Revising Chapter 12 of Planning Policy Wales and Technical Advice Note 21 (Waste) to reflect the new waste policy drivers

A Summary of Consultation Responses

January 2014

ISBN: 978-1-4734-0694-0

Contents

Acknowledgements
This consultation document has been written with the assistance from the National Planning Policy for Waste Technical Advisory Group. This comprised of representatives from local planning authorities, Countryside Council for Wales*, Environment Agency Wales*, the waste industry and colleagues in the Waste Strategy Division, Welsh Government.

* Now Natural Resources Wales.

1 Introduction

The draft recast of national planning policy for waste, which includes Planning Policy Wales (PPW) paragraphs 12.5, 12.6, 12.7 and Technical Advice Note 21 (TAN21): Waste, was launched for consultation on 21 March 2013. The public consultation was open for responses for 12 weeks and closed on 14th June 2013. A total of 13 questions were set out in the consultation document.

This report identifies a number of themes emerging from the consultation responses. Each theme is discussed in turn, the responses analysed, key comments and observations included and any actions taken by the Welsh Government to address them are set out. Appendix I of the Consultation Report contains the list of respondents by sector. Appendix II provides a table containing the main revisions to the draft TAN21 following the consultation process.

There was a common theme of general agreement with the need for revision to TAN21 and the associated paragraphs in PPW. There was also a positive response to the way in which the revised draft TAN21 sets out the strategic land use planning policies in relation to waste management treatment and supporting infrastructure. The majority of responses agreed that the draft TAN21 reflects the changes in waste management priorities and sets out clearly the implications for land use planning.

2 Analysis of Responses by Sector

In total, 41 responses were received for this consultation. Of the responses, 29 (71%) used the proforma questions found in the consultation. The responses represented organisation groups as follows:

- Local Planning Authorities 19 (46%)
- Government/Public Sector 6 (15%)
- Professional Bodies/Interest Groups 8 (20%)
- Businesses 4 (10%)
- Other 3 (7%)
- Voluntary 1(2%)

The list of respondents by sector is included in Appendix 1 of this report.

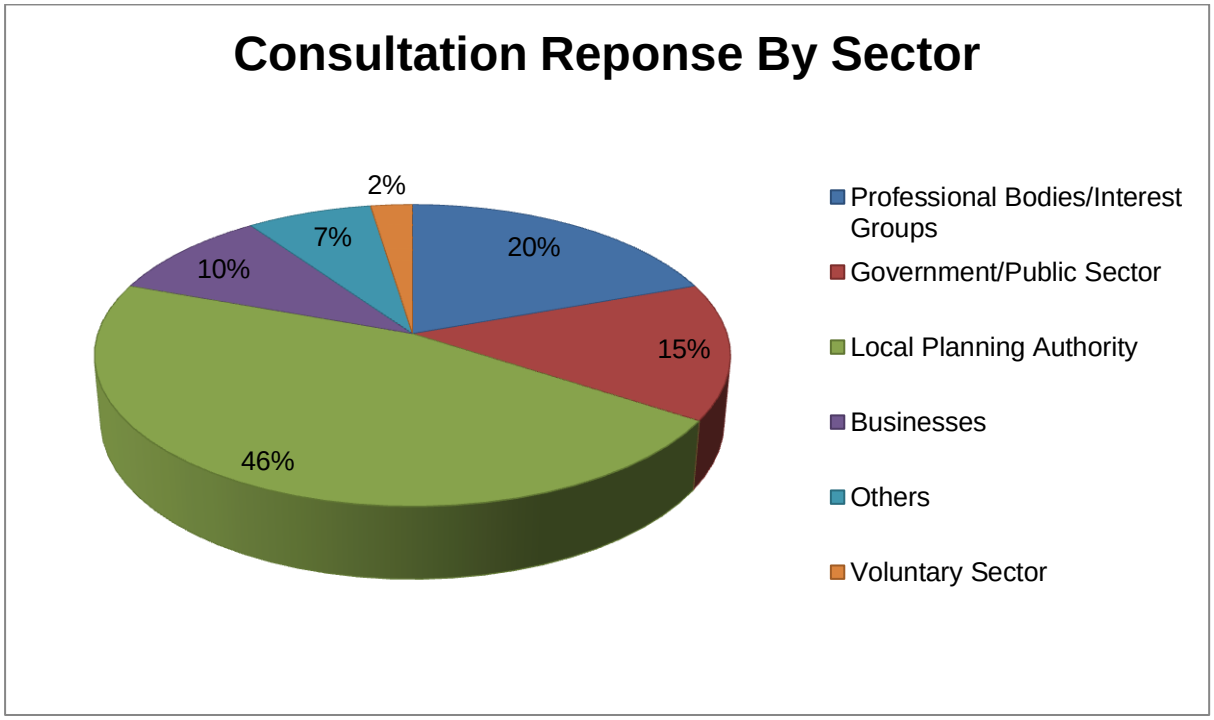

Chart 1: Consultation response by sector

3 Key themes

The responses were grouped into the following themes. The themes are set out below.

3.1 Interaction with waste policy

Over two thirds of respondents agreed that the recast of national planning policy for waste (Technical Advice Note 21: Waste and Planning Policy Wales, Chapter 12 paragraphs 12.5-12.7) explains clearly the role land use planning has in enabling the waste strategy objectives, targets and priorities to be achieved. This theme attracted a number of comments.

