

Nottinghamshire and Nottingham

WASTE LOCAL PLAN

Issues and Options Consultation Report

March 2021

Table of Contents

1. Introduction	2
2. Consultation on the Issues and Options (Reg 18)	3
3. Call for sites	21
4. Conclusion	23

1. Introduction

- 1.1. On-going and effective consultation and community involvement is an essential part of the planning process. Nottinghamshire County Council and Nottingham City Council's approach to consultation and engagement with local people, statutory bodies and other groups during the preparation of the Waste Local Plan and on waste planning applications is set out in their Statements of Community Involvement (SCI).
- 1.2. This consultation statement details the Issues and Options consultation that was carried out for the Nottinghamshire and Nottingham Waste Local Plan. The statement explains:
 - Which statutory bodies, organisations and persons were invited to make representations and how they were invited to be involved
 - A summary of the main issues raised by the consultation
 - How these have been addressed in the Plan

Statement of Community Involvement

- 1.3. All local planning authorities are required to prepare a Statement of Community Involvement (SCI) setting out the consultation and publicity measures they will undertake when preparing their local plans. Both the Nottinghamshire and Nottingham SCI sets out the minimum legal requirements that councils must meet but also shows what additional measures they may use depending on the type of document being prepared. Having an SCI in place ensures that all parties have a clear understanding of when and how they will be involved at each stage in the preparation of the Plan.
- 1.4. On 15 March 2020 the Government published guidance explaining whether Statement of Community Involvement should be reviewed and updated in response to the coronavirus (COVID-19) pandemic. In order to conform to the social distancing measures, set out by the Government, the Councils are both temporarily changing how they consult with the community.
- 1.5. The most recent version of the County Council's SCI was adopted in March 2018. It details which groups will be consulted at specific stages of plan preparation and the methods that will be used (ranging from press adverts, leaflets and posters to exhibitions and public meetings). It states that reference copies of all consultation documents are to be made available to view at specified locations and published on the Council's website. Loan copies of documents should be available on request. A temporary Addendum to the SCI was adopted in September 2020 in response to the COVID-19 pandemic and social distancing restrictions. These changes will apply whilst the COVID-19 restrictions remain in place.
- 1.6. The City Council adopted their SCI in 2019 and introduced an Interim SCI in 2020.

Consultation and Involvement in the Plan Process

- 1.7. Wider public consultation and community engagement was carried out during the Issues and Options stage, targeted consultation with key stakeholders, statutory and

industry bodies was carried out throughout the plan preparation stage as part of both Councils SCI and Duty to Cooperate process.

- 1.8. A non-decision making Member/Officer working group of councillors and officers from the County Council and City Council was also set up and met at key stages of the plan making process to inform members of key issues raised during the consultation stages, discuss possible options and outline future steps.

2. Consultation on the Issues and Options (Reg 18)

- 2.1. This was the first stage of informal public consultation that followed the initial evidence gathering. The purpose of this consultation was to set out the main issues expected to arise during the plan period and to explore what reasonable options exist to resolve them.
- 2.2. Consultation on the Issues and Options ran between the 27th April until the 9th April 2020. However, the consultation period was extended by a further 4 weeks, ending on the 7th May 2020, owing to COVID 19 and the lockdown restrictions that were in place at the time.
- 2.3. The Issues and Options consultation document set out 17 specific questions covering the following:
 - The Plan period
 - The Plan area and its implications for waste management
 - Waste estimates and waste streams
 - Waste scenarios for Local Authority Collected Waste (LACW), Commercial and Industrial Waste (C&I), Construction, Demolition and Excavation Waste (C, D & E) and Hazardous Waste
 - Future recycling rates
 - Energy recovery and disposal capacity
 - The draft vision and objectives of the Plan
 - Broad locations for the location of waste management facilities
 - General site criteria for waste management facilities
 - Development Management Policies

Number of comments received, and the main issues raised

- 2.4. A total of 270 representations from 40 different respondents were received during the consultation period. The following sections below summarise the main issues raised for each of the 17 questions by the Issues and Options document chapter and outlines the Councils response of how the issues raised will be considered in the next stages of the plan.

Introduction

Total number of comments received: 3

- 2.5. Statutory consultees on the Nottinghamshire and Nottingham Waste Local Plan. Expressed their wishes to remain as consultees on the Joint Waste Local Plan.

Response

All comments noted. The Councils will continue to consult the Councils, Statutory consultees, members of the public and other appropriate bodies in line with the Statement of Community Involvement (SCI) and Government Practice on the Waste Local Plan.

Chapter 3- Setting the Overall Context of the Plan

Question 1- 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?

