

## Agenda Item No 7A

### Planning and Development Board

23 May 2011

#### Report of the Assistant Chief Executive and Solicitor to the Council

#### Waste Development Framework - Core Strategy - Emerging Spatial Options consultation (March 2011)

### 1 Summary

- 1.1 This report and appendix outlines Warwickshire County Council's Waste Development Framework - Core Strategy - Emerging Spatial Options consultation document (March 2011) and the Borough Council's recommended responses to the questions raised in the document.

#### **Recommendation to the Board**

**That the comments given in Appendix 1, with any additional comments by Members, be sent to Warwickshire County Council as the Borough Council's response to the consultation by Extended Deadline of 15<sup>th</sup> June.**

### 2 Consultation

- 2.1. Members of the Executive and Planning & Development Boards have been consulted on the draft report and comments incorporated into the report.

### 3 Introduction

- 3.1 The Core Strategy of the Waste Development Framework is a Development Plan Document which sets out the Spatial Strategy, Vision, Objectives and Policies for managing waste for a 15 year plan period up to 2027/2028. It also provides the framework for implementation and monitoring and for waste development management. The document is available for examination online at;  
[http://www.warwickshire.gov.uk/Web/corporate/pages.nsf/Links/0124E30B6045E3F88025784F003435DD/\\$file/WCSESO+-+post+proof+2+version+090311.pdf](http://www.warwickshire.gov.uk/Web/corporate/pages.nsf/Links/0124E30B6045E3F88025784F003435DD/$file/WCSESO+-+post+proof+2+version+090311.pdf)
- 3.2 Prior to the production of the final plan a number of different consultation stages have developed the strategy. Progress on the Core Strategy was delayed for revision in light of new government guidance and the uncertainty over the future of the Energy from Waste plant in Coventry, a joint PFI project between Warwickshire, Solihull and Coventry. As a result, given the time between this consultation and the previous consultations the Warwickshire County Council

have considered it appropriate to give all stakeholders a further chance to comment on the development of Policy principles that will inform the Spatial options as part of this current consultation.

- 3.3 Five Spatial Options have been developed to decide where the future waste management facilities should be located in the County. The Spatial Options form the basis of this consultation with stakeholders and have been developed, tested and refined through early stakeholder engagement with GOWM, the County's Waste Development Forum (which is made up of representatives from industry, interest groups, statutory consultees such as the Highways Agency and the Environment Agency), the Warwickshire Districts/Boroughs and through a workshop with a number of adjoining authorities.
- 3.4 The consultation document sets out what is meant by each of the spatial options, together with identifying its advantages and disadvantages. Stakeholders will be invited to comment on whether there are any other spatial options that have been missed and should be considered in moving forward to the Preferred Option.

#### **4 Waste Development Framework - Core Strategy timetable**

- 4.1 Following the current consultation, all of the comments will be collated and used to produce a report that will summarise the key findings of the consultation. These comments will inform and influence the next stage of the Waste Core Strategy which will be a 'Preferred Option and Draft Policies' document, to be produced for consultation in August 2011. A Publication Draft will then be produced for a 6 week statutory consultation period in December 2011 and then submitted to the Secretary of State in March 2012.
- 4.2 It is intended that there should be an Examination Date in Summer 2012. Warwickshire County Council intends to adopt the Waste Core Strategy around November 2012 - January 2013.

#### **5 Emerging Spatial Options consultation (March 2011) Summary**

- 5.1 The document includes sections on the Policy context, national, regional and local. It provides a Spatial Portrait of Warwickshire in statistical and social terms, identifying transport infrastructure, available waste management facilities location, planning policy and environmental constraints.
- 5.2 A Waste Management context section provides a broad overview of the current and future waste management context in Warwickshire for the four main waste streams; municipal, commercial and industrial, construction and demolition and hazardous waste. It provides a summary of the baseline situation in terms of how each waste stream is currently managed, as well as indication of how waste will need to be managed over the period of the plan.
- 5.3 The document then reviews the vision statement, key objectives and Key Issues that were consulted on in the Waste Development Framework Core Strategy Preferred Options and Proposals, dated August 2006, having been

amended to reflect the consultation responses. Responses are sought to confirm or update the Vision, objectives and issues.

- 5.4 As noted above the document also seeks to review the Policy Principles to address the delay in developing the Spatial Options. A brief summary statement on the policy areas is outlined followed by an appropriate Policy Principle and question seeking responses to confirm or update the principles.

## **6 Spatial Options**

- 6.1 Five Spatial Options are detailed in the consultation document. The five draft spatial options are not intended to be exhaustive or mutually exclusive. However, they are intended to stimulate debate as to the future distribution of waste facilities across Warwickshire.

- 6.2 Each of the spatial options are described and depicted spatially (where possible). Advantages and disadvantages of each are described and views and comments are sought. Views are also welcomed as to whether there are any other options that ought to be considered at this stage.