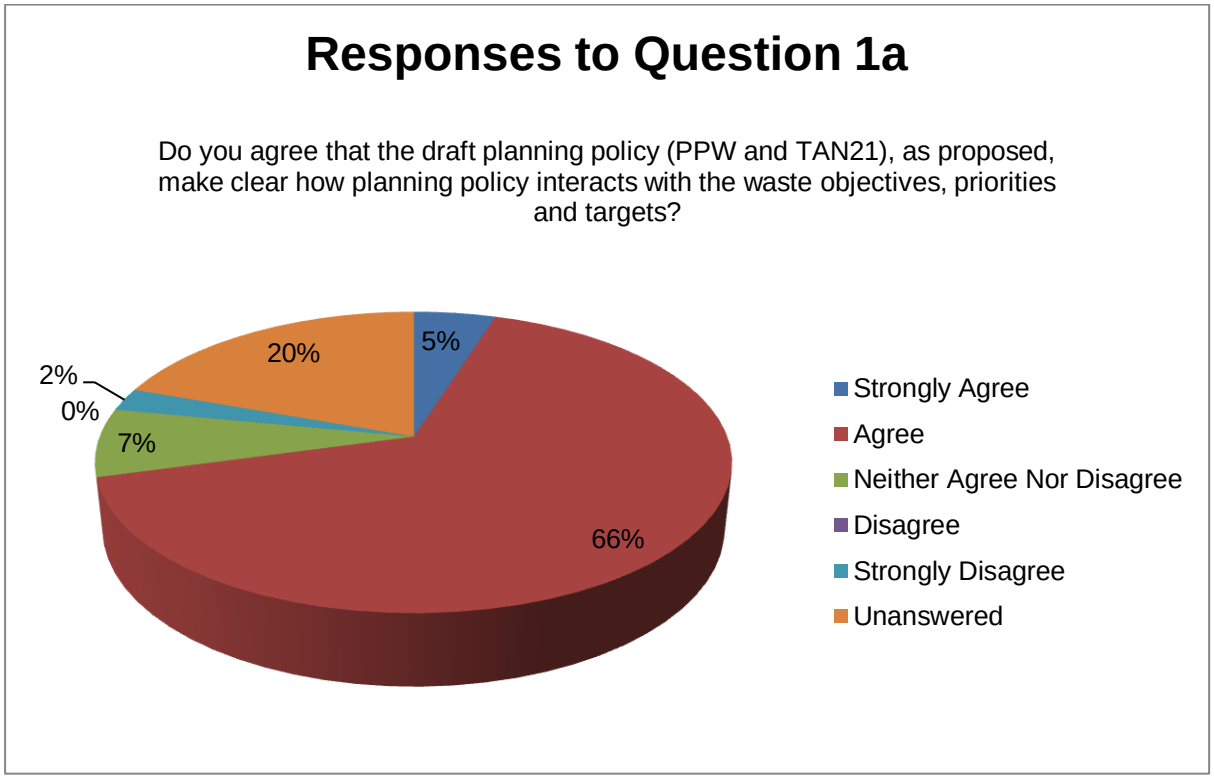

Chart 2: Responses to Question 1a

Some respondents expressed concern that the draft TAN21 revision focused on mixed municipal waste and did not provide similar detailed consideration for other wastes. Respondents recommended that TAN21 should include more detail on other wastes. A summary of the main changes made to the revised draft of TAN21 can be found in Appendix 2 below.

a. Clarity of "other waste"
    - The document needs to highlight that local development plans should identify potentially suitable sites for all waste streams, not just mixed municipal waste.

> *…there is a degree of ambiguity in relation to, for example the consideration/interpretation of the proximity principle under Art.16 of the revised Waste Framework Directive (rWFD). Allied to this, there are different terms used for waste, with a propensity to use "mixed municipal waste". The document as a whole should apply to all waste streams, not just municipal waste or commercial and industrial (C&I) waste*.

- The use of the termS “mixed municipal waste”, “municipal waste” and “residual waste” attracted many comments. Generally, these concerned the scope and meaning to be given to the terms.

b. Technical Detail

- Whilst respondents considered that information on waste treatment methods is useful, some considered that this type of explanation should be taken out of the draft revision of TAN21 and included in a separate technical companion.

Many parts of the draft TAN21 are of specialised technical nature and would need the waste department of the Local Authority to interpret.

WELSH GOVERNMENT ACTIONS

- The draft TAN21 is revised to provide consistency of use of terms throughout the document.
- The content of Chapter 5 is condensed and incorporated within Chapter 4. The detail on waste treatments technologies, planning considerations, mitigation and case studies can be found in the accompanying technical guide, W*aste Planning: Practice Guide*.
- The *Waste Planning: Practice Guide* will accompany the revised TAN21. It will be a separate and freestanding document

3.2 The Waste Network

The majority of responses to Question 2b neither agreed nor disagreed that the draft planning policy, as proposed, will be effective in facilitating the delivery of an adequate and integrated network of mixed municipal waste infrastructure. Respondents agreeing totalled 29% and just 10% considered the draft policy proposals would not facilitate the waste network needed to achieve the requirements contained in Article 16 of the Revised Waste Framework Directive (rWFD)[1].

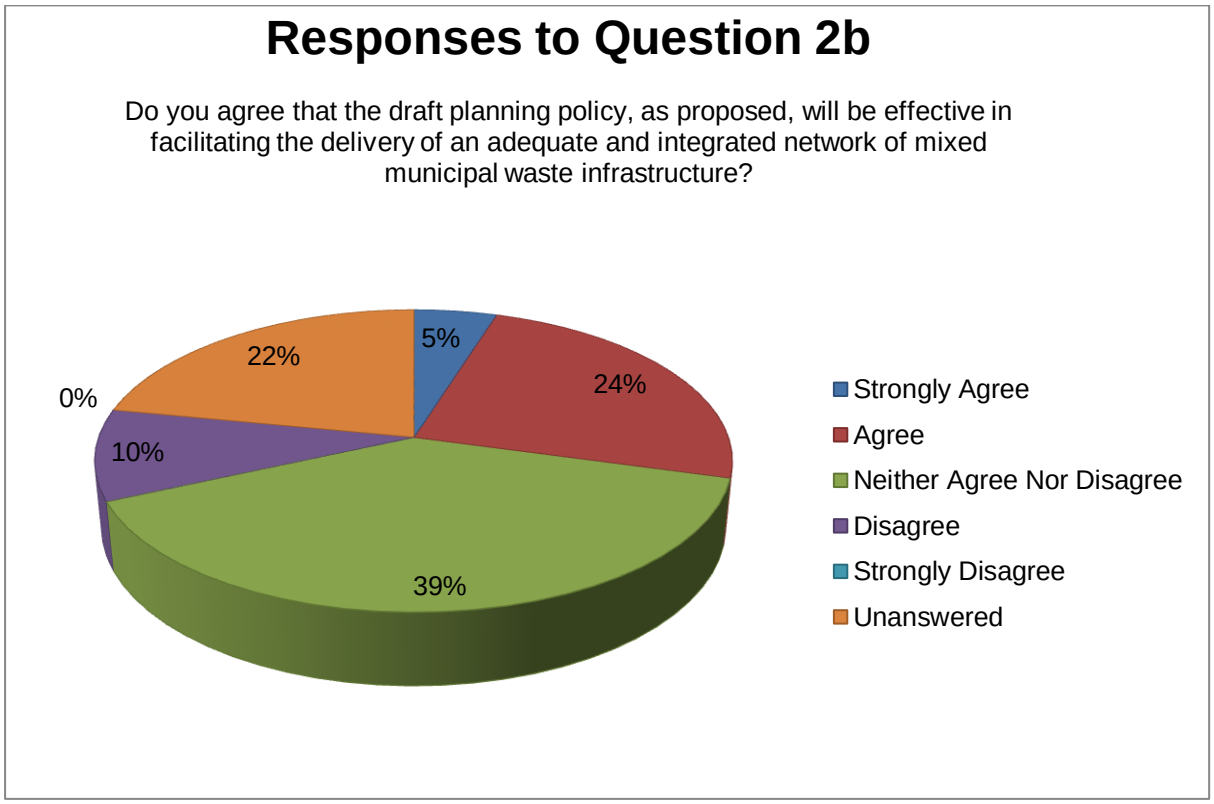

Chart 3: delivering an adequate and effective network of mixed municipal waste

The land use planning system has an important role to play in facilitating sustainable waste management. In order to achieve the objectives set out in Towards Zero Waste (TZW) and the Collections Infrastructure and Markets (CIM) Sector Plan an integrated and adequate network of waste disposal installations and installations for the recovery of mixed municipal waste must be established[2]. There was a mixed response to question 2a, with over one third of responses neither agreeing nor disagreeing. It was recognised that planning policy is limited to facilitating the network and that delivery is dependent on the waste industry and markets and, to an extent, public procurement exercises.

LPAs can only seek to facilitate provisions of an adequate and integrated network of infrastructure, it is for the industry to actually provide it.

