

## APPENDIX A

### **RESPONSE TO THE WASTE LOCAL PLAN CONSULTATION – Updated with Comments on Draft Waste Local Plan, 2022**

**Q1: We envisage the plan period covering up to 2038, do you think this is appropriate? If not, what other plan period should be used and why?**

The plan period seems reasonable particularly given the Government requirement to review plans every 5 years to ensure continuing relevance.

**Q2: Do you think any further information should be included in the overview of the Plan area and the implications for the management of waste?**

It would be useful to highlight existing major waste infrastructure sites in order to provide the current locational context. It would also potentially be helpful to highlight the history of extractive industries in the Plan Area given the past relationship with landfill.

It would also be useful to highlight that between the main towns and ‘small villages’ a number relatively large towns and villages exist across the County. This is a particular issue when considering how to plan the provision of services (including waste) in rural areas.

The map does not appear to show the A46 Newark bypass.

*Draft Waste Local Plan, 2022:*

- *Appendix F of the Waste Needs Assessment, as referenced at paragraph 5.39 of the Draft WLP, contains details of Permitted Waste Management Facilities in the plan area.*
- *References are made in the Draft WLP to mineral waste, although it is not considered necessary to specifically plan or make further provision for this.*
- *The Overview of the Plan Area has not been changed since the Issues and Options Plan and so no further details are included regarding main towns and small villages.*
- *The map has not been changed to include the A46 Newark bypass.*

**Q3: Do you agree with the current waste estimate? Do you have any other information which may lead to a different waste estimate?**

None at this time, the report appears to have captured all of the data we are aware of.

**Q4: Do you have any other information about how these waste streams are managed? Are there other issues the Plan should consider?**

None at this time, the report appears to have captured all of the data we are aware of.

**Q5: Do you agree with the scenarios set out for Local Authority Collected Waste (LACW)? Which scenario do you consider to be the most suitable on which to base the Plan? Do you have any evidence to support any other scenarios?**

Current trends show that waste production levels have fallen and this is to some extent in line with the economic downturn and the subsequent austerity measures. It remains to be seen if the push for more efficient resource use has had sufficient impact to maintain the low levels of growth we have seen since 2014. The continued growth of local authority kerbside garden waste collection may also result in additional demands as waste may be diverted from home composting and into the municipal stream.

On this basis we would advise that predictions of future demands are based on option C.

*Draft Waste Local Plan, 2022:*

- *The approach has been changed in the Draft WLP and Scenario B with a “Low Rate of Decline” in the amount of waste produced per household is pursued. This is based on a decline in the amount of waste per household but taking into account an increased number of households. This sits comfortably with the recommendation previously of using Option C.*

**Q6: Do you agree with the scenarios set out for Commercial and Industrial (C & I)? Which scenario do you consider to be most suitable on which to base the Plan? Do you have any evidence to support any other scenarios?**

As discussed in the response to question 5 current levels of growth are low but we would not necessarily expect them to stay this way. On this basis we would anticipate low growth initially (Option A) but feel this should be reviewed every 5 years to adjust the plan accordingly.

*Draft Waste Local Plan, 2022:*

- *The approach has been changed in the Draft WLP and Scenario B “Medium growth” is pursued. This is based on a 5% reduction in the amount of waste per employee up to 2031 and an increase in the number of employees. The level of waste that is forecast to be generated per year is less in this scenario than the previously supported “Option A Low Growth”.*

**Q7: Do you agree with the scenarios set out for Construction, Demolition and Excavation Waste (CDE)? Which scenario do you consider to be most suitable on which to base the Plan? Do you have any evidence to support any other scenarios?**

We are not in a position to comment on this question.

**Q8: Do you agree with the estimate set out for Hazardous Waste? Do you have any evidence to support any other scenarios?**

We are not in a position to comment on this question.

