers to enable local people in deprived communities to secure employment and skills development.

As described in the PASS, the EfW CHP Facility will be a redevelopment of land which was part of HMNB Devonport. MVV will make a commitment to sponsorship apprenticeships in the City including supporting placements with the City College Plymouth and Plymouth University.

The EfW CHP Facility will provide direct employment during construction and operation, but will also have wider employment and economic benefits through associated indirect service employment, through supporting the economic viability of the Dockyard and by acting as a catalyst for inward investment. MVV and its construction partner Kier will put in place measures to encourage local employment. The EEEBS and ES Chapter 17 provide full details of the employment and education benefits of the scheme.

5.5 Policy CS14 – New Education Facilities

Policy CS14. New Educational Facilities

Development of ….education facilities should be:

1. Well designed, well related to neighbourhood services and amenities and easily accessible by sustainability transport modes.

2. Include, where appropriate, provision for community use in addition to their educational use.

The EfW CHP Facility proposals incorporate important new educational resources for the local community and other groups. These facilities are within the Barne Barton neighbourhood and close to and easily accessible from other nearby neighbourhoods and from the City generally. The facilities are modern and well designed and include access for people with disabilities.

The Administration Block will incorporate a community area for use as meeting/educational space and there will be access to a roof terrace where school children can learn about sustainable waste management and can study the dockyard. A full time Community Liaison Manager will be employed to educate the local community on recycling. The Blackie's Wood area will be developed for biodiversity and access to this area, including a viewing area over Weston Mill Creek, will be provided as an education resource. The PASS and EEEBS provide full details of the education benefits of the scheme.

5.6 Policy CS18 - Plymouth's Green Space

Policy CS18

Plymouth's Green Space

The Council will protect and support a diverse and multi-functional network of green space and waterscape, through:

1. Identifying in the Site Allocations Development Plan Document and Area Action Plans a network of strategically and locally important Greenscape Areas. Development on or adjacent to these Greenscape Areas will not be permitted where it would result in unacceptable conflict with the function(s) or characteristics of that area.

2. Requiring development proposals to improve the quality and quantity of accessible green space, where appropriate.

3. Requiring development proposals to address local deficiencies in accessible green space, where appropriate.

4. Using its planning powers to safeguard important trees and hedgerows, and to secure provision for soft landscaping where appropriate as part of development.

The 'Greenscape Strategy Update for the City of Plymouth' (Land Use Consultants June 2004) describes the function and characteristics of the Blackie's Wood Greenscape area as relating to biodiversity and visual amenity.

The proposed development will make habitat improvements to the adjacent 'Blackies Wood' Greenscape Area, and ensure it will be appropriately managed. ES Chapter 7 concludes that there are expected to be beneficial effects on biodiversity through the enhancements and management proposed for Blackies Wood. ES Chapter 8 concludes that the combination of built form, new landscape and management of existing landscape features will ensure that the scheme positively contributes to the townscape, landscape and biodiversity of the local environment. There will therefore be no unacceptable conflict with the Greenscape designation.

In addition, an area of existing informal open space adjacent to Pool Park Road/Savage Road will be re-graded and improved by landscaping and planting, in order to enhance the quality and quantity of accessible green space in the local area, recognising the deficiencies in accessible green space which exist in the adjacent Barne Barton neighbourhood. A comprehensive soft landscaping scheme is proposed, including the retention of existing trees and hedgerows wherever possible. Full details are set out in the ES Chapter 8 and in the DAS. The development proposals are therefore in accordance with Policy CS18.

5.7 Policy CS19 - Wildlife

Policy CS19

Wildlife

The Council will promote effective stewardship of the city's wildlife through:

1. Safeguarding national and international protected sites for nature conservation from inappropriate development.

2. Appropriate consideration being given to European and nationally protected and important species.

3. Maintaining a citywide network of local wildlife sites and wildlife corridors, links and stepping stones between areas of natural green space.

4. Ensuring that development retains, protects and enhances features of biological or geological interest, and provides for the appropriate management of these features.

5. Ensuring development seeks to produce a net gain in biodiversity by designing in wildlife, and ensuring any unavoidable impacts are appropriately mitigated for.

6. Supporting wildlife enhancements which contribute to the habitat restoration targets set out in the South West Nature Map and in National, Regional & Local Biodiversity Action Plans.

An assessment has been undertaken of the likely impacts of the proposed EfW CHP facility on ecology and nature conservation and the results of this assessment are reported in Chapter 7 of the Environmental Statement.

The EfW CHP development has the potential to create significant adverse effects on habitats and nationally protected and important species (reptiles, bats, breeding and wintering birds, including black redstart). However with the habitat creation, mitigation measures and surveys which are proposed as part of the development, the residual adverse effects on biodiversity are not expected to be significant. Beneficial effects on biodiversity are expected from the ecological enhancements proposed for Blackies Wood and the replacement of a culverted watercourse crossing with a new clear span bridge.

The objective of the proposed biodiversity enhancement measures is to promote a net-gain in biodiversity. The ES Appendix 7.6 (the Biodiversity Budget) concludes that the range of habitat enhancement measures proposed is likely to secure such a net gain.

The proposed development thus meets the policy requirements to conserve, enhance and restore the diversity of England's wildlife and contribute to urban renaissance by enhancing biodiversity in green spaces and among developments so that they are used by wildlife and valued by people. The role of Blackies Wood and the watercourse in educational site visits to the facility will further promote effective stewardship of the city's wildlife.

5.8 Policy CS20 - Sustainable Resource Use

Policy CS20

Sustainable Resource Use

The Council will actively promote development which utilises natural resources in as an efficient and sustainable a way as possible. This will include:

1. Meeting high water efficiency standards, and incorporating new technologies to recycle and conserve water resources.

2. Promoting the use of Sustainable Urban Drainage Schemes.

3. Requiring all proposals for non-residential developments exceeding 1,000 square metres of gross floorspace, and new residential developments comprising 10 or more units (whether new build or conversion) to incorporate onsite renewable energy production equipment to off-set at least 10% of predicted carbon emissions for the period up to 2010, rising to 15% for the period 2010-2016.

4. Ensuring building design reduces energy consumption by appropriate methods such as high standards of insulation, avoiding development in areas subject to significant effects from shadow, wind and frost, using natural lighting and ventilation, capturing the sun's heat, where appropriate.

5. Supporting development that minimises the consumption and extraction of minerals by making the greatest possible reuse or recycling of materials in new construction, and by making best use of existing buildings and infrastructure.

6. Supporting development that seeks to minimise waste and facilitates recycling.

7. Ensuring that development and land use in the 'coastal zone' responds appropriately to the character of the particular type of coast, in the interests of preserving and making best use of this limited resource.

The proposed development has been designed to a high standard of sustainable resource use, as demonstrated by the 'excellent' rating it achieves in its BREEAM pre-assessment (see CCSS). The scheme utilises SuDS and generates a recoverable material that can be used in construction, displacing equivalent amounts of primary aggregate. The CCSS (Appendix 3 of the PASS) also provides a detailed assessment of the sustainability credentials of the proposals, including a demonstration of the compatibility of the proposals with this policy at paragraph 3.1.11.

5.9 Policy CS21 - Flood Risk

Policy CS21

Flood Risk

The Council will support development proposals that avoid areas of current or future flood risk, and which do not increase the risk of flooding elsewhere. This will involve a risk based sequential approach to determining the suitability of land for development. Development in high risk flood areas will only be permitted where it meets the following prerequisites:

1. It can be demonstrated that the development provides wider sustainability benefits to the community that outweigh flood risk.

2. The development should be on previously developed land; if not, there must be no reasonable alternative sites on developable previously developed land.

3. A flood risk assessment has demonstrated that the development will be safe, without increasing flood risk elsewhere. In addition development will be required to incorporate Sustainable Urban Drainage Systems (SUDS) to manage surface water drainage. The

Council will also seek to reduce the increase in flood risk due to climate change through measures to reduce carbon dioxide emissions.

A Level 2 and 3 flood risk assessment (FRA) of the proposed development has been undertaken and is included as Appendix 11.1 of the ES.

The majority of the Site lies within Flood Zone 1, although a small part of the access road would lie within Flood Zone 2. However with mitigation measures, including raised levels, this flood risk would be largely mitigated. ES Chapter 11 considers the likely hydrological, hydrogeological and flood risk impacts of the development and concludes that:

"When taking into account the mitigation measures, all effects for the construction and operation of the proposed EfW CHP facility can be mitigated to a minor level or less. Furthermore, when taking into account the likelihood of such effects occurring, which in all cases is low or unlikely, the associated risks are reduced to low or very low."

Given the very minor nature of the flood risk associated with only a small part of the development, and taking into account the sustainability and deliverability benefits of the development (including the SuDs proposals to manage surface water drainage), coupled with the fact the site is largely previously developed land; it is considered that the proposed development is in accordance with Policy CS21.

5.10 Policy CS22 - Pollution

Policy CS22

Pollution

To protect people and the environment from unsafe, unhealthy and polluted environments through:

1. Ensuring development proposals will be refused which cause unacceptable noise, nuisance or light pollution.

2. Ensuring development causes no unacceptable impact on water or air quality.

The proposed development would require an Environmental Permit in order to operate and would be regulated by the Environment Agency under the Pollution Prevention and Control (PPC) regime. As such, the proposed development would not be permitted to operate if it was to have any unacceptable pollution impact.

