Nottinghamshire and Nottingham Waste Local Plan

Nottinghamshire County Council and Nottingham City Council
Statement in response to Matters, Issues and Questions

MATTER 2 – SCOPE AND CONTEXT OF THE PLAN AND WASTE MANAGEMENT IN THE PLAN AREA.

Issue: *Whether the identification of future waste needs is sufficiently evidenced based and robust.*

Questions 1 – 12

Nottinghamshire County Council

Nottingham City Council

1. Does the Waste Needs Assessment (May 2023) (WNA) provide an appropriate and robust mechanism to support the identification of the future waste management needs in the Plan area and does it adequately take into account future growth forecasts and Government targets to reduce residual waste and increase recycling rates?

1.1. Yes, the WNA provides an appropriate and robust mechanism to support the identification of the future waste management needs in the Plan area and adequately considers future growth forecasts and Government targets to reduce residual waste and increase recycling rates.

1.2. In terms of identifying future waste management needs, the WNA follows the National Planning Policy for Waste (NPPW, 2014), paragraph 3 by '*identifying tonnages and percentages of municipal, and commercial and industrial, waste requiring different types of management over the Plan period',* as reported in Table 6 (LACW) and Table 12 (C&I) of the WNA (document WNA1). The WNA also identifies tonnages and percentages of CD&E waste requiring different types of management over the Plan period (Table 17) and identifies tonnages to be handled over the Plan period for hazardous waste (Table 20).

1.3. These figures were arrived at by taking into consideration a wide range of evidence and policies, as detailed in Appendix B of the WNA, and following the guidance provided in the national Planning Practice Guidance for Waste (PPG for Waste, 2014), paragraphs 28 to 36, for forecasting future arisings for the various waste streams. Further detail of the methodology for forecasting waste arisings is provided in Appendix C of the WNA. This led to the development of the scenarios for future waste arisings presented (Table 4 (LACW), Table 10 (C&I), Table 15 (CD&E) and Table 19 (hazardous) of the WNA). Our response to question 4 of this matter details further the evidence behind the selection of the preferred scenarios for forecast waste arisings, with the scenarios chosen reflecting growth within the Plan area alongside the introduction of measures to reduce waste arisings.

1.4. In terms of choosing the recycling scenarios to use to identify future waste management needs (displayed in Tables 28, 29, 30 and 31 in the WNA and Tables 11 and 12 in the Plan), the WNA takes a balanced approach of looking to the current performance of the Plan area, planned future growth and future preventive measures and targets set nationally. Appendix B provides detail of policy and legislation, including targets, that have been considered. For all waste streams forecasted, the highest recycling scenario was selected, with the LACW scenario reflecting the national target of 65% by 2035.

1.5. The selected preferred scenarios for each waste stream for future arisings and method of waste management therefore reflect the approach taken nationally that to achieve the residual waste long-term target to half the amount of residual waste per capita by 2042, with the total mass of residual waste not exceeding 287kg per head of population in England, waste must be prevented from occurring in the first place (waste reduction or elimination) and more recycled.

1.6. This combined approach will contribute significant progress towards the residual waste long-term target. To demonstrate this, we submit a Technical Note, prepared by AECOM, as an Examination Document. This note indicates that if the preferred scenarios for waste arisings and recycling are achieved by the end of the Plan period (2038), the Plan area will achieve a 40% reduction of residual waste per capita between 2019 and 2038. This is significant progress towards the national target of 50% reduction by 2042.

1.7. Overall, the balanced approach in the WNA aims to be aspirational in achieving targets while remaining realistic, reflecting the current position and trends of the Plan area. This makes the WNA appropriate and robust for identifying future waste management needs, and it adequately considers growth forecasts and targets to reduce residual waste and increase recycling rates.

2. Does the WNA adequately take into account levels of waste management capacity in neighbouring authorities?

2.1. Consideration of neighbouring authorities waste management capacity has been taken into account by the Councils under the Duty to Co-operate.

2.2. The Consultation Statement (Regulation 22) (document CD7) details that from data provided within the 2021 Environment Agency's Waste Data Interrogator, we identified 65 other Waste Planning Authorities (WPA's) that the Councils have strategic waste movements with. These identified authorities were contacted via email and asked several questions, as seen in Appendix 1 of the Consultation Statement (Regulation 22), including whether there were any matters which may affect the scales of these movements, for example, a closure of a facility. Information on the specific facilities that the waste was being received at was provided to aid with their response.