- 6.3 It should be noted that the Options are very strategic in nature and differ mainly in terms of focussing new facilities on existing waste management facilities, existing industrial estates or in/at settlements of differing population sizes. Government guidance in PPS12 advises that Core strategies may allocate strategic sites considered central to achievement of the strategy. However, with the recent decision not to proceed with the joint development of the Waste to Energy Plant in Coventry (known as Project Transform) with Coventry BC and Solihull BC there are no specific sites that can be identified at this stage. The Core Strategy will set out what the characteristics will be of any potential 'strategic' sites so that the strategy and policies provide an appropriate framework for these proposals to be assessed.

## **7 North Warwickshire Borough Response to the consultation**

- 7.1 The Borough's initial response to the consultation questionnaire is contained in the attached Appendix 1. Responses to the questions are highlighted in italics for ease of identification.

## **8 Report Implications**

### **8.1 Finance and Value for Money Implications**

- 8.1.1 There are considered to be no finance or value for money implications arising at present from the Consultation report. The future "Preferred option" consultation and Waste management strategy may have financial implications for the Council in terms of the impact on waste management and the location and operation of waste services.

## **8.2 Safer Communities Implications**

8.2.1 An effective and comprehensive waste management strategy and provision of facilities and sites for future waste generation will help address and discourage issues such as illegal fly-tipping and inappropriate waste disposal and treatment that may also have health and safety implications.

## **8.3 Legal and Human Rights Implications**

8.3.1 These issues are addressed in the regulations and legal process governing the consultation and LDF process.

## **8.4 Environment and Sustainability Implications**

8.4.1 Positive potential impact. The delivery of an effective and comprehensive waste management strategy and provision of facilities and sites for future waste generation, with a focus on re-use and recycling will help reduce CO<sub>2</sub> (and Methane) generation, address potential pollution problems while reducing the need to transport waste large distances.

## **8.5 Equalities Implications**

8.5.1 The regulations governing the LDF process and consultation require an Equalities Impact Assessment to be undertaken on the emerging Core Strategy and spatial options. This will be available from the county council.

## **8.7 Links to Council's Priorities**

8.7.1 The consultation report will have future implications for the following Council priorities;

- Enhancing community involvement and access to services
- Protecting and improving our environment
- Defending and improving our countryside and rural heritage

Reference has been made in the Borough's responses to the consultation on the need to ensure/maintain access to waste facilities and services, protect and improve our environment and defend and improving our countryside and rural landscape character, which address the above priorities. Future consultation on the Preferred Option and any subsequent site specific proposals or applications will need to address the above priorities.

The Contact Officer for this report is Mike Dittman (719451).

**WARWICKSHIRE WASTE CORE STRATEGY  
EMRGING SPATIAL OPTIONS CONSULTATION  
DOCUMENT SUMMARY & QUESTIONNAIRE RESPONSES**

The vision proposed for the Core strategy is;

By the end of the plan period, the amount of waste generated and sent to landfill will be minimised, by increasing recycling and composting and ensuring that sustainable waste management practices are delivered in accordance with the priorities identified in the waste hierarchy <sup>(1)</sup>.

When looking to deliver additional waste management capacity, communication with industry, landowners and local communities will be of importance. There will be a wide range of facilities which are able to serve the key settlements within Warwickshire as well as the rural areas.

All appropriate measures will be taken to protect and conserve the rural characteristics of Warwickshire as well as safeguard existing communities and human health and seek opportunities to develop economic prosperity for future generations.

Note (1): The 'Waste Hierarchy' is set out in the EU Waste Framework Directive and requires reducing the amount of waste produced; reusing wherever possible; recycling and composting material; using waste as a source of energy; and only disposing of waste as a last resort.

**Question**

**1. Do you agree with this vision statement? If not, what amendments would you make to the vision statement**

*Yes – No amendments*

**Key Objectives**

The key objectives for the Waste Development Framework are

- To help deliver sustainable development by using waste as a resource by moving it up the waste hierarchy in accordance with European, national and regional guidance, by looking to landfill disposal as a last option, but one that must be adequately catered for.
- To enable sufficient and timely provision of waste management facilities to meet an identified need.
- To conserve and enhance the natural and historic environment and avoid, mitigate and compensate potential adverse effects associated with the provision of facilities.
- To take all appropriate precautionary measures to avoid or minimise the impact of waste activities on climate change such as minimising waste in future development and reducing emissions of greenhouse gases.
- To have regard for the most sustainable means of transportation of waste in locating facilities.
- To have regard for the concerns and interests of local communities.
- To prevent "inappropriate development" in the green belt as defined in national guidance set out in Planning Policy Statement 10 - Planning for Sustainable Waste Management (PPS10).
- To help secure the recovery or disposal of waste without endangering human health and without harming the environment and enable waste to be disposed of in one of the nearest installations.

