

Appendix 2

Main issues raised in response to the publication of the Pre-Submission Draft Nottinghamshire and Nottingham Waste Local Plan and officer assessment

Please note that this is not a detailed schedule of representations. A document providing more detail will be provided within the submission background documents, which will be published on our webpage [New Waste Local Plan | Nottinghamshire County Council](#) . The specific representations received can be found at [Nottinghamshire County Council - Pre- Submission Draft Waste Local Plan \(oc2.uk\)](#) by clicking on the search icon next to the relevant policies or section.

Duty to Cooperate Bodies

There has been generally a positive response from Duty to Cooperate organisations and the Councils will continue to work with District and Borough Councils and neighbouring Waste Planning Authorities through the Duty to Cooperate and Statements of Common Ground.

Introduction, Scope, Context and Overview of the Plan Area

In relation to the Scope and Context of the Waste Local Plan chapters, respondents primarily sought for the Plan to focus and promote further the circular economy, the drive to reduce and re-use of waste and Government targets to halve residual waste by 2042.

For the Overview of the Plan area chapter, respondents requested further wording to be added in regard to the Historic Environment and smaller villages within the Plan Area.

Waste Management in the Plan Area

Chapter 5 was a key focus for many respondents to the Pre-Submission Draft Waste Local Plan, with representations focusing on the following sub-sections of the chapter:

- Forecasting future waste arisings in the Plan Area
- Future Waste management methods
- Assessing the need for additional waste management capacity

Most respondents disagreed with the chosen waste arisings forecast scenario and recycling scenario, stating that arisings should be lower and more waste recycled due to Government initiatives being introduced, in particular for Household Waste. This then meant the Capacity Gap analysis of what facilities Nottinghamshire and Nottingham need in the future was incorrect, particularly the identification of a shortfall in Energy from Waste Capacity. Representations concluded that this would lead to an overcapacity of Energy from Waste and would prevent waste being re-used or recycled. One respondent went into further detailed analysis of the supporting Waste Needs Assessment (2023) document, questioning the methodologies used.

Other respondents had opposing views, with one respondent stating that Household waste is likely to grow, not decline, due to people working from home. One respondent also questioned whether the recycling scenarios chosen were too optimistic.

Vision and Strategic Objectives

In relation to the Vision, respondents sought for more reference to be made to the new measures the Environment Act (2021) would introduce as well as how the Plan would deliver its aspirations.

Historic England also made three representations on the Vision and Strategic Objectives, seeking for more detail on how the plan will protect and enhancement the heritage of the area. They specifically sought for a new historic environment strategic objective to be added.

Strategic Policies

Representations received on the strategic policies primarily focused upon ensuring that the policies were not overly permissive, especially for Energy from Waste Sites. Some respondents felt Policy SP2: Future Waste Management Provision and Policy SP6: Sustainable movement of waste, need to go further in relation to Energy from Waste facilities to prevent an overcapacity of provision. Some felt there was already an overcapacity of provision when considering the permitted capacity of Energy from Waste sites in Nottingham and Nottinghamshire.

They were many detailed representations that proposed amended wording for several strategic policies. This included representation from a mineral operator, who suggested Policy SP4: Managing residual waste was too restrictive for mineral sites as currently drafted. Historic England also made several representations that some strategic policies needed to consider and make reference to the Historic Environment.

Development Management Policies

Historic England was the main respondent for this chapter, with a primary focus on Policy DM6: Historic Environment and its compliance with National Policy to protect and enhance heritage assets. They made several suggestions on topics the policy should also cover.

Historic England also commented on several other Development Management Policies, seeking to include reference to the historic environment within these policies.

There was support for the Development Management Policies as drafted from Gedling Borough Council and Leicestershire County Council.

Monitoring and Implementation

Only representations were made in relation to the monitoring of Policy SP2: Future Waste Management Provision, with both representation seeking for the Councils to

monitor the composition of waste streams to understand the volumes of residual waste.

Other matters

Representations were also received on Chapter 10, Useful Information, and Chapter 11, Glossary, which proposed amendments to the definitions provided.

Officer response

Officers of both Councils have considered the representations and consider overall the Plan to be sound and appropriate to submit to the Secretary of State for examination.

Some respondents have made helpful suggestions regarding wording changes which officers will be happy to consider further as part of the examination process. It is usual that an Inspector holding an examination of a Local Plan, will invite the Council during the examination to develop modifications to the Plan policies or explanation where necessary to deal with matters of soundness. These are then published for comment and form a basis for the Inspectors Report and recommendations to the Council which marks the end of the examination.

Officers will use the consideration of representations received to prepare wording modifications in advance wherever possible with the aim of assisting the Inspector and reducing the length of the examination as much as possible.