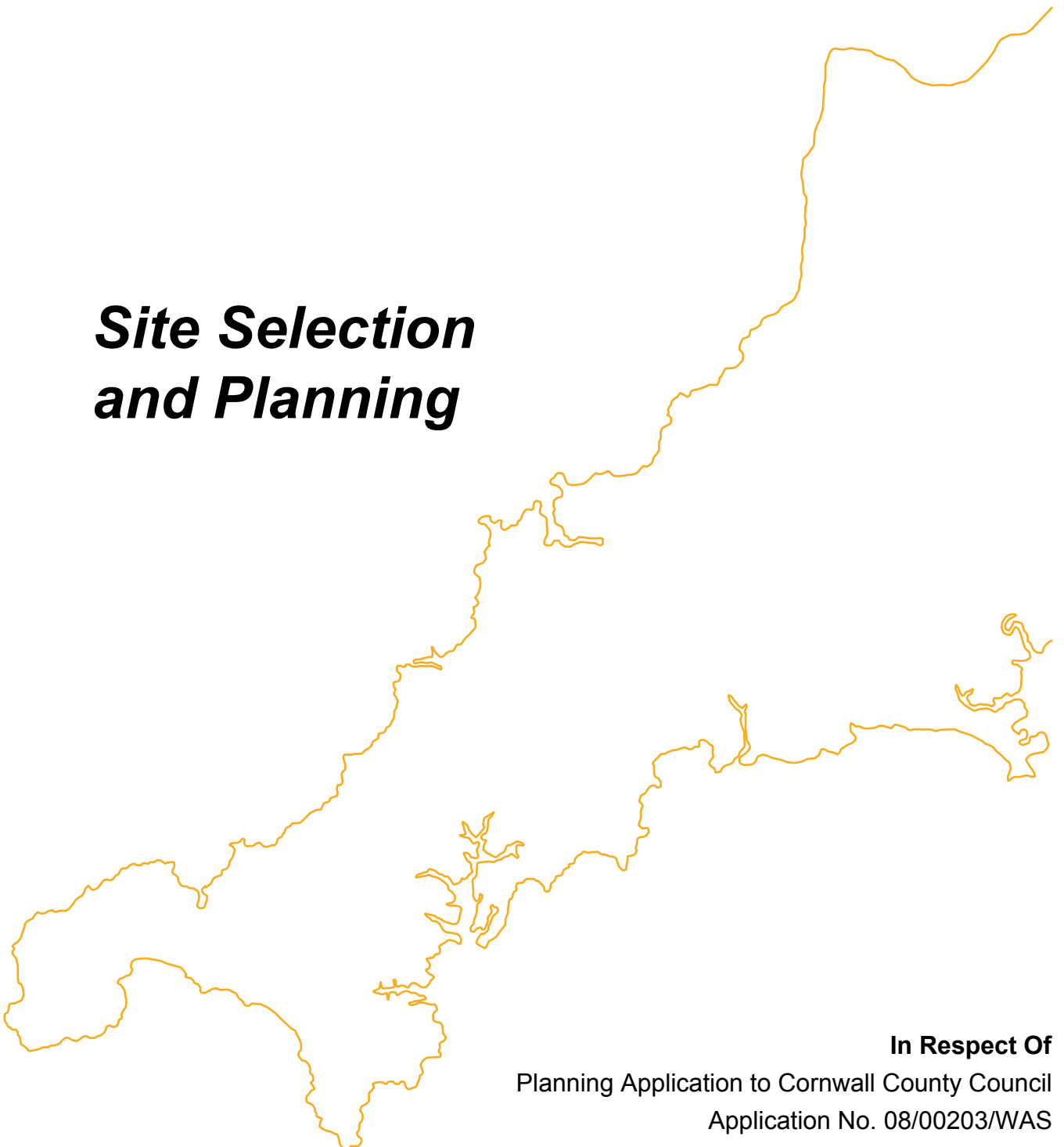




Consultee Response to SITA Additional Information

Consultee
St.Dennis Anti Incinerator Group (S.T.I.G.)