**Question**

**2. Do you agree with the key objectives as set out above? If not, what amendments or additional objectives would you suggest?**

*Yes – However, reference to "regional guidance" may need to be deleted following abolition of RSS.*

## **Summary of the Key Issues discussed in the previous Preferred Options consultation**

### **Waste Management Practices**

- There is a need to adopt the principles of self-sufficiency and proximity with the Waste Hierarchy - i.e. divert waste from landfill and meet all waste recovery targets as well as encourage greater resource efficiency for **Sustainable waste, Municipal waste, Commercial and Industrial waste, Construction and Demolition waste, Hazardous waste management Practices** (it must be recognised that as only relatively small amounts of hazardous waste are generated in each Waste Planning Authority, due to economies of scale a hazardous waste facility could be regional in nature, hence requiring importation of waste from other authorities), and encourage developers to re-use construction materials and seek to locate waste sites close to where the waste is produced in accordance with the principles of proximity to reduce distances for the transportation of waste.

### **Waste Management Treatment and Disposal Options**

- Need to accommodate a wide range of treatment option technologies in order to deliver waste management that accords with the principles of the Waste Hierarchy i.e. reuse, recycling and recovery facilities will be encouraged. Landfilling of waste as a disposal option will be discouraged and only permitted in special circumstances. Any future waste strategy could not discount the use of incineration and thermal treatment as this would be outside Government and EU law.

### **Waste Management Location Options**

- Consider locating new waste facilities in and around urban locations so that waste is managed as close as possible to where it arises.

### **Scale of Waste Management Facilities**

- Adopt policy based on providing flexible local waste facilities scaled to meet most of the requirements of each local district, or a pair of adjoining districts but will need to take account of the fact that due to economies of scale, there may be specialist facilities of sufficient scale in the region or sub-region to manage waste from a wider area where there is need to treat particular materials.

### **Utilisation of Existing Sites for the Provision of New Facilities**

- To give consideration to focusing new sites on existing waste management activities where they are demonstrated to be compatible with other existing adjacent land uses and there is adequate infrastructure in place, while adopting a flexible approach where existing sites may not be practical or viable for all waste types and technologies.

### **Protection of Environmental Resources**

- To ensure that there is adequate environmental protection of statutory designated sites or features and ensure that due regard is given to other non - statutory designations. Proposals should avoid any unacceptable environmental impacts.

### **Transport Infrastructure**

- Siting of facilities should be influenced by a mix of sustainable transport solutions and traffic impacts should be minimised, enabling new waste facilities to be located as near to the main waste arisings/generations as possible in line with the principles of self-sufficiency and proximity. The Core Strategy will need to ensure that proposals do not have an unacceptable adverse impact on communities.

### **Site Decommissioning and Restoration**

- A policy is required to deliver a strategic approach to restoration and site decommissioning of waste facilities.

#### **Question**

#### **3. Are the key issues above still appropriate? If not, what are the reasons for your view?**

*Yes – NWBC would stress the need for adopting a flexible approach where sites are not practical, viable or available for all waste types in all circumstances. No further comment.*

#### **4. Are there any new issues that should be considered?**

*The issue of the principle of proximity to reduce distances for the transportation of waste (para 6.3) should not be at the expense of rural character and environmental impacts. Some of the sites in Spatial options outside development boundaries, in rural locations are on lower classification rural routes/lanes and new or expansion proposals on such sites would not be supported by the Borough Council. This should be clarified or stated explicitly in the document.*

### **Development of Policy Principles**

The issues have been reviewed from the previous consultation stages and responses and are set out in a form whereby they will be developed further and eventually into policies. Given the time between this and the previous consultation it is felt appropriate to give all stakeholders a further chance to comment on these. We have outlined a brief summary statement on the policy areas followed by an appropriate Policy Principle.

### **1. Sustainable Waste Management**

New waste development should be located in accordance with the principles of self-sufficiency and proximity. Waste should be driven up the Waste Hierarchy and must be considered as a resource. Disposal of waste should be the final option whilst communities should take more responsibility for their own waste. New waste development should ensure that all other planning considerations such as transport, protection of human health, protection of the environment and a desire to secure sustainable economic prosperity are given full consideration.

#### **Policy Principle 1**

**The Core Strategy will accord with the objectives of the Waste Hierarchy and the principles of proximity and self sufficiency . Sustainable transport systems will ensure that waste is managed as close as possible to where it arises. Warwickshire will seek to treat an equivalent amount of waste as that produced in the county, whilst recognising cross boundary flows in terms of imports and exports of waste.**

#### **Question**

**5. Do you agree with the policy direction on sustainable waste management (Policy Principle 1) and what are the reasons for your view?**

*Yes – In broad terms subject to points raised elsewhere. No further comments*

### **2. Locational Strategy**

Five Spatial Options are proposed in the Spatial Options Chapter. These are not intended to be exhaustive or mutually exclusive.

