

Analysis of Consistency of Bournemouth, Dorset and Poole Pre-Submission Draft Waste Plan with National Planning Policy for Waste

December 2017

A. A more sustainable and efficient approach to resource use and management through positive planning	Comments
A1. Delivery of sustainable development and resource efficiency, including provision of modern infrastructure, local employment opportunities and wider climate change benefits, by driving waste management up the waste hierarchy	Addressed in NPPF soundness checklist and demonstrates that the Plan is consistent with national policy.
A2. Ensuring that waste management is considered alongside other spatial planning concerns, such as housing and transport, recognising the positive contribution that waste management can make to the development of sustainable communities	Addressed in NPPF soundness checklist and demonstrates that the Plan is consistent with national policy.
A3. Providing a framework in which communities and businesses are engaged with and take more responsibility for their own waste, including by enabling waste to be disposed of or, in the case of mixed municipal	Not covered on soundness checklist. Pre-Submission Draft Waste Plan states: <i><u>‘3.8 The planning system has a role to play in preventing waste and helping communities to take greater responsibility for their own waste by making sure that we can manage our waste safely and as close as possible to where it is produced.</u> Overall, these measures are designed to make sure that we reduce waste and the wider impact of waste on the environment, including limiting any contribution to climate change.’</i>

<p>waste from households, recovered, in line with the proximity principle</p>	<p>‘Policy 1 - Sustainable waste management <i>When considering development proposals, the Waste Planning Authority will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework. It will work proactively with applicants to find solutions which mean that proposals can be approved where appropriate to secure development that improves the economic, social and environmental conditions in the area.</i> <i>Proposals for the development of waste management facilities must conform with, and demonstrate how they support the delivery of, the following key underlying principles of the Waste Plan:</i> The Waste Hierarchy - facilities that contribute to moving waste up the waste hierarchy and demonstrate that waste is being managed at the highest appropriate level Self Sufficiency - facilities that enable the Bournemouth, Dorset and Poole area to move towards net self-sufficiency Proximity - <u>facilities that adhere to the proximity principle through being appropriately located relative to the source of the waste.’</u></p> <p>P97 – 101 Transport and Access</p> <p><i>“12.23 The Waste Plan has sought to find sites to address a number of issues many of which are driven by the need to reduce vehicle movements and the distance waste travels, for example, the establishment of a network of waste transfer facilities and vehicle depots in sustainable locations throughout the county. Transfer stations in particular enable waste to be bulked up close to where the waste is generated, to be transferred on to its final destination in larger vehicles generating fewer movements.”</i></p>
<p>A4. Helping to secure the re-use, recovery or disposal of waste without endangering human health and without harming the environment</p>	<p>Addressed in NPPF soundness checklist and demonstrates that the Plan is consistent with national policy.</p>
<p>A5. Ensuring the design and layout of new residential and commercial development and</p>	<p>Addressed in NPPF soundness checklist and demonstrates that the Plan is consistent with national policy.</p>

<p>other infrastructure (such as safe and reliable transport links) complements sustainable waste management, including the provision of appropriate storage and segregation facilities to facilitate high quality collections of waste</p>	
<p>B. Using a proportionate evidence base</p>	<p>Comments</p>
<p>B1. Ensure that the planned provision of new capacity and its spatial distribution is based on robust analysis of best available data and information, and an appraisal of options. Spurious precision should be avoided</p>	<p>Addressed in NPPF soundness checklist and demonstrates that the Plan is consistent with national policy.</p>
<p>B2. Work jointly and collaboratively with other planning authorities to collect and share data and information on waste arisings, and take account of:</p> <p>(i) waste arisings across neighbouring waste planning authority areas;</p> <p>(ii) any waste management requirement identified nationally, including the Government's latest advice on forecasts of waste arisings and the proportion of waste that can be recycled;</p>	<p>Addressed in NPPF soundness checklist and demonstrates that the Plan is consistent with national policy.</p>