Total number of comments received: 15

- 2.6. In response to Question 1 a total of 5 respondents support the plan period, which is in line with Government policy as set out in the NPPF requiring a 15-year plan period from adoption. The end date dovetails with the end date for the Greater Nottingham Strategic Plan, which covers the period 2018 – 2038. In addition, 1 respondent considered the plan period to be too short, though did not define a preferred plan length and another respondent stipulated a preference for the plan to be 5 years.
- 2.7. Support was provided in terms of ensuring the Council take account of the mandatory period of review (at least once in every 5 years) is critical and the review period may be shorter. This will ensure the Plan's overall ambitions can be met while catering for the changes that lie ahead for the waste sector.

Response

The Councils note that the National Planning Policy Framework (NPPF) requires a 10-15 year plan period. The document will be amended to make this requirement clearer in the Draft Plan. The Plan will however be reviewed on a 5 yearly basis as required by the Planning Regulations and this will be referenced in the document. This Plan will align with the emerging Greater Nottingham Strategic Plan which covers the period 2018-2038. However, LPAs outside of Greater Nottingham (and Erewash) may well be working to different timescales. Under the duty to cooperate we will seek to ensure that we align with these as far as practicable.

- 2.8. Question 2 - Do you think any further information should be included in the overview of the Plan area and the implications for the management of waste?**

Total number of comments received: 17

- 2.9. In response to question 2 and the overview of the plan area, comments from all respondents focused on potential additional information that could be included within the overview text and within Plan 1. Four respondents commented that the overview contained sufficient information.

- 2.10. In relation to the overview text, respondents recommended including references to; the historic environment, the role of open and green spaces on health and wellbeing, High Speed Rail Two, other development plans within Nottingham and Nottinghamshire, including the Nottinghamshire Minerals Local Plan and the emerging Greater Nottingham Plan, future population growth in Nottinghamshire, East Midlands Airport, SSSI sites, Local Wildlife Sites, climate change impacts beyond flooding and a further explanation of the geology of the landscape and how this will effect where new waste infrastructure can be located.
- 2.11. Suggestions for Plan 1: Plan Area sought for this to display more information such as the A46 bypass, large towns and villages in addition to the main urban areas, major waste facilities, SSSI sites and flood plains. One respondent also made suggestions as to how the potential possible Special Protection Area and Special Area of Conservation should be visually represented.

Response

The Councils agree with respondents that reference should be made to the following within the overview: The historic environment, High Speed Rail Two, East Midlands airport, development plans by District and Borough Councils and their planned growth and; the network of SSSI and Local Wildlife sites within Nottinghamshire. The other recommendations, such as the role of open and green spaces, impacts of climate change and how the geology of the landscape will impact where new waste infrastructure can be built, will be covered in the relevant strategic and development management policy sections which will be more focused and detailed on specific issues.

In relation to Plan 1, the intention of this plan was to provide a geographical overview and understanding of the plan area. The additions suggested, such as towns and villages and SSSI sites, could cause the map to become congested and unreadable and become focused on several topic areas instead of providing a visual overview. It is the Councils intention to include in the next stages of the plan maps which will show the waste facilities in Nottinghamshire. If the plan does allocate specific sites for waste management facilities, more detailed maps displaying constraints such as SSSI sites, flood plains, heritage assets will be produced, with these considered within the Site Selection Methodology.

Chapter 4- Waste Management in the Plan Area

Question 3 - Do you agree with the current waste estimate? Do you have any other information which may lead to a different waste estimate?

Total number of comments received: 11

- 2.12. In relation to Question 3 comments stating that there should be more action to improve the proportion of waste recycled and the needs of the rural community needs to be considered. It was considered by a respondent that recycling provision has been reduced and that the proximity to recycling should be within a given distance to off-set carbon foot print and encourage usage.

- 2.13. With reference Table 5 Page 12 of the Preliminary Waste Needs Assessment which identifies the household projections for the Nottinghamshire authorities. It was noted that rather than identifying projections, any increase in waste from domestic properties should be based on the final local housing need figure (using the Government's Standard Method).
- 2.14. EA Permitted waste management facilities are required to submit waste returns that detail the types and quantities of waste they have handled. This data is available on Waste Data Interrogator. Although now voluntary, 1 respondent believes Site Waste Management Plans (SWMPs) have the potential to provide additional information about construction and demolition waste.
- 2.15. Reference was made to the need to provide further data within LACW regarding food waste and another respondent questioned whether LACW include waste taken to Household waste recycling centres?