However, they are intended to stimulate debate as to the future distribution of waste facilities across Warwickshire. Therefore, we are asking which option you consider might be the best one to deliver the Waste Core Strategy.

#### **Policy Principle 2**

**The preferred locational strategy will be chosen following the outcomes of this consultation. Our preferred spatial option will be set out in the next stage of the plan in summer 2011.**

#### **Question**

**6. Do you agree with the policy direction on the strategy for locating new waste development (Policy Principle 2) and what are the reasons for your view?**

*Yes – In broad terms subject to points raised elsewhere. To enable appropriate assessment and consideration of consultation responses. No further comments*

### **3. Strategic Sites**

Core strategies may allocate strategic sites for development that are considered central to achievement of the strategy. However, with the recent decision not to proceed with the joint development of the Waste to Energy Plant in Coventry (known as Project Transform) with Coventry BC and Solihull BC there are no specific sites that can be identified at this stage. The Core Strategy will need to set out what the characteristics will be of any potential 'strategic' sites so that the strategy and policies provide an appropriate framework for these proposals to be assessed.

### **Policy Principle 3**

**The Core Strategy will need to define what constitutes a 'strategic' waste management site. Strategic sites will be those that:**

- contribute significantly to meeting the treatment gap for Commercial and Industrial and Municipal Waste streams to reduce the amount of residual waste disposed to landfill,**
- have the capacity to provide more than a local function i.e. countywide/ sub-regional / regional, and**
- are close to major population centres with good transport links.**

#### **Question**

**7. Do you agree with the policy direction on strategic sites (Policy Principle 3) and what are the reasons for your view? Do you have an alternative definition of a 'strategic' site?**

*Yes – However consideration should be taken of waste management sites/facilities adjoining and outside the County Boundary that could deliver the waste management needs of settlements and industrial estates in the County, reflecting the proximity principle. This should be reflected in the document. Similarly opportunities of re-using waste for energy generation are also not explicitly mentioned or encouraged.*

### **4. Treatment Gap (Capacity Gap)**

The West Midlands Regional Spatial Strategy identified the need for additional waste capacity in the region. Figures were produced by the West Midlands Regional Technical Advisory Body which identified a treatment gap for each Waste Planning Authority. The treatment gap is identified to indicate how much treatment capacity is required for Waste Planning Authorities to meet their landfill diversion targets for municipal and C&I waste. Consequently the treatment gap does not relate to treatment of construction and demolition or hazardous wastes.

The Core Strategy will need to ensure that there is sufficient provision for Warwickshire to meet its treatment gap. The Regional Spatial Strategy - Phase 2 Revision Preferred Option (December 2007) outlined that Warwickshire had an estimated treatment gap of 600,000 tonnes per annum. However, evidence suggests that planning permissions granted since then have equated to 819,000 tonnes per annum of permitted municipal and C&I waste treatment capacity. Whilst information provided by the Industry has suggested that not all of these planning permissions will be implemented, it is estimated that approximately 663,000 tonnes of the total permitted treatment capacity appears to be deliverable. Consequently, it can be assumed that the identified treatment gap for meeting Warwickshire's minimum landfill diversion targets should be met. However, implementation of these permissions will need to be monitored and if any potential shortfall in treatment capacity is observed, the Core Strategy will need to include policies to ensure that any remaining treatment capacity is delivered.

### **Policy Principle 4**

**The Core Strategy will need to ensure that there is sufficient provision for the County to meet its treatment gap for municipal and C&I waste. Where a shortfall in treatment capacity is observed, Warwickshire will plan to provide for the additional capacity through the approval of treatment facilities provided that any proposal accords with the chosen spatial strategy and that it is demonstrated to be environmentally acceptable.**

#### **Question**



**8. Do you agree with the policy direction on meeting the treatment gap (Policy Principle 4) and what are the reasons for your view?**

*Yes – This reflects the evidence currently available.*

**5. Municipal Waste**

Warwickshire's total municipal waste arisings figure for 2008-09 was 296,447 tonnes, down from 303,773 tonnes in 2007/08. Warwickshire is on course to meet its recovery targets to reuse, recycle or compost at least 45% of household waste by 2015 and at least 50% by 2020.

By 2026, Warwickshire's municipal waste capacity requirements will be a minimum diversion from landfill of 288,000 tonnes and a maximum landfill figure of 110,000 tonnes. The Core Strategy will need to ensure that there is sufficient treatment capacity to fill the County's treatment gap in order to meet the municipal waste targets for landfill diversion set out in the Regional Spatial Strategy - Phase 2 revision Preferred Option.

