



# Draft Isles of Scilly Local Plan

Including Minerals and Waste

## 2015-2030

**DRAFT Duty to Co-operate  
Statement of Common Ground  
Between the Council of the Isles of Scilly  
and Cornwall Council**



Council of the  
ISLES OF SCILLY



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**CORNWALL  
COUNCIL**



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Council of the Isles of Scilly  
Draft Isles of Scilly Local Plan 2015- 2030  
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## INTRODUCTION

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1. This is an agreement between the Council of the Isles of Scilly and Cornwall Council in respect of Development Plan preparation. Section 110 of the Localism Act 2011 places a legal duty of Local Planning Authorities (LPA) and other prescribed bodies to cooperate with each other on strategic planning matters insofar as they are relevant to their administrative areas throughout the preparation of their development plan documents. The National Planning Policy Framework (NPPF) 2018 reiterates this duty and requires an independent inspector to assess whether the development plan they are examining has been prepared in accordance with the duty to cooperate. Paragraph 35 requires authorities to demonstrate that plans are ‘sound’ *“based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground”*.
2. It is expected that engagement and cooperation will be constructive, active and ongoing in order to maximise effectiveness throughout plan preparation as well as implementation, delivery and subsequent review. The National Planning Practice Guidance confirms that this is not a duty to agree but that LPAs should make every effort to secure the necessary cooperation on cross-boundary strategic matters before submitting development plan documents for examination. The examination will test whether the duty has been complied with, in respect to the Council of the Isles of Scilly.

### Purpose

3. This SOCG sets out how the Council of the Isles of Scilly and Cornwall Council have actively and positively sought to comply with the duty to cooperate in preparation with the draft Isles of Scilly Local Plan 2015-2030 on strategic matters, with the main cross-boundary factor affecting the islands being the protection of transport connections. This is also directly related to the strategic management of waste for and the requirement for the importation of minerals for the Isles of Scilly and as such both issues have been set out below
4. Issues such as housing provision and the housing market area of the South West of Cornwall is not considered to be a matter on which either Council can co-operate given the isolation of the islands from Cornwall.
5. This statement describes the mechanisms for ongoing cooperation on strategic matters.



## Strategic Transport Issues

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6. In 2011 the Council published a Strategic Transport Framework (STF) document following the approval of the Department for Transport (DfT) of the Route Partnership (RP). The RP project would have secured the long-term viability of a year-round lifeline link by sea with the mainland. On 31st March 2011, however the RP project was rejected by DfT. The STF was produced by consultants WPS during a time when transport connections for the islands were at their most unsecure, particularly with the rejection of the RP together with the withdrawal of helicopter services to the islands provided by British International Helicopters (BIH).
7. Both inter-island transport links and, most significantly, the transport links to the mainland are seen as a significantly important issue for the Isles of Scilly. The transport links are important from an economic perspective as well as ensuring the islands are socially sustainable and provide adequate access to the mainland for health and other social requirements for educational and employment purposes. From the perspective of Cornwall Council the connections to the Isles of Scilly are identified as a key tourism draw, where visitors to the Isles of Scilly often also take advantage of the services and tourism accommodation and facilities provided in west Cornwall.
8. Whilst both authorities seek to support and protect strategic transport links to and from the islands they have limited control as all transport providers and operators are private commercial companies and not publically maintained.

### Connecting Cornwall 2030

9. Connecting Cornwall is Cornwall's Local Transport Plan for 2010-2030 and states:

**We will seek to protect and improve the connectivity of Cornwall with the Isles of Scilly.** This will be achieved by the Isles of Scilly sea link which is a combination of projects involving the upgrading of the harbours and vessels that together will secure the future of a sea service between Cornwall and the Isles of Scilly.

### Cornwall Local Plan: Strategic Policies 2010-2030

10. Cornwall Council's Local Plan was adopted in November 2016 and sets out:

1.40 ...Cornwall has a significant economic and social relationship with the cities and towns of neighbouring authorities to the East and a key role in supporting its neighbours on the Isles of Scilly.

