

Nottinghamshire  
County Council

# Nottinghamshire and Nottingham Waste Core Strategy and Development Control Policies



## Issues & Options Consultation October 2006 What you told us

Nottinghamshire County Council and  
Nottingham City Council

July 2008



Nottingham  
City Council

## What is this document about?

Nottinghamshire County Council and Nottingham City Council are working together to prepare new planning policies for future waste management in our area. These will determine how we provide new sites to recycle, compost, recover energy from or dispose of our waste. We carried out an informal consultation on the general 'Issues and Options' between October and December 2006 which resulted in almost 1400 comments from over 140 organisations and individuals. This document summarises all of the comments that were received. We have not made any response to these comments yet as we want to carry out further consultation before we decide how to go forward.

## How to use this document

This summary sets out the comments made in response to each of the 22 issues set out in the original 'Issues and Options' document. There were also a number of repeated responses and comments that covered more than one issue. These have been grouped together under the section called 'general issues'. This also includes comments that were not relevant to this stage of the plan process or were outside of the scope of this consultation.

## Additional 'Issues and Options'

Since we first consulted on our new policies, the Government has made a number of changes to the planning system which mean that we want to carry out further consultation before going any further. Our original consultation looked only at the broad issues such as how much waste capacity do we need and where do we need more facilities. It did not try to identify specific sites as these were intended to be included in a separate, later document. However, Government now wants to see specific sites included within the Core Strategy wherever possible. This may mean that we no longer need a separate site-specific document. We therefore want to carry out further informal consultation to look in more detail at possible sites and whether these should be included in the Waste Core Strategy. This consultation is likely to take place towards the end of 2008. If you have already responded to our earlier consultation you will be notified automatically about any future consultations but if you would like to get involved or would like more information please contact us as shown below.

## What happens next?

Once the further work and consultation on the additional 'Issues and Options' has been completed, we will prepare a new consultation document setting out our preferred approach. This will take into account all of the comments received during the previous 'Issues and Options' stages and will explain why we have chosen some options and discounted others. You will have a further chance to make informal comments at this stage.

We will then prepare our final 'Submission Draft' of the document which will be submitted for a public examination in front of an independent Inspector. At this stage you can make formal representations on our plans which will be considered by the Inspector. Depending on the findings of the Inspector, we will then adopt the Waste Core Strategy, including any changes that are recommended.

## Want more information?

If you would like more information about planning for waste management within Nottinghamshire please feel free to contact us or look on our website at [www.nottinghamshire.gov.uk](http://www.nottinghamshire.gov.uk):



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## General Issues

This section groups together those comments that did not relate to any specific issue within the 'Issues and Options' paper, or that raised other issues outside the scope of this consultation. These have been included here in order to give a complete summary of all the comments received. Responses to these, and all other comments, will be published once the additional 'Issues and Options' consultation has been carried out.

- **Timing of the consultation** - some respondents suggested that it is premature to prepare a Core Strategy given the uncertainty over some of the waste data.
  - **The County Council's Waste Management Contract** - during 2006 the County Council agreed a new long-term waste management contract for municipal waste. Some respondents made comments on this process and the site-specific proposals associated with it.
  - **Leading by example** - many respondents were keen to see improved kerbside collection schemes for householders and for greater controls over how private companies (e.g. retailers, industry etc.) manage their waste. They also want to see closer working with supermarkets and other industries to raise awareness of the need to minimise waste.
  - **Behaviour change** - many respondents also focused on measures they would like to see introduced to improve waste behaviour such as financial penalties for companies who do not separate their waste for recycling. There were also calls to recycle a wider range of materials through either kerbside collection or the Household Waste Recycling Centres.
  - **Recycling rates** - many respondents felt that the recycling target of 50% for municipal waste is too low. Some also thought that this would mean future recycling rates would be artificially capped at 50% and could not improve.
  - **Role of the Waste Stakeholder Group** - a number of respondents referred to the role of the Waste Stakeholder Group and which organisations were involved. (The group is an informal body made up of representatives from the statutory agencies for health, nature conservation, landscape and the environment; the waste industry; other local authority functions including waste collection, disposal and environmental health; local environmental groups and the local association of Parish Councils).
  - **Sustainability Appraisal** - some respondents were concerned that the Regional Waste Strategy, which forms the part of the background for the Core Strategy, was not itself subject to a separate Sustainability Appraisal.
  - **Map of plan area** - the boundary of the Green Belt is not clear enough.
  - **Background papers** - a small number of respondents highlighted that some of the Background Papers were not initially available on the website. These were all contacted individually and offered a further period in which to comment. No further responses were received.
- Radioactive waste** - some respondents misunderstood the scope of the Waste Core Strategy and made detailed comments relating to radioactive waste - possibly prompted by a national level consultation on radioactive waste at the time. Radioactive waste is not part of the Waste Core Strategy.

## Issue 1: Role of the Waste Core Strategy

The Waste Core Strategy must ensure we have enough waste management capacity to meet future needs and that we manage our waste as sustainably as possible. It will set out how much waste capacity we need, and establish broad principles guiding how and where this waste should be managed.

