

WASTE - DISTRIBUTION AND LOCATION OF NEW FACILITIES

Key Issues – General:

Whether there is clarity in matters relating to the intended location of future waste management facilities. (National Policy, PPS 12, Para 4.1)
 Whether the strategy in respect of energy/value recovery from waste is justified having regard to the evidence base and reasonable alternatives. (Justification / Evidence Base / Reasonable Alternatives, PPS 12, Para 4.37)

Specific Issues and Matters for Discussion:

Whether there is clear evidence and guidance on what would constitute strategic waste sites and where they should be located

1. *Is there a need for a more precise definition of “strategic sites”? (Para 4.16) Would a strategic site have all or some of the characteristics listed in Para 4.17? Should key characteristics be included within the policy (CS2)?*

A definitive description should be supplied that drew upon that published in paragraphs 4.8 to 4.16. Such as ‘Strategic sites are defined as sites located near to the centres of high population density (Leicester City, Loughborough and Coalville) which will divert waste from landfill, i.e. recover a significant proportion of either municipal and/or C&I waste’.

A strategic site would be expected to have all the characteristics listed in paragraph 4.17.

To clarify the definition of strategic sites a minor amendment to paragraph 4.16 and 4.17 is proposed but not to include the characteristics within the policy.

2. *What additional clarity should be provided in respect of the areas being considered under Para 4.9? [CBC]*

The entire framework area is within the ‘three cities’ sub-region, and paragraph 4.9 is a summary of the draft RSS.

3. *In Para 4.18, where is the “previously identified preference” for a mix of large and small sites?*

This was taken from paragraph 4.11 of the waste spatial strategy: further consultation document which referred back to paragraph 4.4 of said document. This explained how at the issues and options stage the option of a mixture of small and large facilities was taken forward as a pattern to distribute facilities. It would be better if the sentence began with ‘Reflecting the previously identified preference from the Issues and Options consultation.....’

4. *Should landfill sites be treated as strategic sites? Does the locational policy provide sufficient flexibility? What are the changes circumstances since the ENTEC study? (Para 4.11) [Ibstock; Lafarge; Viridor]*

No. Strategic Sites are sites that will make a significant contribution to the Spatial Vision. Landfill on its own cannot do this and this is rightly

reflected in the characteristics of paragraph 4.17. The approach to the location of strategic sites is for facilities to be within or immediately adjacent to the main urban areas.

The flexibility within the policy for strategic sites is that the broad areas on the key diagram would not overly constrain the location of new sites. The areas coincide with the settlements with the greatest population and waste arisings. The policy links to Policy CS4 which lists locations the Councils would find acceptable.

The Councils do not consider there to have been any significant change in circumstances since the Entec study (WAS 36).

Whether there is clear evidence and guidance on the locations that would be suitable for non-strategic sites

5. *Should Policy CS3 contain reference to locating non-strategic sites within or adjacent to existing waste facilities where transport, operational and environmental benefits can be demonstrated as a consequence of co-location? [GOEM]*

No, Policy CS4 is for strategic as well as non-strategic sites so it needs to remain in Policy CS4 to ensure it is relevant to both.

6. *With regard to Policy CS3(i), is the intention to locate non-strategic sites in the broad location for strategic sites in the Key Diagram?*

Yes, there are benefits to having, where possible, non-strategic sites near to the greatest waste arisings. But, the policy acknowledges the requirement for such sites in other locations.

7. *Should Policy CS3 support non-strategic waste sites in sustainable urban extensions? [William Davis; Braunstone PC]*

Yes. SUEs will bring forward in the main housing, however, there must be infrastructure facilities within them and waste must be considered in addressing sustainability. Well designed and managed waste facilities can be located near to residential development without having a severe effect on the amenity of residents. This is acknowledged in the Companion Guide to PPS10, paragraph 7.31 (WCD 3). The Councils believe SUEs need to be considered potential locations for sustainable waste facilities. For example, incorporating a CHP (Combined Heat and Power) plant could aid towards making such SUEs zero carbon developments.

8. *In respect of Policy CS3, what is the strategy for other urban areas shown on the Key Diagram such as Lutterworth?*

Where it can be demonstrated that there is a requirement to locate in smaller settlements, such as Lutterworth, then such locations would be considered in accordance with Policy CS4.