[1] Directive 2008/98/EC on waste, OJ [2008] L312/3.
[2] Mixed municipal waste or residual municipal waste includes those mixed wastes collected by third parties from commercial and industrial sectors as well as from private households.

a. Regional Collaboration
   - Those agreeing recognised the importance of a regional approach and collaborative working between Local Authorities in identifying potentially suitable locations for waste disposal installations and installations for the recovery of mixed municipal waste.
   - There was some concern over the challenges that such an approach posed for Local Planning Authorities.

The draft TAN21 relies heavily on regional collaboration and this, up to a point, is supported. However…there is a limit on what can be achieved by a non-statutory "voluntary" body without statutory duties and powers…

b. The Regions
   - Clarity was sought on the geographical coverage of the regions.

c. Scope of the network
   - There was some uncertainty over the scope to which the integrated and adequate network applies.

We are unsure as to why the locations to be identified will only include municipal waste disposal and recovery installations.

WELSH GOVERNMENT ACTION

- The draft TAN21 is revised to clarify the role and expectations of the lead LPAs and the level of Welsh Government support. The detailed guidance on monitoring and site identification will be published within six months of the publication of the finalised TAN21.

- The draft TAN21 is amended to clarify that reference to the regions, refers to the current regions of North Wales, South East Wales and South West Wales.

3.3 Allocating land for waste management infrastructure

When asked whether the draft planning policy, as proposed, will be effective in identifying suitable locations for mixed municipal waste disposal and recovery operations, over one third of responses agreed, with a further 32% neither agreeing nor disagreeing.

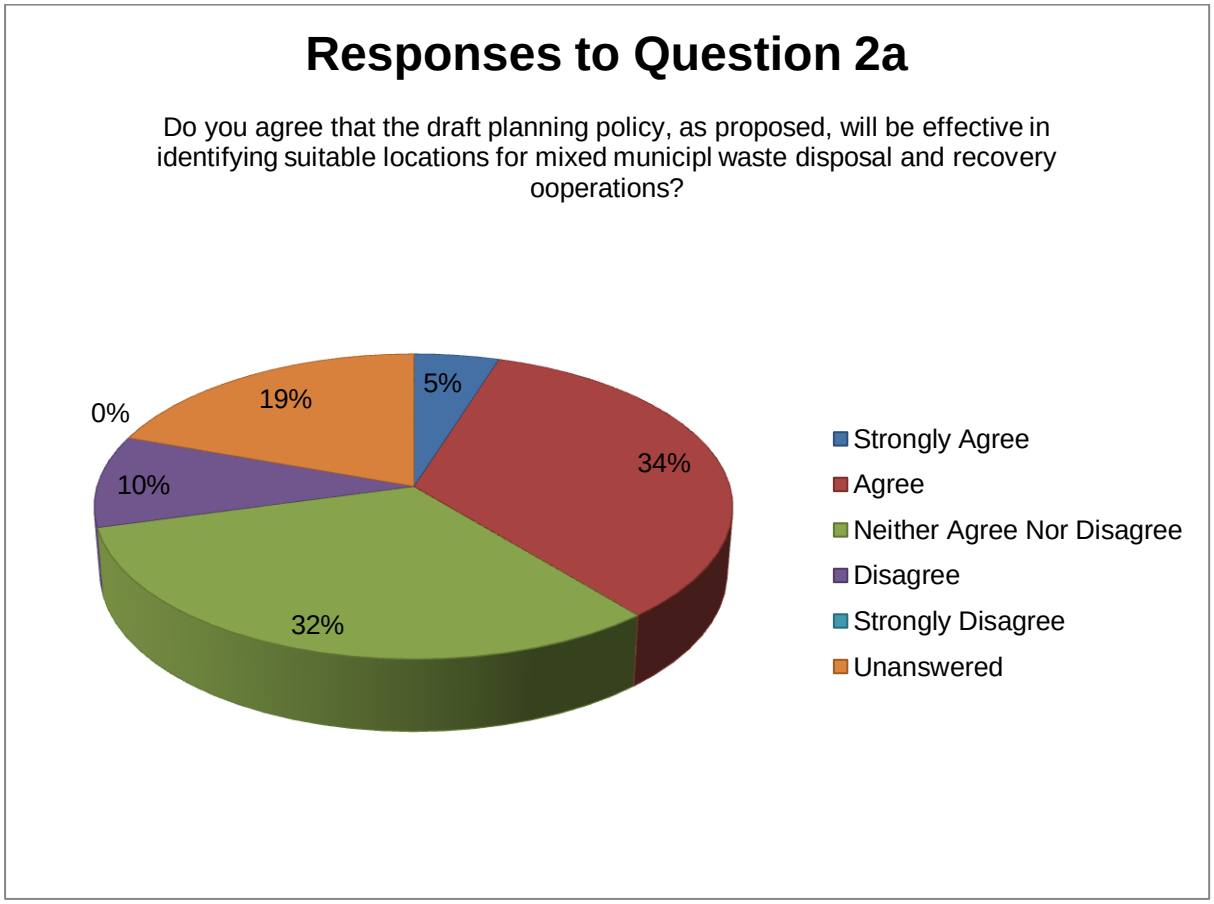

Chart 4: Identifying suitable locations for waste installations

Advances in technology and the introduction of new legislation, policies and practices means that modern in-building facilities, including supporting infrastructure are similar to any other industrial building in many instances. This means that general employment sites and major industrial areas can be suitable locations for new generation waste facilities. When considering open-air facilities, TAN21 refers to the areas of search maps, prepared to support the regional waste plan first reviews. In addition, a list of other types of sites which may be suitable for new or extended waste treatment facilities is provided in paragraph 3.27 of TAN21.

Responses to the new approach in identifying suitable sites for waste management facilities had a mixed response. Some welcomed the flexibility of TAN21:

> *The draft policy will certainly help the identification and delivery of a network of suitable sites. The avoidance of requirements that are too prescriptive is certainly necessary in order to best accommodate installations and facilities that are evolving with new technology and experience*.

Others considered that the calculation of land-take need for each local authority, contained within the regional waste plan first reviews, enabled LPAs to make sufficient provision of land within the development plan. Those respondents felt that moving away from this approach was likely to inhibit the facilitation and delivery of the network for disposal and recovery of mixed municipal waste. The respondent felt that more detail was needed on what comprises a suitable site and clarity in terms of specific allocations.

a. Removing land allocation for waste management facilities
    - Concern was expressed that removing the need for local planning authorities to specifically allocate land for waste management facilities increases uncertainties in the waste industry and for local communities. The locational criteria set out under paragraph 3.30 of TAN21 were welcomed.

b. Suitable Sites
    - Respondents focused on the suitability of employment sites for waste management facilities, pointing out that whilst “many modern waste management facilities have similarities with other industrial developments and that employment land allocations may be suitable”, there are cases where these sites will not be suitable.
    - In addition, it was suggested that owners of employment sites are not always willing to release land for waste management uses and where they are, the costs can be prohibitive.

WELSH GOVERNMENT ACTION

- The draft TAN21 is revised to clarify that it is not only employment land that may offer a suitable site for a waste facility. It emphasises that the appropriateness of a site will be determined by the type of facility.

3.4 Mixed Municipal Waste

A common response to the consultation was that the meaning given to mixed municipal waste was inconsistent within the document, with the definition set out in the revised Waste Framework Directive and that used in the CIM Sector Plan. Some respondents felt that the definition and interchange of terms between municipal waste, mixed municipal waste and residual waste in the draft TAN21 was unclear, inconsistent and confusing. One respondent considered that the draft TAN21 ignored commercial and industrial (C&I) waste collected by third parties.