C. Identifying Need for Waste Management Facilities	Comments
C1. Undertake early and meaningful engagement with local communities so that plans, as far as possible, reflect a collective vision and set of agreed priorities when planning for sustainable waste management, recognising that proposals for waste management facilities such as incinerators can be controversial	Addressed in NPPF soundness checklist and demonstrates that the Plan is consistent with national policy.
C2. Drive waste management up the waste hierarchy, recognising the need for a mix of types and scale of facilities, and that adequate provision must be made for waste disposal	Addressed in NPPF soundness checklist and demonstrates that the Plan is consistent with national policy.
C3. In particular, identify the tonnages and percentages of municipal, and commercial and industrial, waste requiring different types of management in their area over the period of the plan	<p>Not specifically covered on soundness checklist.</p> <p>Chapter 7 'Forecasting waste arisings' of the Pre-Submission Draft Waste Plan Table 2 sets out the total arisings of non-hazardous waste. The sections that follow set out waste arisings for the different management methods over the Plan period – Recycling/Green/Wood/Food/Residual/Inert.</p>
C4. Consider the need for additional waste management capacity of more than local significance and reflect any requirement for waste management facilities identified nationally	<p>Mentioned on legal compliance checklist – see below</p> <p>The Duty to Co-operate Statement has been prepared, which sets out the Councils engagement with neighboring authorities, prescribed bodies and key stakeholders with a statutory responsibility in the preparation of the Local Plan and its evidence base.</p>

<p>C5. Take into account any need for waste management, including for disposal of the residues from treated wastes, arising in more than one waste planning authority area but where only a limited number of facilities would be required</p>	<p>Not covered on soundness checklist.</p> <p>Pre-Submission Draft Waste Plan includes the following:</p> <p>Paragraph 2.34 to 2.43 acknowledges cross boundary movements and provides a summary of the movements that currently take place.</p> <p>Background Paper 3 provides a detailed review of cross boundary waste movements</p>
<p>C6. Is there evidence of collaborative work with other waste planning authorities (e.g. through 'RTABs'), and in two-tier areas with district authorities, through the statutory duty to cooperate, to provide a suitable network of facilities to deliver sustainable waste management</p>	<p>Addressed in NPPF soundness and legal compliance checklists which demonstrates that the Plan is consistent with national policy.</p>
<p>C7. Consider the extent to which the capacity of existing operational facilities would satisfy any identified need.</p>	<p>Not specifically covered on soundness checklist</p> <p>Chapter 7 of the Pre-Submission Draft Waste Plan sets out existing capacity for the different management methods - Recycling/Green/Wood/Food/Residual/Inert. Existing capacity has been compared to projected waste arisings in order to identify shortfalls/surplus capacity.</p> <p>The legal compliance checklist states;</p> <p><i>“The SWTAB has prepared a joint Residual Waste Management Paper which reviews available capacity within the region.” This paper is viable as a background paper to support the preparation of the Waste Plan.</i></p> <p>Background Paper 3 – Cross-boundary Movements</p> <p>Appendix 1 <i>“Initial engagement with Waste Planning Authorities receiving Bournemouth, Dorset & Poole’s waste (July 2013)”</i> – a summary of responses and issues is detailed, and</p>

a copy of the Duty to Co-operate letter which the WPA's were responding to is in **Appendix 2** – extract below:

“...We are contacting all authorities that received waste from Dorset in 2011 and have identified that waste originating in Dorset was exported to your area. Please see attached a breakdown by site name and operator, along with the tonnages received. Note that we have combined any figures with a recorded origin of Dorset, Bournemouth or Poole for each site.

For many authorities tonnages are small, however in line with the Duty to Cooperate, we would like to ascertain if there are any planning restrictions or capacity considerations that you are aware of that could prevent these sites from continuing to accept waste from Dorset in the future...”

Responses state whether or not the existing facilities continue to have capacity for the exported waste.

Given the time that had passed since the initial exercise had been undertaken, it was repeated in January 2017. **Background Paper 3 Appendix 3** “*Engagement with Waste Planning Authorities receiving Bournemouth, Dorset & Poole’s waste (January 2017)*” provides a summary of the responses and issues raised. A copy of the Duty to Co-operate letter is in Appendix 4 – extract below:

“In 2013, we examined movements of waste arising in the county using the Environment Agency’s Waste Data Interrogator (for 2011). At this point we identified movements of waste to your area and wrote to you to ascertain whether there could be restrictions or capacity considerations that could prevent sites from continuing to accept waste from Dorset.