**Policy Principle 5**

**The Policy Principle for Municipal Waste is to encourage the re-use and recycling of materials and to divert material away from landfill in accordance with the principles of self sufficiency and the Waste Hierarchy. Any policy should ensure that proposals to manage municipal waste are encouraged where they can contribute to meeting the treatment gap and diverting waste from landfill, where they accord with the chosen spatial strategy and where they are demonstrated to be environmentally acceptable.**

**Question**

**9. Do you agree with the policy direction on planning for municipal waste (Policy Principle 5) and what are the reasons for your view?**

*Yes – To reflect the requirements of the Waste Hierarchy and recycling targets..*

**6. Commercial and Industrial Waste**

The latest data available estimates that Warwickshire's C&I arisings for 2006/07 was 641,029 tonnes, with approximately 45% of this waste being reused or recycled. Figures produced for the Regional Spatial Strategy estimates that by 2027/28, Warwickshire will be producing over 914,000 tonnes per annum of C&I waste, with a minimum of 686,000 tonnes needing to be diverted away from landfill. The Core Strategy will need to make sufficient provision for diverting C&I waste from landfill and ensure that the County has the required infrastructure to meet the treatment gap for municipal and C&I waste.

**Policy Principle 6**

**The Policy Principle for C&I waste is to encourage the reuse and recycling of materials and to divert material away from landfill in accordance with the principles of proximity, self sufficiency and the Waste Hierarchy. Any policy should ensure that proposals to deal with C&I waste are encouraged where they can divert waste from landfill and contribute to meeting the treatment gap, where they accord with the chosen spatial strategy and where they are demonstrated to be environmentally acceptable.**

**Question**

**10. Do you agree with the policy direction on planning for commercial and industrial waste (Policy Principle 6) and what are the reasons for your view?**

*Yes – Reflects the evidence currently available.*

**7. Construction and Demolition Waste**

The Scott Wilson Landfill Capacity Report (2009) provides the most up to date evidence

base in respect of C&D arisings in the county. It sets out 4 scenarios for the period between 2013/14 – 2027/28.

The Base Case scenario produced a figure of 12,784,000 tonnes and Scenarios 1,2 and 3 are 12,256,040 tonnes equating to 852,266 tonnes per annum. Figures show that Warwickshire imports more construction and demolition waste than is produced in the county.

C&D waste is not one of the elements required to be met as part of the Capacity Gap. However, there should be a presumption that wherever possible C&D waste is recycled. The main issue is therefore to seek to reduce the amount which is sent to landfill and seek to ensure more material is recycled. Construction and demolition waste is extremely hard to monitor because of the non-regulation of many sites. The strategy will need to encourage locating the recycling facilities in the right area i.e. close to the source of the arisings, within or proximate to the urban areas.

#### **Policy Principle 7**

**The Policy Principle for Construction and Demolition Waste is to encourage re-use and recycling of materials and to divert material away from landfill. The Core Strategy will encourage the use of Site Waste Management Plans and provide a strategy which encourages the recycling of construction and demolition waste close to the source of the waste arisings in or around the urban centres.**

#### **Question**

**11. Do you agree with the policy direction on planning for construction and demolition waste (Policy Principle 7) and what are the reasons for your view?**

*Yes – but opportunities of re-using waste for energy generation is not explicitly mentioned or encouraged.*

#### **8. Hazardous Waste**

The total amount of Hazardous Waste that arises in Warwickshire and is managed within the county is 19,404 tonnes. The total amount of Hazardous Waste that arises in Warwickshire but is managed outside the County and at different facilities throughout the Country is 18,905 tonnes. This figure is taken from the Hazardous Waste Data Interrogator (Environment Agency, 2009). The total amount of Hazardous Waste arising in Warwickshire for 2009 was therefore 38,309 tonnes. In terms of imports, the figure for Warwickshire is 51,000 tonnes deposited in the county of which 38,766 tonnes went to landfill which is 76%.

Evidence suggests that most of the hazardous waste that is produced or imported to the county is either transferred or landfilled. There are no major hazardous waste treatment facilities in the county; the transfer facilities are mainly on municipal waste sites and the types of waste are those comprising old fridges, tv's, batteries and oil. Further work on the evidence base is required at this stage to check what proportion of the waste is treated and what proportion is landfilled. Policies should seek to reduce the amount being sent to landfill and encourage further treatment. Currently there is no interest in developing any hazardous waste treatment facilities at the current time. Due to the specialised nature of the waste it is often managed in large facilities which can be regional or sub-regional in scale.

#### **Policy Principle 8**

**A Policy Principle is required that encourages the treatment of hazardous waste where possible. However, given that a large proportion of hazardous can not be fully treated, Warwickshire should also plan for the final disposal of stabilised non-reactive hazardous wastes (in particular asbestos)**

**Any proposal should comply with the Warwickshire Municipal Waste Management Strategy.**

#### **Question**

**12. Do you agree with policy direction on planning for hazardous waste (Policy Principle 8) and what are the reasons for your view?**

*Yes – A flexible approach is necessary and the availability of any hazardous waste treatment facilities in reasonably close proximity to the County ( regional and sub-regional facilities) should be included as part of the strategy considerations.*

**9. Other Types of Waste**

These types of waste include agricultural waste, sewage sludge and radioactive waste emanating from the non-nuclear industry. Low level radioactive waste is predominantly waste with a short half life such as medical waste comprising materials such as used syringes, containers, wipes, gloves and other medical equipment. These comprise relatively small amounts of waste but still nevertheless require consideration in the strategy.