We asked you:

Q1. Do you agree with this vision for the Waste Core Strategy?

You told us:

- There was broad support for the vision and role of the Waste Core Strategy
- The vision should go further and drive efforts for greater waste reduction and re-use
- More emphasis should be placed on managing waste from the commercial & industrial and the construction & demolition sectors
- The Core Strategy's aims and priorities should consider the needs of neighbouring authorities and the region as a whole
- The wording 'over the plan period' should be added to the vision
- The overall strategy for each of the Sub-Areas within the County should be further developed in line with the emerging Regional Spatial Strategy
- The strategy does not adequately account for potential future reductions in waste production and for increased recycling rates
- Concerns were expressed that some of the issues should be addressed regionally rather than at the County/City level
- The role of the Core Strategy should be to provide sufficient waste management facilities to meet future need, but it needs to be flexible enough to adapt to changing circumstances
- A key role of the Core Strategy should be to balance the need to provide new waste facilities with the need to improve environmental quality

## Issue 2: Our Priorities

The Core Strategy has to balance our future waste management needs with wider aims such as maintaining or improving environmental quality, encouraging economic development and maintaining our social well-being. Suggested priorities for the Waste Core Strategy therefore aim to:

- Protect human health and the environment
- Use resources efficiently
- Improve public involvement

## We asked you:

Q2a. Do you agree with these priorities?

Q2b. Are there any other issues we should consider?

## You told us:

Q2a:

- There was broad support for the priorities identified, although some respondents expressed reservations about how the rest of the document aims to address them
- Some felt the priority to use resources efficiently should appear first
- Others felt the priorities should recognise that matters relating to human health and the environment are covered by waste management licensing and PPS permitting functions
- Some felt there should be more effort to ensure the Council effectively responds to community involvement, rather than simply improving it

Q2b: Various additional priorities were suggested including:

- Focus on waste reduction and increased recycling / composting
- Raise awareness to promote behavioural change in relation to waste
- Focus on driving waste further up the waste hierarchy
- Manage waste effectively by using all available means to eliminate need for landfill by 2015
- Address climate change issues
- Focus on 'polluter pays' and 'proximity' principles
- Include the priorities set out in PPS10
- Should adopt zero waste policy
- Focus on issues relating to cost and cost-benefit analysis
- Principle of social justice should be included
- Ensure effective infrastructure is in place to encourage local recycling
- Should focus on incinerating as much of the right types of waste as possible to generate electricity and recover heat for commercial and domestic use
- Priority should be to work on reducing and managing waste from the Commercial and Industrial sector

## Issue 3: Time-scale

National guidance advises that a Waste Core Strategy should look ahead at least 10 years but also look beyond this to any longer-term horizon set out in the Regional Spatial Strategy. For the East Midlands, this is 2021, which would give a plan period of 14 years from adoption.

We asked you:

Q3a. Is this an appropriate time-scale for the Core Strategy?

Q3b. If not, what end date would you prefer and why?

You told us:

Q3a:

- There was some support for the proposed end date of 2021 although other alternatives were suggested (see below)

Q3b:

- Some comments suggested that a time-scale of at least 20 years was necessary
- Others indicated that a time-scale of 10 years should be considered as a maximum given the continual changes in waste management guidance and practice
- A number of comments suggested an end date of 2026, in line with the emerging Revised RSS8, would be more appropriate
- It was suggested that the Waste Core Strategy should be delayed until the emerging Revised RSS8 has been subjected to Examination in Public and the Report of the Panel conducting the examination has been published

## Issue 4: How should we plan for future needs?

Our existing waste management capacity will not meet future needs. As a minimum we must make specific provision to meet the lower growth forecast but we also need the flexibility to respond to higher levels of growth if needed. There are three ways we can do this:

- a) Make only the minimum provision and rely on early monitoring and review of the Waste Core Strategy;
- b) Make maximum provision for future waste growth with no restrictions;
- c) Make maximum provision but only allow a phased release of sites based on monitoring evidence

We asked you:

Q4a. Which of these options do you prefer and why?

Q4b. Is there any other realistic alternative that we should consider?

You told us:

Q4a: There was some support, and objection, for each of the proposed options:

- Those respondents who supported option a) felt that this would provide a better opportunity to take account of possible reductions in waste production and possible improvements in data availability in the future - these respondents generally felt that options b) and c) could potentially lead to over-provision

- Those who supported option c) felt that this would provide the most flexible approach whilst providing certainty of delivery for required facilities - these respondents generally felt that option a) was too restrictive but option b) could lead to unnecessary over-provision
- There was less support for option b), although those who favoured this approach felt that it would ensure that waste would not need to be exported elsewhere and that it would provide flexibility to allow for facilities which did not come forward over the plan period as anticipated

Q4b: Various other options were suggested:

- Aspire to, and plan for, zero waste growth
- Incentivise waste minimisation by making maximum provision for facilities but on a local basis - this would reward communities that engage with waste minimisation as there would be no need to implement the planned new facilities in these areas
- Plan for fewer new waste facilities to force waste minimisation

## Issue 5: Reduction and re-use

We need to promote greater awareness of waste issues for all types of development. One approach is to create better links between our own waste policies and more general planning policies by encouraging the district councils to address this in their plans. Suggested policy areas are:

- Use of recycled materials in new buildings and other development
- Providing space for waste management facilities within/alongside new developments
- Site waste management plans

We asked you:

Q5a. Do you agree with this approach?

