

Nottinghamshire and Nottingham Waste Local Plan

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

MATTER 3 – VISION AND STRATEGIC OBJECTIVES OF THE PLAN

Issue: *Whether the Vision and Strategic Objectives of the Plan are the most appropriate, are soundly based and provide an appropriate basis for meeting the future waste management needs sustainably.*

Questions 1 – 10

1. Is delivery of the Vision realistic and does it adequately and accurately reflect the future environmental, economic and social dimensions of the County and City to ensure the sustainable management of waste?

- 1.1. Yes, we consider that the delivery of the Vision is realistic and that it adequately and accurately reflects the future environmental, economic and social dimensions of the County and City to ensure the sustainable management of waste.
- 1.2. The [Vision](#) is based upon the spatial portrait data as presented in [Chapter 4: Overview of the Plan Area](#) and the consideration of the baseline data collected to enable the identification of the Sustainability Appraisal (SA) objectives, as detailed in Appendix 2 of the [SA Scoping Report](#) (document SA1). As the SA Scoping Report explains in [Table 5](#), the SA objectives adequately cover the three elements of sustainability- social, economic and environmental.
- 1.3. The Vision has been appraised against the 14 SA objectives at each stage of the Plan's development. These appraisals have helped shape the Vision, with chapter 3 of the Sustainability Appraisal, Pre-Submission Draft Report (document CD2) summarising how the Vision has been amended at each stage to take into consideration the SA findings and how this has changed the appraisal scoring. As concluded in [paragraph 3.3](#) of the report, the Vision in the Pre-submission Draft (the Plan) was found to have a positive or very positive impact on all 14 SA Objectives.
- 1.4. The Vision is then delivered by the seven [Strategic Objectives](#), which together cover the themes and topics outlined within the Vision. The strategic policies and the more detailed development management policies then seek to deliver the Objectives and Vision by guiding waste management proposals and decisions in the Plan area.
- 1.5. With consideration of the national and local policies as outlined in [Chapter 3](#) of the Plan, the local context as described in [Chapter 4](#), the SA findings alongside representations received at each stage of the Plan process, we consider that the Vision does adequately and accurately reflect the future environmental, economic and social dimensions of the County and City. The Plan then through its Strategic Objectives and policies seeks to deliver the Vision, which we consider is realistic and ensures the future sustainable management of waste.

2. Does the Vision and Objectives (and the Plan more generally) demonstrate that adequate consideration has been given to any cross-boundary issues, and any strategic growth priorities?

- 2.1. Yes, the Vision and Objectives, and Plan more generally, demonstrate that adequate consideration has been given to cross-boundary issues and strategic growth priorities.

- 2.2. In terms of cross-boundary issues, whilst developing the Plan we have continually engaged with neighbouring WPAs through consultations, as detailed in the [Consultation Statement \(Regulation 22\)](#) (document CD7), and the East Midlands Resource Technical Advisory Board (EMRTAB). For neighbouring WPAs which we share significant waste movements with and so developed Statements of Common Ground with, the Duty to Co-operate Statements (document [CD10](#) and [EXAM 4](#)) detail what specific engagement has occurred with each individual WPA.
- 2.3. The cross-boundary issue of the lack of non-hazardous disposal capacity in the Plan area has been discussed with WPAs, in particular with Derbyshire and Lincolnshire who are the main importers of residual waste to be disposed from the Plan area. As detailed in the respective Statements of Common Ground (documents [CD10](#) and [EXAM 4](#)), the current level of exports from the Plan area to landfill facilities in Derbyshire and Lincolnshire were discussed. 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. This approach is reflected in the [Vision](#) which seeks to treat waste higher up the waste hierarchy, with the proposed main modification to question 6 of this matter ensuring this is explicitly referenced.
- 2.4. The Vision and Objectives, and the Plan as a whole, also seek to recognise that waste will move across boundaries and exportation and importation of waste will continue. Since it is not always viable to have facilities for every waste type in one area, the Plans strategy is therefore to minimise the distance waste travels and ensure sufficient capacity to manage the equivalent of our own waste arisings, also known as net self-sufficiency. As per our response to question 3 of this matter, we have proposed main modifications to the Vision and Strategic Objective 1 to explicitly reference net self-sufficiency. This modification also ensures that the Vision and Objectives demonstrate cross-boundary issues have been considered throughout the Plan's development.
- 2.5. In relation to adequate consideration of any strategic growth priorities, again throughout the Plan's development the Borough, District and Nottingham City Plans, which contain strategic growth priorities for the Plan area, have been considered. As detailed in [Appendix 1 of the SA Scoping Report](#) (document SA1), consideration was given to the key objectives within the Local Plans and how this may have implications for the Plan. This information helped shape the original Vision and Objectives, with these being amended over time to reflect the appraisal findings and feedback from consultations, including representations made by the District and Borough Councils.
- 2.6. As detailed in the [Duty to Co-operate statements](#) and the individual SOCG with the District and Boroughs (document CD10) and our response to question 4 of Matter 1, continued engagement has taken place with authorities throughout the development of the Plan. This includes consideration and discussions occurring around any emerging Local Plans at the time of the