The ES has assessed the impact of the proposed development on noise and vibration (Chapter 14), light pollution (Chapter 8), potential nuisance including impacts on daylight, sunlight and overshadowing (Chapter 16), air quality (Chapter 13), and the water environment (Chapter 10 and 11). The significance of the identified effects and their likelihood of occurrence have been systematically evaluated and mitigation measures for each of the potential impacts have been identified. It is a fundamental objective of the project that contamination should not cause significant adverse effects.

Overall, the ES concludes that, provided appropriate mitigation measures are employed during each phase of the development, the proposed EfW CHP facility will not result in unacceptable impacts from noise, nuisance and light pollution or cause unacceptable impacts on water or air quality.

5.11 Policy CS25 - Provision for Waste Management

Policy CS25

Provision for Waste Management

The Council will facilitate the provision of new or enhanced waste management and treatment facilities, of sufficient capacity to manage waste arising in the city, and potentially from adjoining areas, through the allocation of sufficient land for strategic and local waste management and treatment infrastructure. This will consist of:

1. A range of sites to accommodate Strategic Waste Management and Treatment infrastructure of sufficient capacity to manage and treat the municipal, commercial and industrial, and construction / demolition waste arising in Plymouth and adjoining areas. The combination of sites would be expected to be able to accommodate a range of waste management and treatment facilities and technologies, including: recycling and composting ; bulk waste transfer; and treatment of waste by mechanical, biological and thermal (with energy recovery) methods, but not disposal by landfill.

The allocation of such sites in the Waste DPD should explore potential in the following general areas:

1. Coypool

2. Chelson Meadow (existing waste management facility)

3. Moorcroft Quarry

4. Prince Rock

5. Land west of Ernesettle

2. A range of small sites of up to 1 ha each which can accommodate commercial and industrial or municipal waste transfer, recycling and recovery facilities.

3. Local civic amenity site(s), each of in the region of 0.5 to 1 ha of land, to serve the north of the city and Plympton.

4. Enhancement of the existing Weston Mill Civic Amenity Site or development of a new site of in the region of 0.5 to 1 hectares, to serve the western part of the city.

Priority will be given in the allocation of sites and the consideration of planning applications to previously developed or existing industrial sites.

The proposed development is a direct response to the need for a strategic waste management facility for the treatment of Plymouth's residual municipal waste, and as such is in accordance with Policy CS25. The Waste DPD allocates those sites listed in Policy CS25, but includes a policy (W7) that allows for the development of waste management facilities on land outside allocated sites in certain circumstances. The MVV EfW CHP proposals are located primarily on previously developed land, and as such are in accordance with the final part of Policy CS25.

The proposed EfW CHP Facility is central to the delivery of the SWDWMS, which sets out targets to increase the recycling of household waste to 33% by 2015 and to reduce the proportion of municipal waste sent for disposal to landfill year on year. After recycling, Plymouth currently disposes of all municipal waste to landfill. Technical modelling undertaken to support the PCCMWMS suggests that energy recovery through the thermal treatment of waste is a cost efficient, low risk and sustainable solution to the need to divert residual waste

from landfill. The proposed development will recover energy and heat from residual municipal waste consistent with the MWMS and this policy. Supporting evidence for this assessment of compatibility with planning policy can be found in: PASS and ES Chapters 3 and 5.

5.12 Policy CS26 - Sustainable Waste Management

Policy CS26

Sustainable Waste Management

The Council will promote sustainable waste management by:

1. Promoting waste minimisation through the provision of waste audits for major developments.

2. Requiring the integration of facilities for waste minimisation, re-use, recycling and composting in association with the planning, construction and occupation of new development.

3. Establishing a planning policy framework for the control of waste management development that identifies suitable locations for such development. Providing guidance on minimising potential social, environmental and economic impacts that are likely to arise in the development of waste infrastructure.

4. Working with neighbouring authorities and the South West Regional Assembly to identify and promote the provision of appropriate waste management, treatment and disposal sites on the edge of, or close to, the city in their waste development plans.

As described in Environmental Statement Chapter 3, the capacity required by the SWDWP to manage residual municipal solid waste has been carefully assessed, taking into account a range of factors, including best available forecasts of population and waste growth and assumptions that ambitious recycling targets will be met. The proposed development will be used to manage residual waste only.

The proposed development is therefore delivered as part of an integrated waste management solution for the SWDWP, which includes reduction and recycling strategies and targets set out in the municipal waste management strategies of each of the SWDWP authorities. The EfW CHP will not compromise these targets and will be the main infrastructure required to meet the overall recovery targets. Supporting evidence for this assessment of compatibility with planning policy can be found in: PASS and ES Chapters 3 and 5.

5.13 Policy CS28 - Local Transport Considerations

Policy CS28

Local Transport Considerations

The Council will develop and promote a high quality and sustainable transport system for the city and reduce the need to travel through spatial planning and design, including the following elements:
1. Improving accessibility. New commercial development, which generates significant demand for travel, should be provided in locations well served by a variety of modes of travel, including public transport.

2. Ensuring that sustainable and safe transport provision is dealt with comprehensively in development. Development should where appropriate:

- *contribute to improved public transport provision and the development of new interchanges on the High Quality Public Transport network*
- *support safe and convenient pedestrian, cycling and road traffic movement*
- *provide proactive facilities and measures to support sustainable transport modes*
- *contribute to the progressive introduction of network management technology, to maximise existing and future capacity and investment across all transport modes – and to reduce congestion and delay for the benefit of business and domestic travellers alike.*
- *actively promote green travel plans.*

4. Demand management. Development proposals will be assessed in relation to car parking standards set out in the Council's Car Parking Strategy. These set a maximum level of provision for different types of proposal. These standards will be applied within the context of the capacity of the local road network and the need to promote the city for economic development, support shopping areas, safeguard residential amenity and ensure highway safety.

6. Promoting walking and cycling. Development of a network of safe walking and cycling routes will be promoted (including the SW Coastal Path and National Cycle Network), connecting to transport interchanges, linking communities and recreational areas in the city and beyond. Minimum cycle parking standards will be applied to ensure that new development provides adequate provision for cycling as a sustainable mode of travel.

7. Physical accessibility. Development should contribute to improving accessibility throughout the city by ensuring that new developments, including buildings, streets and public spaces, are designed to be safe and accessible to all users.

A traffic and transport assessment (TA) has been undertaken and is included as Appendix 12.1 of Chapter 12 of the Environmental Statement. The TA considers parking and sustainable transport opportunities for the facility, but notes that these are limited to staff and visitors, who are relatively well catered for. Chapter 12 considers the environmental effects of traffic and transport generated by the proposals. Annex F to the TA is a Framework Travel Plan and MVCV will make a commitment under a legal agreement to implement a Travel Plan which will encourage sustainable travel to work.

As an employment generating development, the site offers realistic choice of access by public transport, walking and cycling, with secure cycle parking and changing facilities provided as part of the development, and access to the local bus and rail network within walking or cycling distance. The proposed development site benefits from direct access to the principal road network and good onward access to the trunk road network. The design responds to the principles set out in the Adopted Design SPD and all appropriate access and safety considerations, including access to the Administration building and community space for people with disabilities. The design and access rationale and its evolution is explained within the DAS (PASS Appendix 1).

5.14 Policy CS32 - Designing Out Crime

Policy CS32

Designing Out Crime

To reduce opportunities for crime and the fear of crime by requiring all new development to incorporate good design principles, including:

1. Providing places with well defined routes, spaces and entrances that provide for convenient movement without compromising security.

2. Providing adequate natural surveillance (overlooking) of adjacent streets and spaces.

3. Ensuring that all new developments are designed to make crime difficult to commit by increasing the risk of detection.

4. Creating a sense of ownership by providing a clear definition between public and private spaces.

5. Promoting activity that is appropriate to the area, providing convenient access and movement routes.

6. Providing where necessary for well designed security features.

7. Providing places that are designed with management and maintenance in mind, to discourage crime in the present and the future.

8. Avoiding the creation of gated communities.

The proposed development has been designed in accordance with the requirement to 'design out crime' and security measures are described in section 9 of the DAS (PASS Appendix 3). These include proposals for security fencing, lighting and controlled access. The applicant will be submitting an assessment of the risk of public disorder from protests to Devon and Cornwall Police.

5.15 Policy CS33 - Community Benefits / Planning Obligations

Policy CS33
Community Benefits / Planning Obligations

Where needs arise directly as a result of development, the Council will seek to secure planning obligations or agreements pursuant to Section 106 of the Town and Country Planning Act 1990 that make a positive contribution to creating a city of sustainable linked communities. Through such obligations and agreements, the Council will seek to ensure that development proposals:
1. Meet the reasonable cost of new infrastructure made necessary by the proposal, including transport, utilities, education, community facilities, health, leisure and waste management.
2. Where appropriate, contribute to the delivery of strategic infrastructure to enable the cumulative impacts of developments to be managed in a sustainable and effective way and support the delivery of the City Vision.
3. Offset the loss of any significant amenity or resource through compensatory provision elsewhere.
4. Provide for the ongoing maintenance of facilities provided as a result of the development.

The proposals incorporate a wide range of community benefits, from access to jobs (direct and indirect), provision of community facility and education resource as part of the building and the enhancement and provision of access to a biodiversity resource and the enhancement of local green-space. The benefits of the scheme are summarised in Chapter 1 of the PASS and Section 3 of the PASS sets out the heads of terms of a legal agreement that MVV is proposing to sign with Plymouth City Council to confirm the provision of certain community benefits. Further details of the benefits of the scheme are

detailed throughout the submission documents, but the EEEEBS and DAS are particular sources of information.

