

KENT WASTE DEVELOPMENT FRAMEWORK CONSULTATION

TONBRIDGE AND MALLING BOROUGH COUNCIL (TMBC) RESPONSE
- Officer-Level Comments (4/10/06)**Q. Do you agree with the general approach to site identification?**

TMBC Response: Agree that the 'clean sheet' approach is a sound strategy to adopt. It is important to look at all potential options and appraise them accordingly in order to determine which areas/sites represent the most sustainable solutions. The approach and modelling should include the capacity required to accommodate waste from London. It is recognised that the South East Plan has not been adopted yet but it is inevitable that Kent will have to accommodate some of the waste from London. At the very least a 'worst case scenario' should have been assessed and modelled.

The approach would benefit from the development and application of a Sustainability Appraisal (SA) on the Areas of Search (AoS). This would allow potential sites/areas to be assessed against a range of environmental, economic and social sustainability objectives that reflect national, regional and local policies and priorities. The SA would allow consultees to be able to compare the sustainability credentials of each of the AoS and therefore reach an informed decision as to which AoS represent the most sustainable solutions.

Q. Do you have any comments on the scenarios used to identify potential site(s) for new waste treatment capacity in East Kent?

TMBC Response: The rationale for developing the scenarios should be included. There is insufficient information to judge the benefits and costs of each scenario. This information is needed in order for an informed comment to be made on which of the scenarios selected represent the most realistic and sustainable option. A scenario identifying smaller facilities should have been modelled.

Q. Do you have any comments on whether the Kent Waste Development Framework should identify 2 larger or 4 smaller non-inert landfills?

TMBC Response: The rationale for developing the scenarios should be included. There is insufficient information to judge the benefits and costs of each scenario. This information is needed in order for an informed comment to be made on which of the scenarios selected represent the most realistic and sustainable. A scenario identifying smaller facilities should have been modelled.

Q.19. Do you have any comments on the NetWaste modelling and site selection methodology used to identify potential site(s) for new waste treatment capacity in East Kent?

TMBC Response: The modelling is far too heavily weighted on drive-times and the use of the fastest roads. It does not look at the scope for transporting waste by modes other than road transport, for example rail, as advocated in PPS10. The model should take into consideration the location of Air Quality Management Plan areas and the impact of transporting waste upon them.

The number of planning constraints is not comprehensive enough. It should also include Conservation Areas and Air Quality Management Areas because the transporting of waste could potentially have a harmful impact upon these. Furthermore, planning opportunities should also be identified, for example existing facilities, previously developed land, industrial sites.

Q. Do you have any comments on the methodology used to identify potential areas of search for new non-inert landfill capacity in Kent?

TMBC Response: The Areas of Search (AoS) should have been sieved by the use of the identified planning policies and constraints. Just identifying the planning constraints in the optimal AoS that may have a bearing on the suitability of sites for landfill, without assessing their impact, is not sufficient.

Q. Do you think that the Kent Waste Development Framework should specify the type(s) of technology which should be used for waste treatment?

TMBC Response: The Kent Waste Development Framework (KWDF) should not be too prescriptive in terms of defining which technologies should be used for waste treatment. It should incorporate a degree of flexibility. The KWDF should recognise and advocate good current technologies which perform well in environmental quality terms and acknowledge that the availability of new cleaner technologies will be assessed and considered at the planning application stage.