Plan's development, notably the now adopted [Bassetlaw Local Plan](#) and the emerging [Greater Nottingham Plan](#). This has helped us understand where growth is expected, with this detailed in paragraphs 7.22 and 7.23 of the justification text for Policy [SP3](#), and so where waste facilities may be needed to support growth. To reflect the strategic growth priorities, the Vision, Objectives, and the Plan more generally, therefore seeks to locate facilities closely linked to main concentrations of population and employment and so where growth is expected. To ensure the link between all the Local Plans and the Waste Plan is clear, we propose an additional modification to the sub-chapter '[Local Policy](#)' in Chapter 3 of the Plan to explain this.

- 2.7. Considering the above, we therefore consider that the Vision and Objectives, and the Plan more generally, demonstrate that adequate consideration has been given to any cross-boundary issues, and any strategic growth priorities.
- 2.8. We will continue to engage with local and neighbouring authorities through our duty to co-operate and via the following partnerships:
- Greater Nottingham Planning Partnership
 - Heads of Planning Group South Yorkshire Mayoral Combined Authority
 - North Derbyshire and Bassetlaw HMA Local Plan Liaison Group
 - EMRTAB Group
 - Nottinghamshire Policy Officers Group
 - Nottinghamshire Development Management Liaison Group
- 2.9. Through continued engagement, this will maintain our awareness of strategic growth priorities and cross boundary issues, with future AMRs presenting an update of these to ensure the Plan continues to reflect current priorities and issues.

3. Should the Vision reflect an aspiration for net self-sufficiency and, if so, should the Plan explain how this could be achieved?

- 3.1. The second paragraph of the [Vision](#) reflects an aspiration for net self-sufficiency, outlining how there will be a mix of waste management sites to ensure sufficient capacity to meet current and future needs. This aspiration is then reflected in [Strategic Objective One](#) and in the Strategic Policies, predominantly [SP2](#). The supporting justification text for SP2, paragraph 7.14, explains how the Plan takes a pragmatic approach of providing sufficient capacity to manage the equivalent of its own arisings, net self-sufficiency, as self-sufficiency is often not practical, viable nor sustainable.
- 3.2. As detailed in our response to question 10 of Matter 2, we appreciate that this approach is not explicit within the Plan. We therefore propose main modifications to the Vision, and other elements of the Plan, to ensure it explicitly reflects the aspiration for net self-sufficiency.

4. How does the Plan contribute to the improvement in the quality of life of those living, visiting and working in the Plan area and, in particular, how do the Strategic Objectives contribute to the delivery of this aspect of the Vision?

- 4.1. The Plan seeks to contribute to the improvement in the quality of life of those living, visiting and working in the Plan area predominantly by ensuring the waste management facilities do not have unacceptable impacts on amenity and the environment.
- 4.2. [Strategic Objective 5: Community, Health and Wellbeing](#) reflects this and aims to deliver this element of the Vision, with the Objective seeking to ensure waste facilities do not adversely impact on quality of life, including through mitigating impacts such as noise, odour and dust. Policy [DM2](#) seeks to deliver Objective 5 by ensuring impacts on health, wellbeing and amenity are avoided or adequately mitigated, providing examples of the types of impacts that need to be considered.
- 4.3. Other Objectives and Development Management Policies also aim to mitigate the impacts of waste management development, all of which help to integrate waste facilities into the local area and can help improve the quality of life of those living, visiting and working in the Plan area. For example, through [Strategic Objective 4: The environment](#) and Policies [DM4](#), [DM5](#), [DM6](#) and [DM7](#), the Plan seeks to protect the natural and historic environment. This includes protecting and enhancing landscapes, local biodiversity, water quality and the historic environment. Paragraph 8.123 of Policy [DM9](#) provides detail of what obligations may be sought from the Councils which could help mitigate any implications of waste development including delivering these enhancements. For example, the provision of open space and the enhancement of the historic environment. The protection and enhancement of these can provide key access to those living, visiting and working in the Plan area and so, as explained in the introduction of each policy, help to improve mental and physical wellbeing and quality of life.
- 4.4. We therefore consider that the policies within the Plan and the Strategic Objectives, particularly Objectives 4 and 5, help to deliver the aspect of the Vision to contribute to the improvement of quality of life for those living, visiting and working in the Plan area.

5. Does the Vision accord with the NPPW insofar as it states that waste planning authorities “should prepare Local Plans which identify sufficient opportunities to meet identified needs for their area for the management of waste streams”?