**Policy Principle 9**

**The Policy Principle for Other Wastes such as agricultural waste, sewage sludge and radioactive waste is to encourage re-use and recycling of materials and to divert material away from landfill in accordance with the principles of self sufficiency and the Waste Hierarchy. Any policy should ensure that proposals for other waste types are environmentally acceptable.**

**Warwickshire should make some provision for managing low level radioactive wastes when permissions for additional waste treatment capacity is granted.**

**Question**

**13. Do you agree with the policy direction on planning for other wastes (Policy Principle 9) and what are the reasons for your view?**

*Yes – To reflect the proximity principle and encourage re-use and recycling. But opportunities of re-using waste for energy generation is not explicitly mentioned or encouraged.*

**10. Safeguarding**

It is important that where existing waste sites are already making a contribution to treating the county's waste and are in environmentally acceptable locations, they are not compromised by new non-waste developments. As waste facilities are often not perceived to be popular neighbour uses, where sites are functioning without problems they should be retained where possible.

Such developments need to be considered in the Borough and District planning application process. Sites will be identified and all strategic sites will be safeguarded from new non-waste development.

**Policy Principle 10**

**Sites which contribute significantly to the county's waste management capacity should be safeguarded from non – waste developments.**

**Question**

**14. Do you agree with the policy direction on the safeguarding of existing waste sites (Policy Principle 10) and what are the reasons for your view?**

*Agreed – To ensure continued efficient use, maintenance and viability of existing facilities.*

**11. Landfill**

National policy states that waste disposed to landfill must be reduced wherever possible, both to reduce greenhouse gas emissions and to enable the more efficient use of resources. The Landfill Directive has set targets of reducing the amount of waste going to landfill and the Landfill Tax was introduced in 1996 in an attempt to reduce the amount of waste going to landfill.

However, landfill will always be an important option for certain domestic, commercial and industrial wastes produced in the UK and this is likely to continue. Landfilling is also an important component of many quarry restorations.

There are two types of landfill:

**a) Non Inert Landfill** - Waste that is potentially biodegradable or may undergo significant physical, chemical or biological change when deposited at a landfill site.

**b) Inert Landfill** - This comprises mainly construction and demolition waste and is waste that will not easily decompose.

Current figures for Warwickshire indicate that for municipal waste, out of 296,447 tonnes produced in Warwickshire in 2008/9, approximately 51.625% was disposed to landfill. For C&I waste it is more difficult to assess the arisings. Various figures show that somewhere in the region of 641,029 tonnes of arisings were produced.

Whilst there appears to be adequate landfill capacity until the end of the plan period, at some stage the concentration of all the county's landfill capacity may lie solely in the north, and there may be a shortage of facilities in the south. It is intended that further analysis in terms of future landfill capacity will be undertaken and used to inform future policies relating to landfill.

### **Policy Principle 11**

**Landfilling is the least desirable element of the Waste Hierarchy and will not be encouraged. However, where there is no other option for managing waste then landfill must be a disposal option. Whilst there appears to be landfill capacity to cover the plan period, where there is a shortage of capacity and a need can be demonstrated then the strategy should be to ensure that capacity is delivered where it can be demonstrated to be environmentally acceptable.**

#### **Question**

**15. Do you agree with the policy direction on landfill (Policy Principle 11) and what are the reasons for your view?**

*Yes – To reflect current evidence on capacity and the need to provide sufficient facilities throughout the County to comply/accord with the proximity principle.*

### **12. Environmental Considerations**

An overarching policy is required to ensure that the natural and built environment is adequately protected so that there are no unacceptable environmental or amenity impacts that result from any waste facility. The provision of waste management facilities to meet the County's sustainable waste management requirements will need to be balanced against the need to protect the environment and local amenity. Recognised features of international, national, regional or local importance will need to be identified and protected.

Waste developments will need to be designed to the highest possible standard so that they respect the general character of the local environment. The Core Strategy will seek that proposals provide environmental and other improvements, or mitigation and compensation where adverse impacts of waste development would be experienced.

### **Policy Principle 12**

**The Core Strategy will protect the local environment by ensuring that there are no unacceptable adverse impacts from waste developments on the natural or built environment. The Core Strategy will ensure that the highest standards of operational practice are used and that development is designed to the highest possible standard and incorporates sustainable construction principles.**

#### **Question**

**16. Do you agree with the policy direction on environmental considerations (Policy Principle 12) and what are the reasons for your view?**

*Yes – Additional/strengthened consideration is needed to minimise facilities impact on landscape and countryside character.*

**13. Implementation and Monitoring**

As a Waste Planning Authority, Warwickshire is required to monitor its policies through the Annual Monitoring Report (AMR) and regularly review its performance. The information drawn together in the AMRs will inform the production of the Waste Development Framework and any subsequent adopted WDF policies and report their progress against relevant targets and objectives.