Q5b. Are there any other options that you think we should consider?

You told us:

5a:

- Overall support was expressed for the proposed approach
- Some respondents felt that this issue should be given higher priority within the Core Strategy
- Others supported the approach, but felt that the issue of reducing and re-using waste should extend beyond issues primarily related to construction and new developments
- Some respondents sought a greater emphasis of the leadership role of local authorities and suggested that new developments such as schools should act as examples of how such measures can be incorporated

- Whilst the provision of space for waste management facilities within/alongside new developments is supported, such facilities should not be located in areas of high flood risk
- Provision of integrated waste management facilities should be made without detrimental impacts in landscape or biodiversity terms

5b: Various additional options were put forward:

- Suitable types of inert construction and demolition waste could be put to good use such as constructing flood defences in villages currently subject to flood risk
- Put pressure on other areas to reduce and recycle waste such as packaging, junk mail, plastic carrier bags
- Emphasis should be placed on re-using / recycling existing buildings rather than demolishing them
- Encourage greater segregation and separation of waste to increase re-use, recycling and composting
- Other options could include community and commercial re-use projects
- Provide more Household Waste Recycling Centres
- Aspire towards zero waste production
- Encourage assessment of planning applications for new developments against Building Research Establishment Environmental Assessment Method (BREEAM) standards, with targets to achieve at least a 'good' rating
- Districts and the County and City Councils should work together but not necessarily share facilities unless it is to their mutual benefit

## Issue 6: Future provision for recycling

Meeting future recycling targets for municipal waste will depend on providing new large-scale Material Recovery Facilities (MRFs) to support local recycling efforts. The Core Strategy will also need to consider how well the existing network of Household Waste Recycling Centres (HWRCs) is working.

Future needs for commercial and industrial wastes are less certain but it is important that we promote greater recycling of these wastes as far as possible. This could mean allowing new sites where needed or making better use of existing facilities. Providing a Resource Recovery Park may be another option.

**We asked you:**

**Q6a. Should we promote Materials Recovery Facilities that are able to take commercial and industrial as well as municipal waste?**

**Q6b. Should we promote the idea of a Resource Recovery Park for Nottinghamshire?**

**Q6c. Are there any areas that are not well served by exiting Households Waste Recycling Centres or where these need to be improved?**

## You told us:

### Q6a:

- There was broad support for the promotion of MRFs able to take commercial and industrial waste as well as municipal waste
- A number of respondents were concerned at the prospect of large-scale MRFs and felt that a number of smaller-scale facilities (for both municipal and commercial and industrial waste) would be more appropriate
- Some respondents noted that joint MRFs may not be practical as the sources of municipal and commercial and industrial waste might not be the same geographically
- Other respondents felt that the costs of joint MRFs should be borne by businesses rather than the public
- A small number of comments noted that the expansion of existing facilities should be fully explored before considering the development of new facilities
- A small number of respondents did not support the principle of joint MRFs and felt that other options were more appropriate in environmental terms

### Q6b:

- There was broad support for the concept of a Resource Recovery Park in Nottinghamshire
- A number of respondents commented that a series of Resource Recovery Parks should be developed - some sought parks in both the north and south of the County and others sought parks for each main urban area
- Some respondents felt that support or opposition to Resource Recovery Parks would be dependent on the precise facilities and technologies that would be developed there
- A number of respondents were concerned that a Resource Recovery Park might replace current Household Waste Recycling Centres or that waste would have to be transported over large distances to get to such a park.

### Q6c:

- Respondents suggested that Household Waste Recycling Centres could be improved in Cotham, Retford, Ollerton, Boughton, Clipstone, Worksop, Southwell (Fiskerton Tip) and in southwest Nottinghamshire generally
- There should be more co-operation between neighbouring authorities so that residents living near to 'borders' should be allowed to use Household Waste Recycling Centres in the neighbouring authority if this was the nearest facility
- Some respondents were unclear about how the Core Strategy would address the issue of end-of-life vehicles and waste electronic equipment in line with new EU directives

## Issue 7: Composting

Composting rates must increase significantly if future recycling targets are to be met. The type and scale of existing sites is quite limited and only provides for municipal waste. Promoting wider use of composting for other wastes will require the provision of enclosed or in-vessel schemes in some cases.

We asked you:

Q7a. Should we promote higher levels of composting for municipal waste (including large-scale sites)?

Q7b. Should we promote greater recycling of commercial and industrial (e.g. food) waste?

