

Forward Planning
Mid Devon District Council

Strategic Planning

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By email

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12th July 2016

Dear Sir/Madam,

Consultation on:

- (a) **Refuse Storage for New Residential Properties SPD**
- (b) **Draft Statement of Community Involvement**

Thank you for consulting Devon County Council on the above documents, for which brief comments are provided below.

Refuse Storage for New Residential Properties SPD

Devon County Council, in its role as waste planning and waste disposal authorities, welcomes the proposed guidance as a means of increasing the effectiveness of the collection of waste for recycling and, as a consequence, limiting the quantity of waste to be managed by methods lower in the waste hierarchy.

While the guidance is comprehensive in terms of provision of refuse storage outside dwellings, it is suggested that developers are also encouraged to consider the adequacy of space for internal storage in kitchens and/or utility rooms to facilitate recycling. In this regard, it is noted that the list of containers used in Mid Devon on page 2 of the guidance does not include kitchen caddies for food waste, and it is suggested that these be included to highlight the need for internal storage.

The scoping report reviews national and local policy, but omits three key sources that are worth referring to:

- (a) National Planning Policy for Waste, in paragraph 8, requires that local planning authorities should ensure that "new, non-waste development makes sufficient provision for waste management and promotes good design to secure the integration of waste management facilities with the rest of the development and, in less developed areas, with the local landscape. This includes providing adequate storage facilities at residential premises, for example by ensuring that there is sufficient and discrete provision for bins, to facilitate a high quality, comprehensive and frequent household collection service".
- (b) The Devon Waste Plan, which forms part of the development plan for Mid Devon, includes Policy W4 that requires provision of a waste audit statement with major

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planning applications. This statement should explain how waste generated during construction and occupation is managed, including provision of sufficient storage facilities.

- (c) To support Policy W4 of the Devon Waste Plan, Devon County Council has published a Waste Management and Infrastructure SPD that provides detailed guidance and a template for waste audit statements.

As well as recognising these sources of policy and guidance in the scoping report, it would be worth including brief mention in the introduction to the SPD, not least to underline that compliance with the SPD will assist applicants in meeting national and development plan policy.

Statement of Community Involvement

The Draft SCI is clearly structured and strikes a good balance between legibility and detail. It would be helpful if the scope of the term 'community' were to be made clearer at the start of the document as, for example, paragraph 2.1 implies that only 'the public' are to be involved, while elsewhere there is reference to voluntary bodies, community groups and parish/town councils.

In the Introduction, it would be helpful to include a brief reference to the Duty to Cooperate to clarify that this will operate in parallel to community involvement. To avoid any misunderstanding, it would also be worth mentioning that the SCI only applies to plans and planning applications for which the District Council is responsible, and does not cover minerals, waste and county council development that are addressed in Devon County Council's SCI.

Please let me know if you wish to discuss these points further.

Yours faithfully,

Joe Keech
Chief Planner