It is a statutory requirement of the planning process that the monitoring and enforcement of planning permissions and conditions takes place.

**Policy Principle 13**

**Warwickshire will continue to fulfil its statutory requirements to monitor and enforce waste policies and planning applications.**

**Question**

**17. Do you agree with the policy direction on implementation and monitoring (Policy Principle 13) and what are the reasons for your view?**

*Yes – No further comments.*

**Emerging Draft Spatial Options**

**Spatial Option 1**

**Develop new facilities County wide on industrial estates, brownfield industrial land(vii) and existing waste management facilities.**

**Advantages**

- The infrastructure is already largely in place.
- Transport routes have already been identified and tested on industrial estates, brownfield industrial land and existing waste management facilities.
- The option provides the largest choice of potential sites

**Disadvantages**

- Potential sites may be located away from waste arisings, generating longer haulage.
- Existing waste management facilities may be in remote locations with poor access.
- The option may not provide sufficient steer to locate new development in the most sustainable locations

**Spatial Option 2**

**Develop new facilities County wide on existing waste management facilities.**

**Advantages**

- The infrastructure is already in place at the existing waste management facilities.
- Managing waste is already an accepted use at existing sites.
- Transport infrastructure is already largely in place.
- There is scope for co-location of facilities.

**Disadvantages**

- The existing waste management facilities may not be in the correct place in relation to the waste arisings.
- Existing waste sites may be in remote locations.

- The introduction of different waste technologies at the existing sites will necessitate a reassessment of their impact, as things may well have changed since they commenced operations.
- This option could prolong adverse impacts thought to be temporary when operations were originally permitted.

### **Spatial Option 3**

**Develop new facilities on industrial estates, brownfield industrial land(viii) and existing waste management facilities within the main settlements of over 6000 population(ix) within Warwickshire: Alcester, Atherstone, Bedworth, Bulkington, Coleshill, Kenilworth, Leamington Spa, Nuneaton, Polesworth and Dordon, Rugby, Southam, Stratford, Warwick and Wellesbourne.**

#### Advantages

- The infrastructure is already in place in these locations.
- The locations are closest to the areas of highest waste arisings.
- Major waste infrastructure is already in place on existing waste management facilities in some of these locations.

#### Disadvantages

- There is comparatively less choice of sites for consideration/ potentially less viable sites
- There may be competition with other land uses for the land in these locations.
- The acceptability of waste management facilities in these locations will need to be tested.

### **Spatial Option 4**

**Develop new facilities on industrial estates, brownfield industrial land(x) and existing waste management facilities within, or in close proximity(xi) to the main settlements of over 6,000 population(xii) i.e. Alcester, Atherstone, Bedworth, Bulkington, Coleshill, Kenilworth, Leamington Spa, Nuneaton, Polesworth and Dordon, Rugby, Southam, Stratford-upon-Avon, Warwick and Wellesbourne.**

#### Advantages

- Any new facility should be close to an area of relatively high waste arisings (i.e. within or close to at least one of the main towns of over 6,000 population).
- The infrastructure is already largely in place.
- Existing uses on industrial estates, brownfield industrial land and at existing waste management facilities have already been tested for acceptability.
- There is a comparatively high number of sites for consideration.

#### Disadvantages

- The option includes some potentially remote locations.
- The scope of the option may mean that new sites are not proximate to the areas of highest waste arisings.
- There will be increased pressure on the existing infrastructure and services in these locations.
- The impact of new waste management facilities will need to be reassessed in these locations.

### **Spatial Option 5**

**A 'settlement hierarchy' option based on areas of higher population and/or existing waste management capacity**

i.e. Develop facilities on industrial estates, brownfield industrial land(xiii) and existing waste management facilities within the following locations:

- i. priority given to within and/or in close proximity(xiv) to the 'primary' settlements(xv) of Nuneaton, Rugby, Leamington Spa, Bedworth, Warwick, Stratford-upon-Avon and Kenilworth; or within 5km of the Coventry Major Urban Area (MUA); or
- ii. within and/or in close proximity to the 'secondary' settlements(xvi) of Atherstone, Coleshill and Southam where it is demonstrated that the development provides significant transport, operational and environmental benefits; or

iii) sites outside primary and secondary settlements where specific types of waste development might be acceptable where there are no unacceptable adverse environmental effects.

Advantages

- Facilities will be located close to the areas of highest waste arisings.
- The infrastructure is already largely in place at existing waste facilities.
- Existing uses have been tested for acceptability.
- The primary settlements are served by principle transport routes e.g. A45/A46 transport axis.
- There is scope for co-location of facilities.
- There is a comparatively high choice of sites for consideration.