Whether there is an appropriate strategy for locating waste sites

9. *Does Policy CS4 contain sufficient clarity with regard to intended priorities? [Ibstock; Viridor]*

The sequential approach is limited to the bullet points, not the numbered points. This is not clear and text should be added to the policy to clarify this.

10. *In Policy CS4, should there be reference to land forming part of new major employment development proposals? [William Davis]*

Point a) is not intended to be restricted to just new employment development. Major housing or retail development can generate significant waste and therefore, such locations need to be considered as locations for waste treatment facilities.

11. *Is Policy CS4 flexible enough to take account of changing economic conditions? [SITA]*

Each proposal would be assessed against the policy and a judgement made to how it fits within the priorities but bearing in mind other factors. For those proposals that fall lower down the priority list it would be for the applicant to provide evidence of why the site was, nevertheless, appropriate and the Authority to assess its suitability based upon this. No change proposed.

Whether there is an appropriate strategy concerning re-use, recycling, waste transfer and composting facilities

12. *Would Material Recovery Facilities (Para 4.29) be better discussed in the context of strategic sites?*

No. Strategic sites are those that recover waste – MRFs just sort and bulk up waste. They vary in scale and the type of waste stream they serve. Consequently, they may be suitable to a range of locations.

13. *Does Para 4.32 contain adequate precision with regard to the coverage of waste transfer and materials recovery facilities?*

Yes, these types of facilities, as shown on the Key Diagram, are dispersed throughout the County. However, the text could be aided by a minor change to better reflect that the coverage of these facilities is adequate.

14. *Is Policy CS5 too weak and directionless?*

The intention of the policy is to encourage development that moves the management of waste up the waste hierarchy. It is in accordance with paragraph 22 of PPS10 (WCD 2) which states that authorities '*should not require applicants for new or enhanced waste management facilities to demonstrate a quantitative or market need for their proposal*'. The policy is positive and makes it clear that this type of development will be allowed provided it does not cause unacceptable harm to the environment or communities.

Whether alternatives to the strategy for recovering energy from waste have been given appropriate consideration and whether the policy is clear and justified

15. *Does the evidence base adequately support Policy DC6? Is this part of the strategy the most appropriate when considered against reasonable alternatives? Has the matter been addressed adequately in the sustainability appraisal and public engagement exercises? [CBC]*

The evidence base (waste needs assessment (WAS 22a)) and paragraphs 4.1-4.7 of the Core Strategy adequately explain the RSS' requirement for the recovery of municipal waste (landfill diversion) and the amount required to reduce the levels of municipal and C&I waste going to landfill.

The other principal alternatives to deal with waste are landfill and recycling. These are both dealt with in the Core Strategy. The policy lays down criteria against which proposals for such would be assessed. The Core Strategy does not preclude or prefer any particular type of waste treatment. The alternative would be to give a preference to a particular treatment technology. Given that the County Council's waste procurement project is neutral on technology type it is considered a neutral technology approach is reasonable.

The Councils believe it has been adequately addressed in the sustainability appraisal and the consultation process.

16. *To what "reasonable alternative strategies" is attention being drawn? [CBC]*

It is presumed this is for CBC to answer.

17. *Should Policy CS6 be re-written such that priority is give to pre-sorting; then maximising value recovery from by-products of the process; then energy recovery? [GOEM]*

The order is not in one of priority. Such proposals would be expected to satisfy each of the bullet points within the policy so prioritising would not provide any benefit. No change proposed.

18. *Should Para 4.35 / Policy CS6 contain reference to the production of energy from landfill gas? [Ibstock]*

No, energy from landfill gas is more appropriately dealt with at paragraph 4.56 because it is a by-product of landfill.

19. *Could pre-sorting of waste take place at incinerator sites (Para 4.43)?*

Yes. However, it could be carried out off-site and still satisfy (iii) of Policy CS6.

Whether there is clear evidence and guidance on the locations where new or additional landfill could be acceptable

20. *Does Para 4.48 contain sufficient clarity with regard to the allocation of non-inert landfill sites?*

This has been covered in the answer to question 18 of New Waste Management Capacity.

21. *Would not criteria (ii) and (iii) of Policy CS7 also apply to allocated sites?*

Yes, text to be amended.

22. *Policy CS8 (inert waste landfill) implicitly accepts landraising. Is this intended?*

Yes.

Whether there is a clear spatial strategy concerning other forms of waste management

23. *Does Policy CS9 provide adequate guidance to developers?*

Given the supporting text which explains the other forms to which the policy refers – yes.

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