Response

The Councils agree that the requirements for local authorities to deal with food waste lies outside the remit of the Waste Local Plan and is dealt with by the Waste Management Team. In response to recycling the Councils believe that recycling is given appropriate emphasis in the document. Meeting current and future recycling targets is highlighted in Objective 5. Recycling targets are set for private companies who dispose of waste as referenced on page 37. A section on recycling is included on page 38. It is also referenced under recovery, and waste transfer. The scope of the plan para 1.2 sets out an aspiration to achieve the highest rates of recycling possible. Recycling is highlighted as key to the circular economy. Recycling rates are referenced at para 4.5 Pars 4.21 and 4.22 reference recycling as does question 9 and the vision includes an aspiration to exceed recycling rates.

The Councils agree to look into rural initiatives in terms of accessibility in rural areas.

The Waste Local Plan will reference appropriate strategic documents and standard methodology so as to align with household projections.

The definition of LACW includes waste taken to Household Waste Recycling Centres.

Information from the Waste Data Interrogator has been analysed as part of the available evidence base. Site Waste Management Plans are only available for a relatively small number of developments but can be considered where available.

Question 4 - Do you have any other information about how these waste streams are managed? Are there other issues the Plan should consider?

Total number of comments received: 16

- 2.16. In relation to Question 4 comments were raised with regard to the information about waste types and recycling rates provided being limited and highlighting a lack of knowledge, measurement and recording. The respondent considers that data is the first step at assessing future needs. Quoting national estimates such as for commercial waste (C & D) is imprecise. Trend analysis and future projections, which also take into account projected changes in waste types, quantities is required if the plan is to be sound.
- 2.17. In addition, other than via existing methods of disposal, the plan should consider the potential issue expected from changes in the likely increased utilisation/reuse opportunities of separated waste streams during the life of the plan. It is anticipated that certain waste streams, such as separated food wastes and non-recyclable plastics, will increasingly become utilised for alternative end use materials during the timeframe of the plan. A review of this potentially new disposal area should be undertaken at each of the 5 year review periods.
- 2.18. EA permitted waste management facilities are required to submit waste returns that detail the types and quantities of waste they have handled. This data is available on Waste Data Interrogator. Although now voluntary, we believe Site Waste Management Plans (SWMPs) have the potential to provide additional information about construction and demolition waste.

Response

The Councils use published data/estimates for recycling rates for commercial and construction waste. These are only available at the national level as stated in the document and supporting evidence.

The Waste Local Plan will be reviewed every 5 years, as set out in the NPPF, this will ensure information is up to date.

The Councils use Information from the Waste Data Interrogator. It is analysed as part of the available evidence base and informs the Waste Local Plan. With reference to Site Waste Management Plans, these are only available for a relatively small number of developments but can be considered where available.

Question 5 - 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?

Total number of comments received: 14

- 2.19. Support was expressed for all the Options detailed, with varying degrees. Options C having the most support and 1 respondent did not support the growth scenarios and would prefer a 'no growth' outcome.
- 2.20. One respondent considered that Option A is lacking in ambition and there should be a higher reduction target per household. Option D should not be countenanced at all.

Similarly, rapidly advancing technologies in reuse of industrial and commercial waste as a valuable resource should also enable a higher target for the C&I sector.

- 2.21. Two respondents considered that the scenarios offer a good range. Based on patterns over the past 10 years (household waste grew by only 2.2% 2010-2017). They consider scenario B is most realistic i.e. the quantity of waste produced per household will be broadly static, albeit with economic boom and recessionary peaks and troughs, but overall LACW will increase over time as there is growth in the number of households.
- 2.22. One respondent agreed with the proposed scenario range provided within the plan, and feel Scenario A (0.5 % growth) is the most realistic estimate of the four scenarios proposed and, therefore, the most suitable scenario to base the local plan against.
- 2.23. The scenarios are appropriate but modelling the likelihood of each may add to the relevance of the plan. Within LAWC the food waste element is worthy of separate analysis & policy solutions being the heaviest fraction of that waste stream.

Response

The Councils note that in general the alternative scenarios are considered reasonable and will consider further the responses to inform the next stage of the Waste Local Plan.

The Councils are producing a Waste Local Plan and food waste collection systems are not within the scope of the Waste Local Plan, they are the responsibility of the Waste Management Teams.

The Waste Local Plan cannot control the level of future waste arisings but has to consider the amount and type of waste management capacity that is likely to be required.

Question 6 - 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?

Total number of comments received: 11

- 2.24. In response to Question 6, support was given to all Scenarios in equal measure, with most respondents considering they provided a good range. In addition, it was considered they should be reviewed every 5 years.
- 2.25. Scenario C or D was considered the most appropriate to ensure flexibility to react to economic / social / political and technological changes allowing the industry to provide the facilities in the right place to meet demand.

- 2.26. One respondent proposed that the scenario range provided within the plan was good and felt that Scenario B (2 % medium growth) is the most robust estimate of the three scenarios proposed.