- 5.1. The second paragraph of the [Vision](#) seeks for the Plan to deliver an appropriate mix of waste sites to ensure sufficient capacity to meet current and future needs, with a proposed main modification in response to Question

3 of this matter to include an aim for net self-sufficiency. This reflects [paragraph 3 of the NPPW](#).

- 5.2. To ensure clarity, we propose a further main modification to paragraph 2 of the Vision to include that sufficient capacity will meet needs for all waste streams. To ensure it is clear that the Plan seeks to ensure sufficient opportunities to meet identified needs, we also propose a main modification to the third paragraph of the Vision to state that new facilities will be in sustainable locations to support the needs of Nottinghamshire and Nottingham and of all new development. With these proposed modifications, we consider that the Vision more explicitly accords with the NPPW by ensuring sufficient opportunity to meet identified needs for the Plan area for the management of waste streams.

6. Does the Vision and Objectives (and the Plan more generally) adequately promote the proximity principle, circular economy principles, and the waste hierarchy?

- 6.1. Yes, the Vision and Strategic Objectives, and the Plan more generally, adequately promote the proximity principle, circular economy principle and the waste hierarchy as set out below.

Proximity Principle

- 6.2. The second paragraph of the [Vision](#) reflects the proximity principle by seeking for waste management facilities to be closely linked to our concentrations of population and employment, the main sources, and generators of waste, so that waste can be managed close to where it is produced. This aim is then continued within [Strategic Objective 6: Sustainable Transport](#), outlining the desire to locate facilities near the source and/or end markets to reduce transport distance and environmental impacts. Policies [SP3](#) and [SP6](#) then seek to deliver these elements. Policy [SP3](#) does so by seeking to locate waste management facilities near the main urban areas and so the sources of waste, helping to manage waste more locally with Policy [SP6](#) seeking to minimise the distance waste needs to travel. Paragraph 7.49 of the justification text reflects the proximity principle and the pragmatic approach taken that not all waste will be handled locally, which the policy itself seeks to reflect.
- 6.3. We therefore consider that the Plan does adequately promote the proximity principle but recognise that the Vision could explicitly reference the proximity principle to ensure clarity. We therefore propose a main modification to address this.

Circular Economy

- 6.4. As outlined in the first paragraph of the [Vision](#), the Plan seeks to produce less waste by 2038 by minimising the use of resources and re-using these as far as possible as part of a truly circular economy. [Strategic Objective 2: Climate Change](#) and [Strategic Objective 3: Strengthen our economy](#), then highlights

this further by seeking to promote waste as a resource. Policy [SP1](#) aims to deliver this by ensuring all proposed developments reduce and re-use waste as much as possible, therefore promoting the circular economy.

- 6.5. The Vision, Objectives and the Plan do therefore adequately promote the circular economy principles.

Waste Hierarchy

- 6.6. As with the circular economy, the first paragraph of the [Vision](#) promotes the waste hierarchy by prioritising the higher levels of reduce and re-use of waste as far as possible. Where waste is generated, the Vision then aims to meet and exceed recycling targets, with residual waste to then be recovered for maximum value, with disposal as a last resort. This is reflected in [Strategic Objectives 1, 2 and 3](#). Policies [SP1](#) and [SP2](#) aim to deliver the waste hierarchy, with SP1 focused on preventing waste arising and re-using where possible, the top tiers of the hierarchy, with Policy [SP2](#) prioritising recycling, then recovery and disposal as the last resort.
- 6.7. To ensure it is clear, we propose a main modification to the Vision to explicitly reference that we aim to manage waste higher up the waste hierarchy.

Conclusion

- 6.8. In conclusion, we consider that with the main modifications to make explicit reference to the proximity principle and waste hierarchy in the Vision, that the Vision, Objectives and the Plan more generally adequately promote the proximity principle, circular economy principles, and the waste hierarchy.

7. Are the Plan's objectives consistent with the NPPW insofar as it states that waste planning authorities should look for opportunities to co-locate waste management facilities together and with complementary activities?

- 7.1. As outlined in our response to Question 11 of Matter 2, we agree that the Plan could go further to support and consider the co-location of waste management facilities together and with complementary activities. We therefore propose a main modification to [Strategic Objective 1](#) to include support for waste management sites that support opportunities to co-locate waste management facilities and complementary activities, where appropriate, and that are in the most suitable and sustainable locations.

8. Does the Vision and Strategic Objectives adequately protect the historic environment?

- 8.1. Yes, the Vision and Strategic Objectives adequately protect the historic environment.