5.16 Policy CS34 - Planning Application Considerations

Policy CS34

Planning Application Considerations

Planning permission will be granted if all relevant considerations are properly addressed. These considerations will include whether the development:

1. Has adequately considered the on and off-site impacts of the proposal in terms of climate change, flood risk, wildlife, natural resource use and pollution.

2. Makes efficient use of land, including where appropriate providing for dual use of facilities.

3. Positively contributes to the townscape, landscape and biodiversity of the local environment.

4. Is compatible with its surroundings in terms of style, siting, layout, orientation, visual impact, local context and views, scale, massing, height, density, materials and detailing.

5. Incorporates public spaces, landscaping, public art and 'designing out crime' initiatives.

6. Protects the amenity of the area, including residential amenity in terms of satisfactory daylight, sunlight, outlook, privacy and soft landscaping.

7. Ensures public safety.

8. Provides for safe and satisfactory access and making a contribution to meeting the parking requirement arising from necessary car use.

9. Demonstrates that existing drainage, waste water and sewerage infrastructure capacity is maintained and where necessary enhanced, to enable the development to proceed.

10. Ensures where appropriate equality of access and use for all sections of the community.

5.16.1 Criterion 1

The planning application and Environmental Statement have considered and addressed the on and off site impacts of the proposed development on climate change (Climate Change and Sustainability Statement PASS Appendix 3), flood risk (Chapter 11 Hydrology, Hydrogeology and Flood Risk of the Environmental Statement), wildlife (Chapter 7 Ecology of the Environmental Statement), natural resource use (Climate Change and Sustainability Statement) and pollution (Chapter 10 Contamination and Chapter 11 Hydrology, Hydrogeology and Flood Risk of the Environmental Statement).

Environmental Statement Chapter 11 concludes that the proposed development would have a low or very low impact on flood risk. Chapter 7 concludes that the proposed development would have residual adverse effects on ecology that would be insignificant and beneficial ecological impacts arising from ecological improvements to Blackies Wood and the replacement of a culverted watercourse crossing with a new clear span bridge.

Chapter 10 of the Environmental Statement concludes that provided appropriate mitigation measures are employed during each phase of the development, the proposed development will not pose an increased risk to human health or the environment through contamination. Regulation of the proposed development under the Pollution Prevention and Control (PPC) regime through an Environmental Permit would ensure there would be no unacceptable pollution impact and ES Chapter 10 concludes that there would be no significant adverse effects on air quality.

The CCSS (PASS Appendix 3) identifies that the proposed development will contribute to the diversion of residual waste from landfill and will recover electricity and heat from that waste, thereby reducing greenhouse gas emissions and helping to mitigate the causes of climate change.

5.16.2 Criterion 2

The proposed development represents an efficient use of land, being located largely on previously developed land on the edge of the ongoing operational area of HMNB Devonport. This location enables the EfW CHP facility to exploit opportunities to sell both electricity and steam (CHP) to the Naval Base and Dockyard, i.e. a 'dual use' of the facility, in addition to the management of waste.

5.16.3 Criterion 3

The proposed development has been designed to take account of the surrounding townscape and landscape, and to contribute positively through a building design that is engaging and interesting, and helps to mitigating the visual impact of the scale of the building. The DAS provides full details.

Chapter 8 of the Environmental Statement considers the landscape impact of the proposed development. The assessment concludes that there would be permanent character change and some adverse effects, but that there would be beneficial effects of bringing Blackies Wood under management, clearing up degradation and improvements to amenity value. There would also be some significant beneficial effects on local landscape character and the combination of built form, new landscape and management of existing landscape features will ensure that the scheme positively contributes to the townscape, landscape and biodiversity of the local environment.

The development proposals include ecological improvements, management of 'Blackies Wood' to enhance its biodiversity value and removal of the culverted watercourse will also have a beneficial impact on local biodiversity.

5.16.4 Criterion 4

The design of the proposed facility has evolved to take account of and respond to its surroundings. The evolution of the design, including its orientation and its rationale in respect of its relationship with its surroundings is explained in the Design and Access Statement (PASS Appendix 1). The assessment of visual effects in Chapter 8 of the ES notes that during construction, major significant adverse visual effects would be experienced by some residents of Talbot Gardens. Once the facility is completed and becomes operational, there would be major significant adverse effects on residents of Savage Road and Cardinal Avenue, but once the proposed mitigation in the form of landscaping is in place and becomes established, there only remaining major significant adverse effects would be on residents of Cardinal Avenue.

The overall objective of the landscape design for the proposed development is to provide structure, partial screening and enhancement to the site and to ensure that existing trees and vegetation are retained where possible. The landscape strategy and architectural design proposals for the EfW CHP facility are designed to integrate the proposed development into its landscape setting, whilst at the same time minimising to an acceptable degree the adverse effects on landscape character and views.

ES Chapter 8 concludes that the proposed scheme is in line with Policy CS34 in that it is compatible with its surroundings in terms of style, siting, layout, orientation, visual impact, local context and views, scale, massing, height, density, materials and detailing

5.16.5 Criterion 5

The proposed development has been designed to incorporate designing out crime initiatives as explained in section 9 of the DAS (PASS Appendix 1). The proposals include a comprehensive landscaping strategy for both the site (see DAS), which incorporates two areas for public art and nearby public open space at Pool Park Road/Savage Road.

5.16.6 Criterion 6

Chapter 16 of the Environmental Statement considers the impacts of the proposals on daylight, sunlight and shadowing with respect to residential amenity and public open space. It concludes that the proposed development will not result in any unacceptable impacts in relation to daylighting, annual and winter sunlight availability and overshadowing when assessed against the relevant BRE guide levels. Impacts on visual amenity are considered in Chapter 8 of the Environmental Statement, which concludes that although a limited number of views will be adversely affected, the building design and landscape strategy helps to minimise these effects to an acceptable level.

ES chapters 13 and 14 assess the potential amenity impacts from noise and air quality respectively. Full details of the measures planned to minimise amenity impacts to an acceptable degree are provided in the ES and a full consideration of the acceptability of amenity impacts is provided in the consideration of compatibility with the Waste DPD, Policy W7, criterion 4, below.

5.16.7 Criterion 7

The proposed development would have no negative impact on public safety. Security measures are detailed in the DAS (PASS Appendix 1) and relevant aspects of public safety have been assessed in Chapter 10 (Contamination), Chapter 12 (Traffic and Transport), Chapter 13 (Air Quality), Chapter 14 (Noise and Vibration) and Chapter 18 (Health and Wellbeing) of the Environmental Statement.

5.16.8 Criterion 8

The internal road and pedestrian area layout has been designed to allow the safe movement of vehicles and pedestrians and with regard to relevant health and safety legislation and good industry practice. The facility will provide adequate car parking and disabled access parking spaces, motorcycle spaces. More details are provided in the DAS and in Chapter 12 (Traffic and Transport) of the ES.

5.16.9 Criterion 9

Chapter 11 Hydrology, Hydrogeology and Flood Risk of the Environmental Statement provides an assessment of the potential impacts on surface water and groundwater receptors, together with the flood risk associated with the proposed development. A Level 2 and 3 FRA has been prepared for the development and is reported at Appendix 11 of the Environmental Statement. As the proposed development will result in an increase in the hardstanding area on site compared with existing conditions, surface water runoff from the site will increase and a Surface Water Drainage Strategy has been prepared to ensure that there will be no adverse impacts as a result (Appendix 11 of the Environmental Statement).

5.16.10 Criterion 10

The proposed development ensures appropriate equality of access, as explained in Section 11 of the DAS (PASS Appendix 1).

6 Plymouth Waste Development Plan Document 2006-2021

6.1 Policies W1 - W6

Policies W1 to W4 relate to specific sites allocated for waste management development and are therefore not relevant to this planning application. Policy W5 relates to the extension of the existing Weston Mill Civic Amenity Site and is therefore not relevant to this planning application. Policy W6 relates to the identification of a site for a recycling centre in the Derriford/Seaton Area Action Plan or in the Sustainable Neighbourhoods (Key Site Allocations) DPD and is therefore not relevant to this development.

6.2 Policy W7 - Unallocated Sites

Policy W7 of the Plymouth Waste Development Plan Document (PWDPD) provides for planning permission to be granted for the development of waste management facilities on sites not allocated in the PWDPD, subject to the proposed development satisfying certain criteria. Policy W7 is reproduced below and this section (6.2) of Appendix 7 of the Planning Application Supporting Statement demonstrates that the proposed EfW CHP development is consistent with the criteria of Policy W7.

PWDPD Policy W7

"Proposals for the development of strategic, large scale or local waste management facilities on sites not allocated in this development plan will be permitted, where they meet the following criteria:

1. *They are consistent with relevant waste planning policies and objectives, are compatible with the objective of moving the management of waste up the waste hierarchy, and do not compromise the achievement of recovery targets.*

2. *Priority will be given to the use of previously developed land. However, loss of Greenfield land may be acceptable if it does not result in significant adverse impact on greenscape character or functions, and that the impacts of the development can be adequately mitigated and the development proposal otherwise performs well in relation to the other criteria of this policy.*

3. *They are compatible with their environmental setting and will not result in unacceptable impacts on important environmental, historic or cultural assets.*

4. *They will not result in unacceptable direct or indirect impacts on the residential amenity of existing or proposed communities, or unacceptable impacts on the amenity of other neighbouring users that would be sensitive to waste management development.*

5. *They have good access to the principal road network which should have adequate capacity, or potential to have adequate capacity, to accommodate the transport movements associated with the proposal. Where practicable, they should have access to a choice of transport modes other than road.*

6. *The proposal does not have a significant conflict with other spatial planning objectives set out in the LDF, particularly in relation to urban regeneration,*

economic development, environmental improvement, and significant growth priorities."