You told us:

Q7a:

- There was support for composting municipal waste
- Community composting and home composting should be encouraged
- More composting facilities are required
- Some support was expressed for large-scale facilities alongside promoting more home facilities
- Some had concerns over environmental issues (particularly smells) - there were views that facilities (especially larger ones) should be located away from residential areas
- There were some objections to a strategy based on one large facility, with views that more local options should be pursued
- Composting policies need to consider methane capture/reduction
- Some commented that the process is reliant upon finding markets for compost, and that decisions on the most appropriate strategy should be driven by Sustainability Appraisal and Best Practicable Environmental Option processes

Q7b:

- Those who answered this question expressed broad support for promoting composting for other waste types including commercial and industrial

## Issue 8: Energy recovery

We cannot recycle all of our waste and we cannot continue to simply dispose of it in landfill sites. We will need some form of additional energy recovery if we are to meet future targets for municipal waste. However, energy could also be recovered from a large proportion of other waste that is currently landfilled. This would help to offset some of our need for fossil fuels and reduce our reliance on landfill.

We asked you:

Q8a. Should we promote higher levels of energy recovery (for all waste) in order to limit our future landfill needs?

Q8b. Should we have a single policy to cover all types of energy recovery or are there reasons why they should be treated separately?

## You told us:

### Q8a:

- Responses varied from a broad acceptance that some form of additional energy recovery is needed for all waste types to strong objections to any type of energy recovery
- Those that supported greater use of energy recovery also wanted to see local benefits in terms of heat and/or power being used in nearby businesses and homes
- Most of those who opposed higher levels of energy recovery were against the use of incineration on the grounds of possible health and other environmental impacts
- Some of those that supported energy recovery in principle expressed a concern that it should not take place at the expense of the environment
- The proximity of any new sites to residential areas was a major concern
- There was a common concern that increased energy recovery should not compete with efforts to boost recycling
- Future energy recovery facilities should be located close to the main sources of waste, have good transport links and not harm existing residential areas

### Q8b:

- Some respondents supported the principle of a single policy to deal with all types of energy recovery
- Some felt a single policy approach would provide potential developers with the flexibility required to develop the most appropriate solution rather than constraining them to a particular type of technology
- Others did not support a single policy approach - concern was expressed that this would not allow the different issues associated with different technologies to be fully and rigorously addressed
- Some respondents felt that the policy should at least distinguish between energy recovery from source separated waste (e.g. anaerobic digestion) and recovery from residual mixed waste (e.g. incineration)
- Others felt that the methane generating capacity of anaerobic digestion and sewage sludge digestion should be more fully addressed as an energy source

## Issue 9 - Meeting future landfill needs

Even with high rates of recycling and recovery, Nottinghamshire will need to dispose of around 18 million tonnes of non-hazardous and 6 million tonnes of inert waste by 2021. Existing sites are running out rapidly and we urgently need to replace them. The priority is to find new non-hazardous capacity to serve Nottingham, Mansfield and Ashfield but we will also need to maintain provision for inert waste in the longer-term.

## We asked you:

Q9a. Do you agree with this assessment of our priorities for future landfill needs?

Q9b. If not, what alternatives can you suggest for disposing of waste that cannot be managed in another way?

## You told us:

### Q9a:

- Some respondents supported the assessment of priorities for future landfill needs. Of these, some suggested that future sites should be close to the main sources of waste
- Others who supported the assessment noted that future sites should be co-located with other industrial uses, and that proper use should be made of waste heat and methane from landfill
- Other respondents supported the use of inert waste as it can lead to the reclamation of land that would otherwise be unusable
- A number of respondents disagreed with the assessment of priorities for future landfill needs
- A large proportion of these respondents expressed concern over the data used to assess future need - in terms of both the projected future waste arisings and the existing capacity of current landfill sites and how long these might last
- These respondents therefore expressed a need for a more robust evidence base for landfill planning, particularly given the impacts that such development would have on local communities and the length of covered by the Waste Core Strategy

### Q9b:

- Some respondents felt that the re-working of former landfill sites and 'mothballed' landfill sites should be considered before looking for new landfill sites
- Others felt that landraising in locations well away from existing residential properties should be preferred over landfill sites near to existing homes
- Other respondents considered that greater freedoms to recycle inert waste materials where they arise would lead to a reduction in the need for inert landfill capacity
- A number of respondents felt that large landfill sites should not be provided as this might compromise future recycling and reduction efforts, and could lead to waste being imported from elsewhere
- Of those who disagreed with the priorities for future landfill provision, there was a general feeling that more effort should be made in relation to reduction, recycling and the source separation of waste

## Issue 10: Hazardous waste disposal

Future requirements for hazardous waste disposal are likely to be limited but Nottinghamshire may, nevertheless, have to play in its part in supporting regional efforts to manage hazardous waste

We asked you:

Q10. Do you think there is a case for providing hazardous waste disposal capacity within Nottinghamshire in future?