In order to update our evidence base, we have recently carried out a similar exercise looking at movements of waste that took place in 2015. Comparing waste movements from 2011 and 2015, we have identified a number of changes. Note that we are reviewing only ‘strategic’ movements, defined as 1000 tonnes + for non-hazardous and inert waste and as 100 tonnes + for hazardous waste.”

D. Identifying Suitable Sites and Areas	Comments
<p>D1. Identify the broad type or types of waste management facility that would be appropriately located on the allocated site or in the allocated area in line with the waste hierarchy, taking care to avoid stifling innovation.</p>	<p>The types of facility which are considered appropriate on the site allocations has been set out in the Pre-Submission Draft Waste Plan – See policy 3 and Appendix 3 Allocated Waste Sites – Inset Maps</p> <p>Background Paper 2 Waste Plan Site Selection sets out all the sites that have been considered through the preparation of the Waste Plan and for what uses they have been considered for.</p> <p>At earlier stages in the plan making process sites were considered for a wider range of uses. Through the assessment process and consultation uses have been refined to reflect the need for new facilities and issues associated with sites and facilities proposed. For example, land at Woolsbridge Industrial Estate (Inset 1 of the Pre-Submission Draft Waste Plan) was considered for a HRC. However, due to the location of the site, distance from users, access and vehicle movements associated with this type of waste facility the site has not been allocated for this use.</p> <p>Further information on where changes to proposed uses have been made through the stages of preparation can be found in the response schedules and within Background Paper 2.</p>
<p>D2. Plan for the disposal of waste and the recovery of mixed municipal waste in line with the proximity principle, recognising that new facilities will need to serve catchment areas</p>	<p>Addressed in NPPF soundness and legal compliance checklists which demonstrates that the Plan is consistent with national policy. (<i>referred to within Spatial Strategy / Policy 1 / Objective 2</i>)</p>

<p>large enough to secure the economic viability of the plant;</p>	
<p>D3. Consider opportunities for on-site management of waste where it arises.</p>	<p>The Pre-Submission Draft Waste Plan states:</p> <p><i>“12.111 In order to drive waste up the waste hierarchy, the waste implications of all new development, including, but not limited to, residential, commercial, industrial and waste developments must be considered. On site waste management can reduce the amount of waste arisings, especially at a local level. Reuse and recovery opportunities should be maximised, and off-site disposal minimised. The preparation of a Site Waste Management Plan is good practice for construction projects and is required through policies in Local Plans in some areas.</i></p> <p><i>12.112 The National Planning Policy for Waste requires that new non-waste development makes sufficient provision for waste management. Development proposals should include appropriate on-site provision of facilities for the separation or storage of waste, which should be adequate to meet the needs of the proposed development and the type and amount of waste arising from occupation.”</i></p> <p>Policy 22 ‘Waste from new developments’ requires that proposals for major development should “...incorporate adequate facilities into the design that allow occupiers to separate and store waste for recycling and recovery on site...”</p>
<p>D4. Consider a broad range of locations including industrial sites, looking for opportunities to co-locate waste management facilities together and with complementary activities. Support for using heat generated by waste treatment.</p>	<p>Site allocations and locations are referred to on the soundness checklist but not with specific reference to the type’.</p> <p>The Pre-Submission Draft Waste Plan states:</p> <p>“Co-location and cumulative impacts</p> <p><i>3.20 Co-location of waste management facilities is encouraged, in accordance with the National Planning Policy for Waste. A broad range of waste management and transfer facilities can be combined within the same site enabling complementary management of</i></p>

different types of waste through different processes. This can have advantages, such as reducing the transportation of waste to different processing facilities and supporting effective and efficient co-collection rounds, thereby minimising potential environmental impacts and disturbance to local residents.