Site Selection and Planning



In Respect Of
Planning Application to Cornwall County Council
Application No. 08/00203/WAS

Site Selection and Planning

Introduction

S.T.I.G. maintains its objection to Incineration as a matter of principle.

As an organisation we do not support the use of incineration to deal with waste in principle. It is our view that there are better alternatives.

Nor do we believe that waste management should be a centralised process. It remains our view that waste should be dealt with as close as possible to where it arises.

However, it is clear to us that SITA's proposal is contrary to a wide range of national, regional and local policies, as regards the siting of large waste management facilities. In particular, these include the Regional Spatial Strategy, the fact that the Waste Local Plan is out-of-date and the arbitrary nature of the site selection process.

Section 5

Site Selection And Planning Policies

(See also Section 13 ES Alternatives)

We consider the information in this section to be inadequate in responding to the objections raised by Restormel Borough Council and other consultees.

We believe that Restormel were correct in their objection that "the site selection process failed to consider more appropriate sites that are closer to the 'strategically significant cities and towns' as advocated by the draft Regional Spatial Strategy." We also maintain that there is non-compliance with the waste hierarchy, national waste strategy and advice in PPS1 and its supplement on Climate Change.

It is our view that the Waste Local Plan was flawed when concluding that an incinerator at the proposed location was the appropriate solution for dealing Cornwall's domestic waste.

Emerging Regional Spatial Strategy

Policy W2 of the emerging Regional Spatial Strategy (RSS) clearly states '*strategic waste management or disposal facilities should be sited within, on the edge of, or in close proximity to Strategically Significant Cities and Towns (SSCTs).*

It is self-evident that the China Clay Area / Central Cornwall Area of Search (CCAS) is not within or close to a SSCT and the areas covered by the designation in Cornwall are Truro-Falmouth/Penryn-Camborne/Pool/Redruth (i.e. those areas where there is the greatest concentration of population and waste arisings).

We note the comments of SITA in response 3.1 and consider it indefensible that they continue to argue that they can rely on the out-dated area of search highlighted in the Waste Local Plan that has been superseded by PPS10 and the emerging RSS.

We expect the proposal's failure to be consistent with policy W2 in the emerging RSS to be stated as one of the reasons for this application to be refused.

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S.T.I.G. notes that the term *Energy from Waste* is consistently used as a synonym for Incineration. This is a blatant misrepresentation and a cynical misuse of language, designed to mislead.

Energy from Waste is not exclusive to Incineration. There are more benign, non thermal, proven technologies readily available.

The Role Of Cornwall County Council And The Chief Planning Officer

In response 3.1, SITA states that *“a meeting with Cornwall County Council’s Chief Planning Officer on 12th June 2006 confirmed that the applicant’s search assessment could reasonably be restricted to the Central Cornwall Area of Search”* and *“at this meeting, the applicant sought and subsequently received, confirmation from the Chief Planning Officer that the alternative sites assessment should be restricted to the CCAS.”*

We are concerned therefore that Cornwall County Council may, in part, be responsible for the applicant’s failure to investigate better alternatives, to the St.Dennis site, that are in-line with regional planning policies.

We are further worried that the ruling administration of Cornwall County Council, who have a majority on all committees including the Planning Committee, made representations to change Policy W2 of the emerging Regional Spatial Strategy during the consultation into the draft document in 2008.

We take the view that it was wrong for Cornwall County Council to seek such blatant changes to the Regional Spatial Strategy in order to remove reasons for the incinerator application to be refused.

The statement from SITA (Section 13 ES Alternatives, responses 2.2) that the CCAS *“should be the focus”* for site selection because SITA and the County Council were challenging parts of the draft RSS is unacceptable.

SITA and the County Council should not have blindly followed their own path but developed an appropriate waste disposal proposal that was in-line with regional policies.

We disagree with SITA’s statement the RSS policy was not relevant as Cornwall’s *“settlement pattern is different to that of other parts of the region ...”*

With respect to SITA, Cornwall’s distinct settlement pattern and geography makes the imposition of an incinerator in the China Clay Area unsuitable.