Response

The Councils will take account of the support provided for each Scenario and will take account of the comments in relation to reacting flexibly to meet industry changes in ensuring demands are met.

Question 7 - 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?

Total number of comments received: 11

- 2.27. In general the scenarios are supported. Reference was made to the Greater Nottingham Growth Options consultation which puts forward different options which provide some flexibility and future drafts will distribute housing across the Greater Nottingham area. This distribution should inform the Waste Local Plan.
- 2.28. Reference was made to Historic England's 2019 Heritage Counts report which focuses on reuse and recycling buildings to reduce carbon and highlights alternative opportunities to demolition of existing fabric and new build which produces C, D and E waste. This information may be of use as evidence base information for the PPP section of the Sustainability Appraisal associated with the Plan in respect of the above questions. In addition, the 2019 report includes reference to the work undertaken by Poyntons, commissioned by Nottingham City Council, in respect of new homes over commercial uses in existing built fabric.

Response

The Councils note the support provided by respondents to the different scenarios. We are fully aware of the need to ensure flexibility in terms of housing distribution across the Plan area.

Question 8 - Do you agree with the estimate set out for Hazardous Waste? Do you have any evidence to support any other scenarios?

Total number of comments received: 8

In response to Question 8, 7 out of the 8 respondents had no comment to make. One respondent stated that they do not at present have the technical knowledge to advise

on which it considers to be the best scenarios and considers that the two Waste Authorities are in the best position to judge once they have the specialist input from relevant experts in the waste field. There will be a further opportunity to comment at the draft Waste Plan stage based on the evidence available at that time.

Response

The Councils note the comments made on this section of the Issues and Options document.

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?

Total number of comments received: 12

- 2.29. In response to Question 9 the concept of continued economic growth may have to be reassessed in light of global warming and pandemics. There needs to be flexibility in the plan to enable dealing with unforeseen consequences.
- 2.30. One respondent expects future recycling rates to be higher (60%+) but given the uncertainty around national policy and future economic growth they understand why the proposed plan is for a 10% increase. It was noted that additional consideration should be given to the types of facilities that may be required to handle new and increased waste streams.
- 2.31. One respondent agreed that recycling rates are likely to increase further with the introduction of separate food waste collections as outlined in the Environment Bill 2020. Likewise, the impact of any future deposit return schemes could have an effect on the kerbside collection schemes for some dry recyclables. To further increase recycling rates across Nottinghamshire further action should be given to expanding the current input specification which places restrictions on what can be delivered and recycled at the current MRF.
- 2.32. With regards to recycling rates one respondent assumes recycling rates and the use of manufacturer take back schemes will increase. They consider that the consultation is not considering any change to the makeup of waste such as through the introduction of new or emerging products such as increased use of plant based products for manufacture and packaging, changes in consumer buying patterns and product mix as part of a natural evolution. An example is the growth in personal IT and communications equipment in recent years and how this is making older infrastructure such as fixed telecommunications equipment redundant or needing to be repurposed. Will changes to the way people live, work and socialise also result in change. A forward thinking plan needs to consider such factors.

- 2.33. Two respondents agreed that recycling rates are capable of increasing by circa 10% over the WLP period, but this requires quite significant intervention and implementing all of the measures in 'Our Waste, Our Resources; A Strategy for England' (DEFRA 2018). Achieving circa 50% household waste recycling and circa 65% C&I waste recycling by the end of the WLP period would be in line with Tolvik national modelling.
- 2.34. It was suggested that these targets for recycling should be more ambitious, as this will drive innovation, and should be combined with drivers and incentives from the public sector to force change. The current situation under Covid 19 has shown how dramatically behaviour can be changed in a very short time (under awful circumstances that we hope will never be repeated) given sufficient government will. NWT would suggest that there is an opportunity for the WPAs to use lessons learned from the current crisis, about reductions in food waste, increased re-useable packaging (such as glass milk bottles) etc., to set considerably more ambitious targets, for the LACW stream in particular.
- 2.35. One local resident stated that recycling rates in Nottingham City are very poor in comparison to national figures, it would therefore be logical for the plan to deliver much higher rates linked to top quartile or top 5%.
- 2.36. One respondent considers that both kerbside and HRC systems need to change radically to achieve good waste management principles and performance.

Response

The Councils consider that the responses to Question 9 are outside the scope of the Waste Local Plan, relating to recycling rates and refuse collection. The Councils note these comments and kerbside collections are the responsibility of the Waste Management Team and lay outside the remit of the Waste Local Plan.

Question 10 - What role do you think recovery should play? Should the plan provide for higher levels of energy recovery in future?