You told us:

- The majority of respondents felt there was no case for providing hazardous waste disposal capacity in Nottinghamshire - there is little demand, the County is geologically unsuitable for such facilities, and facilities should be provided on a regional basis
- A number of respondents felt that Nottinghamshire should, in principle, provide for its own fair share of hazardous waste (although not provide for imports of waste)
- As farms often generate low levels of hazardous waste, local provision would avoid the need to transport this elsewhere
- One respondent stated that, if Energy from Waste is to increase in the future within Nottinghamshire, there will be an associated increase in the production of hazardous waste

## Issue 11: Waste transfer

Waste transfer will play an important role in supporting other types of waste management – especially for recycling. Combining sites that can take several types of waste may be more effective than making separate provision although there may be a need for smaller sites in rural areas or to manage specialist wastes. The location of sites will be important in reducing the overall distance waste has to travel and the number of vehicle movements. We may need almost double our current capacity by 2021.

We asked you:

Q11a. Is there a need to have separate facilities for different waste types?

Q11b. Are there any areas of Nottinghamshire where you think new facilities are needed?

You told us:

Q11a:

- There was a mixed response about having separate facilities
- Those respondents that supported such an approach felt that this would enable better sorting of waste - enabling better re-use and recycling
- Those who did not support this approach felt there was a need for more local facilities taking several waste types, rather than a smaller number of larger, specific facilities. Others noted that there might not necessarily be an operational need for separate facilities for different waste types
- Other respondents who did not support separate facilities felt that these would be more likely to result in the need for greater transport of waste. There was also a concern that existing local facilities might be lost
- Other respondents felt the approach would depend on the volume of different waste types and their point of generation

Q11b: Various options were suggested, including -

- A need for Waste Transfer Stations in Newark & Sherwood District
- A need to provide some facilities in rural areas which could also deal with waste from agriculture
- All settlements of whatever size need waste facilities in easy reach
- A need for more facilities in Nottingham and a number of smaller sites elsewhere

## Issue 12: The future pattern of waste development

As most waste comes from our urban and industrial areas, it makes sense to locate the majority of waste management sites as close as possible to these areas. Key areas are likely to be:

- Nottingham
- Newark
- Mansfield
- Worksop

In more rural areas there may be a need for a lesser number of small-scale sites to meet local needs.

**We asked you:**

**Q12a. Do you agree with this proposed pattern of development?**

**Q12b. Are there any alternatives that you think are better?**

**You told us:**

Q12a:

- The vast majority of respondents supported the proposed pattern of development, although some stated that facilities should not be located within densely populated areas, should not be too large and that policies should be developed to set out how social, environmental and economic criteria would be applied in determining precise locations

- Others supported the proposal but felt there should be greater correlation between the distribution of new waste facilities and the growth proposed within the Regional Spatial Strategy
- Some respondents supported the proposal with the exception of on-farm composting schemes
- Others felt that, whilst small facilities in rural areas are important, these must be established in consultation with local communities
- Others felt that new facilities should be distributed around the county to ensure social fairness, and that deprived communities should not be the focus for new waste development

Q12b:

- Very few alternatives were proposed, although it was suggested that all rural villages should be provided with skips for organic and garden waste for composting and bottle / paper banks for recycling

### Issue 13: Suggested search sequence

Wherever possible, waste should be managed close to source. This suggests that the Waste Core Strategy should promote a sequential approach to site selection based on:

- Re-use waste on-site
- Use existing land or buildings close to source
- Manage waste further afield only where there are no acceptable local sites or more remote sites offer overall environmental benefits (e.g. reclaiming derelict land)
- Greenfield land (i.e. undeveloped) close to source

We asked you:

Q13a. Do you agree with this suggested approach?

Q13b. If not, what alternative(s) do you suggest?

You told us:

Q13a:

- The majority of respondents agreed with the approach in principle
- Of those that broadly agreed with the approach, the following comments were raised:
  - Proximity to trunk roads needs to be considered and impacts kept to a minimum
  - Additional criteria relating to the proximity principle should be added
  - The second bullet should be expanded to include extensions to existing facilities
  - The precise location of facilities will need to take into account environmental, landscape and biodiversity factors
  - Greenfield sites should be kept to an absolute minimum / there should be no need to use Greenfield sites

- It should be spelled out that the second bullet relates to previously developed land
- The use of derelict land in remote locations would not necessarily always offer environmental benefits
- There appears to be a tension between the intention to manage waste close to source in line with the sequential approach and the option of developing a small number of larger waste facilities expressed elsewhere in the document
- Facilities should only be developed close to source where this involves sites located away from centres of population - otherwise Greenfield sites should be used
- Some respondents did not support the proposed approach. These respondents argued that the proposed approach does not take account of the location of facilities in relation to main centres of population. They also believed that the use of derelict land implies the use of former colliery sites, and expressed concern that developing waste facilities in such locations would have further detrimental impacts on communities that have been blighted by such uses for long periods of time

Q13b:

- Some respondents felt that composting would be more appropriate in the countryside - particularly on-farm schemes
- Others felt that the search sequence might be suitable for built development but would not be suitable for landfill
- It was suggested that the co-location of facilities should be added to the list as a priority
- Further respondents suggested that the impact on local communities should be the first priority when determining suitable site locations
- Others proposed the following sequence:
  - Reduce all types of waste
  - Re-use waste on site
  - Use existing facilities close to source
  - Manage further afield with consideration to environmental damage and benefits
  - Re-open 'mothballed' sites

## Issue 14: Suggested site criteria

The various types of different waste management facilities vary in their scale, appearance and environmental impact. As well as setting out an appropriate search sequence (see Issue 13 above), the Core Strategy also needs to identify the types of site or location that are suitable for these different uses. As a guide to what might be acceptable the 'Issues and Options' consultation document set out a possible approach based on the following broad types of location and tried to match facility types by their size, appearance and/or environmental impact.