**Question 9: Do you consider these assumptions about future recycling rates are an appropriate basis for the Waste Local Plan. Do you have any evidence to suggest that different assumptions should be made?**

We expect future recycling rates to be higher (60%+) but given the uncertainty around national policy and future economic growth we understand why the proposed plan is for a 10% increase.

Additional consideration should be given to the types of facilities that may be required to handle new and increased waste streams.

*Draft Waste Local Plan, 2022:*

- *The Draft WLP has adopted a target of 65% recycling for Local Authority Collected Waste, 80% recycling for C&I waste and 95% recycling for CD&E waste.*
- *The Waste Needs Assessment and Draft WLP state that there is sufficient capacity to meet the targets for Local Authority Collected Waste and C&I waste within the plan period and that there is capacity for the targets for recycling and recovery for C&DE waste.*

**Q10: What role do you think recovery should play? Should the plan provide for higher levels of energy recovery in future?**

Energy recovery through incineration can be unpopular and controversial, and the practice may receive less support in the future.

Rather than planning for increased usage/capacity for energy recovery from incineration, opportunities should be created for increased recycling and priority given to energy recovery from food and garden waste via in-vessel composting and anaerobic digestion facilities.

*Draft Waste Local Plan, 2022:*

- *Table 11 of the Draft WLP shows that up to and including 2029, there is a deficit of capacity for energy recovery for the Local Authority Collected Waste and C&I waste streams. The Draft WLP does not pro-actively plan for this deficit and no new facilities or allocations are specifically provided for within the plan.*
- *The increased target in relation to recycling will reduce demand for energy recovery in comparison to the Issues and Options plan.*

**Q11: Do you agree with the need to provide additional disposal capacity within the Plan Area?**

We agree that some disposal capacity will still be required. This can be minimised through better recycling opportunities which should reduce the by-products of incineration such as incinerator bottom ash which would still require landfill for disposal.

*Draft Waste Local Plan, 2022:*

- *Tables 11 and 12 of the Draft WLP show that there is a significant deficit in capacity for disposal of waste, however, the Draft WLP does not pro-actively plan for this deficit and no new facilities or allocations are specifically provided for within the plan.*
- *The increased target in relation to recycling will reduce demand for disposal in comparison to the Issues and Options plan.*

**Q12: Do you agree with the draft vision? Are there other things we should include?**

We suggest amending the final paragraph to provide a specific overarching target:

*To protect the quality of life of those living, visiting and working in the area and to avoid any risks to human health. Facilitate the application of the waste hierarchy and the circular economy to prevent and re-use waste as a resource wherever possible and to exceed a 60% recycling rate for all mixed municipal and industrial waste in Nottinghamshire and Nottingham by 2030.*

*Draft Waste Local Plan, 2022:*

- *The Vision in the Draft WLP has been completely redrafted.*
- *Reference is made to medium sized facilities being located close to Newark, but no further details of what these consist of are provided.*

**Q13: Are the above objectives appropriate? Are there others we should consider?**

We suggest that Objective 4 be revised to take account of the potential need for mitigation where avoidance is not possible:

Community, Health and Wellbeing – to ensure any adverse impacts from new waste facilities on local amenities and quality of life including dust, traffic, noise, odour and visual impact are appropriately mitigated and local health concerns are addressed.

*Draft Waste Local Plan, 2022:*

- Whilst the Draft WLP has not revised Objective 4 as recommended, the words “do not adversely impact on” sufficiently cover the point previously made.

**Q14: What do you think of our proposals for the broad locations of future waste management facilities across the Plan Area? Are there other options we should consider?**

While it is superficially attractive to have a facility near Newark, this may not be the most sustainable approach, and it may prove to be unpopular with local residents. Even proposals on industrial sites can be controversial near residential areas.

A large number of vehicles used by tradespeople and small businesses making journeys to visit the waste management facility from around and outside the District could have a significant carbon footprint. If these vehicles could visit one of a network of smaller sites closer to them, there would be fewer emissions.