Total number of comments received: 16

- 2.37. Support was given to the opportunities that are available to utilise the potential resource of energy recovery from waste. New developments should be encouraged through more effective enabling policies and proposals in the new Waste Local Plan with complimentary policies in the next round of Local Plans. Many respondents believe that recovering energy from (residual) waste can contribute to a balanced energy policy. The recovery activities should not undermine preventing or minimising waste. The recovery activities should form part of a properly considered and appraised strategy. We consider that energy generated by incineration should be recovered as far as is practicable, for example using Combined Heat and Power (CHP) schemes.

- 2.38. One respondent recommend that any new sites identified for potential energy recovery facilities are assessed by using the five step site allocation assessment methodology set out in Historic England's Advice Note 3.
- 2.39. One respondent suggested that 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.
- 2.40. One respondent suggested the WLP amends the terminology used. 'Recovery' includes recycling and believe what is being referred to here is, for the purposes of the waste hierarchy, 'other recovery'. They suggest the term 'energy recovery' is adopted as it is likely to be better understood. The respondent believes it is important that Nottinghamshire delivers more energy recovery infrastructure within the WLP area. As the UK moves towards delivering its final energy recovery capacity, which will occur in the WLP period, the WLP must be flexible and recognise that the latter EfW facilities will undoubtedly rely on wider catchment areas to 'mop up' the remaining residual waste.
- 2.41. Another respondent believes that waste cannot be recycled, using it as a source of energy can provide benefits in terms of generating heat and power. There are a number of studies that demonstrate ERFs do not 'compete' with recycling facilities and this is set out in a report issued by the Environmental Services Association. They consider that ERFs will play a very important role to ensure that this non-reusable, non-recyclable waste is not sent to landfill. They strongly believe there is the need for additional energy recovery capacity within the Plan area and beyond in the wider region.
- 2.42. A further respondent states there should be a target to reduce the production of RDF and other waste disposal by incineration. Nottingham and Nottinghamshire, in line with the former's ambitious Carbon neutrality target and given the innovation and science sectors in the City and County, should be well placed to lead in this area of avoiding the production of materials that have to be converted to RDF. Therefore, driving the need for reduction in energy use should be the overriding policy, not supporting energy recovery. This should apply across all sectors, particularly municipal and industrial, and notably with regard to housing.
- 2.43. One resident stated that with a change in what can be exported and increasing thought change to carbon reduction, especially with cop26 coming up and large commitments needing to be made on reduction of fossil fuel use - the plan needs to be for a higher level of energy recovery, in balance with recycling. It would be short sighted to not increase the operational amount of energy recovery.
- 2.44. The current strategy has an element of feed the beast to keep the energy recovery facility working. This undermines the waste hierarchy objectives. Energy recovery should be a last resort from residual waste with no alternative options. The estimates should be driven from that philosophy, not any given proportion. Again modelling will need to be fairly sophisticated.
- 2.45. One resident stated that incineration should be the last resort.

Response

Both Councils agree that they want to reduce energy use across Nottinghamshire and Nottingham and support a low carbon form of EFR, thus taking a multipronged approach. The issue of energy neutrality lies outside the scope of the WLP, this plan is about waste management facilities not energy use, energy use is covered in other documents such as the Energy Strategy.

Question 11 - Do you agree with the need to provide additional disposal capacity within the Plan Area?

Total number of comments received: 14

- 2.46. Gedling Borough Council does not consider there is a suitable site in Gedling Borough for landfill disposal. Any site selected would need to be designed, managed and operated to the highest possible standards
- 2.47. One respondent stated that any increase in disposal capacity should follow a properly considered and appraised strategy, taking into account all of the data available to the Waste Authority.
- 2.48. Historic England recommend that any new sites identified for potential additional disposal facilities are assessed by using the five step site allocation assessment methodology set out in Historic England's Advice Note 3: The Historic Environment and Site Allocations in Local Plans.
- 2.49. One respondent agreed 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.
- 2.50. Two respondents agreed that the Councils should retain capacity for landfill disposal and that additional disposal capacity is likely to be required. Not only to reduce transport as highlighted, but also to provide resilience and reassurance for those investing within the Plan Area that their needs can be met at an affordable cost in the future.
- 2.51. One respondent stated that in terms of landfill they would encourage the Councils to consider a flexible approach in setting restoration aims for new or existing mineral extraction sites that would seek to consider the landfill of non-inert waste as part of those approved development schemes, and to consider those aims at this early stage whilst considering all of the necessary environmental and amenity obligations.