WELSH GOVERNMENT ACTION

- The meaning to be given to mixed municipal waste is included in Chapter 1 of TAN21. TAN21 reflects the meaning given in the CIM Sector Plan, where mixed municipal waste is referred to as waste that includes those mixed wastes collected by third parties from commercial and industrial sectors as well as from private households.

- The meaning to be given to mixed municipal waste is revised in the glossary to ensure consistency

3.5 Proximity Principle

Some respondents considered that reference to the proximity principle, its meaning and scope was ambiguous in the revised draft TAN21. The proximity principle, under Article 16 of the rWFD, provides that waste to be disposed of, or mixed municipal waste to be recovered, should take place "in one of the nearest appropriate installations". The acknowledgement in TAN21 that applying the proximity principle should not prevent the movement of waste across administrative boundaries was welcomed.

WELSH GOVERNMENT ACTION

- TAN21 is revised to discuss the management of waste in relation to "one of the nearest appropriate installations".
- TAN21 emphasises that the meanings to be applied to the principles of waste management reflect the definitions provided in the Collections, Infrastructure and Markets (CIM) Sector Plan.

3.6 Landfill

3.6.1 Retaining a minimum level of landfill

Respondents recognised the importance of diverting waste away from landfill, where alternative and more sustainable waste management options exist. However, respondents acknowledged that for some types of waste, for example asbestos, disposal to landfill remains the best environmental management choice. As a result, the majority of respondents agreed that a minimum level of landfill capacity and void in each region should be retained, relative to a trigger point.

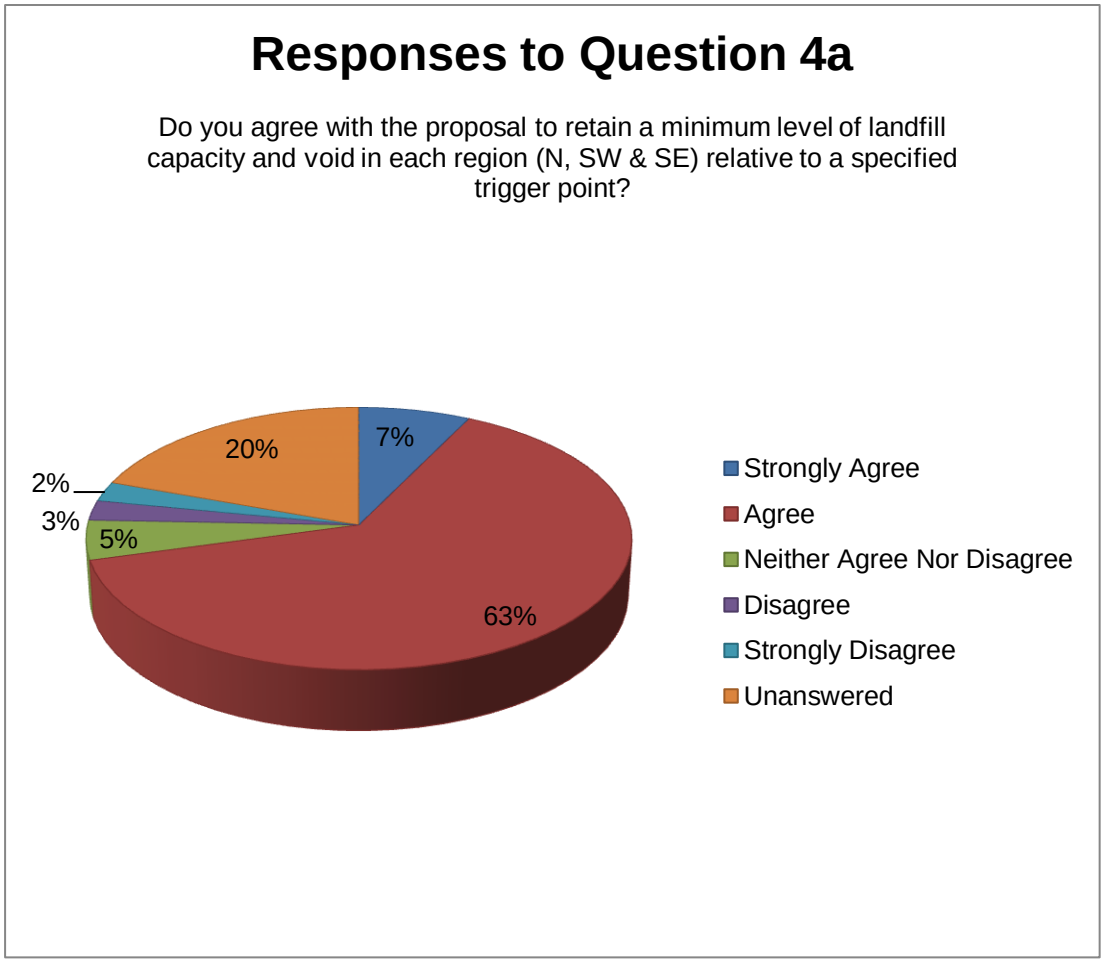

Chart 5: retaining landfill capacity and void

Despite the target of zero waste as set out in Towards Zero Waste (TZW), it is recognised that some waste or waste residues will remain which cannot otherwise be reused or recycled, or are unsuitable for treatment in an energy from waste (EfW) facility. Where no markets can be found for EfW by-products and residues such as incinerator bottom ash (IBA) (e.g using IBA as a recycled aggregate) there may be no choice but for such products to be landfilled. As such we support the need to retain a minimum level of landfill capacity and void in each region.

It is anticipated that as Wales progresses towards achieving the recycling and reuse targets in TZW and the CIM Sector Plan through high volume source segregated collection, the volume of waste sent to landfill will decline. In the short to medium term there will be a continued need to develop more residual municipal waste treatment and recovery facilities and a continued, albeit reducing need, for disposal.

To avoid overprovision of landfill capacity, it is intended that landfill capacity is monitored and where it falls below a certain trigger point, a site search and selection process will be undertaken at a regional level. The majority of respondents agreed that setting a trigger based upon a minimum level of landfill capacity and void space was a suitable approach to ensuring that Wales has sufficient capacity to manage waste arisings without impeding the long term waste management objectives of as close to zero waste to landfill as possible[3].

Yes – It is agreed that a minimum level of landfill capacity should be retained in each region. Whilst landfill is no longer the preferred option, it will nevertheless have a continuing role to play in the management of residual waste at least in the short to medium term. The view is based on the fact that:

- *There will inevitably be a period of transition…*
- *All other waste management methods leave residual amounts of waste…*
- *It is likely that for some waste, the Best Practicable Environmental Option (BPEO) will continue to be landfill*

3.6.2 Type of trigger

The majority of consultation responses (63%) agreed that monitoring landfill capacity by number of years of void space is an appropriate method.