3.21 The cumulative impacts of waste management operations on the same site or in close proximity to each other needs to be assessed when determining a planning application. Impacts might affect the well-being of the local community, environmental quality or economic potential. Whilst measures can be taken to avoid or mitigate cumulative impacts, there may be cases where the consequences of the development either singly or in combination add up to such a severe impact that development is considered inappropriate.

3.22 Co-location of waste management facilities with end users of outputs from waste processing is also encouraged. This may include opportunities for co-location with potential users of low carbon energy and heat; fuels; recyclates and soils.

3.23 Energy recovery facilities provide particular opportunities to provide low carbon energy and heat to customers and suppliers. In particular, combined heat and power schemes provide opportunities for providing efficient, low carbon energy to sites such as hospitals, leisure centres, commercial buildings, factories, and industrial estates, although small businesses and residential developments can also benefit. Applications for energy recovery should demonstrate that opportunities for co-location with potential heat customers and heat suppliers have been sought. This is to ensure the maximum use of energy from waste and enable the utilisation of the heat produced as an energy source. See Chapter 9 for further information.

3.24 Opportunities for the co-location and intensification of waste management facilities have been considered in preparing this Plan and the allocation of sites. Several existing waste management facilities are allocated in the Plan for intensification, see Policy 3 and the proposed uses set out in Insets 1 -13. Policy 2 encourages co-location of waste management facilities and complementary activities, whilst striking an appropriate balance between the positive benefits of co-location and the impacts of an intensified usage. To ensure that European wildlife sites are safeguarded from any effects of development proposals should also comply with Policy 18 and all other relevant policies within the Waste Plan.”

	<p><i>“Policy 2 - Integrated waste management facilities</i></p> <p><i>Proposals for waste management facilities which incorporate different types of waste management activities at the same location, or are co-located with complementary activities, will be supported unless there would be an unacceptable cumulative impact on the local area.”</i></p>
<p>D5. Give priority to the re-use of previously-developed land, sites identified for employment uses, and redundant agricultural and forestry buildings and their curtilages.</p>	<p>Partially covered on soundness checklist;</p> <p>The current use of land has been considered when assessing sites for inclusion in the Pre-submission Draft Waste Plan. Further details can be found in the Sustainability Appraisal Report and the site assessments. Positive scoring (green/yellow) has tended to be awarded to sites on allocated employment land, adjoining existing waste facilities.</p> <p>Background Paper 2 – Waste Plan Site Selection (pg7-8) states:</p> <p><i>“...A comprehensive review of employment land and other possible opportunities suggested through the Waste Plan Issues Paper has been undertaken. This exercise looked at the following areas of land:</i></p> <ul style="list-style-type: none"> • <i>Industrial and employment land over 0.5 hectares that would be available in the short to medium term</i> • <i>Existing waste management sites (see above)</i> • <i>Allocations made in the adopted Waste Local Plan (see above)</i> • <i>Sites put forward by the waste industry through a 'call for sites' exercise (see above)</i>

	<ul style="list-style-type: none"> • <i>Discussions with district/borough/parish/town councils and other relevant stakeholders</i> • <i>Rejected site options contained in the Gypsy, Traveller and Travelling Showpeople Site Allocations DPD...</i> <p>There is no specific list of redundant agricultural and forestry buildings and their curtilages available to review. However, discussions with district councils and other relevant stakeholders would have highlighted any appropriate sites within this land type.</p>
<p>D6. Waste planning authorities should assess the suitability of sites and/or areas for new or enhanced waste management facilities against each of the following criteria:</p> <ul style="list-style-type: none"> • the extent to which the site or area will support the other policies set out in this document; • physical and environmental constraints on development, including existing and proposed neighbouring land uses, and having regard to the factors in Appendix B to the appropriate level of detail needed to prepare the Local Plan; • the capacity of existing and potential transport infrastructure to support the sustainable movement of waste, and products arising from resource recovery, seeking when practicable and beneficial to use modes other than road transport; and 	<p>Partially covered on soundness checklist expect cumulative impacts</p> <p>Co-location and cumulative impacts pg22 para 3.20 – 2.24</p> <p><i>“Policy 2 - Integrated waste management facilities</i></p> <p><i>Proposals for waste management facilities which incorporate different types of waste management activities at the same location, or are co-located with complementary activities, will be supported unless there would be an unacceptable cumulative impact on the local area.”</i></p> <p>Chapter 6 ‘Allocation Sites’ pg 32 para 6.7</p> <p><i>“6.7 Where Allocated Sites are also existing waste management facilities, the cumulative impacts of intensification will need to be fully considered to ensure there are no unacceptable adverse impacts. Development of new facilities or capacity for the management of non-hazardous residual waste on existing sites should assist in pushing waste up the waste hierarchy and would need to comply with all other policies in the Plan. Chapter 12 provides guidance on considering possible effects on European sites (see paragraph 12.89) and proposals should accord with Policy 18.”</i></p> <p>p35 para 6.11</p>

