

INSP. EX02 Matter 3 (PS03) Minerals and Waste

Council of the Isles of Scilly Position Statement

6th January 2020





Matter 3 – Minerals and Waste Policies OE5 and OE6

- 3.1 Is the approach of policy of OE5 to managing waste, and in particular the reliance on Site Waste Management Plans, consistent with national policy and justified by robust evidence?
- 3.1.1 In relation to the Inspectors question and the consultation response¹, the Council considered the matter of waste in more detail in the Infrastructure Capacity Assessment Topic Paper [Ref: EB038]. The plan does not have any strategic policies for waste as set out in Paragraph 20(b) of the 2019 NPPF. This is on the basis that strategic policies should be limited to those necessary to address the strategic priorities of the area. Significant investments (2014-2017) on redeveloping the Council's waste management site transformed a large and unsightly legacy waste site with an aged and inefficient incinerator, to its current Household Waste and Recycling site, which has significant capacity for managing the islands waste throughout the plan period. This is set out in paragraphs 35-40.
- 3.1.2 Monitoring waste movements that arise out of development proposals, together with the monitoring of the amount and type of waste and recyclables provided across the islands, will inform whether there should be revisions to the plan within the first 5 years to address any shortfall in waste management facilities on the islands.
- 3.2 Should "where re-use on site" (policy OE5(2), second sentence) read "where re-use on-island" for consistency with the preceding sentence?
- 3.2.1 The Council would agree that the change suggested above would make for a more consistent policy.
- 3.3 Is modification of policy OE5 to state that there is a preference for the co-location of facilities for recycling/composting with existing waste facilities necessary for the plan to be sound?
- 3.3.1 Not necessarily, particularly on the off-islands where the waste management transfer sites have limited capacity to accommodate, for example, composting of organic waste streams, either through open composting or mechanical composting. Furthermore as indicated in the Council's recent Waste Reduction Strategy (EB052)², there may be business opportunities to manage waste and recyclables. These are not necessarily going to be co-located on existing waste management sites, including the main waste management site at Porthmellon on St Mary's. Any in-vessel composting or recycling, however, managed and operated by the Council on St Mary's would be located on the Council's waste

¹ LP-R19-008, page 25: EB03 https://scilly.gov.uk/sites/default/files/DRAFT%20WASTE%20REDUCTION%20STRATEGY.pdf



management site at Porthmellon to consolidate operations and given its capacity to accommodate additional facilities.

- 3.4 Is there a need to allocate/safeguard sites for waste disposal, recycling, or composting in order for the plan to be sound?
- 3.4.1 The Council considers the islands have adequate sites for waste and recycling in its 3 existing and lawfully operating sites on St Mary's. The main site is St Mary's Household Waste and Recycling Centre, where the Council operate and carry out its waste collection and management function. Here all household and most of the islands commercial waste is sorted and largely sent to the mainland for onward recycling or disposal. The second site is a construction and demolition recycling facility where inert materials are reprocessed for onisland re-use. This is located at Pendrathen Quarry on the north side of St Mary's and operates privately. The third is a green waste composting facility at Parting Carn Farm on St Mary's which also operates privately. All three sites are on St Mary's.
- 3.4.2 Whilst these could be safeguarded for waste disposal/recycling/composting it is not considered necessary for the plan to be sound. These sites are in locations on St Mary's where there is no pressure for alternative uses that could result in these sites being lost or compromised. In the case of the main waste site operated by the Council, there would be significant logistical and financial challenges to relocate and develop a new facility.
- 3.5 Is the approach of policy OE6, promoting the re-use of recycled and secondary construction materials and restricting the requirement for any direct extraction, consistent with national policy and justified by robust evidence?
- 3.5.1 In response to the Inspectors question and consultation responses³, as with the assessment of waste, which was considered in the Infrastructure Capacity Assessment Topic Paper [EB038], the assessment of minerals was also considered in a topic paper: Minerals Resource Assessment [Ref: EB043]. Pages 21-22 sets out the assessment of the minerals approach against national policy. On the basis of scale, exceptional environmental quality and the need to reduce waste exported from the islands, the promotion of recycled materials was considered to be the most practical and appropriate approach, justified by the fact that there are not currently any active quarries on the Isles of Scilly. Furthermore, this approach is considered consistent with the scale of sustainable development promoted in the Local Plan.

³ LP-R19-05, pages 33-34; LP-R19-014, pages 43-49 of EB03 https://www.scilly.gov.uk/sites/default/files/planningapps/EB03%20Draft%20Local%20Plan%20Reg%2019%20Summary%20of%20Consultation%20Responses 0.pdf



3.6 Has the approach set out in policy OE6 been formulated having appropriate regard to a robust assessment of reasonable alternatives? Is there evidence to demonstrate that, having regard to all relevant factors, importing minerals to the islands would be more sustainable than extraction within the Isles of Scilly? (see also question 1.4)

- 3.6.1 As set out above, there are no active quarries on the islands. It was not considered appropriate to consider the only other alternative to the policy approach of Policy OE6, which would be to re-establish quarrying on the islands. This decision was on the basis of the highly sensitive environment, limited and finite land base and that the location of the last active quarry is in close proximity to one of the identified settlement areas on St Mary's. Additionally it is considered that modern construction methods would reduce the requirement for traditional materials and make development projects more cost-effective relative to the cost (financially and environmentally) of direct extraction taking place on the islands.
- 3.6.2 Investigating the amount of legacy materials remaining as extractable on the islands was considered to be a disproportionate approach relative to the amount of sustainable development proposed over the plan period.