2.3. Following this contact, further discussions were held with several WPAs, predominantly with neighbouring authorities with the highest waste movements. At these meetings, bespoke analysis of trend data of waste movements was provided for the authority, including identifying facilities to which waste was being exported and imported and the quantity of waste. Such information was used to aid discussions to determine if there were any issues around capacity that need to be considered, with a focus on waste exported to non-hazardous landfill facilities. As shown in the Duty to Co-operate statement, incorporating Statements of Common Grounds (documents CD10 and EXAM 4), no issues on capacity were raised in relation to the facilities waste is exported to from the Plan area. No issues were also raised about unmet capacity requirements for the WPA which the WNA and the Plan would need to consider.

2.4. Since no issues were raised throughout the Plan process, the WNA therefore only considered the exports and imports of waste in terms of waste arisings as the capacity at neighbouring authorities had been adequately considered through Duty to Co-operate.

2.5. We will continue to engage with neighbouring WPAs and discuss the availability of capacity through the East Midlands Resource Technical Advisory Board (EMRTAB), and through engagement on Plans and the Duty to Co-operate. Should any issue be highlighted regarding capacity, this will form part of the strategic matters reported, and so the impacts considered, in future Authority Monitoring Reports (AMR).

3. Does the WNA and the Plan adequately consider the relationship between increased energy recovery capacity and landfill capacity?

3.1. Both the WNA and Plan recognise and consider the relationship between increased energy recovery capacity and landfill capacity.

3.2. The WNA in paragraph 3.25 recognises that for LACW, the Plan area disposes a lower percent (6.2% in 2021) then the national target of 10% or less of MSW going to landfill by 2035. This is also recognised in the AMR (document SD1), which notes that the decline in the amount of LACW going to landfill alongside stalling recycling rates has led to an increase in the amount of waste being recovered at energy recovery facilities.

3.3. For C&I waste, as detailed in paragraph 3.49 of the WNA, the disposal rate for the Plan area currently is estimated at 28%. Recycling rates though for C&I waste are estimated to be higher than LACW, estimated at 63% in 2021, and therefore only 9% of C&I waste is estimated to be recovered.

3.4. To reflect this position, the WNA and Plan therefore, in their forecast methods of waste management, apply an assumption that 5% of LACW and 10% of C&I waste will be sent to landfill by 2035. With taking the highest recycling scenarios forward, as explained in paragraph 3.25 and 3.50 of the WNA, it is therefore assumed the remaining 30% of LACW and 10% of C&I waste will be recovered via Energy from Waste facilities or subject to other disposal methods. This is then applied to calculate the capacity requirements as detailed in Tables 28 and 29 of the WNA and Table 11 in the Plan.

3.5. Both the WNA (paragraph 3.25 and 3.50) and the Plan (paragraph 5.49) note that this assumption of 5% of LACW and 10% of C&I waste to landfill is a maximum assumption, a worse-case scenario, to ensure capacity requirements are not underestimated. There is though nothing to preclude waste being managed higher up the waste hierarchy if viable, which could in turn reduce the capacity requirements for landfill. However, it is noted that the Plan does not go further to explain that, whilst this would reduce disposal requirements, this would mean a higher requirement of recycling and recovery capacity, with paragraph 5.48 of the Plan only highlighting that permitted recovery capacity could reduce landfill requirements if implemented.

3.6. We therefore propose an additional modification to paragraph 5.49 of the Plan to add that if waste is treated higher up the waste hierarchy, this would also result in an increase of needed capacity for recovery to offset this.

3.7. As explained in paragraph 5.49 of the Plan, the AMR will monitor how waste is being managed and compare this to the forecasts in the WNA and the Plan as the current AMR does. We will continue to provide an update on recycling, recovery and disposal rates by waste stream in future AMRs. To ensure this is clear, we also propose additional text to be added to the introduction of Chapter 9: Monitoring and Implementation to explain such.

3.8. With the proposed modifications, this will ensure clarity to demonstrate that the WNA and the Plan adequately consider the relationship between energy recovery capacity and landfill capacity.

4. Are the chosen scenarios for forecast waste arisings sufficiently evidenced based to be considered as the preferred options upon which to base the Plan?