Local community sites – close to existing homes and shops may be suitable for smaller community facilities such as bring sites (i.e. bottle/paper banks).



Employment land - already used or allocated for industry, storage, distribution, offices etc. may be suitable for a wider range of waste uses – especially where these are contained within a building e.g. larger recycling sites, energy recovery, in-vessel composting etc. In some cases this could include open air uses such as scrapyards and composting.



Derelict land/other brownfield sites – land that has been abandoned or is no longer in use could be redeveloped for a range of waste management uses. This could include built uses such as recycling, energy recovery and composting but there may also be opportunities to reclaim old quarries or similar through landfill.



Countryside/agricultural land – may provide opportunities for smaller scale recycling or energy recovery facilities to meet local needs. Large scale open-air composting may also be appropriate. There may also be limited scope for waste disposal in some cases.



Greenbelt – may also be suitable for some waste management uses although this would generally be smaller scale. This could include landfill where it is used to reclaim old quarries or derelict land within the Greenbelt.

## We asked you:

Q14a. Do you agree with this suggested approach?

Q14b. Are there any other types of location you think we should consider?

## You told us:

Q14a:

- There was a mixed response in relation to the suggested approach
- A number of respondents expressed general support, although some also raised the following additional concerns:
  - It should be made clear this is a general approach and that the individual circumstances of particular sites will need to be considered
  - Whilst urban industrial sites close to waterways should be considered, the other uses of such waterways should not be prejudiced by new development
- Whilst agreeing generally, some respondents felt that Green Belt land should not be considered for development under any circumstances

- Of those who disagreed with the proposed approach, the following particular issues were raised:
  - All sites should be considered on an equal basis according to merit
  - There should be only 1 single site criteria for energy recovery facilities, and Mechanical Biological Treatment should not be included in this category
  - Too much emphasis is placed on former colliery and quarry land, where communities may have been detrimentally affected by these uses for many years
  - Green Belt should not be considered for landfill
  - Open land should not be used for waste disposal, transfer or in-vessel composting
  - Derelict/brownfield land is not always the most appropriate option for large developments, particularly where it is in remote locations. This approach also ignores the specific biodiversity value associated with some such land
  - It is wrong to exclude small-scale anaerobic digestion schemes in the Green Belt, particularly where these could be associated with agricultural activity

Q14b: Various alternative approaches were suggested, including:

- Some former sand and gravel workings should be specifically mentioned
- Landscape character assessment could be used as a tool to help steer the range of options
- Community sites for micro in-vessel composting should be explored
- The first consideration should be the impact on neighbouring communities
- There should be a differentiation between sites close to residential areas and those further away
- There should be clearer support for the continuation of existing Household Waste Recycling Centres in the open countryside where there are currently no environmental problems
- The emphasis should be on planning for smaller-scale facilities with shorter life spans
- There should be greater emphasis on existing waste sites
- The safe operation of aircraft should not be compromised by new developments

## Issue 15: Safeguarding

The Core Strategy will need to consider whether it is appropriate to give long-term protection to certain sites through a safeguarding policy.

We asked you:

Q15a. Do you think it is necessary to have a safeguarding policy?

Q15b. Should this only be for major sites?

Q15c. Are there specific locations or types of site that you think should be safeguarded?

## You told us:

### Q15a:

- There was a mixed response in relation to the principle of safeguarding sites, with some supporting it and others objecting to it

### Q15b:

- Of those who supported safeguarding in principle, some felt that it should apply only to large sites whilst others felt that it should also apply to small sites
- A number of respondents felt that safeguarding should only apply to large sites and only for needs over the short to medium term
- Some respondents felt that, where a small number of sites offered strategic advantage (for example large sites or those with potential access by sustainable transport methods including rail and water), these should be safeguarded. Others felt that sites should be safeguarded providing they have been subject to a full assessment and considered to be sequentially preferable
- A large number of those who did not support the principle of safeguarding felt that this could blight sites and that restoration conditions at mineral sites would not be implemented - in conflict with the objectives of the Minerals Local Plan

### Q15c: Suggested locations and types of site were:

- Sites should be attached to industrial and commercial estates and incineration plants, not in the countryside
- Priority should be given to the extension of existing sites
- Clay workings should be safeguarded as potential landfill sites
- Green Belt should be safeguarded

## Issue 16: Extensions to existing sites

The Core Strategy could include a policy in favour of extending facilities where this would bring clear environmental benefits.