6.2.1 W7 Criterion 1: Consistency with Relevant Waste Policy

6.2.1.1 Introduction

Criterion 1 of Policy W7 sets out three requirements for proposed waste management development on unallocated sites. These requirements state that the proposed development should:

- be compatible with the objective of moving the management of waste up the waste hierarchy;
- not compromise the achievement of recovery targets; and
- be consistent with relevant waste planning policies and objectives.

6.2.1.2 Waste Hierarchy

The proposed development will recover energy and heat from residual municipal waste that is currently disposed of by landfill. The proposed development therefore provides a residual waste solution which accords with the objective of moving waste management up the waste hierarchy.

The EfW CHP Facility would sit within the "other recovery" level of the waste hierarchy, which is a lower level in the hierarchy than "recycling". However, the capacity of the EfW CHP facility has been carefully designed to manage residual waste that has not been recycled as part of the recycling strategy of the SWDWP authorities. These recycling strategies aim to meet or exceed government recycling targets. ES Chapter 3 provides a more detailed assessment of the need for residual waste recovery capacity.

In addition, because the proposals include the delivery of combined heat and power to the Devonport Dockyard, they will make an additional contribution to tackling climate change, over and above the carbon emissions benefits of a traditional EfW scheme that would only provide power to the national grid by allowing existing fossil fuel plants in the Dockyard to be placed on "stand-by" and only used when the EfW plant is not operating. Whilst the waste hierarchy, as defined in Waste Strategy 2007, does not distinguish between CHP and none-CHP EfW schemes, the provision of CHP in this scheme, in accordance with government sustainable energy policy in PPS1, the PPS1 Climate Change Supplement and PPS22, is a clear indication that the proposals are very firmly in accordance with the waste hierarchy. PASS Appendix 4 (Energy and Employment Strategy) provides a full description of the CHP benefits of the scheme.

6.2.1.3 Recovery Targets

The proposed development will be complimentary to, rather than in competition with, other waste reduction and recycling initiatives. The facility will be used to manage residual waste which is the material that remains after the recyclable portion of the waste stream has been removed.

The proposed development is to be delivered as part of integrated waste management solutions for the SWDWP, including reduction and recycling strategies and targets that are set out in the municipal waste management strategies of the SWDWP partner authorities. The

EfW CHP will not compromise waste recycling targets and will be the main infrastructure required to meet overall diversion from landfill targets.

As described in Environmental Statement Chapter 3, the amount of capacity required by the SWDWP area to manage residual municipal solid waste has been carefully assessed and reviewed between the submission of the Outline Business Case and the Final Business Case by the Partnership, taking into account a range of factors, including best available forecasts of population and waste growth and assumptions that ambitious recycling targets will be met, through a number of initiatives by the Partnership authorities.

6.2.1.4 Relevant Waste Planning Policy

Relevant waste planning policy is set out primarily in PPS10 and in the development plan.

The development plan comprises RPG10, the Plymouth Core Strategy (PCS) and the Plymouth Waste DPD (PWDPD). RPG10 pre-dates PPS10, the PCS and the PWDPD and consequently the weight to be attached to RPG10 policies must be considered in this context, but the proposals are fully compatible with the waste management policies of RPG10 (as summarised in Appendix 7), particularly in meeting the targets set out in Policy RE5 and the greenhouse gas reduction and renewable energy generation targets in Policy RE6.

The supporting text to Policies W7, W8 and W9 of the PWDPD states that these policies have been prepared to provide the positive planning framework required by Core Strategy Strategic Objective 13, point 5, which states that sustainable waste management will be achieved through the provision of a positive planning framework to enable sustainable waste management development, where environmental impacts are acceptable. The PCS includes two policies on waste management, CS25 and CS26. In this context, the proposals are in accordance with the final sentence of PCS Policy CS25, in that they are located on previously developed land and (as demonstrated in Appendix 7). The proposals are also firmly compatible with Policy CS26 on sustainable waste management, as far as it is relevant to this planning application, in that the proposals are part of an integrated waste management solution, are consistent with development control objectives to minimise potential adverse effects of waste development and are part of a partnership waste management solution with neighbouring authorities.

The PWDPD contains two main policies (W7, W8) that are relevant to the determination of this planning application and the compatibility of the planning application with Policy W7 is the subject of this section. Policy W7 does not require the consideration of the availability or suitability of alternative sites, including those allocated in Waste DPD Policies W1 and W2. However, potential alternative sites and the site allocations in policies (W1 and W2) are addressed in Chapter 5 of the Environmental Statement and they do not have the same capacity to provide a CHP solution with the associated carbon savings.

Relevant national waste planning policy is set out by PPS10 and a consideration of the compatibility of this planning application with the relevant policies of PPS10 is provided in Appendix 7 to this document. In summary, it can be concluded that the application is in accordance with the Key Planning Objectives of PPS10.

In relation to the consideration of planning applications for waste management development on sites not allocated in a development plan, paragraph 24 of PPS10 states:

“Planning applications for sites that have not been identified, or are not located in an area identified, in a development plan document as suitable for new or enhanced waste management facilities should be considered favourably when consistent with:

(i) the policies of this PPS, including the criteria set out in paragraph 21;

(ii) the waste planning authority's core strategy"

The criteria set out in paragraph 21 of PPS10 relate to the physical and environmental constraints on development, potential impacts on the well being of the community, the capacity of transport infrastructure and priority being given to previously developed land. These criteria are broadly covered by Waste DPD Policy W7.

The Environmental Statement submitted in support of this planning application demonstrates that the development is compatible with the physical and environmental constraints on development and it also concludes that there would be no unacceptable potential cumulative effects. The Transport Assessment demonstrates that the existing transport infrastructure has sufficient capacity to support the sustainable movement of waste and Chapter 5 of the Environmental Statement includes a consideration of alternative sites and the potential for transportation of waste and products of the EfW process by other transport modes, concluding that North Yard offers the most deliverable CHP opportunity and that alternative transport modes are not practicable in this case. The proposed development is on previously developed, former industrial land.

6.2.1.5 Criterion 1 Conclusion

The above analysis and supporting evidence demonstrates that the proposals conform with the requirements of criterion 1 of Policy W7.

6.2.2 Criterion 2: Previously Developed Land

6.2.2.1 Introduction

The vast majority of the development area is located on an area of land that was filled for the purpose of creating permanent operational storage area and car-parking for HMNB, under planning permission 00/00997 and is within the curtilage of the developed HMNB Devonport and its defence buildings and qualifies for the definition of 'previously developed land' under PPS3, Annex B. Most recently the Site was used for the processing of demolition rubble, under planning permission 04/01974 dated 30/12/2004. Previous planning permissions for the Site are summarised in section 3.2 of this PASS.

Although the main EfW CHP facility development area is located on previously developed/industrial land, the 'red line' planning application boundary extends around the biodiversity network feature and local Greenscape area that is locally known as 'Blackies Wood'. Compatibility with CS policies 18 and 19 relevant to Greenscape and biodiversity network is established in Appendix 7. This area of woodland is included in the planning application boundary because MVV has leased this land from the MoD and intends to undertake biodiversity improvements the woodland habitat and to provide access to the area including for use as an educational resource to groups visiting the facility.

Also included within the red-line planning application boundary is an area to the south of the proposed main EfW CHP facility, known as Table Top Mountain, which will be used temporarily as a construction compound and will be handed back to the MoD on completion of construction. This area is also previously developed land and the planning history of this area is summarised in Section 4.2.

The site access route from the site to the adopted public highway, and the network of proposed CHP infrastructure improvements, which are routed from the main EfW CHP site into the MoD

Dockyard, are also included in the planning application boundary, and all lie mainly on previously developed or developed land.

The existing steam / hot water system which serves the Dockyard will also be refurbished and upgraded and included in the planning application boundary as will the electricity connections to the existing sub-station.

6.2.2.2 Criterion 2 Conclusion

The proposed EfW CHP facility and associated access road and electricity and steam network infrastructure is situated mainly on previously developed land and is therefore considered to be in accordance with criterion 2 of Policy W7.

6.2.3 Criterion 3: Environmental Setting

6.2.3.1 Introduction

Criterion 3 of Policy W7 states that proposals for waste management development on unallocated sites should be compatible with their environmental setting and should not result in unacceptable impacts on important environmental, historic or cultural assets.

6.2.3.2 Environmental Setting

The environmental setting of the site is described in Chapter 4 of the Environmental Statement. The EIA has taken account of the environmental setting of the site and has considered the likely effects of the proposed development on the application site and the environmental setting of the site.

The Site is located at present within the secure boundary of HMNB Devonport Dockyard, and as such its environmental setting is heavily influenced by the adjacent and nearby dockyard uses. As part of the development a new secure fence will be constructed to separate the development from the Dockyard. The site is situated in the 'North Yard' area of the Dockyard, which will continue to act as an operational naval base while it is anticipated that areas of the South Yard are likely to be released for non-military uses by the MoD. Likely future developments in the North Yard area include the development of a Royal Marine landing craft depot, a rehabilitation facility for injured military personnel and the possibility of a submarine dismantling project being undertaken at the Dockyard.