Disadvantages

- There is no clear definition of 'in close proximity', as this may well vary with the waste stream and capacity.
- There will be increased pressure on the existing infrastructure and services in these locations.
- The impact of new waste management facilities will need to be reassessed.

**Question**

**18a. Which of the spatial options outlined above do you consider to be the most appropriate? What are the reasons for your choice?**

**18.b. Are there any other spatial options that you feel should be considered?**

*North Warwickshire Comments on Spatial Options;*

*General Comments –*

*The Policy Principles and Options should seek to ensure that any new Industrial/Commercial Estates (of appropriate size/threshold) automatically include an appropriately sized on-site waste management facility to cater for their own waste and provide or encourage opportunity for energy generation. This will help ensure the sites are sustainable in terms of the County and Borough's Core strategies*

*Some of the existing sites identified in the Spatial Options, outside settlement development boundaries, are in rural locations, on lower classification rural routes/lanes. The development of new or expansion proposals on such sites would not be supported by the Borough Council. Restriction/Constraints over development on such sites should be clarified or stated explicitly in the document in terms of no adverse environmental or visual landscape impact (along lines of a strengthened point iii) in Option 5).*

*There appears to be either a clarification or correction needed in Options 4 and 5 as to what settlements are affected and referred to in the options. Option 4 lists those settlements over 6000 and identifies them on the Key Diagram. Option 5 appears to use the same 6000 population criteria for the "Secondary Settlements" referred to but does not list them on the option text or indicate them on the Option Key diagram. The relevant settlements should be identified in both text and diagram.*

*Existing industrial estates/sites may provide opportunities for new (or for improving existing) waste facilities to address waste generated on existing sites (particularly via vacant plots/units within them). The opportunities for re-using these waste management facilities for energy generation should also be included and/or encouraged. However, it is important to stress and ensure that new waste management facilities on existing industrial estates should be employment generating before support is forthcoming.*

*None of the proposed options make explicit the implications of National environmental and planning policy designations (e.g. Green Belt), constraints that will limit the potential of many sites identified in the options. This may be helpful in spatial terms to focus/identify where the greatest pressure for new or expanded sites is likely to/can be accommodated.*

*In applying the proximity principle the Core Strategy fails to indicate or take into account the presence of major urban areas immediately adjoining the County Boundary, including Tamworth, Solihull and Coventry. The availability and accessibility of waste management/disposal facilities that could contribute to serving/managing the needs of Warwickshire settlements should be noted. Arbitrary political and administrative boundaries should not prevent access to and use of facilities and joint cross border, partnership management of waste should be applied in such circumstances.*

*Option 1 – This Option may have some adverse implications for North Warwickshire due to the presence of a number of fairly rurally located industrial employment sites and ex industrial Brownfield sites. Although the proximity principle should normally apply the dispersed rural nature of such sites may mean new waste management facilities are inappropriately located and may have adverse impacts on traffic generation/travel distances and adverse impacts on the rural landscape and countryside character.*

*Option 2 – Noting comments as for option 1. Supported only if it includes a rationalisation and review of existing waste management sites and their existing waste processes to help assess their suitability for new development or extended services. This will ensure they are appropriate to the location and the nature of the waste generated and dealt with locally. Expansion of very rural sites along rural access routes should be discouraged/opposed.*

*Option 3 – Not supported. Noted that it accords with the proximity principle, locating facilities within settlements and near main waste generators. However, availability of suitable sites within these settlements boundaries will be extremely limited, as is evidenced by the lack of current site opportunities identified in emerging Borough and District Core strategies. Competing land uses and potential adverse impacts from existing adjoining development and land uses will constrain the potential for developing new waste management facilities and sites*

*Option 4 – Although it accords with the proximity principle, locating facilities closest to main waste generators, the difficulties created by competing land uses are added to by the lack of definition of the term “in close proximity”. It may enable waste management facilities/services to be better integrated with new development proposals (and hence sites and sources of waste generation) emerging through the LDF Development Plan process but there are concerns it may enable inappropriately located sites with poor infrastructure and access to come forward.*

*Option 5 – Although relating well to those settlements likely to generate greatest levels of waste the restriction of only locating facilities within or in close proximity to the primary settlements may restrict access to and opportunity of delivering sufficient sited waste management facilities in other significant settlements North Warwickshire Borough. The Borough has no “Primary settlements” within its boundary and only 2 “Secondary Settlements” at Atherstone and Coleshill are explicitly identified (see general point above). This may encourage additional, unnecessary and adverse levels of traffic generation.*

*Alternative Option approach;*

*To discourage inappropriate development within the Green Belt and unsustainable rural locations in the Borough, a hybrid Option 4 or 5 including elements of Option 2 (Develop new facilities County wide on existing waste management facilities only where appropriate in size, location and environmental impact?) may be more relevant and appropriate. This issue may already be accommodated by the term “or in close proximity” but clarification and definition of the term is required.*