## We asked you:

### Q16. Do you agree with this approach?

## You told us:

- There was broad support for the principle of extending existing facilities which was considered to be in line with national and regional policy
- Of those that supported this approach, most felt that this would represent the most sustainable option and make the best use of current infrastructure

- Whilst supporting the approach in principle a number of detailed concerns were raised:
  - Issues about the quality of life of local residents must be considered and extensions should only be allowed where they have been subject to full consultation with all affected people
  - There should be no impact on humans and health
  - Full planning permission must be sought before facilities are extended
  - Care should be taken not to endanger the health of animals, especially those in the food chain
  - The policy will need to refer to the quality of access to the site, the existing infrastructure and whether there is capacity on the road network
- A number of people did not support the extension of existing facilities for the following reasons:
  - The position depends on local circumstances and the suitability of individual sites for extension - extension does not necessarily bring environmental benefits in all cases
  - Decisions should be taken on an individual basis, taking account of cumulative impacts on people and the environment
  - Just because a site was considered appropriate 20 years ago does not necessarily mean that it would be suitable now
  - There is not enough information provided to support the proposals

## Issue 17: Policy Topics

- Air, soil and water
- Landscape and wildlife
- Historic environment and built heritage
- Traffic and access
- Quality of life
- Site restoration

### We asked you:

Q17a. Do you agree with the way in which we have grouped these topics?

Q17b. Are there any other impacts that you think should be considered?

### You told us:

Q17a:

- There was broad support, in principle, for the proposed policy topic groupings
- However, a number of those respondents who supported the approach in principle argued that there was a need to address how the issues would be prioritised in the event of conflict between them - and that this should be subject to further consultation

- Some respondents felt that 'quality of life' should be given the highest priority
- One respondent commented that air quality appears twice in the list
- Other respondents felt that the themes, in descending order of priority should be: safety of the public; quality of life of nearby population; landscape, wildlife, historic environment and built heritage

Q17b: Other topics that were suggested included:

- Loss of amenity
- Loss of rights of way and impacts in terms of enjoyment and safety of users
- Impacts on the trunk road network and use of Green Travel Plans where possible
- Reference to future development patterns
- Flood risk
- Threat to human health, wildlife and livestock
- Climate change
- Convenience of sites in relation to local users
- Social justice / community engagement
- Impacts on waterway corridors and users of these corridors
- Landscape and wildlife issues should embrace not only existing site conditions but also potential for enhancement
- Landscape section should include connectivity and potential connectivity of habitats
- Proximity to residential development
- Likelihood of attracting additional development
- Underground watercourses, springs and aquifers
- Site restoration should refer to the potential to contribute to Biodiversity Action Plan (BAP) targets
- Safe operation of aircraft
- An alternative list of themes comprised:
  - Geology, soils and water
  - Landscape
  - Natural environment
  - Historic environment and built heritage
  - Traffic
  - Site Restoration

## Issue 18: Planning Conditions

National guidance prescribes a list of possible impacts that we must consider when deciding whether or not waste development should go ahead. We also need to know which issues cause the most concern and if there are any other measures that we could reasonably take to improve the acceptability of waste management facilities.

**We asked you:**

**Q18a. What concerns you most about waste management sites?**

**Q18b. What else could we do to reduce the local impacts of these sites?**

## You told us:

Q18a: The concerns expressed (in no particular order) were:

- Air quality issues
- Impacts on soil and geology
- Flood risk and water quality issues
- Amenity implications - noise, dust, vibration, litter
- Impacts on residential areas - including impacts on property prices
- Transport and road infrastructure impacts
- Effects on wildlife - loss of habitats and impact on habitat connectivity
- Impacts on health and safety - both human and other ecosystems
- Impacts on quality of life of nearby communities
- Loss of countryside
- Climate change
- Pollution
- Issues relating to democracy, public consultation and social justice
- Sustainable development principles
- Fly-tipping
- Ensuring the safe operation of aircraft
- Convenience of location
- Site restoration
- Ensuring effective control and regulation

Q18b: The suggested measures for reducing the impact of waste sites (again in no particular order) were:

- Use tools such as landscape character, sensitivity and capacity studies to identify appropriate sites
- Early consideration of potential impacts
- Engage with local communities - hold early discussions / consultation over proposals
- Ensure plans and policies are communicated in plain English
- Ensure any conditions are enforced
- Locate facilities away from residential areas
- Use planning obligations as well as conditions
- Use measures such as landscaping, screening, bunding, exclusive access roads where cost is met by developers

## Issue 19: Reducing the number of policies

As a way of reducing the number of policies in the plan, we propose to merge the following issues into single policies:

|                       |   |   |
|-----------------------|---|---|
| 'nuisance'            | = | noise, dust, mud, odour, vermin, light pollution  |
| 'countryside'         | = | open space, landscape, countryside character  |
| 'nature conservation' | = | wildlife and their habitats including trees, woodland, heathland, water and geological sites  |
| 'restoration'         | = | site restoration including how work will be phased, the final landscape scheme and alternative schemes  |
| 'maintenance'         | = | site maintenance, aftercare and long-term site management including monitoring drainage, landfill gas etc.  |
| 'after-use'           | = | measures to suitability of the site for agriculture, woodland, nature conservation, recreation and/or built development including soil depth and land stability |

### We asked you:

Q19a. Do you agree with the proposed approach of combining policies where possible?