Although the site is situated within the Dockyard, it is also located within relatively close proximity to residential properties to the west / north west of the site in Barne Barton, particularly those on Savage Road and Talbot Gardens, beyond Blackies Wood biodiversity network feature and local Greenscape area. Other residential areas lie to the east of the site, but are separated from the site by a Greenscape area and railway line, which is routed on a viaduct as it passes the Site. As such, both the residential areas and Blackies Wood contribute to the environmental setting of the site.

The impact of the development on its environmental setting is considered particularly in the ES Chapters on Ecology (ES Chapter 7) and Landscape (ES Chapter 8).

Chapter 7 of the ES concludes that, subject to the implementation of mitigation measures that form part of the proposed development, there are expected to be beneficial effects on biodiversity in respect of the enhancements proposed to Blackies Wood and the replacement of a culverted watercourse crossing with a new clear span bridge.

Chapter 8 of the ES describes the likely effects on landscape character and visual amenity of the proposed development. The ES Chapter's conclusions in respect of visual amenity are addressed below, under criterion 4. In terms of landscape character, ES Chapter 8 concludes that the combination of built form, new landscape and management of existing landscape features will ensure that the scheme positively contributes to the townscape and landscape of the local environment.

Based on the findings of the ES, it is considered that the proposed development is not unacceptable in its environmental setting.

6.2.3.3 Important Historic and Cultural Assets

ES Chapter 9 presents an assessment of the potential effects of the proposed development on heritage assets. The ES Chapter concludes that (with appropriate mitigation) the proposed development would only have a number of effects of minor and moderate adverse significance on a limited number of historic features. Given the benefits of the proposed development, it is considered that these adverse effects would not be unacceptable.

6.2.3.4 Important Environmental Assets

The ES includes an assessment of the environmental effects on a range of environmental assets, including national planning policy designations. The necessary topic-coverage of the ES has been agreed with the waste planning authority through an EIA scoping process, culminating in a formal 'scoping opinion' issued by the authority, which is reproduced at Appendix 2.3 to the ES. The ES includes assessments of the effects of the proposed development on the environmental asset topics listed below.

- Ecology
- Landscape
- Cultural Heritage
- Land and Water Quality
- Hydrology, Hydrogeology and Flood Risk

The conclusions of the ES are summarised in Section 8 of the PASS and the ES itself is accompanied by a Non-Technical Summary and Chapter 20 of the ES is a summary of the EIA findings. None of the assessments of environmental effects in the above topic areas conclude that the development would give rise to any permanent significant adverse effects, consequently the proposals accord with the Criterion 3 requirement that there should be no unacceptable impacts on important environmental assets.

6.2.3.5 Criterion 3 Conclusion

The likely effects of the proposed EfW CHP facility on its environmental setting and on important historic, cultural and environmental assets have been comprehensively assessed as part of the EIA process and reported in the ES. The ES concludes that there would be no unacceptable impacts on these assets. The proposed development is therefore in accordance with criterion 3 of Policy W7.

6.2.4 Criterion 4: Amenity

6.2.4.1 Introduction

Criterion 4 of Policy W7 states that proposals for waste management development on unallocated sites should:

> *"…not result in unacceptable direct or indirect impacts on the residential amenity of existing or proposed communities, or unacceptable impacts on the amenity of other neighbouring users that would be sensitive to waste management development."*

The Environmental Statement includes the findings of an assessment of the impact of the proposed development on residential amenity and the amenity of other neighbouring users that are potentially sensitive to waste management development. The scope of the assessment of effects on amenity was informed by a formal EIA scoping process and by a scoping opinion issued by Plymouth City Council, which can be found at Appendix 2.3 to the ES. The ES includes assessments of the effects of the proposed development on the amenity topics listed below.

- Views (Visual Impact)
- Air Quality
- Noise and Vibration
- Daylight, Sunlight and Overshadowing
- Inter-relationship and Cumulative Effects
- Summary of Environmental Effects, Mitigation and Monitoring

6.2.4.2 Receptors

The ES identifies the principal receptors of the scheme and these vary for different types of potential effects and are identified in individual ES chapters, but broadly speaking, these are human beings the areas they occupy, such as residential and workplace buildings close to the proposed facility.

6.2.4.3 Potential Impacts

The conclusions of the ES are summarised in Section 9 of the PASS and the ES itself is accompanied by a Non-Technical Summary.

The EfW CHP facility includes a number of measures designed to minimise emissions of dust and odour to air, including the tipping and handling of waste and loading of process residues taking place entirely within the building, the maintenance of negative air pressure within the building to avoid release of odour and an exhaust gas cleaning system designed to meet modern standards and avoid the release of dust. The assessment of amenity effects relating to dust and odour demonstrate that there would be no significant adverse effects. The Environmental Permitting regime provides the mechanism by which the controls will be put in place and enforced, to ensure that the proposed EfW CHP facility is operated in a manner that would not result in significant effects on local air quality.

The siting and design of the facility was carefully considered to ensure that potential effects relating to the reduction of daylight and sunlight and overshadowing, were minimised. The

assessment of these potential effects in the ES demonstrates that this process was successful and that there are unlikely to be any significant adverse effects.

The facility has been carefully designed to avoid adverse impacts from noise generated by the process. The route taken by HGVs delivering and exporting materials to and from the building has been located on the side of the building furthest away from the closest residential area and all waste and materials handling processes will take place within the building. The noisiest components of the facility are enclosed in double-skinned cladding and in places by concrete walls. Generally, the noisier peripheral plant items have been located on the east side of the building, away from the closest residential area. The assessment of adverse impacts from noise demonstrates that, for short durations, when construction activity is closest to nearby properties, it is possible that noise limit values will be exceeded leading to some significant adverse effects. However, these adverse effects can be minimised by the application of noise barriers and where this is practical, these effects will be reduced to low or negligible significance. Therefore, the overall significance of construction noise effects is assessed as being very low.

At an early stage in the EfW CHP facility design evolution process, it was established, in consultation with the South West Regional Design Panel and with Plymouth City Council, that an EfW CHP building of the scale proposed could not be hidden in the location proposed and that an appropriate design response was required, to address the scale and particular location of the proposed building.

MVV, advised by its architect and landscape architect, embarked on a design evolution process, with the objective of delivering a design that responded to its surroundings and that was of a quality and elegance which would encourage public acceptance and pride in a building that embodies a sustainable future for the local community, Devonport Dockyard and the thousands of local jobs that the Dockyard supports. The proposed design solution includes an acknowledgement of the impact of a building of this scale on certain local view points, through a high quality, distinctive and elegant design, which connects the neighbourhood to the history of the Dockyard. A full description of the design evolution process is provided in the DAS, submitted in support of this planning application.

The assessment of adverse impacts on views from a range of locations, including residential properties, public areas and businesses, demonstrates that there are likely to be a small number of major adverse impacts on views from certain residential properties in the Barne Barton and Weston Mill Area. Chapter 8 of the ES quantifies these impacts, noting that major significant adverse effects are limited to one receptor during construction (Talbot Gardens), two receptors at year one of operation (Savage Road and Cardinal Avenue) and one receptor at year 15 of operation (Cardinal Avenue).

The quality of views that are adversely affected, which are currently dominated by a disused and mixed-character industrial foreground and a monochromatic industrial backdrop of large scale buildings, has been taken into account in the EIA methodology.

Chapter 8 of the ES concludes that, the soft landscaping and Greenspace enhancement proposals, together with the elegant and distinctive design of the building, ensure that the scheme makes a positive contribution to local townscape, landscape and biodiversity, sufficient to mitigate the adverse visual impacts classified by the EIA methodology as significant. Overall, despite its visual prominence from some locations, the ES concludes that the proposed scheme is in line with Core Strategy Policy CS34, in that it is compatible with its surroundings in terms of style, siting, layout, orientation, visual impact, local context and views, scale, massing, height, density, materials and detailing.

6.2.4.4 National Planning Policy

Planning decisions where a balancing judgement between the wider benefits of a development proposal against potential adverse local impacts must take account of national planning policy, as summarise in Chapter 5 of this Planning Application Supporting Statement. In particular:

- PPS1 – wider sub-regional, regional or national benefits should be considered alongside adverse local impacts.
- PPS1 – different weigh can be given to social, environmental, resource or economic considerations.
- PPS1 Climate Change Supplement – new development should be planned to make good use of opportunities for decentralised and renewable or low carbon energy.
- PPS1 Climate Change Supplement – other than in the most exceptional circumstances, any local approach to protecting landscape or townscape does not preclude the supply of renewable energy.
- PPS4 - Planning applications that secure sustainable economic growth should be treated favourably.
- PPS10 - Recognition of the wider sustainable development benefits of waste management development should be given great weight in planning decisions
- PPS22 - The wider environmental and economic benefits of all proposals for renewable energy projects, are material considerations that should be given significant weight in determining planning applications
- The Localism Bill and the 23/03/11 Ministerial Statement – "the answer to development and growth should wherever possible by 'yes', except where this would compromise the key sustainable development principles set out in national planning policy."
- The Localism Bill and the 23/03/11 Ministerial Statement – planning decisions should give appropriate weight to the need to support economic recovery, that applications that secure sustainable growth are treated favourably
- The Localism Bill and the 23/03/11 Ministerial Statement – Economic benefits should be an important consideration. Decisions should place particular weight on the potential economic benefits offered by an application.

6.2.4.5 Criterion 4 Conclusion

The ES has assessed the proposed development to determine its potential impact on residential amenity on all relevant sensitive receptors.

The ES concludes that the proposed development would have no significant adverse effects on residential amenity in terms of air quality or daylight, sunlight or overshadowing. It is therefore concluded that the proposed development would have no unacceptable amenity impact in regard to these factors.