2.11 Aerohub: Newquay airport with Goonhilly has secured Enterprise Zone status which aims to create new jobs and growth through facilitating private sector investment within the aerospace sector by creating a new aviation/aerospace sector that will deliver high value, highly skilled permanent jobs underpinned by the development of an aviation skill centre. Four



development zones each with its own Local Development Order have been identified. Whilst Cornwall's Enterprise Zone is based at the Aerohub, the impacts of this will be wide ranging – providing benefits for the economy of Newquay, Cornwall and the Isles of Scilly and beyond. ...

2.201 ... We will maintain our key transport network and associated infrastructure for walking; train; bus; car; cycle; air and sea transport as well as safeguarding future opportunities for delivering improvements and to maintain links with the Isles of Scilly and other parts of the UK.

Policy 27: Transport and accessibility ... For major developments to ensure a resilient and reliable transport system for people, goods and services, development proposals should:

1. Be consistent with and contribute to the delivery of Connecting Cornwall 2030, Cornwall's Local Transport Plan or any subsequent LTPs; and ...
6. Safeguard land for the delivery of strategic transport opportunities including land around existing facilities to allow for expansion and use for future sustainable modes of travel e.g. closed branch rail lines and links to the Isles of Scilly.

### Isles of Scilly Consultation Draft Local Plan 2015-2030

11. In order to safeguard transport connections to and from the islands, which are identified as an essential element for both the community and the economy, the emerging draft Isles of Scilly Local Plan makes various references to protecting transport infrastructure, including:

**Issue:** *Transport: Supporting better access across the islands, in particular supporting sustainable and active transport solutions, by foot, bicycle, electric vehicles and enabling people to access amenities such as schools, shops, employment and essential infrastructure through a range of transport options, maximising opportunities for all. New housing, employment and community development opportunities will need to promote active travel within and across island communities, as indicated in the spatial strategy section of the Local Plan. Strategic transport links to the mainland are fundamental to the future sustainability and viability of the islands, although improving such links are largely outside the scope of this Local Plan.*

**Vision:** *In 2030: Residents, businesses and visitors enjoy more affordable, resilient and reliable transport links to the mainland and between islands throughout the year following improvements to transport services and networks.*

**Aim 5:** *Engender and support a strong, vibrant and healthy island community with an improved quality of life for its residents.*

**Objectives:** *Support proposals that strengthen or support transportation links on each inhabited island and between the islands and the mainland, including connecting transport systems.*



**Spatial Strategy:** *Support sustainable travel options and reduce the environmental and social impacts of climate change and transport by reducing the need to travel by petrol and diesel vehicles through the siting and design of new developments and encourage sustainable travel options, including walking, cycling and the use of electric vehicles.*

12. In addition to the clear acknowledgment that transport is a significant issue for the islands, specifically the Local Plan supports initiatives that improve the reliability and resilience of the strategic transport connectivity by ensuring the operational effectiveness of St Mary's Quay, St Mary's Airport and Tresco Heliport. Given the location of the islands, efficient, reliable, year-round transport services connecting to the mainland are paramount, providing the lifeline for businesses, visitors and residents.

### **Meeting Transport Needs**

13. Supporting the maintenance and improvement of transport links between Cornwall and the Isles of Scilly is consistent with Cornwall Council's Strategic Policies and Proposals.



## Strategic Waste Management

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14. Both the Council of the Isles of Scilly and Cornwall Council are Unitary Authorities and therefore each have waste planning responsibilities. The National Planning Policy for Waste (NPPW) 2014 requires local planning authorities to work towards a more sustainable and efficient approach to resource use and management. This includes the delivery of sustainable development and resource efficiency, including provision of modern infrastructure, local employment opportunities and wider climate change benefits, by driving waste management up the waste hierarchy.
15. There is a duty to ensure waste management is considered alongside other spatial planning concerns and recognising the positive contribution that waste management can make to the development of sustainable communities. In developing waste management policies there is a requirement to base these on a proportionate evidence base and working collaboratively with other planning authorities to collection a share data and information on waste arisings. This should take account of waste arisings across neighbouring waste planning authorities.
16. This is particularly pertinent when considering the very small scale of the islands, the level of anticipated development over the plan period and options for routes to waste management. Whilst there is a reliance on mainland contractors for onward movement of the islands' waste, there are currently no collaborative arrangement in place with Cornwall Council to combine waste collection and management. In the absence of a formal agreement between the Council of the Isles of Scilly and Cornwall Council for strategic waste management, there is an informal arrangement and continuing open dialogue to ensure that future collaborative working opportunities are not precluded.
17. Given the limited on-island solutions for managing waste, the shipping of waste for onward management (recovery, recycling and disposal) is another crucial reason for protecting the transport links between the islands and mainland Cornwall. Currently, all residential waste is disposed of at the 'energy from waste plant' at St Dennis in Cornwall. Additionally most recyclables are also sent to centres in Cornwall further emphasising the strong links and interdependencies.