4.1. Yes, the chosen preferred scenarios to forecast waste arisings for Local Authority Collected Waste (LACW), Commercial and Industrial (C&I) and Construction, Demolition and Excavation (CD&E waste) are sufficiently evidenced based upon which to base the Plan. The detailing and evidence are provided within the WNA and is summarised below by each waste stream. Ultimately, for all waste streams, the preferred option taken forward was the scenario that reflected historic waste arisings in the Plan area, considered waste reduction measures to be introduced and ensured that the Plan could provide sufficient capacity for the Plan area.

Local Authority Collected Waste (LACW)

4.2. For LACW, following the PPG for Waste (2015), three scenarios for forecasting waste arisings were presented which consider a range of different scenarios for waste per household. This included a scenario of high decline (scenario 1 in the WNA, scenario A in the Plan), a scenario of low decline (the preferred scenario, scenario 2 in the WNA and scenario B in the Plan) and a scenario of no change (scenario 3 in the WNA and scenario C in the Plan). Each scenario for waste per household was combined with forecasts of future growth in household numbers to determine the forecast LACW arisings.

4.3. As detailed in paragraph 3.22 of the WNA, the low decline scenario was chosen as the preferred scenario. Unlike the high decline scenario, this removed the impact of the 2007 recession on the annual historic trend, with arisings between 2007 and 2008 declining by 40,000 tonnes. Considering the much lower arising figure by 2038 that the high decline scenario produced, along with consideration of recent figures, the high decline scenario did not reflect predicted future trends. These factors, as well as the need to ensure the Plan provides sufficient capacity for the Plan area, concluded that the high decline scenario was deemed inappropriate.

4.4. The no change scenario was also deemed not to be reflective of future trends as it was not reflective of the historic trends, shown in Table 2, Figure 2 and

Figure 3 of the WNA, nor did it reflect waste reduction measures to be introduced.

4.5. The chosen scenario (low decline) is the preferred approach based upon these factors.

Commercial and Industrial (C&I) Waste

4.6. The three scenarios for C&I waste are similarly prepared to that for LACW as per the PPG for Waste (2015), with a scenario for no change (scenario 1 in the WNA, scenario A in the Plan), medium growth (scenario 2 in the WNA, scenario B in the Plan) and high growth (scenario 3 in the WNA, scenario C in the Plan). The medium growth and high growth scenarios were combined with forecasts of future growth in employee numbers to determine the forecast C&I waste arisings.

4.7. Paragraphs 3.40 and 3.42 in the WNA explain how consideration has been given to the impact of the COVID 19 pandemic and the outcomes from the Nottingham Employment Land Needs Study. Considering that the study forecasts and plans for economic growth in the Plan area, with the PPG for Waste (2015) advising that some growth in C&I waste arisings should be assumed unless evidence indicates otherwise, the scenario of no change is not reflective of potential future trends.

4.8. Since there are multiple measures to be introduced that aim to reduce waste arisings, this also suggests that the high growth scenario is not truly reflective of potential future trends, with the medium growth scenario providing a balance of waste reduction measures being introduced along with growth in employment, expected after 2025 to reflect the situation following the COVID 19 pandemic.

Construction, Demolition and Excavation (CD&E) Waste

4.9. Following PPG for Waste (2015), the WNA starts from the basis that arisings for CD&E will remain constant and looks at any other factors which may affect arisings. The WNA details in paragraphs 3.62 to 3.64 factors, including projects, which may impact CD&E waste arisings. No major project is considered to bring a high-level increase in arisings and so it is a reasonable expectation that the arisings for CD&E will continue to fluctuate as they have done since 2010, as shown in Table 13 and Figure 8 in the WNA.

4.10. The only scenario therefore presented is a constant level of CD&E waste arisings based upon the past 10- year average for the Plan area (2012-2021). This reflects the variation that can be seen in arisings over time and that, as projects finish, new ones begin.

Conclusion

4.11. Overall, we consider that the WNA takes account of a range of factors when setting out what the forecast waste arising scenarios should be and the selection of the preferred scenario for each waste stream.

4.12. All preferred scenarios have been chosen by weighing up the evidence of historic trends in the Plan area and future indicators and measures which may impact waste arisings. The preferred scenarios are therefore a balance between being realistic of what has happened in the past but also being ambitious and looking to the future and new measures of moving towards a more circular economy. This ultimately helps to ensure the Plan is not underestimating future waste arisings and so failing to plan sufficiently for its needs.