- 2.52. Support for the requirement to provide some ongoing disposal capacity for certain waste types, which cannot be recovered or recycled, within the Plan area. Future disposal of waste to landfill should first require an assessment of the waste to confirm that it cannot be utilised. However, not all respondents support disposal, considering it to be at the bottom of the waste hierarchy and should therefore be used only when there is no other available option.
- 2.53. Furthermore, by promoting recycling within the local plan and promoting the most efficient use of materials over the lifecycle of the building as part of Nottingham County and City Councils role as planning authorities, it is possible to increase the rates of recycling of construction and demolition rates. The consequence of this will be a reduction in the volume of material that needs to be disposed of.
- 2.54. One respondent suggested that any additional capacity should be targeted to be deliberately small, to drive more material into the reduce-reuse-recycle circle.
- 2.55. One respondent stated that the priority should be for increased recycling rates- particularly introducing more kerbside collection options for a range of plastics, initiatives and encouragement for food waste recycling/upcycling etc must be the priority to overall reduce this waste, alongside with public engagement and knowledge of exactly what can be recycled.
- 2.56. One resident said the current plan is too dependent on too few facilities, so a more diverse arrangement will be needed strategically.
- 2.57. One respondent raised concerns about other waste streams. It is likely that there will be an amount of waste that there is nothing else to do with and provision should be made for storage of such materials pending the development of appropriate methodologies for recovery / recycling.

Response

The Councils agree that any increase in disposal capacity should be properly considered and appraised.

Chapter 5- Our Vision and Strategic Objectives

Question 12 - Do you agree with the draft vision? Are there other things we should include?

Total number of comments received: 18

- 2.58. In response to Question 12 one respondent thought the vision was too passive. However, In general most respondents agreed but feel it could go further and suggest some additions. It should do more than “promote and modern and effective waste management industry”, it has to stimulate a sustainable waste management industry, encourage innovation and solutions which could also be beneficial to the economy and society as a whole. Further the Plan needs to be integrated into other plans, objectives and strategies, not seen as a standalone item. In addition, amended text “minimise greenhouse gas emissions that result from waste management in the County” is more accurate as a description of what appears to be intended.
- 2.59. One respondent stated that a main driver of the Waste Local Plan is to facilitate the movement of waste up the waste hierarchy consideration should be given to referencing the hierarchy earlier on in the Vision. They believe wording in the second paragraph could be amended to read: "minimise the effects of negative climate change". In addition, the Vision would be further enhanced if it includes a commitment to the wider UK Government target of net zero by 2050.
- 2.60. Another respondent believed the reference to managing waste locally wherever possible, should relate to complete waste management not, for example, simply managing by bulking the waste and exporting it out of the County and the role of the restoration of waste sites to priority habitats should be highlighted.

Response

The Councils agree that the Vision should be strengthened, and the text will be amended to reflect comments from the respondents where appropriate.

Question 13 - Are the above objectives appropriate? Are there others we should consider?

Total number of comments received: 28

- 2.61. In response to Question 13 the majority of respondents supported the objectives, suggesting additional text or areas where they could be improved, such as encouraging alternative modes of transport to road-based modes where practical and to allocate waste sites strategically, based on proximity to transport links, and the waste source or end-market.
- 2.62. With reference to Objective 1 climate change, it was pointed out that objective does not explicitly mention Greenhouse gas emissions. An objective should be that specific waste types will be processed by the method with the lowest net Greenhouse gas emissions. The statement “avoiding damage to air quality, water or soil, reduce the need to transport waste” should be removed from this objective as these issues are mentioned in objectives 3 and 7. Additionally, the statement “encourage the efficient use of natural resources by promoting waste as a resource,” should be a separate objective and include proactively working to reduce the net amount of waste produced.

- 2.63. One respondent stated that there should be incentives for waste disposal and use of recycling sites to prevent fly tipping - management and prosecution with increased fines. Boundary agreements with other districts to accept waste from other areas. Objectives should be stated, linked to every policy. There should be annual reviews to monitor progress.
- 2.64. One respondent suggested that the plan for the environment could be more ambitious. Stating that Objective 3 is loosely defined around protecting the environment. More importantly, there should be a commitment to work with other stakeholders, including Severn Trent Water, to ensure that there is not deterioration against Water Framework Directive waterbody status and, where possible, enhance the environmental status. and in addition, needs to refer to habitats.
- 2.65. With reference to Objective 4 a respondent suggested that the objective be revised to take account of the potential need for mitigation where avoidance is not possible. In addition it was suggested that the text be amended to “to ensure any new waste facilities do not adversely impact on local amenities and quality of life from impacts such as dust, traffic, noise, odour and visual impact, and any loss of local greenspace upon which people rely for their good health and wellbeing and address local health concerns.” Issues relating to Objective 4 Such impacts would be considered by further HIA and this would also include loss of greenspace. It was also suggested that it is considered that greater clarity should be provided in respect to 'addressing local health concerns'. Several respondents believe that Objective 4 should make reference to traffic, dust and noise.
- 2.66. With regard to Objective 5 respondents suggested that it is essential to emphasise that any sites should be allocated on the basis of both robust SA and EIA, so that proper comparative assessments are made at the plan-making stage.