- 8.2. Paragraph 4 of the [Vision](#) outlines that we will protect and enhance our environment, which includes heritage, with [Strategic Objective 4: The environment](#) reflecting this. The Vision and Strategic Objective were appraised against the Sustainability Appraisal (SA) Objectives, including SA Objective 4 which assesses whether they protect the quality of the historic environment, heritage assets and their settings above and below ground. As shown in [Table 3.1](#) and [Table 4.1](#) of the Sustainability Appraisal, Pre-Submission Draft Report (document CD2) the Vision was found to likely have a positive impact on SA objective 4 and Strategic Objective 4 was found to be compatible with SA Objective 4.
- 8.3. We recognise that Historic England raised objections to the Vision and Strategic Objective 4 and 7 at the Pre-Submission Draft Plan Consultation. As outlined in the [Statement of Common Ground with Historic England](#) (document EXAM 3), we have proposed a main modification to [Strategic Objective 4](#) (reference PMM1 in document EXAM 2) to amend the structure so that the natural aspects of the environment are first discussed followed by the historic environment. The historic environment element has been re-worded to ensure that it is clear that the historic environment will be protected and enhanced, with harm avoided in the first instance. Historic England have accepted and welcomed this change.
- 8.4. Considering that [Strategic Objective 4](#) seeks to protect and enhance the historic environment, we do not consider further reference is needed in [Strategic Objective 7](#). No modifications in relation to the historic environment has also been proposed to the [Vision](#) as we consider, as worded, the Vision adequately seeks to protect the historic environment.
- 8.5. We therefore consider the Vision and Strategic Objectives, along with the more detailed policies contained within the Plan, do adequately protect the historic environment.
- 9. In the absence of any specific allocations for new waste management facilities, how does the Plan deliver Strategic Objective 1 with particular regard to ensuring that there is a mix of site types, sizes and locations to help manage waste sustainably?**
- 9.1. Due to the limited range of sites submitted by waste operators during the preparation of the Plan, we were unable to make an objective comparison of a range of possible sites and so were unable to allocate specific sites. However, as per National Policy, the Plan still seeks to ensure sufficient capacity and waste management facilities for the Plan area to meet its needs, reflected by [Strategic Objective 1](#). This objective can be delivered by several of the Strategic and Development Management Policies.
- 9.2. As no allocations are made, the Plan contains a criteria-based policy, [Policy DM1](#), which indicates what types of locations are likely to be considered suitable for different types of waste use. This policy therefore acts as a guide for developers to understand what type and size of facility may be appropriate

in what location, seeking then to influence and deliver a mix of site types and sizes. This flexible approach is similar to that taken by other WPAs who recently adopted a Waste Local Plan and in the [Nottinghamshire and Nottingham Waste Core Strategy](#) (adopted December 2013), which has enabled a range of types and size of facilities to come forward and be permitted, ranging from large scale energy from waste facilities to small waste transfer stations. The Policy is therefore flexible and enables opportunity for sites to come forward based upon market demand and need and demonstrates that Strategic Objective 1 can be delivered without specific allocations.

- 9.3. [Policy SP3](#) also helps to deliver Strategic Objective 1 by outlining the broad locations in which waste management facilities will be supported, seeking for facilities to be close to urban areas and the size of the facility appropriate to its location. By locating facilities nearby to the main urban areas and settlements, and so the sources of waste, [Policy SP3](#) alongside [Policy SP6](#), which again seeks to reduce the distance waste travels, helps deliver the sustainable element of [Strategic Objective 1](#).
- 9.4. These policies together then will enable a mix of sites to come forward in appropriate locations to help manage waste sustainably and so deliver Strategic Objective 1. As [per Chapter 9: Monitoring and Implementation](#), these policies will be monitored and reviewed via future AMRs and if indicators suggest the need in the Plan area is not being appropriately met through waste management facilities, then the plan may need to be reviewed.

10. In circumstances where alternatives to road transport are not possible or feasible, how does the plan achieve compliance with Strategic Objective 6?

- 10.1. As highlighted in the Plan, it is recognised that road transport is likely to remain the predominant mode of transport for transporting waste, but we want to encourage the use of alternative modes as much as possible. This pragmatism is reflected in Policies [SP6](#) and [DM12](#) and so why [Strategic Objective 6](#) seeks to encourage alternative modes of transport rather than require. Providing that proposals have fully considered alternative modes of transport and have outlined why these alternative modes are not possible or feasible, as required by Policy [SP6](#), the Plan can achieve compliance with this element of Strategic Objective 6.
- 10.2. [Strategic Objective 6](#) also seeks for more than just the use of sustainable transport, looking to also reduce the distance waste needs to travel, thus addressing the proximity principle, and ensuring existing transport links are used to minimise impacts of new waste development proposals. Therefore, there are several elements which the Plan can achieve compliance with Strategic Objective 6 than just using alternatives to road transport. To ensure this is clear, we propose a main modification to amend the title of the Strategic Objective 6 from 'sustainable transport' to 'sustainable movement of waste'.