4.13. As the Plan moves forward, the arisings for each waste stream will be monitored in the AMR. This information is crucial for monitoring the Plan's policies, as detailed in Chapter 9: Monitoring and Implementation, and the Plan's performance. The AMR will provide an update on waste arisings for each waste stream and compare the actual waste arisings to the forecasted waste arisings from the WNA, a similar approach to that already taken in the AMR (document SD1).

4.14. We therefore consider that the chosen scenarios for forecast waste arisings are sufficiently evidenced based to be considered the preferred option to base the Plan upon.

5. Does the approach taken in the Plan to not identify any specific allocations for new waste management facilities inhibit the attainment of the preferred high recycling scenarios for LACW, C&I and CD&E Waste?

5.1. No, the approach taken to not identify any specific allocations for new waste management facilities will not inhibit the attainment of the preferred high recycling scenarios for LACW, C&I and CD&E Waste.

5.2. Firstly, as identified in Table 11 and 12 of the Plan, there is sufficient operational recycling capacity in the Plan area already to accommodate the anticipated arisings when the preferred recycling scenarios for LACW, C&I and CD&E are achieved at the end of the Plan period (2038). There is also sufficient capacity to accommodate beyond the preferred high recycling scenarios.

5.3. Secondly, as outlined in the Vision and Strategic Objective 1, it is the Plan's aim to manage waste higher up the waste hierarchy, pursuing to meet existing and future national recycling targets. Policy SP2 seeks to deliver this aim by prioritising facilities for recycling, composting and anaerobic digestion[1] This

[1] Whilst anaerobic digestion is classified as other recovery in the hierarchy, as per The Waste Management Plan for England (2021) it is recognised that anaerobic digestion can contribute towards recycling targets which is why it is also prioritised

prioritisation will enable proposals for facilities that will increase recycling rates to come forward and be permitted if appropriate, despite there already being sufficient capacity in the Plan area. Policy SP2 also does not include the preferred recycling scenario rates so to not inhibit further recycling facilities coming forward, should these high recycling rates be achieved.

5.4. Alongside Policy SP2 is Policy DM1, which provides a criteria-based policy and sets out locations most likely to be considered suitable for different types of waste uses. By taking this approach and not identifying specific sites or areas, this enables flexibility and the opportunity for innovative technology and facilities which increase recycling to come forward, which may have different land or market requirements to current facilities.

5.5. It should also be recognised that the implementation of national policy and initiatives will be crucial in attaining the preferred high recycling scenarios, but their introduction is beyond the control of the Plan.

5.6. Overall, the Plan seeks to ensure recycling increases and reaches the preferred high recycling scenarios for all waste streams through its policies. We consider the policies offer flexibility and that the approach to not identify any specific allocations for new waste management facilities will not inhibit the attainment of the preferred recycling scenarios for LACW, C&I and CD&E.

5.7. As noted in the Monitoring Chapter of the Plan, future AMRs will monitor recycling rates by waste stream. Should recycling rates differ greatly to the preferred high recycling scenarios, the Policies and Plan will be reviewed. Our proposed modification to address question 4 of Matter 6 also ensures that any review would also consider the allocation of specific sites or areas of search for new waste management facilities.

6. How does the Plan influence the attainment of the preferred high recycling scenarios to ensure that the capacity gaps identified in Tables 11 and 12 are robust?

6.1. The Plan influences the attainment of the preferred high recycling scenarios through its Vision and Strategic Objectives, which aim to meet and exceed recycling targets, and Policy SP2.

6.2. Policy SP2 seeks to prioritise recycling, composting and anaerobic digestion facilities, all of which can contribute to achieving the higher recycling scenarios under current government guidance. The Policy also applies more criteria to be met for proposals of facilities treating waste lower down the waste hierarchy to be permitted. For example, energy recovery facilities will need to meet three clauses to gain the support of the policy, with clause (i) added following consultation on the Draft Plan (document PD2) to ensure such facilities will not prejudice the higher recycling scenarios being achieved. This will influence the type of facilities proposed and permitted in the Plan area and ensure waste is managed higher up the waste hierarchy and so that the high recycling scenarios can be attained.

6.3. The Councils also chose not to include the preferred high recycling scenario rates within the Policy so that, should the recycling scenarios be achieved, this would not prevent further recycling facilities coming forward and the Plan area achieving even higher recycling rates, reflecting our Vision.