[3] The Welsh Government (June 2010) *Towards Zero Waste: One Wales One Planet*. Available online at: http://wales.gov.uk/topics/environmentcountryside/epq/waste_recycling/publication/towardszero/?lang=en

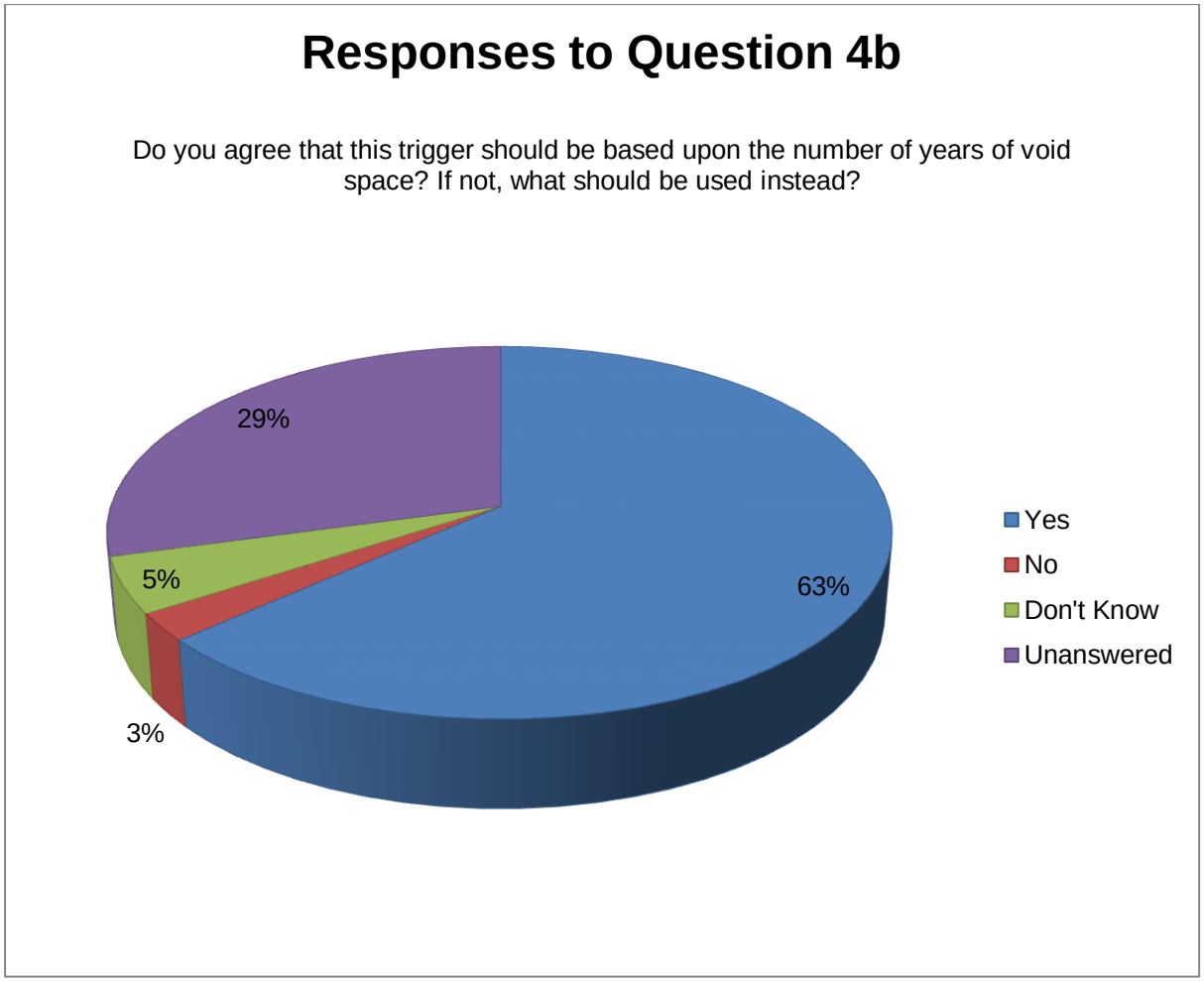

Chart 6: Number of years of void space

a. Methods of Calculation

- Although not the only approach, number of years of void spacewas considered as “possibly the easiest to use” measure from which to set a trigger for the identification of new landfill capacity. The method of calculating the number of years of void space was considered to be a “critical question”:

The number of years of void space seems a sensible method to monitor landfill capacity. The method of calculating the number of years of void space is the critical question…It would seem sensible to use existing rates of deposition with a shorter trigger point (5 Years) to avoid overprovision of landfill. Careful monitoring would then be required to ensure that anticipated trends continue.

Different methods of calculation were suggested including:

The maximum volume/capacity of a landfill void should be calculated and divided by the average tipping rates per annum over the last 10 years to determine the number of of years of void space. Any other factors which may influence this figureshould be taken into account i.e.change in the packaging regulations.

A number of years is considered to be appropriate trigger mechanism. However, this figure will be to reviewed with time, because as technology develops, less and less waste should be sent to landfill, so the volume of landfill capacity required per year to meet the need will reduce.

b. Data gathering

Some responses noted the reliance of this appoach on Natural Resources Wales (NRW):

…Natural Resources Wales have a key role to play in the supply of data and estimates of void space and therefore this approach is only appropriate if NRW are able to fulfil this role.

Natural Reources Wales provides estimates of landfill life in years based upon current deposition rates and remaining void space.

It was suggested by a number of respondents that there was a risk of overestimating the rate at which landfill void will be used up. Responses suggested that the means used by NRW for calculating remaining landfill life (based upon current deposition rates and remaing void space) did not take into account the continual fall in landfill deposition rates since 2007. With the expectation of the level of deposition to landfill decreasing year on year, in line with the objectives and targets set out in TZW and the CIM Sector Plan, some respondents argued that remaining landfill life is likely to increase each year without additional void being needed because of a decrease in deposition rates.

3.6.3 Number of years of void space

Responses were divided in terms of the number of years of void space which should be set as the trigger point at which a site search for further landfill would need to be identified. In general, it was acknowledged that adequate time was needed to be built into the trigger to enable the identification of suitable sites, acquisition, funding, obtaining planning and permitting in order that new capacity was operational in time – lead-in time. Differences arose between responses in relation to the length of lead-in time considered appropriate.

Not all respondents answered this question. Of those who responded to this question, the majority considered that a two phase trigger of 5-7 years should be introduced. Under this suggestion, it was envisaged that local planning authorities identify where landfill capacity falls below both a 7 and 5 year void in a region. The identification of a 7 year void represents the level at which sufficient capacity is likely to exist in a region to meet future disposal needs and as such this is the level at which void capacity should ideally be maintained. This enables time for the market to come forward with a solution. The 5 year level should be identified as a trigger for pursuing any action which may be necessary to facilitate future provision.