Response

The Councils will amend the text of the proposed objectives where appropriate. With reference to incentives for waste disposal the plan will be monitored annually, and a Waste Authority Monitoring Report is produced and published on the County Council website.

We consider that Objective 2 adequately covers investment. The text of Objective 3 will be amended in line with comments with reference to water and the historic environment

The plan will be developed in line with National Policy, including the NPPF. The objectives provide an overarching strategy and the Development Management policies will provide further detail on the environment and heritage.

Old disposal sites may be restored and if these are mineral voids, the restoration will be addressed by the Minerals Local Plan which seeks biodiversity led restoration.

Further consideration will be given to objective 4 and if clarity is needed in relation to Veolia's comments.

Further consideration will be given to objective 4 and if clarity is needed in relation to Veolia's comments.

Chapter 6- Providing for new waste management capacity

Question 14 - 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?

Total number of comments received: 17

- 2.67. In response to Question 14 support was provided for the approach that broad locations for larger facilities being focused in and around Greater Nottingham and Mansfield/Ashfield as these locations are where the majority of waste is generated. Respondents also referred to the need to ensure all decisions on location should always be subject to robust science based decision-making, tested through SA and EIA, so that the full range of impacts, including long distance ones such as NOx, can be properly assessed.
- 2.68. It was pointed out that the Councils will need to be aware of a number of environmental factors which will need to be assessed during the process of determining the location of any new facilities, e.g. flood zones, existing contaminated land, threat to controlled waters, proximity of (protected) habitat. The potential amenity issues arising from the facilities operation and which may have an adverse affect on existing sensitive receptors (e.g. housing) will also be an important factor.
- 2.69. With reference to paragraph 6.1 it was highlighted that details that new waste facilities will be close to the main urban areas. Whilst this approach may be appropriate for Recycling and Households Waste Sites (RHWS), it is not appropriate for Wastewater Treatment Works (WwTW), historically WwTW have generally been located away from built up areas due to the nature of their operation and the nuisance that could be

caused. WwTW area also generally located in low lying locations near watercourses as such the location of any new WwTW may not fit with the principles outlined within paragraph 6.1 this should be accounted for by clarifying that Sewerage assets such as WwTW and Pumping stations, area exempt from the principles of paragraph 6.1.

- 2.70. Some local residents stated that whilst it is 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.
- 2.71. A respondent, whilst supporting the approach of a focus on urban centres believe this can lead to gaps in provision and is of the view that there is an urgent need to replace the Langar facility which was closed several years ago and has left the east of Rushcliffe BC with no convenient household waste facility.
- 2.72. One local resident stated that the outlined approach is supported. However, radically better collection systems, with good waste reduction & recycling that are needed to improve the basic waste management in Nottinghamshire would require some different facilities e.g. food waste. Decommissioned power station sites have access to the River Trent and the rail network and could provide sustainable locations for recycling or recovery facilities to be created.
- 2.73. Reference to siting facilities within the Green Belt was highlighted by some respondents that seek to ensure the integrity of the Green Belt is maintained in line with the NPPF.

Response

The Councils consider that the collection of waste and managing this is best delivered through non-planning mechanisms and through the waste management team.

It is acknowledged that water recycling and water treatment facilities have different requirements to other waste facilities, a separate policy on the Broad locations strategy may be required.

Specific sites will be considered within the site selection methodology. The plan will also contain Development Management policies covering these factors.

The Councils cannot rule out sites in Newark. A network of waste sites may not be viable or feasible, particularly for some waste facilities where the catchment may need to be wider to ensure viability. The site selection methodology will consider industrial estates and proximity to sensitive receptors to understand if sites can be appropriate. The methodology we use will be robust and sit alongside the Sustainability Assessment (SA) and other assessment documents that are undertaken.

Question 15 - 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?

Total number of comments received: 18

- 2.74. In response to Question 15 there was general support for a criteria based policy and some respondents suggested alterations to make the approach more robust. It should be sufficient for most waste facilities and it is accepted that forecasting the amount/type of land/facility required would be very difficult. There is also a potential concern that allocation could potentially sterilise otherwise developable sites and it is preferable to judge each case on merit against the criteria based policy. Employment sites of a general industrial nature may be suitable for most waste facilities provided they are compatible with the nature of the employment site; and would not cause a significant adverse impact on the amenity of nearby residents and occupiers.
- 2.75. Specific reference was made to ensure the Councils refer to specific criteria are required for existing, expanded and new water recycling centres including supporting infrastructure and that there also needs to be a criteria based policy to cover waste developments that might come forward on unallocated sites.