6.4. It must though be recognised that the attainment of the high recycling scenarios is also dependent upon the implementation of national measures and policies, such as the introduction of food waste collections and simpler recycling. Such measures are beyond the control of the Plan but will affect our arisings, recycling rates and so capacity requirements. Future AMRs will monitor and report the introduction of these measures, as well as any new policies and targets, and report on the progress towards the high recycling scenarios for each waste stream. If it is found that the high recycling scenarios are not being achieved, and so the capacity gap analysis is no longer reflective of the current and future needs of the Plan area, the Plan will be reviewed as per the Monitoring framework in Chapter 9.

6.5. Overall, the Plan has enabling policies for the attainment of the preferred high recycling scenarios to ensure the capacity gaps identified in Tables 11 and 12 are robust.

7. Does the Plan make adequate provision for future non-hazardous landfill to manage LACW and C&I in circumstances where paragraph 5.49 of the Plan identifies that opportunities for new provision during the Plan period may be limited?

7.1. Paragraph 5.49 of the Plan states that the opportunity for new non-hazardous landfill to manage LACW and C&I waste is limited in the Plan area due to the underlying geology and groundwater constraints. Considering this and that only one site for non-hazardous waste disposal was put forward during the call for sites exercise, there was not a sufficient range of sites to consider for allocation within the Plan.

7.2. The Plan therefore takes the approach to minimise the levels of residual waste by prioritising facilities that manage waste higher up the waste hierarchy. This is reflected in the Vision, Strategic Objectives and Policy SP2. This is also reflected in the WNA which, as explained in paragraph 5.49 of the Plan, bases the capacity gap for LACW and C&I disposal upon future landfill rates of 5% for LACW and 10% for C&I waste. This though is likely to be a maximum as we continue to minimise waste going to landfill and treat waste higher up in the waste hierarchy, with the permitted 892,100 tonnes per annum of Energy recovery capacity potentially helping with this and so reducing the amount of future disposal requirements.

7.3. In the absence of allocating land for non-hazardous landfill provision, the Plan contains policies in which to assess any future non-hazardous waste landfill proposals, should they come forward. Policy SP4 details what a proposal would be required to demonstrate to be permitted and Policy DM1 outlines

potential suitable locations for disposal, with further detail in paragraphs 8.17-8.19 of the justification text.

7.4. As stated in the supporting text of Policy SP4, non-hazardous landfill sites are decreasing and becoming more specialised as operators focus on existing facilities. This combined with the lack of suitable sites in the Plan area may mean that residual non-hazardous waste is handled outside the Plan area. As explained by paragraphs 7.39 and 7.14, it is therefore the aim of the Plan to provide sufficient waste management capacity to manage the equivalent of our own needs and recognise that it may not be possible to provide every type of facility in the Plan area.

7.5. This lack of non-hazardous capacity has been discussed with neighbouring Waste Planning Authorities, in particular Derbyshire and Lincolnshire who were identified as main importers of residual non-hazardous waste from the Plan area. As outlined in the respective Duty to Co-operate statements (document CD10 and EXAM 4) both authorities agree that whilst in the short term the movements should not pose an issue, they could in the longer term. They therefore support the approach taken in the Plan to support movement of waste up the waste hierarchy and minimise the levels of residual waste requiring disposal to landfill to help address this issue during the Plan period.

7.6. On going discussion with WPA's will continue on this matter through the EMRTAB group and through engagement on Plans and Duty to Co-operate. Should any issues be highlighted regarding non-hazardous capacity, this will form part of the strategic matters reported in any future AMRs and consideration given as to whether a review of the Plan is required. As per our response to question 4 of Matter 6 and proposed main modification, a review will also consider the allocation of specific sites or areas of search for new waste management facilities to ensure need is being met.

7.7. Considering the above circumstances, we believe the approach the Plan takes does make adequate provision for future non-hazardous landfill to manage LACW and C&I waste. This will continue to be monitored closely on a Plan area and regional basis.

8. Does the approach taken in the Plan to not identify any specific allocations for new waste management facilities inhibit the movement of waste management up the waste hierarchy and adequately support the circular economy? In this respect would the Plan be consistent with the NPPW in terms of looking for opportunities to co-locate waste management, and in terms of care being taken to avoid stifling innovation?

8.1. No, the approach taken to not identify any specific allocations for new waste management facilities does not inhibit the movement of waste management up the waste hierarchy and adequately supports the circular economy. This approach is also consistent with the NPPW in terms of looking for

opportunities to co-locate waste management and care being taken to avoid stifling innovation.