### Isles of Scilly Consultation Draft Local Plan 2015-2030

18. The waste management elements of the draft Isles of Scilly Local Plan are set out within Section 2 (Sustainable Scilly) (see policy SS2), which includes the requirement to provide recycling storage in new developments. The remaining elements of waste management fall within Section 3 (Our Outstanding Environment). Waste and recycling is addressed proportionately to the circumstances of the islands and to ensure that the management of waste is sensitively considered as part of development proposals and the waste hierarchy is embedded at the start of a development process.



19. The Council of the Isles of Scilly Local Planning Authority have an emerging Local Validation checklist to manage the planning process and ensure that Site Waste Management Plans where required are submitted at the start of the planning process. This is an essential element to monitoring sources of waste and means of waste management and disposal.
20. Policy OE6 sets out the expectations in relation to development management and waste:

***Policy OE6: Waste Management***

- 1) *Where appropriate, development proposals must demonstrate best practice in addressing waste management solutions having regard to the waste hierarchy and submit a site waste management plan (SWMP) to support planning applications.*
- 2) *Construction and demolition waste should be minimised and must be managed and re-used on-island where there will be no harmful impacts. Where re-use on site would result in an environmental risk to biodiversity, the historic environment, amenity of neighbouring properties or land uses, or the water environment, appropriate off-island management or disposal will be required.*
- 3) *Significant proposals including for major development, must demonstrate how the construction and operational phases of the development will be consistent with the principle of sustainable waste management through a waste management plan to include a waste audit, which should be submitted with the application.*
- 4) *Waste facilities for re-use, recycling, composting and the generation of heat/energy will be permitted where they improve the sustainable management of waste on the islands and accord with other relevant policies in the Local Plan.*

**Cornwall Local Plan: Strategic Policies 2010-2030**

21. Cornwall Council's Local Plan was adopted in November 2016 and sets out waste management in two of its strategic policies: Policy 19 Strategic Waste Management Principle and Policy 20: Managing the provision of waste management facilities.

***Policy 19: Strategic waste management principles***

1. *Proposals must show best solution having regard to the 'waste hierarchy'. The Council will support energy recovery facilities where options higher up the waste hierarchy cannot reasonably be realised.*
2. *New or extensions to existing landfill facilities (with the exception of Connon Bridge landfill site which will close on 31 December 2018) will only be supported where:*
  - a) *In the case of Local Authority Collected Waste proposals contribute towards meeting a shortfall in capacity;*
  - b) *In the case of Construction, Demolition and Excavation waste, they contribute to meeting a shortfall in capacity and, wherever possible, make use of the material for restoration of former mineral workings where restoration is needed and appropriate; or*





## Strategic Management of Minerals

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23. Both the Council of the Isles of Scilly and Cornwall Council are Unitary Authorities and therefore have minerals planning responsibilities. Paragraph 203 of the NPPF requires local planning authorities to plan for a sufficient supply of minerals to provide the infrastructure, buildings, energy and goods that the country needs. Since minerals are a finite natural resource, and can only be worked where they are found, best use needs to be made of them to secure their long-term conservation.
24. At present there are no active quarries within the Isles of Scilly, although there will continue to be some demand for local stone even with modern construction methods. Local stone is a key characteristic of the vernacular of the islands in the built environment as well as stone bound hedges, which form an important aspect of the islands' distinctive landscape.
25. In order to ensure that the built tradition, character, distinctiveness and historic environment of the islands is conserved and enhanced, encouragement will be given to use locally sourced and sustainable materials with an emphasis on re-use of recycled and secondary materials. This is advocated in both Policies OE6 and OE7 and the requirements for Site Waste Management Plans. The policies establish an appropriate and proportionate approach in the context of the NPPF, which advocates a steady and adequate supply of aggregates. Given the scale of development anticipated over the plan period and its exceptional environmental quality it would be inappropriate to advocate mineral extraction, on the Isles of Scilly.
26. In the absence of direct extraction on the Isles of Scilly, it is likely that materials will be shipped to the islands through existing transport connections with Cornwall, regardless of the origin of the material. In comparison to the scale of development established in the Cornwall Council Local Plan, the quantity of minerals and materials travelling through the County and destined for the islands to fulfil its development needs, would not result in a significant or adverse impact to the quarries or communities of Cornwall.