Major sites could be located on brownfield sites away from residences in areas with good transport links rather than around areas where a lot of waste is produced. Smaller Waste Transfer Stations could then be used to move the waste to larger facilities.

Existing employment sites with established or former industrial uses could be suitable locations for these smaller sites, in some instances meaning that waste would be brought from businesses on the same site. This could provide opportunities to reuse brownfield sites where the principal of industrial use is established.

This approach would support local businesses by providing a simple and convenient way to access recycling and recovery facilities which can handle a range of materials at one location. This would facilitate the easy management of waste within the waste hierarchy. Smaller, more energy efficient, vehicles can be used to travel short distances to transfer stations and overall vehicle miles would be reduced.

If one facility became unable to operate normally, material could be moved to an alternative location.

Where appropriate, opportunities should be sought to use railways and rivers to transport waste. This would reduce both traffic impacts and harmful emissions from motor vehicles.

*Draft Waste Local Plan, 2022:*

- Draft WLP Policy SP3 sets out the broad locations for new waste facilities. This states that medium sized waste treatment facilities will be supported in, or close to, the built-up areas of Nottingham, Mansfield / Ashfield, Newark, Retford and Worksop.
- No details of what constitutes a medium sized facility are included within the policy or supporting text.
- The approach taken is in line with N&SDC Amended Core Strategy policies SP1, SP2, SP3 and CP6.
- This policy needs to be read in conjunction with Draft WLP Policy DM1, which sets out general site criteria for different types of waste management facilities.

- *Draft WLP Policies DM2 and DM3 will, to an extent, provide protection from inappropriate development.*
- *The lack of allocations in the Draft WLP is an omission which it is recommended is addressed in consultation with the industry and landowners – there could be a range of reasons why few sites were put forward during the last Call for Sites, not least because it was conducted during the Covid-19 pandemic when there was great uncertainty for businesses. This exercise should be rerun, potentially putting measures in place if necessary, to generate a greater level of response and potential sites for allocation.*
- *It is also recommended that existing waste management sites and employment land should be reviewed to establish the potential for extensions or new facilities to enable the identification of broad locations on which future waste management development might be acceptable.*

**Q15: Do you think that a general criteria approach is sufficient to deal with future provision or should the Plan be allocating specific sites? Are there other options we might consider?**

A criteria based approach could be appropriate if it takes account of the concerns raised above and facilitates the development of a network of waste management facilities. Impacts on the climate crisis should also be considered as part of this approach.

This could be combined with a call for sites for smaller Waste Transfer Stations where materials can be sorted and bulked up for transport elsewhere.

*Draft Waste Local Plan, 2022:*

- *Policy DM1 of the Draft WLP sets a criteria based approach, which together with Policy SP3 can help guide development but both need greater clarity in either the policies themselves or the supporting text.*

**Q16: What do you think of our proposals for the scope of the development management policies? Are there any others that should be covered such as for specific types of waste management facility?**

We agree that all the topics suggested should be considered and we propose adding two: the climate crisis; and impacts on the waste hierarchy.

*Draft Waste Local Plan, 2022:*

- *The Development Management section of the Draft WLP does not include dedicated policies on either of these matters.*
- *However, Policy SP5 is entitled Climate Change and deals with this issue, although some amendments are recommended.*
- *The Draft WLP discusses the waste hierarchy throughout and the targets it includes show a clear commitment to driving waste up the waste hierarchy.*

**Q17: Are there any other comments you would like to make to help inform the preparation of the Waste Local Plan?**

We are keen to see issues relating to the climate crisis and the environment addressed within the plan.

*Draft Waste Local Plan, 2022:*

- *As stated above, Policy SP5 addresses climate change, although some amendments are recommended.*

- *The Draft WLP contains policies DM4, DM5, DM6 and DM7 which all seek to deal with environmental issues, although some amendments are recommended to DM6 to provide clarity.*