8.2. In relation to the waste hierarchy and circular economy, the Plan through its Vision and Strategic Objectives seeks to treat waste higher up the waste hierarchy and see waste as a resource to enable a circular economy. These aims are then delivered through Policies SP1, which seeks to prevent and increase the re-use of waste (the top two tiers of the hierarchy), promoting the circular economy, and SP2, which reflects the remaining tiers of the waste hierarchy by prioritising recycling facilities, then recovery and finally disposal as a last resort.

8.3. As the Plan does not allocate sites, it contains a criteria-based policy, Policy DM1, which sets out locations most likely to be considered suitable for different types of waste uses. By taking this approach and not identifying specific sites or areas, this enables flexibility and the opportunity for innovative technology and facilities to come forward that enable the movement of waste up the hierarchy, which may have different land or market requirements to current facilities.

8.4. The approach then to not allocate specific sites offers operators the opportunity and flexibility to locate facilities in locations which can meet changing market demands and needs as well as changing technology. The Plan therefore is consistent with the NPPW to take care to avoid stifling innovation.

8.5. Regarding co-location, we do not consider that the approach to not identify specific allocations is inconsistent with the NPPW. By having the criteria-based policy, this seeks to locate facilities near industrial areas and in places with complementary activities. Alongside Policy SP6, which seeks to reduce the distance waste travels, this enables facilities to come forward and offers the opportunity for co-location. This approach also allows for flexibility and opportunities to be taken to meet changing market demands and needs.

8.6. Paragraph 8.7 of the justification text for Policy DM1 reflects the NPPW and states that facilities should look for opportunities to co-locate where possible and/or with complementary activities. Paragraph 8.9 then goes onto discuss the possibility of resource recovery parks, which is an example of the benefits that co-location can bring. As detailed in our response to question 11 of this Matter, we will propose main modifications to the supporting text of DM1 and SP3 to ensure support for the opportunity to co-locate waste facilities together is clear.

8.7. Overall, the Plan's approach to not identify any specific allocations for new waste management facilities, but instead to have a criteria-based approach, allows for flexibility and opportunity for innovative technology and facilities to develop. It therefore will not inhibit innovative facilities coming forward, the co-location of facilities nor the movement of waste management up the waste hierarchy and adequately supports the circular economy.

9. Does the Plan adequately take into account the implications of the declarations of climate change emergencies and consequent reductions in CO2 emissions targets and the impacts this might have on sites with contracts for the management of household, industrial and commercial waste with those bodies?

9.1. As outlined in the Local Policy section of Chapter 3: Context for Waste Planning in the Plan, we have considered both Councils ambition to reduce carbon emissions when developing the Plan. This ambition is reflected throughout the Plans Vision, Strategic Objectives and its Policies, with our response to question 18 of Matter 1 outlining how the Plan strives to mitigate the causes of climate change and ensure adaptability to the impacts of climate change.

9.2. Both Councils recognise the crucial role waste can play in reducing CO2 emissions, with both The Nottinghamshire Plan (2021) and Nottingham City 2028 Carbon Neutral Plan (2020) aiming to reduce waste arisings, recycle more and divert waste from landfill. The Plan reflects these aims, with forecasting future waste management methods assumptions in Chapter 5 choosing high recycling scenarios and a disposal rate of 5% for LACW and 10% for C&I waste. This reflects the Plans broader Vision and aims to move towards a more circular economy and manage waste higher up the waste hierarchy, with the introductory text of Policy SP5 specifically outlining how this can help reduce CO2 emissions and meet the Councils climate change goals.

9.3. Throughout the Plans development, we have engaged with both Councils Waste Management Teams to understand any issues in the management of waste that the Plan needs to consider. In particular, we have had ongoing discussions with the Nottingham City Waste Management team as they developed and published a new Municipal Resources and Waste Strategy (2023) to ensure the Plan aligned with its approach. Neither Waste Management Teams are aware of any impacts to sites with contracts for the management of household, industrial and commercial waste since the declaration of climate change emergencies and CO2 reduction targets. If contracts were to be impacted in the future, these would reflect the above assumptions of higher recycling and lower disposal rates taken by the Plan to recycle more and divert waste from landfill.