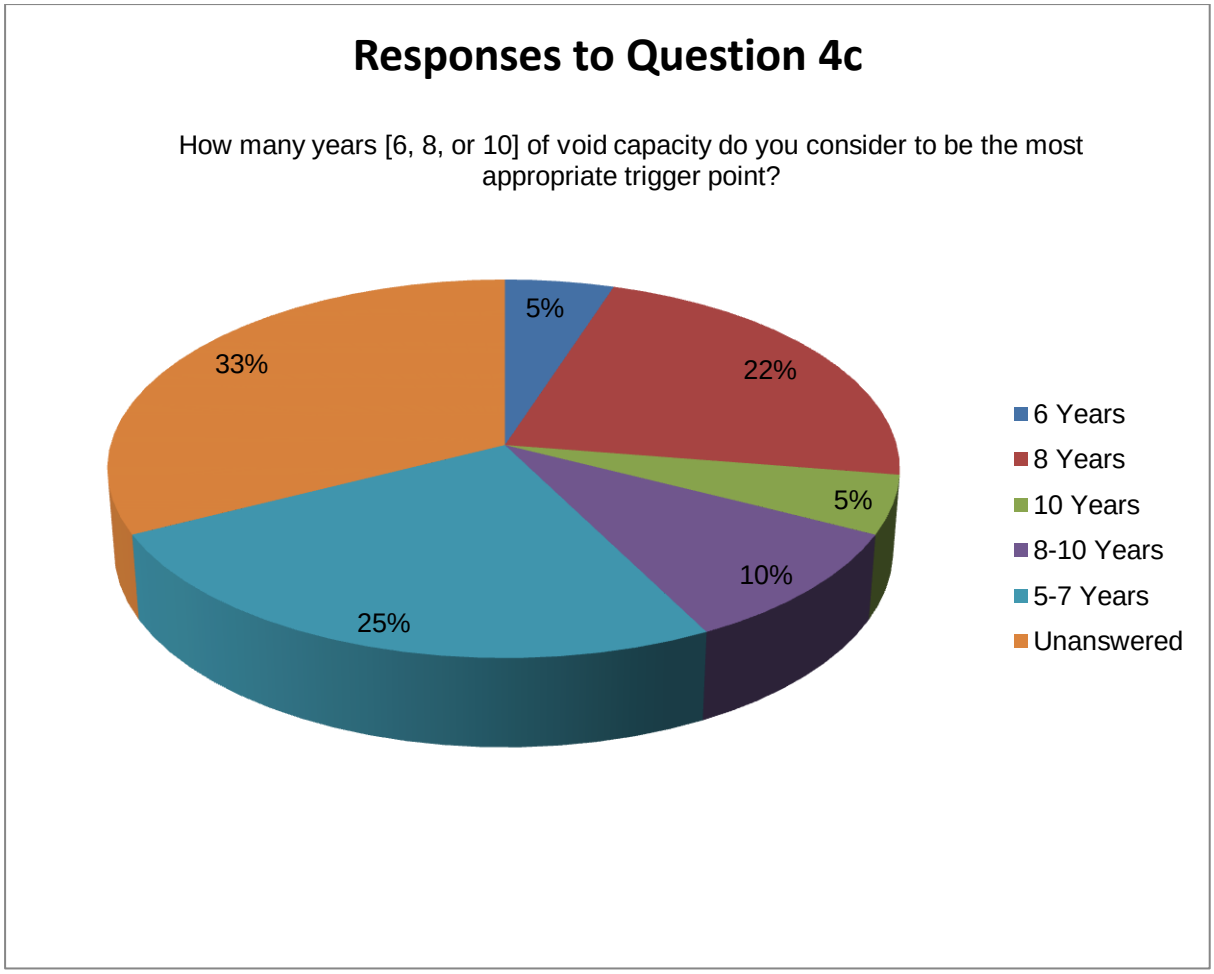

Chart 7: Years of void space

WELSH GOVERNMENT ACTION

- Guidance on monitoring, regional collaboration and the compilation of the Waste Planning Monitoring Report will be published within 6 months of the publication of the revised TAN21.
- The monitoring guidance will include details on how the number of years of landfill capacity will be calculated.
- The revised draft of TAN21 establishes the trigger point based upon the 5-7 year two phase trigger.

3.7Regional Collaboration

Generally, responses agreed that regional collaboration was necessary for strategic planning of waste disposal and recovery operations.

Collaboration between planning authorities is important in monitoring the progress towards establishing the integrated and adequate network for the disposal of waste and for the recovery of mixed municipal waste. It is expected that these types of waste treatment facilities serve a wider area than just a single local authority administrative boundary. Waste should be dealt with in one of the nearest appropriate installations. This may be in a neighbouring local authority area or even cross border.

The emphasis on regional collaboration in terms of bringing about a sustainable waste management network is supported. It is not realistic to expect that each LPA area will be capable of accommodating every type of waste management facility, nor indeed would such a move be necessary (as the TAN seems to suggest), therefore this approach is crucial in terms of ensuring that such a network can exist and operate on an inter-authority scale whilst still adhering to the proximity principle.

Concern was raised about the practicality of relying on regional collaboration for the identification and site selection of new landfill, should a trigger point be hit.

a. Limitations of voluntary collaboration

- Absence of statutory duties and powers will limit what can be achieved in the identification of sites, particularly sites for highly sensitive land uses.

b. Resources

- Whilst the need for regional collaboration was generally accepted, concern was expressed over the resourcing of regional collaboration and monitoring.

WELSH GOVERNMENT ACTION

- Guidance will be provided to supplement TAN21. This guidance will set out how the regional voluntary joint arrangement will operate, the role and expectations of Local Planning Authorities, the Lead Authority for each region, Natural Resources Wales and the Welsh Government (including how the Welsh Government will resolve any conflict that may result).

3.8 Waste Planning Monitoring Report

Over half of the responses agreed with the proposal in the revised draft TAN21 to introduce the production of and Waste Planning Monitoring Report as the main way of collecting up-to-date information on the status and type of new and emerging waste infrastructure and identify possible future need and capacity shortfalls. Only 2% disagreed with the Waste Planning Monitoring Report proposal.