Chapter 14 of the ES considers noise and vibration effects. The assessment finds that, whilst construction noise could cause some short-term significant adverse effects, where it is practical to implement, mitigation in the form of noise barriers close to the construction activity will reduce noise effects to low or negligible significance.

Chapter 8 of the proposed development, covering landscape and visual impact, concludes that the proposed development would have some long term beneficial effects on local landscape

character and some major significant adverse effects on visual amenity for up to three residential visual receptors at Talbot Gardens, Savage Road and Cardinal Avenue. The landscape and visual impact assessment concludes that the combination of built form, new landscape strategy and management of existing landscape features are appropriate and sufficient to overcome the adverse visual effects classified by the EIA methodology as significant. The perception of significance of these adverse effects on views are also likely to be softened by a general public appreciation of the quality of the landmark building design and the important role played by the building in securing a sustainable future for the community.

The determination of whether these limited and quantified adverse affects on amenity are acceptable or not, must, in accordance with national planning policy, (see paragraph 11.6.13) be part of a balanced judgement, taking account of the need for residual waste management capacity and the wider sustainable development and other benefits of the scheme and the potential adverse effects.

In the case of this development proposal, its has been demonstrated through a comprehensive EIA process, that the likely significant adverse impacts on the amenity of residents and other neighbouring users is limited to effects on views from up to three residential visual receptors and possible short term construction noise. The ES reports that all other potential amenity impacts (such as those from dust, odour, vibration, operational noise and daylight and sunlight effects) will be mitigated by appropriate engineering design and good waste management practice measures.

The benefits of the scheme are dramatic and wide-ranging and evidence of these benefits is presented in many of the documents submitted in support of the planning application, including:

- Planning Application Supporting Statement
- Design and Access Statement
- Sustainability Statement
- Energy and Employment Strategy
- Environmental Statement Chapter 3 - Need
- Environmental Statement Chapter 17 – Socio-Economics

The main benefits of the scheme are listed below.

- Meeting the need for sustainable waste management for a sub-regional area, including the benefits of reduced greenhouse gas emissions to help tackle climate change and avoidance of pollution associated with landfill.
- Generation of renewable energy and steam for heating, resulting in 90% reduction in CO2 emissions from the current Dockyard heating system.
- Helping to tackle climate change by off-setting 35,000 tonnes per annum of CO2 equivalent.
- Jobs – the creation of direct jobs in construction and operation and indirect jobs in the wider economy.
- Jobs and Economy - Approximately £1.9M per annum energy bill savings to Devonport Dockyard and an important contribution to the creation of a sustainable business at HNNB

Devonport and the Dockyard, to saving jobs and creating new employment opportunities and as a vital part of the Dockyard regeneration.

- A wide range of community benefits, including the provision of important new community facilities for education and access to improved recreation facilities.
- Enhancements to the biodiversity of the Blackie's Wood area, which will become a major educational resource.

The balancing judgement on the acceptability of the limited adverse effects from short-term construction noise and on visual amenity should be made in the context of these extensive wider local, sub-regional and regional-scale benefits, and in the context of the applicant having demonstrated (in Chapter 5 of the ES) that there are no other locations where there would be less overall adverse impacts than at North Yard, and that could offer the same CHP benefits.

The applicant has made significant efforts to ensure that the proposed design, siting and orientation of the EfW CHP building within the site minimises the number of adverse visual impacts. The scheme involves comprehensive noise mitigation measures designed into the operational facility and noise barriers to mitigate construction noise. The scheme also involves soft landscaping and Greenspace enhancement proposals, together with the striking and iconic landmark building design, which make a positive contribution to local townscape, landscape and biodiversity. Indeed, the design, with its connections to the history of Devonport, it is intended to engender a sense of pride and acceptability locally and widely within Plymouth, similar to other iconic architecture elsewhere in the UK.

PASS appendices 3 and 7 demonstrate that proposed Devonport EfW CHP facility is consistent with government sustainable development policy at all levels. Equally, the scale of the sustainability benefits of the proposals can only be realised at the North Yard location, due to the potential to deliver a CHP system by connecting into an existing CHP network in North Yard. The delivery of sustainable development is an overarching objective of national planning policy and overwhelming weight must be attached to the compatibility of the EfW CHP facility with sustainable development policy, (on the economy, communities and the environment) to the extent that this must outweigh what the ES finds likely to be a relatively limited impact on amenity.

It can therefore be concluded that, both in respect of individual amenity topics and on balance relative to the scale of the local, sub-regional and regional sustainable development benefits that the scheme will deliver, the impact of the proposed EfW CHP facility on amenity will not be unacceptable, and that this planning application is compatible with criterion 4 of Policy W7.

6.2.5 Criterion 5: Transport

6.2.5.1 Introduction

Criterion 5 of Policy W7 states that proposals for waste management development on unallocated sites should:

> *"…have good access to the principal road network which should have adequate capacity, or potential to have adequate capacity, to accommodate the transport movements associated with the proposal."*

A traffic and transport assessment (TA) has been undertaken and is included as an Appendix to Chapter 12 of the ES. Chapter 12 considers the environmental effects of traffic generated by the proposals.

6.2.5.2 Access to Principal Road Network

The Site has excellent access to the principal road network, being located adjacent to the Camel's Head entrance to the Dockyard at the western end of the A3064, Weston Mill Drive, which is a Principal Road. Further, the A3064 leads directly to the trunk road network, joining the A38, which is a regionally significant transport route. It is therefore considered that the proposed development will comply with the locational requirements of Criterion 5 of Policy W7 in terms of proximity to the principle road network.

6.2.5.3 Road Network Capacity

The TA (ES Appendix 12.1) considers the impact of the scheme on three public highway network junctions and concludes that the optimum capacity of each of these junctions is not exceeded due to traffic generated by the scheme. The optimum capacity of one junction (Weston Mill Drive/Carlton Terrace) is predicted to be slightly exceeded in the first year of operation, but this would be the case with or without the development. The TA also considers the capacity and safety of the junction of the proposed new junction within Camel's Head Gate to serve the new access road to the EfW CHP facility site. Again, the TA concludes that the capacity and safety of this junction is adequate.

6.2.5.4 Criterion 5 Conclusion

The proposed development Site benefits from direct access to the principal road network and good onward access the trunk road network. A full TA, including capacity assessments of significant junctions, has been submitted as ES Appendix 12.1. The TA concludes that all relevant junctions have sufficient capacity to accommodate the vehicle demands.

The proposed development will therefore not have any unacceptable impact on the road network and the proposed development accords with criterion 5 of Policy W7.

6.2.6 Criterion 6: Spatial Planning Objectives

6.2.6.1 Introduction

Criterion 6 requires that:

"The proposal does not have a significant conflict with other spatial planning objectives set out in the LDF, particularly in relation to urban regeneration, economic development, environmental improvement, and significant growth priorities."

6.2.6.2 Local Development Framework – Spatial Planning Objectives

The main Local Development Framework document is the core strategy 2006-2021 (CS), which was adopted in 2007. The CS contains 13 Strategic Objectives, which are synonymous with spatial planning objectives. The main focus of this assessment of the compatibility of the proposal with spatial planning objectives is therefore the relevant CS Strategic Objectives.

Other elements of the Local Development Framework that contain spatial planning objectives relevant to this planning application include the design SPD and the Sustainable Neighbourhoods DPD.

It should be noted that because the Site is not allocated in the Plymouth Development Framework, it therefore does not directly conflict with land use policy based on allocations for specific use types.

Strategic Objective 1 includes that the delivery of the vision of Plymouth as a strategic city within the South West region will be set firmly in the context of delivering 'Urban Renaissance' and Sustainable Communities, including working towards carbon neutrality through the reduction of consumption, the provision of renewable energy and reducing the need to travel. The proposed development is in accordance with this vision as it will provide a sustainable solution to the management of Plymouth and South West Devon's residual municipal waste and a proportion of the commercial and industrial waste arising in the same area (see ES Chapter 3) and will contribute significantly to the reduction of greenhouse gas emissions by reducing the amount of waste sent to landfill and generating low carbon electricity and heat, which will replace electricity and heat generated from fossil fuels, as described in the Energy and Employment Statement.

The EfW CHP facility also offers the potential to supply CHP to new, energy intensive businesses that could be located in the Dockyard, thus supporting the delivery of the objective for Plymouth to fulfil its potential as the economic hub of the far South-West and to support longer term growth.

Strategic Objective 2 is concerned with the delivery of the city vision, including quality employment provision and supporting regeneration and diversification. The proposals are squarely behind delivering this vision, both in terms of the jobs created directly in the construction and operation of the facility, and in terms of the indirect jobs in supply industries.

CHP will play an important role in securing a sustainable business future for HMNB Devonport and the Dockyard. Additionally, the MoD has undertaken review of its Devonport operations under Programme Roundel and Vision 25. Land has been released into the private sector to allow regeneration and additional opportunities for local employment. The release of South Yard areas for housing redevelopment by Redrow and yacht manufacture by Princess Yachts are recent examples. Under Vision 25, the Naval Base will be selectively redeveloped to improve operations and the efficient use of space. An initial study has identified areas for disposal and opportunities for improving the efficient use of space as part of a Master Plan.