<ul style="list-style-type: none"> the cumulative impact of existing and proposed waste disposal facilities on the well-being of the local community, including any significant adverse impacts on environmental quality, social cohesion and inclusion or economic potential. 	<p><i>“6.11 In the event that there are suitably located Allocated Sites but these are not available or are otherwise unsuitable for the proposal, it will be necessary to ensure that the proposal would not sterilise, or prejudice, their development for other or similar waste management needs, or create a situation where unacceptable cumulative impacts could occur in the future.”</i></p> <p>p97 para 12.25 (Transport and access)</p> <p><i>“12.25 Where appropriate, the Waste Plan also seeks to encourage the co-location of waste facilities. Locating waste facilities together has the advantage of reducing overall volumes and cost of transport, however the cumulative impact of additional traffic and whether this can be mitigated locally needs to be considered fully on a site by site basis.”</i></p> <p>p100 para 12.41 (Quality of life)</p> <p><i>“12.41 There is also the potential for other emissions such as bio-aerosols and nitrogen oxides, although as stated above the control of emissions from waste management facilities is part of the Pollution Control Regime. Nonetheless, applicants will be expected to take into account the presence of Air Quality Management Areas (AQMA), which can be particularly affected by increased HGV movements, and the cumulative impacts on air quality that may result.”</i></p> <p>p109 Policy 17 ‘Flood Risk’</p> <p><i>“Proposals for new waste management facilities within Flood Zones 2 and 3 and of one hectare or greater within Flood Zone 1 must be accompanied by a Flood Risk Assessment (FRA). This must take into account cumulative effects with other existing or proposed developments...”</i></p> <p>p113 Policy 18 ‘Biodiversity and geological interest’</p> <p><i>“Proposals should be accompanied by an objective assessment of the potential effects</i></p>
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	<p><i>of the development on features of biodiversity and/or geological interest, taking into account cumulative impacts with other development and the potential impacts of climate change.”</i></p> <p>Chapter 7 of the Sustainability Appraisal Report considers the cumulative and in-combination effects of the Waste Plan. Table 24 highlights specific cumulative impacts of the site allocations contained in the Pre-Submission Draft Waste Plan and sets out details of how the plan overcomes or provides mitigation of the potential impacts.</p>
<p>D7. In preparing Local Plans, waste planning authorities, including by working collaboratively with other planning authorities, should first look for suitable sites and areas outside the Green Belt for waste management facilities that, if located in the Green Belt, would be inappropriate development. Local planning authorities should recognise the particular locational needs of some types of waste management facilities when preparing their Local Plan.</p>	<p>Addressed in NPPF soundness and legal compliance checklists which demonstrates that the Plan is consistent with national policy.</p>
<p>E. Monitoring and Reporting</p>	<p>Comments</p>
<p>E1. To inform the preparation of Local Plans and to inform the determination of planning applications as part of delivering sustainable waste management, local planning authorities should, to the extent appropriate to their responsibilities, monitor and report:</p> <ul style="list-style-type: none"> • take-up in allocated sites and areas; 	<p>Details can be found in monitoring reports. These are referred to within soundness and compliance checklists.</p>

<ul style="list-style-type: none">• existing stock and changes in the stock of waste management facilities, and their capacity (including changes to capacity); waste arisings; and,• the amounts of waste recycled, recovered or going for disposal.	
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