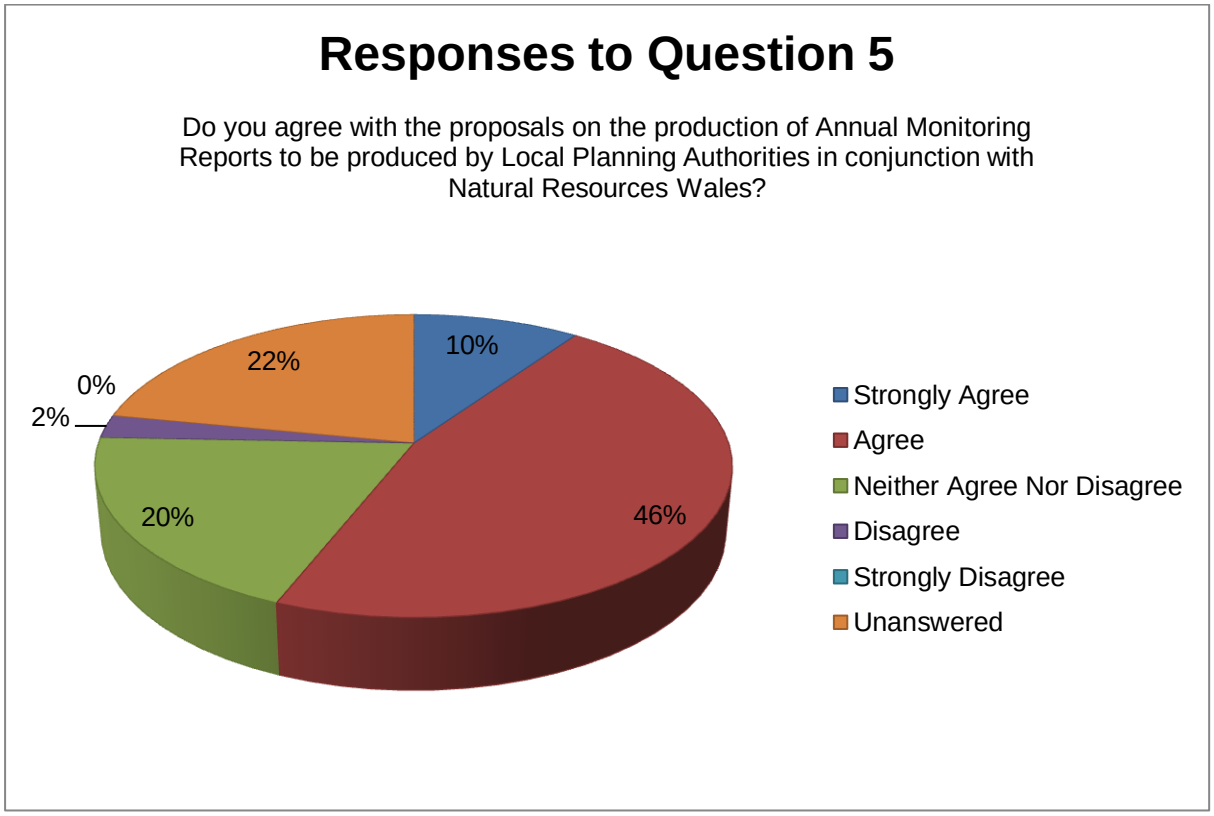

Chart 8: Monitoring Report

The Waste Planning Monitoring Report will gather up-to-date information on landfill void and operational recovery capacity. This information, gathered from local authority data and data from Natural Resources Wales (NRW) will be collated for each of the three regions by a Lead authority. The majority of those responding to this question supported the production of an Waste Management Planning Report and considered it to be valuable in stimulating new markets and investment, as well as in identifying where there is a need for further mixed municipal waste treatment. The prime concern was the resourcing and potential additional burden placed upon LPAs.

a. Availability of resources

- Some respondents considered the Waste Planning Monitoring Report would be likely to generate additional workload for LPAs.

Agree for need, but we would require clarification on the proposals for the "lead LPA" and whether resources would be available to undertake the monitoring as there is concern over additional workload that this would generate.

Local Planning Authorities are already committed to producing LDP Annual Monitoring Returns. In line with the commitment by WG not to impose additional reporting burdens on local authorities, WLGA would request that consideration is given to whether existing reporting requirements can be amended.

b. Quality of information

- Linked to the concern over availability of resources were comments on the scope and type of waste data collected. It was pointed out that this data will affect the accuracy of the Waste Planning Monitoring Report. It is considered important that guidance provides sufficient level of detail on how and what data should be collected and interpreted:

The WG and NRW should work together to ensure that adequate statutory reporting mechanisms and/or surveys supply comprehensive, accurate, timely and consistent data on waste arisings and the full range of permitted, licenced and exempt facilities.

c. The role of Natural Resources Wales (NRW) and Local Planning Authorities

- Many respondents considered the importance of NRW's involvement in the Waste Planning Monitoring Report, some suggesting that NRW may be better placed than the LPAs to produce the Waste Planning Monitoring Report. Responses requested further detail on the roles of LPAs, NRW and WG:

The roles of the Local Authorities, NRW and WG are not entirely clear.

WELSH GOVERNMENT ACTIONS

- Resources should be committed to the Lead Authorities for each region by Welsh Government. This will be set out in the guidance to the Waste Planning Monitoring Report.

- The guidance providing detail on the Waste Planning Monitoring Report process will clarify the scope of data required, the roles of the Local Planning Authorities, Natural Resources Wales and the Welsh

3.9 Waste Planning Assessment

The Waste Planning Assessment (WPA) is a tool established in the revised draft TAN21. Its purpose is to ensure sufficient information is submitted to demonstrate how the proposed waste development will contribute towards meeting Wales' overriding objectives (TZW, CIM Sector Plan) for dealing with waste and how the proposal has taken into account the priority order for waste management established by the waste hierarchy. Two thirds (66%) of respondents agreed with the purpose and introduction of the WPA.

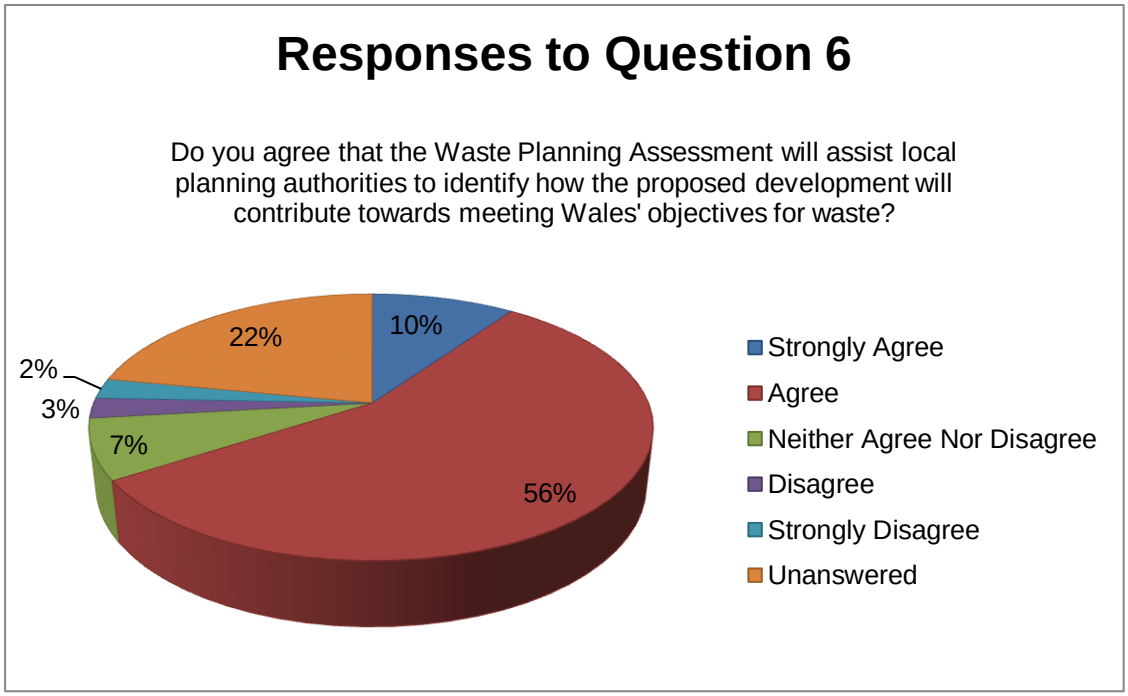

Chart 9: Waste Planning Assessment

a. Quality

- Some concern was raised by respondents over the potential variation in quality of information and level of detail being provided by the applicant in the WPA:

The new requirement to provide a Waste Planning Assessment (WPA) with every submitted planning application for waste infrastructure proposals is likely to generate a significant variety in terms of size and quality. A prime example is the need to submit a Design and Access statement with the majority of planning applications. In practice, the quality of such statements varies considerably and many are deficient and produced by unqualified persons…

b. Type of information

- Responses raised uncertainty about when, or in what instances, a WPA should be submitted and the type of information which the WPA should contain:

It would be helpful to differentiate between the information likely to be required for significant infrastructure (landfill, EfW etc) compared with smaller scale.

c. Amount of information

- Responses raised concern over the potential of the WPA to place additional burden on the applicant, and the local planning authority. In particular, the heading titled "types and quantities of waste to be managed". One respondent felt that the WPA would inhibit competition and would pose a barrier to investment in projects which offer sustainable waste management solutions. Respondents were keen to ensure that the WPA was proportionate to the nature, scale and type of waste management facility and that TAN21 emphasised the flexibility of the WPA in terms of the level of detail and information to be contained in it.