Q19b. Are there any other policy areas that you feel should be merged?

### You told us:

Q19a:

- A number of respondents expressed support for reducing the number of policies
  - Of these, some felt a reduction in policies would only be appropriate if this did not result in policies which were excessively long, while others thought it would only be appropriate providing all issues were fully covered in each policy
  - Some supported the proposed approach providing that the titles of policies were not misleading - in particular it was noted that 'open space' was covered in the countryside theme despite the fact that open space can be an important asset in urban areas
- A number of respondents did not support the proposed approach
  - The majority of these felt that all the issues were important enough to be considered in their own right
  - Others felt that it was inappropriate to cover potential safety issues under the category of 'nuisance'

Q19b:

- Countryside and nature conservation issues could possibly be combined
- If combining policies an overall clause should be inserted to state that all reasonable powers to protect the public, countryside etc. will be exerted as necessary
- Policy areas on the following issues were requested:
  - Water resources
  - Planning obligations
  - Human health
  - Rights of way impacts

## Issue 20: Supplementary guidance

Producing supplementary guidance on best practice and the types of planning condition that might be imposed on development would help us to have fewer and shorter policies but we will need to be satisfied that this is a sound and workable approach.

We asked you:

Q20a. Do you think that it is appropriate to prepare supplementary guidance along these lines?

Q20b. Are you concerned that this might weaken our planning policies?

You told us:

Q20a:

- There was a mixed response with a number of respondents supporting the proposed approach and others objecting to it
- Whilst supporting the approach some respondents raised the following concerns:
  - It should not duplicate other documents
  - It must be underpinned by very strong statutory policies which are not open to misinterpretation
  - Any supplementary guidance must be transparent, accessible and open to consultation
  - Such guidance could deal with matters such as measures to offset environmental impacts and site restoration
- Those respondents who objected to the use of supplementary guidance as proposed, raised the following concerns:
  - Formal statutory policies are needed
  - There should be no need for supplementary guidance as the correct policy, in accordance with PPS10 guidance, should be within the Core Strategy

Q20b:

- Again there was a mixed response
- Those respondents that objected to the proposed use of supplementary guidance generally felt that it would weaken planning policies
- Those who supported the use of supplementary guidance generally felt that this would not weaken planning policies

## Issue 21: National and regional policy

We propose not to repeat national or regional policy or legislative requirements unless there is some sound local reason to do so.

We asked you:

Q21. Do you agree with this more streamlined approach?

You told us:

- There was some support for this approach
- Of those who supported the proposed approach in principle, the following additional comments were expressed:
  - Signposting to relevant policy documents is necessary so that those who are not familiar with national policy can understand the context
  - It is clearly essential that plan policies are in conformity with national and regional policy
  - Some national policies have been ignored within the current document, such as the reduction in landfill of commercial and industrial waste
- Other respondents did not support this approach because:
  - Reference to national policy is necessary for people unfamiliar with the system to understand the context
  - It is important to give local expression to the full range of national policy

## Issue 22: Local Issues

The following list sets out those issues that we feel should still be covered by local level policies:

- Landscape
- Green Belt
- Nature Conservation
- Heritage
- Design Quality
- Public Access

We asked you:

Q22a. Do you agree with this approach?

Q22b. Are there other issues that you feel should be included?

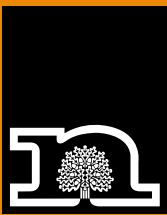
You told us:

Q22a:

- There was general agreement for this approach
- Of those who supported the approach in principle, the following additional comments were made:
  - The comments on Mature Landscape Areas and local areas of heritage importance downplay their place in statutory Development Plans
- Others objected to the proposed approach on the following grounds:
  - Other issues are dealt with entirely appropriately in the RSS and in other policies within Local Development Framework Core Strategies. The Waste Core Strategy / Waste Development Framework should stick to waste issues rather than trying to duplicate other policies.
  - Not enough information is provided on Green Belt

Q22b: Various additional areas were suggested for inclusion as local issues including:

- Flood risk
- Design issues - particularly in relation to sustainability
- Waterways
- Local landscape character
- Areas of special local value - not just Mature Landscape Areas
- Potential surface and groundwater resources which could affect SINCs and SSSIs
- Rights of way
- Loss of local amenity
- Biodiversity Action Plan priorities and wide-area conservation schemes
- Local biodiversity policies should reflect the imperative to enhance biodiversity not just protect it
- The following additional comments were also made in relation to the local issues:
  - Green Belt must be protected
  - All local issues should be covered in their own right



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