

Appendix: Comments by Gedling Borough Council on the Nottinghamshire and Nottingham draft Waste Local Plan (regulation 19)

Vision and Objectives

The Waste Local Plan is supported by a Vision for less waste by reusing resources as part of a circular economy. Seven strategic objectives are set out:

- Meeting future needs
- Climate change
- Strengthen our economy
- The environment
- Community health and well being
- Sustainable Transport
- High quality design and operation

Comment

The vision and objectives are supported.

SP1 - Waste Prevention and re-use

All development should be designed, constructed and operated to minimise the creation of waste, maximise recycling and assist with collection, separation, sorting, recycling and recovery of waste from the development during its use.

Comment

Supported.

SP2 - Future Waste Management Provision

The policy aims to provide sufficient waste management capacity to meet identified needs and prioritises new or extended recycling, composting and anaerobic digestion - followed by energy recovery and lastly new or extended disposal for any residual waste in order to drive waste management up the waste hierarchy.

Comment

Supported.

Broad Locations

Policy SP3 supports waste treatment facilities in suitable locations which are well related to the main urban areas and settlements. Treatment facilities within the countryside will be supported only where such locations are justified by a clear local need. Where land is designated as Green Belt, Policy SP7 (Green Belt) will apply.

Comment

A welcome clarification that Policy SP3 clearly states Green Belt policy will apply in designated Green Belt areas addressing Gedling Borough's previous representations. Policy is supported.

SP4 Managing Residual Waste

Policy SP4 deals with residual waste that cannot be practically reused, recycled or processed in any other way. It splits the waste stream into 'inert waste' and 'non-hazardous and hazardous waste'. Proposals for the recovery of inert waste will be permitted subject to criteria including where it provides significant benefits and the waste material cannot be reused etc. and involves the minimum quantity of waste necessary. The supporting text to Policy SP4 explains that inert material can be put to beneficial use to restore former minerals sites or to cap landfill or landraise schemes. This can be categorised as recovery as opposed to disposal where the material replaces non-waste materials which would otherwise have been used.

A more stringent set of criteria is applied to proposals for the disposal of hazardous and non-hazardous waste which cannot be reused etc. including the need to show an overriding need for additional disposal capacity which cannot be met elsewhere.

Comment

Policy SP4 is supported.

SP5 Climate Change

Policy SP5 requires for waste management facilities to be located, designed and operated to minimise potential impacts on the causes of climate change throughout the lifetime of the development. This includes, amongst others, reducing greenhouse gas emissions, making efficient use of natural resources, limit climate impacts and supporting renewable and low carbon energy and associated infrastructure through design. Development should be resilient to climate change.

Comment

Support Policy SP5.

Sustainable movement of waste

Policy SP6 seeks to minimise the distances waste needs to travel and to make best use of the existing transport network and ensure that proposed facilities use the main highway network where appropriate.

Comment

Support Policy SP6.

Green Belt

Policy SP7 states that proposals for waste management facilities considered to be inappropriate will only be approved where very special circumstances can be demonstrated. Where proposals are considered not to be inappropriate development in the Green Belt, they will be supported where this would maintain the openness of the Green Belt and purposes of including land within it.

Comment

Policy SP7 reflects National Planning Policy and is supported.

Safeguarding Waste Management Sites

Policy SP8 seeks to avoid the loss of existing authorised waste management facilities, including potential extensions; unimplemented planning permissions; and facilities to transport waste such as rail. In particular, the Policy is intended to prevent proposals for non-waste management facilities in close proximity stymieing the operations of the waste facility through suitable mitigation so that waste operations can continue unhindered. This is particularly relevant to the Boroughs/Districts as non-waste proposals generally fall within their planning remit.

Comment

Policy SP8 is supported in principle.

Development Management Policies

DM1 General Site Selection Criteria

Policy DM1 sets out general site criteria. This policy is very similar to the existing policy in the Waste Core Strategy establishing the broad principles and areas where waste management facilities are likely to be appropriate for example on existing employment land. Within the Green Belt the policy indicates that small scale anaerobic digestion, open air composting and waste water treatment facilities are likely to be acceptable. The only larger facilities which may be suitable in Green Belt locations are indicated as landfill as this is less likely to impact on openness.

Comment

No comment on the Policy. Gedling Borough Council does not consider there is any site within Gedling Borough suitable for the landfilling of non-inert waste including both hazardous and non-hazardous waste.

DM2: Health, Wellbeing and Amenity

Addresses the potential impacts on health and wellbeing. Policy DM2 identifies a wide range of potential impacts but states clearly these are not exhaustive.

Comment

Support Policy DM2.

DM3 – Design of Waste Management Facilities

Policy DM3 seeks to ensure proposals are of an appropriate scale, form, layout orientation and materials for its location. Boundary treatments should be well designed including security features and screening, landscaped and integrated into its surroundings. Proposals should be designed to incorporate sustainable features

such as minimising greenhouse gas emissions and ensure resilience and adaptation to climate change by taking into account flood risk and building orientation.

Comment

Support Policy DM3.

DM4 Landscape Protection

Policy DM4 seeks to avoid adverse impacts on the character and distinctiveness of the landscape. Landscaping should reflect the advice in the Nottinghamshire Landscape Character Assessment.

Comment

Support Policy DM4.

DM5 – Protecting and Enhancing Biodiversity

A comprehensive policy covering the protection of international, national and locally designated wildlife sites, priority species and priority habitats. Reflects the avoid, mitigate, compensate principle. Proposals should retain, protect and restore and enhance biodiversity contributing to the targets in the Nottinghamshire Local Biodiversity Action Plan and as a minimum provide 10% net gain for biodiversity.

Comment

The Policy includes a target of a minimum of 10% biodiversity net gain and is supported.

DM6 - Historic Environment

Policy DM6 seeks to protect designated and non-designated heritage assets and their settings are conserved in a manner appropriate to their significance.

Comments

Policy DM6 reflects the NPPF and is supported.

DM7 Water Resources and Flood Risk

Developers will need to demonstrate that there is no unacceptable impact on the integrity and function of flood plains or increased risk of flooding on site or elsewhere. Where required developments would need to satisfy the flooding sequential test and exceptions test has been applied and submit a flood risk assessment. Development should also incorporate sustainable urban drainage systems wherever practical. Policy DM7 protects water resources from potentially polluting water resources including ground water and surface water a particularly important consideration for waste management operations.

Comment

Policy DM7 reflects the NPPF and is supported.

DM8 Public Access

Policy DM8 states that development should not have an unacceptable impact on the rights of way network. Any necessary diversions of footpaths must meet the criteria in the policy.

Comment

Support Policy DM8.

DM9 – Planning Obligations

The Councils will seek to negotiate planning obligations as measures for controlling waste facilities and mitigating any negative impacts to secure sustainable development objectives which cannot be achieved by the use of planning conditions.

Comment

Noted.

DM10 The Cumulative Impact of Waste Management Development

Policy DM10 recognises that there can be a cumulative impact from several waste management operations on an area and allows this to be taken into account.

Comment

Support Policy DM10.