### Isles of Scilly Consultation Draft Local Plan 2015-2030

27. The management of minerals on the Isles of Scilly is covered in section 3 (Our Outstanding Environment) of the Local Plan through specifically Policy OE6 (Minerals). This policy strongly advocates the use of both recycled and reclaimed traditional and natural materials before direct extraction. It is also a requirement of this policy to include a Site Waste Management Plan for any development proposal. Such a plan will be required to include a Local Aggregate Assessment to enable the monitoring of source mineral materials, including volumes of materials imported to the islands. The target for this policy is to seek to achieve 100% of local materials using reclaimed/recycled local stone or new materials from Cornish/South-West



locations. The trigger for reviewing this would be an increasing trend of materials coming from other parts of the UK and overseas.

28. Policy OE6 sets out the expectations with regard to the management of minerals over the plan period.

**Policy OE6 Minerals**

*Support will be given to the supply of indigenous minerals to meet local construction needs on the islands, including traditional materials, through the use of recycled and secondary materials to restrict the requirement for any direct extraction. Site Waste Management Plans (SWMP) will be required to include measures to recycle and recover inert construction, demolition and excavation materials for reuse as an aggregate for building works, thereby also reducing transportation costs and carbon emissions.*

**Cornwall Local Plan: Strategic Policies 2010-2030**

29. Cornwall Council's Local Plan (2016) and sets out minerals management in two of its strategic policies: Policy 16 Minerals: General Principles and Policy 17: Minerals Safeguarding.

**Policy 17: Minerals - general principles**

1. *Support will be given to maintain and grow a world class, thriving and sustainable minerals industry in Cornwall which meets local needs as well as exporting minerals, predominantly by rail and sea, to serve regional, national and international markets.*
2. *A sufficient supply of indigenous minerals will be maintained to achieve sustainable and economic growth, whilst encouraging the use of recycled and secondary materials, particularly secondary aggregates from china clay (kaolin) production, to minimise the requirement for new extraction.*
3. *New mineral development, (including extensions to existing sites) will be supported in the following areas:*
  - a. *China clay (kaolin) and secondary aggregate extraction in the St Austell (Hensbarrow) China Clay Area;*
  - b. *Primary aggregate extraction where it is outside the AONB designation; and*
  - c. *throughout Cornwall for:*
    - i. *Building, roofing, heritage and*
    - ii. *ornamental stone,*
    - iii. *Metal and industrial minerals,*
    - iv. *Primary aggregate development for particular grades of material not provided for by other permitted reserves.*
4. *Improved and more efficient working practices at existing minerals sites will be supported.*
5. *Mineral recycling and recovery facilities will be supported where they fall within well screened areas at currently operational quarries and landfill sites.*
6. *Mineral development should have no adverse impact on: slope stability, differential settlement of quarry backfilling, and mining subsidence.*



7. *All mineral development should enable progressive and effective reclamation at the earliest opportunity, taking into account aviation safety, for appropriate and beneficial afteruses that:*
- i. Contribute to and enhance the natural and local environment including, ecosystem services and networks,*
  - ii. Conserve and enhance heritage assets and protect and enhance valued landscapes, geological conservation interests and soils; and*
  - iii. Have the potential for wider community benefits.*

### **Policy 18: Minerals safeguarding**

- 1. Important mineral resources and reserves and existing, planned and potential bulk transport, storage, handling and processing facilities and sites shall be safeguarded from sterilisation by other forms of incompatible development.*
- 2. Mineral Safeguarding Areas will be identified for the following minerals resources and reserves;*
  - a) aggregates (both primary and secondary),*
  - b) china clay,*
  - c) building and ornamental stone (including roofing and heritage materials) and*
  - d) metals (including relevant shafts and adits),*
- 3. Mineral Safeguarding Areas will be identified for the following existing, planned and potential mineral infrastructure;*
  - a) key concrete batching and other products and roadstone coating,*
  - b) Storage, handling, processing and distribution of minerals,*
  - c) the bulk transport of minerals by rail, sea (ports) or haul roads.*