Response

The Waste Local Plan will have a separate policy for water treatment facilities and will be developed in line with the NPPW.

The Councils do not propose to allocate sites for new sewage assets but to have a separate policy to consider where such facilities would be appropriate where a need is identified.

If a criteria approach taken, sites would be subject to Development Management policies and necessary assessments, if allocating sites, they will be assessed through the site selection methodology and the Sustainability Assessment.

Employment land will be considered if appropriate for waste facilities but will be dependent on local circumstances and the proposed waste facility.

Chapter 7- Development Management Policies

Question 16 - 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?

Total number of comments received: 17

- 2.76. In response to Question 17 it was generally agreed that all the topics suggested should be considered. In addition, two other topics were suggested the climate crisis; and impacts on the waste hierarchy.
- 2.77. A respondent identified that a large part of the Plan area is within the Airport safeguarded zone, particularly the 13km bird safeguarded area. It is therefore important that the aerodrome safeguarding requirements for East Midlands Airport are included within the scope of future development management policies that are identified in Section 7.

Response

Both Councils agree that adequate referencing to East Midlands Airport will be made in the Waste Local Plan. Other potential topic areas will be considered as Policies in the Waste Local Plan.

Question 17 - Are there any other comments you would like to make to help inform the preparation of the Waste Local Plan?

Total number of comments received: 24

- 2.78. Reference was made to the fact that the plan contains no reference to contingencies; the current Covid-19 pandemic shows how easy it is for disruption to occur in a very short time-frame. The Plan should be aligned with any current or future contingency planning or strategy for the area and country as a whole.
- 2.79. One respondent stated that they consider it essential that up to date biodiversity information at the necessary level of detail is used to help the preparation of the Plan, both with regard to data from the NGBRC and the Biodiversity Opportunity Maps.
- 2.80. Most of the comments received were expressing no comments, which explains why we had so many respondents, but few substantive comments.

Response

The Issues and Options was compiled prior to the Covid 19 outbreak. The impacts of Covid 19 will be assessed and written into the plan, where appropriate.

The Councils will ensure the most up to date biodiversity information is used as the Draft Waste Local Plan is developed.

3. Call for sites

3.1. A Call for Sites was carried out alongside the Issues and Options consultation, with a total of 9 sites received which are detailed in the table below.

Site Name and location	Operator	Type of Facility	Throughput	Notes
Bilsthorpe Business Park	Peel L&P Environmental Ltd	Energy from Waste facility	250,000 tonnes-incineration/ pyrolysis/ gasification 150,000 tonnes-Material Recovery Facility 100,000 tonnes-specialist treatment	
EMERGE Centre, Ratcliffe on Soar Power Station	Uniper UK Ltd	Energy from Waste facility	472,100 tonnes	An application has been submitted for this development to Nottinghamshire County Council and is under consideration.
Harrimans Lane, Dunkirk	Sims Group UK Ltd	-	-	This site already has permission and the operator wishes for the site to be safeguarded within the plan.
High Point, Derby Road, Kirkby in Ashfield	Brian Cutts	Disposal-Non-hazardous	120,000m3	
Land at Coneygre Farm, Hoveringham	Lee Reclaim Limited	Disposal	Not provided	The site currently has permission for a recycling facility and inert fill of the old Hoveringham Quarry.

Land off Private Road No.3, Colwick Industrial Estate	Veolia ES (Nottinghamshire)	Materials Recovery Facility, wood recycling, clinical waste transfer station	130,000 tonnes- Materials Recovery Facility 40,000 tonnes- wood recycling 130,000 tonnes- clinical waste transfer station	
Littlewood Lane, Mansfield Woodhouse	Midland Landfill	Disposal- Inert	420,000m3 capacity	Propose to dispose of inert construction and demolition waste to fill the void of Littlewood Quarry.
Ranskill, Retford	Retford Waste Ltd	Recovery	27,500 tonnes- Materials Recovery Facility 40,000 tonnes- Household Waste Recycling Centre	This site already has an existing waste facility.
Ratcliffe on Soar Power Station	Uniper UK Limited	Recovery- Municipal solid waste, construction and demolition, commercial and industrial, non-hazardous and other (RDF/SRF and waste biomass)		This would be developed alongside the EMERGE Centre listed above.

3.2. Both the Councils will examine the sites against a set of criteria based questions, planning policy and other factors, such as our Waste Needs Assessment and potential

future waste capacity requirements during the Plan period and make a judgment as to whether sites for waste facilities need to be allocated in the Waste Local Plan, or whether a criteria based policy approach would be more suitable.

4. Conclusion

- 4.1. All of the comments and sites put forward as part of the Issues and Options and Call for Sites consultation will be assessed and will fed into the next stage of the Waste Local Plan.