The MP for Truro and St Austell Matthew Taylor probably summed it up best when he said: *“Rather than come forward with a waste proposal meeting regional planning guidance, it seems the County is trying to get the guidance deleted. It is as if a football referee not only took sides, but changed the rules mid-game to favour his team.”*

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We would seek an assurance that the County Council will determine this planning application correctly and in-line with local, regional and national planning policies, and will not allow its own failings to influence the final recommendation to the Planning Committee.

Waste Local Plan

We are especially concerned that SITA (in response 3.1) justify the CCAS via the Waste Local Plan when the company itself departs from other policies set out in the Waste Local Plan.

These include Policy L6, which states that an incinerator within the CCAS would be acceptable where certain conditions are met.

Areas where we believe the policy has not been met are as follows:

- In order to “*demonstrate reasonable proximity and accessibility to the Primary Route Network,*” SITA wish to construct a new road, which will extend over a considerable distance, adversely impact on a number of properties and the countryside, while costing millions of pounds.
- We consider that the need to actually build such a road undermines their claim that site has acceptable links to the road network.
- The plan is now to construct a 240,000 tonne incinerator rather than one with a “*gross maximum capacity of no more than 200,000 tonnes.*”
- There is no attempt for the site to be served by rail. Arguing that it has the potential to be served by rail is inadequate and disingenuous.
- The need for the proposal not to “*adversely affect the integrity of a Special Area of Conservation*” must also be questioned. The position of the proposed site alongside the Goss Moor SAC means that there is already a proposal to increase the height of chimney on the facility to 120m in order to reduce the impact of emissions on this area. This shows that the risks are real but the cumulative impact of the emissions from this facility and others in the vicinity, such as the Indian Queens Power Station (which directly abuts the SAC) and the proposed bio-gas plant at Fraddon, have not been fully taken into account.

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The Site Selection Process

In terms of site selection (see responses 3.6-3.8, 3.11, 3.12 and also Section 13 ES Alternatives, responses 2.2), SITA extended the CCAS by 1km in all directions.

SITA's explanation that it *"wished to consider sites that are close to the adopted boundary line but outside of it, on the basis that such sites may have characteristics that would closely match the operational, planning and environmental criteria for the CERC ...the 1 km extension is felt to represent a reasonable distance that does not stray so far from the CCAS that the benefits of defining concentration of the locational factors are lost"* (Section 13 ES Alternatives, responses 2.2) is unacceptable.

In the same section, SITA admit that the reason why the area of search was extended was as follows: *"1km was partly chosen so that the site at Rocks driers could be included."*

The fact that this was done and yet other sites from outside the China Clay Area were excluded from consideration shows that SITA's approach to site selection was both arbitrary and inappropriate.

Why was the area of search not extended to areas, which might match the operational, planning and environmental criteria or directed to the locations advocated by the emerging Regional Spatial Strategy?

We have studied the map of the potential incinerator sites and find that of the 35 identified, three fell outside the CCAS but within the 1km buffer. In response 3.7, SITA states that a further 12 sites were not considered because they were *"outside the applicant's study area."*

It is wrong that some sites can be discounted because of their location outside of the CCAS while the boundary is tweaked to allow three sites to be considered. Once again, there is evidence of a definite lack of transparency in this process.

An appraisal of the map showing the "long list of potential CERC sites" demonstrates that only sites in the southern part of the CCAS were considered. Only two sites were included which were positioned above the present line of the A30, namely one at the Indian Queens Industrial Estate and another near St.Columb Road Railway Station.

It is clear to us that there was a predetermined decision to locate the facility in or around the fringes of the China Clay Area.

Only sites in the clay parishes of Roche, St.Dennis, St.Enoder, St.Stephen and Treverbyn were considered and we consider that this is further evidence of an unacceptable and unaccountable site selection process.

As a consequence, it is little wonder than the site at St.Dennis is so unsuitable.

It remains the case that the construction of an incinerator would adversely affect the communities of both St. Dennis and Treviscoe, the landscape character of the area and harm the visual amenities and dominate the setting of the two villages.