*The Cornwall Minerals Safeguarding Development Plan will develop detailed policy and identify sites for safeguarding minerals, mineral resources and associated facilities for transport, storage, handling and processing for onward transport by rail or sea. Key sites used for the batching / manufacture of concrete products and coated materials will also be identified for safeguarding as well as sites for processing and the distribution of substitute recycled and secondary aggregate materials. Policy will also be developed to encourage prior extraction where appropriate*

### **Meeting Minerals Management Transport Needs**

30. Both the Council of the Isles of Scilly and Cornwall Council support the maintenance and improvement of transport links. As such the management of minerals over the plan period is supported, between Cornwall and the Isles of Scilly, although there are no specific strategic plans proposed.



## Compliance with the Duty to Co-operate

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31. The Council of the Isles of Scilly have engaged constructively and regularly with Cornwall Council, throughout the preparation of the Isles of Scilly Local Plan 2015-2030. In accordance with statutory requirements and in recognition of the
32. The Statement of Common Ground (SOCG) sets out the agreed position of both the Council of the Isles of Scilly and Cornwall Council following the Regulation 19 consultation, during which Cornwall Council made representations. The representations submitted were predominantly related to reinforcing the protection of transport links, which underpin the islands' economy, support its community and provide waste management routes as well as enabling the importation of minerals to the islands.
33. Appendix 1 of this document presents the various amendments proposed by both sides and an agreed position. Subject to the proposed amendments (as set out in Appendix 1) being made to the Isles of Scilly Local Plan 2015 – 2030, Cornwall Council is satisfied that its representations to the Isles of Scilly Local Plan 2015-2030 have been addressed.

Signed on behalf of the Council of the Isles of Scilly

**Craig Dryden, Senior Manager Infrastructure and Planning**

Signed on behalf of Cornwall Council

**Louise Wood, Chief Planning Officer Cornwall Council**



## Appendix 1

34. Consultation Responses in connection with the evolution of the Isles of Scilly Local Plan can be viewed in the links in the table below.

Consultation	Cornwall Council Response	Council of the Isles of Scilly Response
<a href="#"><u>Local Plan Review – Scoping Report (Reg 18) 2015</u></a>		
<p><b>Public Consultation on the commencement of the review of the 2005 Local Plan. The scoping report set out the ‘issues’ for the islands over the plan period.</b></p>	<p>We support the overall emphasis in the Scoping Report in reflecting the National Planning Policy Framework. In particular we also welcome the recognition at paragraphs 1.8 and 3.26 of the Duty to Co-operate between neighbouring planning authorities and the undertaking at paragraph 1.12 to continuous engagement with statutory consultees including Cornwall Council. Cornwall Council is committed to ongoing dialogue as both the Isle of Scilly Local Plan Review and the Cornwall Local Plan progress.</p>	<p>The respondent’s comments are noted.</p>
<p><b>Transport</b></p>	<p>In particular, we support the inclusion of an Objective “to secure resilient, year-</p>	<p>The respondent’s comments are noted.</p>



	<i>round transport services to Cornwall ...”</i> and we will continue to engage with you on the land use implications.	
<b>Waste Management</b>	We also welcome policy seeking to move the processing of waste up the waste hierarchy by providing policy for re-use and recycling as well as exploring the possibilities for energy recovery on the islands.	The respondent’s comments are noted.
<b><u><a href="#">Draft Isles of Scilly Local Plan 2015 – 2030 (Reg 18) 2018</a></u></b>		
<b>Second round of public consultation of the issues and options for the draft local plan.</b>	<p>Duty to Co-operate</p> <p>Cornwall Council welcomes the opportunity to respond to the draft Local Plan for the Isles of Scilly and the acknowledgment of the Duty to Co-operate and the close working relationship between our two authorities, which we are keen to sustain.</p> <p>Para 12 refers to our comments on the 2015 Scoping consultation. We stand by these comments and are pleased to see the 2018 consultation draft reflects them.</p> <p>As the draft plan has advanced we provide a more detailed response below. If there are any aspects of our response which you would like</p>	Noted