9.4. We therefore consider that the Plan does adequately take into account the implications of the declarations of climate change emergencies and consequent reductions in CO2 emissions targets. Whilst this has not as yet impacted contracts for the management of household, industrial and commercial waste, the Plan reflects these aspirations, for both the Councils and other bodies, and so should reflect any future implications in the life of the plan. Any future AMRs will monitor waste arisings, recycling and disposal rates and also any potential circumstances which may affect how waste is managed, transported and treated in the Plan area, ensuring then the Plan remains relevant, up to date and sustainable.

10. Should the Plan be more explicit regarding the approach to net self-sufficiency with particular regard to energy recovery?

10.1. The Plan as a whole, through the Vision, Strategic Objectives and Policy SP2, strives to ensure that there is sufficient capacity to meet current and future needs in the Plan area. The Plan recognises, as explained in paragraph 7.14, that this is not always practical, viable or sustainable and so aims for sufficient capacity to manage the equivalent of our own waste arisings. Policy SP6 then reflects this and outlines what would be required from facilities which would treat waste from a wider catchment area.

10.2. The Plan therefore is seeking for net self-sufficiency, but we recognise this could be more explicitly mentioned within several areas of the Plan. We therefore propose modifications to the Vision, Strategic Objective One, which also address question 3 of Matter 3, as well as modifications to Policy SP2 and its justification text and Policy SP6, with the latter also addressing question 11 of Matter 4, to explicitly mention the approach to net- self-sufficiency.

10.3. Regarding net self-sufficiency and energy recovery, as per the main approach of the Plan, it is our aim to ensure sufficient energy recovery capacity for the Plan area whilst recognising that energy recovery facilities often require larger catchment areas to enable sufficient feedstock for it to be economically viable, with long term contracts in place to ensure this.

10.4. Table 11 of the Plan identifies a deficit in the energy recovery capacity for the Plan area to handle Household and Industrial and commercial waste, which decreases over the Plan period to reflect the forecasted growth in recycling and so fall in waste to recovery. By 2038 the expected capacity gap is a small -53,669 tonnes per annum.

10.5. In calculating this capacity gap, as per the NPPW only the operational facilities have been included. As identified in paragraph 5.48, there is an additional 892,100 tonnes of permitted capacity in the Plan area for energy recovery. Considering the small deficit gap and the total permitted capacity, it is expected that this gap for recovery could be met through permitted facilities to enable self-sufficiency, if implemented by the waste industry.

10.6. To acknowledge such, we propose an additional modification to paragraph 5.48 to reflect that the permitted energy recovery capacity would sufficiently address the deficit identified as well as provide capacity to reduce future landfill requirements, which would enable the Plan area to move towards net self-sufficiency.

11. Should the Plan be more explicit with regard to the co-location of waste management facilities?

11.1. Co-location of waste management facilities is mentioned in the justification text for Policy DM1 (paragraph 8.7). It reflects bullet 4 of paragraph 4 of the NPPW that authorities should consider looking for opportunities to co-locate waste management facilities together and with complimentary activities. Paragraph 8.9 then goes on further to discuss combined facilities in resource recovery parks and that some types of facilities can benefit for being located close together.

11.2. We do though recognise that the supporting text for Policy DM1 could go further to show support and promote the co-location of waste management facilities. We therefore propose a main modification to paragraph 8.7 and propose for the benefit of co-location to be mentioned in the supporting text of Policy SP3, which focuses on broad locations of waste management facilities. This will complement the proposed main modification to Strategic Objective 1 which addresses question 7 of Matter 3.

12. Do the Scope and Context of the Plan consider the relationship with the Nottinghamshire Minerals Local Plan (2021) in relation to the production and use of secondary and recycled aggregates?

12.1. As per paragraph 4.62 of the Nottinghamshire Minerals Local Plan, the Plan in Policy DM1 does guide and promote aggregate recycling facilities, both temporary and permanent, with paragraph 8.12 of the justification text providing further detail. However, we recognise that the Plan does not explicitly outline the relationship with the Nottinghamshire Minerals Local Plan (2021) in relation to the production and use of secondary and recycled aggregates.

12.2. We therefore propose an additional modification to the sub chapter 'Local Policy' in Chapter 3: Context for Waste Planning, to include a heading of Local Development Plans. This will include a description of the relationship between the Nottinghamshire Minerals Local Plan and the Waste Local Plan in relation to the production and use of secondary and recycled aggregates.