During the pre-application public consultation exercise undertaken by MVV (see PASS Appendix 2), a number of local people expressed concern about the future of the Naval Base and Dockyard. The proposed EfW CHP facility is a vital part of the Dockyard regeneration and the existence of a CHP network will contribute to the retention of existing employment in the Dockyard and provide the opportunity to market the site to potential new employers. The sustainable source of energy at predictable long term cost will be a strong incentive for investment in new jobs, and a strong catalyst for the retention of HMNB Devonport as the largest base for the Royal Navy and the regeneration of the Dockyard. More detailed evidence on the energy, economic and employment benefits of the EfW CHP facility is provided in ES Chapter 17 and the Energy, Economy, Employment and Education Statement.

Strategic Objective 3 is about delivering sustainable linked communities. Whilst the EfW CHP scheme is not directly related to the development of communities, some of the proposed community benefits, such as recreation areas and access to community and education facilities within the building, will help to meet the objective of providing a thriving mixed use centre to each community, providing well designed green spaces and providing education, leisure and recreation opportunities. This PASS summarises the community benefits offered, including the Section 106 heads of terms, which include a commitment to work with the Council to develop further CHP and district heating opportunities in the City and to share expertise.

Strategic objective 4 relates to the quality of new development. The proposed EfW CHP technology is a high quality, high efficiency solution to the management of residual waste in the SWDWP area. The iconic and elegant design contributes to the achievement of sub-objective

3, 5 and 7. As described in the DAS, the design of the EFW CHP is a distinct enhancement to the Dockyard vernacular and raises the standard of design for future development. Equally the design evolution has been driven by (and the final design responsive to) a careful analysis of the physical, social and economic context of the site.

Strategic Objective 5 relates to the preparation of Area Action Plans for areas of the City that are described as having the greatest development pressure or opportunity or sensitivity to change. There is no Area Action Plan for the North Yard part of Devonport Dockyard and Strategic Objective 5 is not directly relevant to this planning application.

Strategic Objective 6 concerns the delivery of the economic strategy. Five of the six sub-objectives of Strategic Objective 6 are relevant to the proposed EFW CHP facility and these are addressed in turn, below.

Strategic Objective 6 (1) covers the protection and enhancement of the City's unique assets. As described under the consideration of compatibility with Criterion 3, the Environmental Statement accompanying this planning application contains a full assessment of the potential for adverse effects on environmental assets, concluding that adverse effects on environment or heritage assets would be acceptable and the development will contribute significantly to the retention of the Dockyard as an active and vibrant unique characteristic of Plymouth.

Strategic Objective 6 (2) relates to delivering a range, mix and quality of employment land/premises to provide for inward investment opportunities and Strategic Objective 6 (3) covers opportunities for employment in each neighbourhood. The proposals will not only create employment opportunities in construction and operation roles, (which match the skill sets existing in Plymouth), and indirect jobs in supply industries, but will also generate enhanced potential for investment in business attracted by the potential of CHP and the economic advantages that reduced energy bills can offer. The facility will also play an important role in securing the future of HMNB Devonport and the Dockyard as a sustainable business. Evidence of the economic and employment benefits of the proposals is provided in the EEEEBS (PASS Appendix 4) and ES Chapter 17.

Strategic Objective 6 (4) deals with developing Plymouth's skills base / supporting investment in learning infrastructure / promoting local labour on major construction projects. MVV and its contractors will actively encourage the use of local labour and local labour agreements both for the construction and operation of the facility. MVV has also entered into discussions with City College, Plymouth and the University of Plymouth with regard to sponsoring training and apprenticeships. The Section 106 Agreement heads of terms (see PASS Section 2) and the Energy and Employment Strategy (PASS Appendix 4) include details of the mechanisms proposed.

Additionally, the EfW CHP facility will include and administration block, which will incorporate facilities available for use by the community. The facilities will include rooms for meetings and lessons and a viewing balcony, from which it will be possible to view the facility site and the wider North Yard part of HMNB Devonport and the Dockyard. It is proposed that a main purpose of these facilities will be to act as an education resource, ideally with an active link to local schools and colleges, where students can visit to learn about sustainable waste management and energy and about the history and future of the Dockyard. Further, access to Blackies Wood and Weston Mill Creek will be available, which will provide opportunities for recreation and education on biodiversity topics. Community benefits offered are summarised in this PASS, including the S.106 heads of terms.

Strategic Objective 6 (6) involves seeking consistency with the Plymouth Local Economic Strategy. The above assessment of consistency with Strategic Objective 6 demonstrates that

the proposals are fully consistent with the relevant parts of the six broad aspirations of the Plymouth Local Economic Development Strategy 2006-2021 & Beyond. MVV has committed to working with the City Council to share its expertise in developing District Heating systems for the benefit of the wider community. More information on the implications of the EfW CHP facility for the Local Economic Strategy can be found in ES Chapter 17.

Strategic Objective 7 is concerned with the delivery of adequate shopping provision and includes a sub-objective of the promotion of a new food-store as part of a new district centre in the Weston Mill area. The EIA process has taken account of this strategic objective and of the Weston Mill mixed use centre Policy CS07. The Weston Mill neighbourhood is situated to the East of the application site boundary and the EIA process has taken account of the potential for environmental impacts in the area of the proposed district centre development, including the potential effects of changes to traffic flows in the area in the Transport Assessment (ES Appendix 12.1). Chapter 19 of the ES considers environmental effects of the proposed EfW CHP facility in combination with potential effects of other future developments, including the Weston Mill district centre. The ES does not report any significant adverse environmental effects, either generated by the EfW CHP facility itself, or that could be generated in combination with the development of a new district centre, that would prejudice the delivery of Strategic Objective 7.

The proposed EfW CHP facility has no positive or negative implications for the delivery of Strategic Objective 8.

Strategic Objective 9 relates to the delivery of educational improvements. Sub-objectives 3 and 4 of Strategic Objective 9 relate to new educational provision and supporting the enhancement of higher education. The proposals for a community and educational facility within the EfW CHP site, as described in this PASS and in the DAS and for provision of support for higher education training and apprenticeships (proposed as a S.106 commitment), are advantageous to the delivery of these objectives.

The proposed EfW CHP facility has no positive or negative implications for the delivery of Strategic Objective 10.

Strategic Objective 11, Delivering a Sustainable Environment, includes nine sub-objectives relating to the goal of maintaining a clean and sustainable environment.

The EfW CHP facility proposals include an extensive area of woodland which will be accessible and be managed primarily for biodiversity and an area of green space which will be developed and made available for recreational use, which will contribute to the achievement of sub-objectives 1, 2, 3 and 6. The EfW CHP facility generates renewable energy and steam for heating purposes at the Dockyard, replacing existing fossil-fuel-based generators, thereby making a major contribution to the delivery of strategic objectives 4 and 5.

The EfW CHP facility will contribute to delivering sub-objective Objective 7 by employing stringent pollution controls to the standards required by the Environment Agency, thus minimising pollution associated with the management of waste, and significantly reducing pollution levels compared to the current practice of landfilling and the burning of fossil fuel specifically to generate steam and electricity for the Dockyard.

Chapter 11 and Appendix 11.1 of the ES demonstrate that the proposals do not adversely affect the management of flood risk and therefore do not conflict with sub-objective 8. The applicant has engaged extensively with government, other organisations and the local community, as reported in the Statement of Community Involvement submitted with this planning application (PASS Appendix 2). This process has not revealed any evidence that the

proposals conflict with the delivery of sustainable and integrated coastal planning, as required by sub-objective 9.

The proposed EfW CHP facility has no positive or negative implications for the delivery of Strategic Objective 12.

Core Strategy Strategic Objective 13 defines the objectives for the delivery of sustainable waste management in Plymouth, stating that a spatial planning framework in the LDF should be established that supports the Regional and Council's Municipal Waste Management Strategy (MWMS), helping to enable people and businesses produce less waste and provide long term sustainable waste management.

ES Chapter 15 and the BREEAM assessment submitted with the planning application demonstrate that the proposals are consistent with the waste minimisation objectives of sub-objective 1. Sub-objective 2 relates to re-use, recycling and composting and whilst the EfW CHP facility does not feature these waste management options, it's capacity has been carefully designed to manage the residual waste, left over once ambitious targets for re-use, recycling and composting have been met in the future by the SWDWP authorities, i.e. it does not prejudice the delivery of sub-objective 2, by treating waste that would otherwise by recycled or composted.

The EfW is firmly in line with sub-objectives 3, 4 and 5, by delivering residual waste management capacity for municipal and commercial and industrial waste arising in Plymouth and adjoining areas and by doing so in a way that maximises the sustainability potential of waste management by the inclusion of CHP and by avoiding unacceptable impacts on the local and global environmental quality, as evidenced by the ES submitted with this planning application, the conclusions of which are summarised in the assessment against Policy W7 criteria 3 and 4 above.

Strategic Objective 14 relates to the delivery of sustainable transport and sub-objectives 5, 6 and 7 are relevant to the EfW CHP proposals. The use of alternatives to road transport have been considered and rejected for a range of practicability reasons, as reported in ES Chapter 5. Road safety, congestion and the potential adverse impacts of traffic serving the facility have been considered in the Transport Assessment and in several of the ES chapters, including those on noise and air quality. The assessments demonstrate that, when the proposed new access junction arrangements and controls over the timing of certain HGV trips, together with a financial contribution to future junction improvements, these strategic objectives are not compromised.