	<p>clarification on please do not hesitate to contact us for clarification. Cornwall Council is committed to ongoing dialogue as the Isles of Scilly Local Plan Review and the Cornwall Local Plan (partial) Review (commencing this year) progress.</p>	
<p><b>Transport</b></p>	<p>Strategic transport links to the mainland Policy 27 of the Cornwall Local Plan states major development proposals should "...Safeguard land for the delivery of strategic transport opportunities including land around existing facilities to allow for expansion and use for future sustainable modes of travel e.g. closed branch rail lines and links to the Isles of Scilly...." Also PP1 Objective 3 for the West Penwith Community Network Area includes to "...Support in principle the long term future of ... the provision of air and sea routes to the Isles of Scilly...".</p> <p>The emerging Cornwall Site Allocations DPD is currently at examination. Para 3.11 of the draft DPD recognises the harbour at Penzance is of strategic importance, with the former providing the only freight and passenger ferry link</p>	<p>Revise Policy SS10 and paragraph 80 to strengthen its support for new infrastructure that will enhance the resilience of strategic transport links to the mainland.</p>



to the Isles of Scilly. Para 3.22 highlights the economic function of the ferry link. Strategic Aim 7 for Penzance and Newlyn includes “To maintain and improve the area’s strategic transport connections with the Isles of Scilly”. Para 3.30 specifically states that development must “maintain the efficient operation of the Penzance to Isles of Scilly ferry link.”

We agree that the Vision should reflect the importance of movement between the islands and the mainland (para 65) including the statement at para 70/Vision on affordable, resilient and reliable travel throughout the year to be achieved through improvements. Particular support is given to Strategic Aim 2 and Strategic Aim 5: Objective 5 (para 71) on the basis that they foster strategic transport infrastructure.

We agree that “Strategic transport links to the mainland are fundamental to the future sustainability and viability of the islands...” (IoS draft paras 60 and 140) and consider that the Local Plan should include a positive policy approach for infrastructure which will support strategic transport links to the mainland.



	<p>Draft Policy SS10 is welcomed and we request that this is strengthened by explicit support for new infrastructure that will enhance the resilience of strategic transport links to the mainland. There is also an opportunity to make a more positive statement in the last sentence of para 80.</p>	
<p><b>Waste Management</b></p>	<p>Waste and energy          We welcome the support that the draft Plan gives to the Smart Islands programme. Smart Islands will enable new methods that reduce the environmental impacts of waste disposal and generate energy from the waste, thereby improving energy resilience and help drive waste management up the waste hierarchy and support the proximity principle (ambitions of the National Planning Policy for Waste).          We support the requirement of a Site Waste Management Plan through draft Policy SS2 and suggest this is extended to include where buildings are to be demolished and rebuilt.</p> <p>Draft Policy OE6 requires development to "...include waste management</p>	<p>Revise policies SS2 and OE6 accordingly</p>



	<p>solutions that have regard to the waste hierarchy...”. We recommend that the wording is strengthened. For example, Cornwall Local Plan Policy 19 states “Proposals must show best solution having regard to the ‘waste hierarchy...’.</p> <p>The preference for on-island construction waste management (where appropriate) at draft Policy OE6 is supported.</p> <p>We recommend a policy seeking the provision of recyclable waste storage in relevant new developments is included. Draft Policy SS8 is welcomed in its support for enhancing the resilience of the islands through renewable energy.</p>	
<p><b>Minerals</b></p>	<p><b>Minerals</b>          We welcome the support for the supply of indigenous materials through the use of recycled and secondary materials (according with NPPF para 143) and the requirement to recycle and recover construction / demolition / excavation (material) for reuse. The word “material” (or similar) appears to be missing from draft Policy OE7 however. We recommend “as an aggregate” is</p>	<p>Amend Policy OE7 accordingly</p>



	removed so that the policy can encompass the reuse of other materials e.g. building stone/quoins or roofing materials.	
<b>Pre-Submission Draft Isles of Scilly Local Plan 2015 – 2030 (Reg 19)</b>		
<b>Transport</b>		
<b>Waste Management</b>		
<b>Minerals</b>		