…the WPA should not be seen as inflexible; it should be commensurate with the scale of development.

d. Duplication of information

- The WPA was considered by some respondents to overlap with the information which would be contained in an Environmental Statement (ES) for those projects falling under Environmental Impact Assessment (EIA) development:

…in relation to the environmental information, where a planning application is EIA development, and thus supported by an ES, then there is risk of duplication. In such cases, it should not be necessary for the information to be needed in the WPA.

We strongly disagree with the need for a separate waste planning assessment with every waste planning application as this will duplicate matters which would already normally be covered, as appropriate, on a case by case basis. We also disagree with the overly prescriptive list of additional matters to be covered in such an assessment.

e. Demonstrating need for the waste proposal

- One respondent disagreed with the suggestion that the applicant should demonstrate the need for an energy from waste recovery facility. The response argued that there is no rationale for "capping energy recovery facilities". Annex B makes it clear that need is only relevant to proposed disposal installations and installations for the recovery of mixed municipal waste. The longer term aim of waste management is to enable an infrastructure network based on a high level of re-use and recycling. The draft TAN21 states explicitly that the planning authorities in Wales should be providing a integrated and adequate network all types of waste infrastructure

and facilities and as far as possible indicating the locations to which waste management facilities should be directed, taking into account the Collections Infrastructure and Markets (CIM) Sector Plan and the scenarios contained within the forecasted waste arising by regions.

WELSH GOVERNMENT ACTIONS

- The revised draft TAN21 explains that the WPA should be appropriate and proportionate to the nature, size and scale of the development proposed. This does not prevent the LPA requesting further information which they consider to be material to the planning decision.
- The suggested information to be included in a WPA (found in Annex II of the revised draft TAN21) simplifies and reduces the information to be provided under “types and quantities of waste to be managed”.

3.10 Planning Considerations and the Waste Planning Practice Guide

The inclusion of generic planning considerations for waste management facilities and the supporting infrastructure was largely welcomed by respondents to the consultation. However, there was some concern over the technical complexities associated with proposals for waste management facilities and associated infrastructure. Whilst some discussion on the technologies and the specific planning considerations likely to be relevant was welcomed, it was felt that such detail should be contained in a separate document:

For its purpose as a planning document, some of the technical information could be slimmed down.

WELSH GOVERNMENT ACTIONS

- Technical detail has been extracted from the revised draft of TAN21. Information on waste technologies is provided in the free standing document *Waste Planning: Practice Guide*.

3.11 Cross referencing

The draft revised TAN21 was viewed by some respondents to be long and difficult to read across the chapters. It was suggested in consultation responses that TAN21 utilise cross references within sections and chapters. In addition, one response suggested that sections of the WPA should be cross referred to the relevant sections in the main body of TAN21:

> *There would be merit in cross referencing the sections of the WPA with the relevant sections of the TAN.*

WELSH GOVERNMENT ACTION

- Cross referencing in TAN21 will be included, where relevant.
- Cross referencing will be included between the WPA (Annex B) and the chapters of TAN21.

Appendix 1 - Full List of Respondents

Biffa

Blaenau Gwent County Borough Council

Bridgend County Borough Council

Caerphilly County Borough Council

Cardiff City Council

Chartered Institute of Wastes Management (CIWM)

Cheshire West and Chester Council

City and County of Swansea Council

Clean Power Properties Limited

Conwy County Borough Council

Country Land and Business Association (CLA)

Denbighshire County Council

Dwr Cymru/Welsh Water

Environmental Services Association (ESA)

Flintshire County Council

Friends of the Earth (FoE)

Gwynedd County Council

Health and Safety Executive (HSE)

Institution of Civil Engineers Wales (ICE)

Isle of Anglesey County Council

Joint Advisory Committee (JAC) for the Clwydian Range and Dee Valley Area of Outstanding Natural Beauty[4]

Natural Resources Wales (NRW)

Neath Port Talbot County Borough Council

Newport City Council

[4] Represents the local authorities of Denbighshire, Flintshire and Wrexham and landowners, farmers and conservation and recreational interests.

Nick T

North Wales Minerals and Waste Planning Service (NWMPS)

North Wales Regional Working Technical Party

Pembrokeshire Coast National Park Authority

Pembrokeshire County Council

Planning Aid Wales

Planning Inspectorate Wales

Planning Officers Society Wales Minerals and Waste Group (POSW)

Potters Waste Management

Rhondda Cynon Taff County Borough Council

Richard G Waters

Royal Town Planning Institute (RTPI)

Vale of Glamorgan Council

Wales Health Impact Assessment Support Unit (WHIASU)

Welsh Local Government Association (WLGA)

Wheelabrator Technologies Inc.

Wrexham County Borough Council

Appendix 2 – Main changes to the draft planning policy on waste revisions

Consultation Response	Welsh Government Amendment
Definition of municipal waste	Definition amended in glossary and in Chapter 1. Clarification of scope of mixed municipal waste/residual waste.
Definition of recovery	Clarify the difference between disposal (D10) and recovery operations (R1)
Meaning given to proximity principle	Amended to clarify nearest appropriate installation (NAI)
Removal of best overall environmental option (BOEO)	Removed references to BOEO.
Reference to seismological risk unnecessary	Reference to seismological risk deleted.
Clarification on regional groupings for collaboration on waste infrastructure	Collaboration at regional level clarified as referring to North, South West, South East Wales.
Highlighting early engagement with NRW, local communities, the waste industry and town and community councils	Emphasis added to early engagement with NRW Included statement recognising benefits of early engagement with local communities
Designated areas and appropriateness of waste infrastructure proposals	Amended planning considerations to clarify that suitable waste infrastructure proposals are not precluded in designated areas
Phrasing change to protection of ground and surface water	Phrasing changed as suggested in consultation response
Benefits of parallel tracking should be included	Inclusion of sentence highlighting strengths of parallel tracking planning and permitting applications
Waste Hierarchy Diagram	Amended to include “other” recovery and further information on each option
Built heritage should be included as a planning consideration	Built heritage included in Annex C
Inclusion of reference to Health Impact Assessment	Inclusion of reference to HIA
Waste Planning Monitoring Report	Term – changed from AMR to WPMR
Waste Planning Assessment	Scope of WPA – proportionate response Requires applicant to provide information on the consultation undertaken
D10 and R1 – energy efficiency	Clarify the difference between disposal (D10) and recovery operations (R1)
Calorific Value (CV) and waste composition	Included explanation of CV and effect of change in waste composition to volume of waste
Landfill trigger	Range adopted: 7 years - 7 year void represents the level at which sufficient capacity is likely to exist in a region. This trigger enables the market to come forward. 5 years – At this trigger point action should be taken to facilitate future provision.