Strategic Objective 15 concerns the delivery of community well-being. Issues of health and wellbeing are specifically assessed in Chapter 18 of the ES (which is summarised at Appendix 5 to this PASS). Chapter 18 and Appendix 5 conclude that incorporated mitigation measures, taken together with other developments in the local area, can be reasonably considered to be capable of minimising the potential for adverse effects on the core protective factors for mental well-being. Overall the proposed scheme is highly unlikely to interfere with the successful implementation of any of the measures in Plymouth's Health, Social Care & Well-being Strategy that are intended to address priority health and well-being inequalities within Plymouth and therefore the effect of the scheme (with incorporated mitigation) on health and well-being is considered to be negligible. Therefore the effect of the scheme (with incorporated mitigation) on health and well-being is considered to be negligible and any fears of potential health and well-being effects are unlikely to be objectively justified. These conclusions demonstrate that the EfW CHP facility would not conflict with Strategic Objective 15, and many of the positive community benefits proposed as part of the development, and those offered under the S.106 heads of terms, would make a positive contribution to the delivery of certain of the sub-

objectives, such as the proposed enhancement of green space to provide a recreation resource, providing a community meeting place and addressing and minimising potential health impacts.

The spatial planning objectives contained within the Plymouth Waste Development Plan Document (adopted 2008) are reproduced from Core Strategy Strategic Objective 13, which are addressed in Appendix 7 to the PASS.

The design supplementary planning document, "sustainable design in Plymouth" (adopted 2009) (the Design SPD), was prepared as part of actions by Plymouth City Council to deliver the Core Strategy Strategic Objective 2, which is addressed above. A more detailed response to the Design SPD is provided in the DAS (PASS Appendix 1) submitted with this planning application.

The emerging Sustainable Neighbourhoods DPD1 (including key site allocations) is being prepared by Plymouth City Council to identify major sites that might be required to meet Plymouth's future needs, as outlined by the Core Strategy, as well as making suggestions to guide development that will address the needs of local communities and to identify areas that should be protected from development.

The DPD is at the issues and preferred options stage, but already identifies some key issues within the neighbourhoods closest to the proposed development site that should be addressed in all development.

In February and March 2011 Plymouth City Council undertook public consultation on a number of proposals for the City's neighbourhoods. The EfW CHP site is located within the neighbourhood of Barne Barton, but is also close to the neighbourhoods of Keyham and Kings Tamerton & Weston Mill.

A Draft 'Sustainable Neighbourhood Plan' has been prepared for the neighbourhood of Barne Barton. Key issues that arise in relation to the sustainability of the local neighbourhood in which the MVV EfW CHP development will sit include:

- Poor condition of open space and public areas. Access to much of the public open space is controlled by the MoD and not made available to residents. Opportunities should be taken to improve public access to the waterfront and open spaces;
- Lack of local employment opportunities, with one of the lowest job-to-resident ratios in Plymouth;
- Long journeys to work, with fewer residents able to walk or cycle to work;
- Poor health and high social deprivation, including concerns about crime;
- Inadequate provision of community facilities and local shopping services.

Similar issues exist in Keyham and Kings Tamerton & Weston Mill. In Keyham, there are good local employment opportunities, but these are dominated by the Dockyard, making employment prospects vulnerable to change. Kings Tamerton & Weston Mill has the lowest job to residents ratio in Plymouth and public green space is inadequate.

The MVV development proposals recognise the poor condition of open space and public areas in the neighbourhood and seek to address this by providing a new informal sports pitch/play area and improving the ecological condition of and access to the adjacent woodland and Local Greenspace Area (Blackies Wood). Access to Blackies wood will be available to school parties

[1] Plymouth City Council, Sustainable Neighbourhoods Development Plan Document, Draft for Consultation, January 2011

etc, and will form an important educational resource of a type in short supply in the area. The development will create employment and training opportunities for local residents, through the construction, operation and maintenance contracts of the site and facilities and apprenticeships in conjunction with local colleges.

For those residents who gain employment at the site, the length of journeys to work will be short. Residents will be able to take advantage of opportunities to walk or cycle to the site, as secure cycle storage will be provided. The provision of an informal sports pitch/play area on land just north of Blackies Wood and the site will contribute to tackling poor health of the local community. The visitor centre will provide a local community facility for educational purposes, as well as a local meeting space.

Evidence of compatibility with the emerging sustainable neighbourhoods DPD can be found in: PASS, EEEEBS, and ES Chapter 17.

6.2.6.3 Criterion 6 Conclusion

The proposed development is in accordance with the strategic objectives of Plymouth's LDF and will make a positive contribution to the delivery of many of the objective and help to directly deliver the waste management objectives. It is therefore considered that the development proposals accord with criterion 6 of Policy W7.

6.2.6.4 Policy W7 Conclusion

The evaluation presented above demonstrates that the proposed development is in accordance with criteria 1-6 of policy W7 and is therefore in accordance with Policy W7 as a whole.

6.3 Policy W8

Plymouth Waste Core Strategy Policy W8 applies to all applications for planning permission for waste management development. Policy W8 has 12 sub-criteria, several of which overlap or duplicate the criteria of Policy W7. Section 6.3 of PASS Appendix 7 includes a detailed consideration of the compatibility of the EfW CHP Facility proposals with Policy W8. This assessment is summarised below.

6.3.1 Criterion 1: Impacts on Environmental, Social or Economic Assets.

The environmental impacts of the proposed development have been assessed by the Environmental Statement and are considered in relation to criterion 3 of Policy W7, above. The social and economic impacts of the development are also considered in Chapter 17 Socio-economics of the Environmental Statement, which draws on evidence in the EEEEBS. Chapter 17 concludes that the proposed development would have an overall beneficial impact on Plymouth and the South West's economies.

6.3.2 Criterion 2: Adverse Amenity Impact Mitigation

The adverse amenity impacts of the proposed development have been assessed by the Environmental Statement and are considered in relation to criterion 4 of Policy W7, above.

6.3.3 Criterion 3: Adverse Health Impact Mitigation

The proposed development will operate within stringent emissions limits set out by the Waste Incineration Directive. The plant will also be regulated by the Environment Agency and will require an Environmental Permit to operate.

Chapter 18 and Appendix 5 conclude that incorporated mitigation measures, taken together with other developments in the local area, can be reasonably considered to be capable of minimising the potential for adverse effects on the core protective factors for mental well-being. Overall the proposed scheme is highly unlikely to interfere with the successful implementation of any of the measures in Plymouth's Health, Social Care & Well-being Strategy that are intended to address priority health and well-being inequalities within Plymouth and therefore the effect of the scheme (with incorporated mitigation) on health and well-being is considered to be negligible. Therefore the effect of the scheme (with incorporated mitigation) on health and well-being is considered to be negligible and any fears of potential health and well-being effects are unlikely to be objectively justified.

6.3.4 Criterion 4: Pest/Vermin Mitigation

The proposed development will be a modern, state-of-the-art waste management facility. All waste loading, unloading, processing and storage will take place within the building. Waste stored in the waste bunker will be continually mixed by the mechanical grab so as to ensure a consistent make-up of waste material is fed into the process, making the facility less attractive to vermin and pests. The plant will also be regulated by the Environment Agency and will require an Environmental Permit to operate, which will good operational practices to control pests and vermin.

6.3.5 Criterion 5: Standard of Design

The DAS (PASS Appendix 1) describes the design and landscape strategy. Chapter 8 of the ES considers landscape and visual impacts, and concludes that the facility will result in some positive effects on local landscape character and that here are likely to be some significant adverse effects on a small number residential viewpoints, but that the design of the facility and the landscape strategy appropriate and sufficient to mitigate the adverse visual impacts classified by the EIA methodology as significant.

6.3.6 Criterion 6: Transport

The impacts of the proposed development have been assessed by the Environmental Statement (Chapter 12) and by a Transport Assessment and are considered in relation to criterion 5 of Policy W7, above.

6.3.7 Criterion 7: Vehicle Movement within Site

Section 6.4 of the Environmental Statement describes access, circulation, parking and security. The internal road and pedestrian area layout has been designed to allow the safe movement of vehicles and pedestrians and with regard to relevant health and safety legislation and good industry practice. Detailed calculations have been made of the vehicle movements expected to arrive at and depart from the EfW CHP facility. These calculations can be found in Chapter 12: Transport Assessment of the Environmental Statement. The DAS also includes a description of the incorporated measures for safe access and circulation within the site.

6.3.8 Criterion 8: Adverse 'Other' Impact Mitigation

The site is outside the MoD's dockyard explosive safeguarding zone and so no additional measures are required for building design. A Warships in Harbour Risk Assessment, Nuclear Safety Case Risk Assessment and Helicopter Flight Path Risk Assessment have all been carried out by the MoD (see Appendix 6.1 to the Environmental Statement) and no restrictions on the proposed EfW CHP facility have been identified.

6.3.9 Criterion 9: Spatial Planning Objectives

The impact of the proposed development on spatial planning objectives is considered under criterion 6 of Waste DPD Policy W7 above, which concludes that the proposals are in accordance with and help to deliver many of, the relevant objectives.

6.3.10 Criterion 10: Sustainable Waste Management

The impact of the proposed development on sustainable waste management and relevant waste planning policy is considered under criterion 1 of Waste DPD Policy W7 above, which concludes that the proposed development is in accordance with the policy.

6.3.11 Criterion 11: Sustainable Design

A BREEAM Pre-Assessment has been prepared and is included part of the CCSS (Appendix 3 to the PASS). The Pre-Assessment demonstrates that the development achieves an 'Excellent' design rating.

6.3.12 Criterion 12: Climate Change and Sustainability Statement

A Climate Change and Sustainability Statement is submitted as Appendix 3 to the PASS. The statement has been prepared in accordance with the Design DPD and concludes that the development proposals are in accordance with sustainable development policy at the national, regional and local level.