

## Staffordshire and Stoke-on-Trent Joint Waste Local Plan 2010 - 2026



The First Review of the Waste Local Plan, December 2018



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## 1. Executive Summary

All County and Unitary Authorities are required to produce a Waste Local Plan setting out a strategy and planning policies to ensure that there are sufficient facilities to properly manage the waste that is produced in the area. Staffordshire County Council and Stoke-on-Trent City Council worked together to produce [The Staffordshire and Stoke-on-Trent Joint Waste Local Plan 2010-2026](#) (Waste Local Plan) which was adopted in March 2013.

New regulations which came into effect on 6 April 2018 [[The Town and County Planning \(Local Planning\) \(England\) \(Amendment\) Regulations 2017](#)] require local planning authorities to complete reviews of their local plans every 5 years, starting from the date of adoption.

This First Review of the Waste Local Plan reports that the Waste Local Plan is performing well and is providing an effective planning policy framework for the determination of planning applications for waste development in Staffordshire and Stoke-on-Trent. It is in conformity with national policy and guidance, and there have been no changes to local circumstances or our strategic priorities which would require any modifications. Overall, the report concludes that the Plan does not need to be revised at this time.

A second review of the Waste Local Plan will be required before March 2023 (i.e. 10 years from adoption), unless an earlier review is deemed necessary due to significant changes in national policy and guidance local circumstances or our strategic priorities.

## 2. Introduction

### 2.1. Why review the Plan?

[The Staffordshire and Stoke-on-Trent Joint Waste Local Plan 2010 – 2026](#) was adopted in March 2013, setting out a strategy and planning policies to ensure that there are sufficient facilities to properly manage the waste that is produced in the area. At the time of publication, the Plan contained a stated intention for a 5-yearly review of the Waste Local Plan and synchronisation with the refresh of the [Staffordshire and Stoke-on-Trent Joint Municipal Waste Management Strategy](#) (refer to Paragraph 6.9 of the Waste Local Plan).

Recent changes in legislation included within [The Town and County Planning \(Local Planning\) \(England\) \(Amendment\) Regulations 2017](#) now require local planning authorities to complete reviews of their local plans (and statements of community involvement) every 5 years, starting from the date of adoption.

Planning Practice Guidance on [plan-making](#), published 13 September 2018, confirms that:

- Every 5 years from the date of adoption of the plan document, a local planning authority must complete its review and decide either that our policies do not need updating and publish our reasons for this decision; and/ or
- that one or more policies do need updating, and update our Local Development Scheme to set out the timetable for this revision.

In determining whether policies should be updated, we therefore need to assess:

- Success of policies against indicators in the Development Plan as set out in Section 6 (Implementation and Monitoring), and Table 4 (Measuring Policy Implementation) of the Waste Local Plan;
- Our appeals performance;
- Conformity with national planning policy; and,
- Changes to local circumstances.

### 2.2. How have we reviewed the Plan?

We have reviewed our waste planning policies and also relevant monitoring indicators (set out in Waste Local Plan Section 6, Table 4: Measuring Policy Implementation) to answer a series of questions:

- Is the Plan up-to-date and working in the way it was proposed? i.e. are we meeting or on track to meet our targets;
- Have waste applications been determined in accordance with the aims of the Plan?
- Are any new policies required, or do policies need to be revised or deleted as they are no longer appropriate due to special circumstances or new guidance?
- Are our waste policies a barrier to development or are they achieving our vision for waste management in Staffordshire and Stoke-on-Trent?

We have also:

- reviewed our evidence base by updating the number and capacity of our waste management facilities in order to assess what progress is being made against new waste capacity requirements in the Waste Local Plan to be able to manage an amount of waste, at least equivalent to the amount generated in the plan area. In particular the list of sites set out in the Waste Local Plan Appendix 5 'Waste Infrastructure at May 2012', and the number of facilities and capacity of facilities by broad type of waste management set out in Appendix 6 Tables 18 and 19, have been updated. This has been done using the [Environment Agency's 2017 Waste Data Interrogator](#) (currently the best available data) in addition to applications determined since May 2012 which have added new waste management capacity;
- reviewed the relevant policies and strategies of the County Council (as the Waste Disposal Authority), Stoke-on-Trent City Council (as the Waste Disposal and Collection Authority and Planning Authority for its area) and the Staffordshire Borough / District Councils (as the Waste Collection Authorities and Planning Authorities for their areas) to see if there has been any significant changes since the Waste Local Plan was adopted in 2013 e.g. changes in strategic priorities or delivery of infrastructure identified in the [Municipal Waste Management Strategy](#) (2007 and 2013 refresh); changes in assumptions for population growth; and, changes to waste arising forecasts.
- checked whether our overall strategy for managing the development of waste management facilities (our Vision, Strategic Objectives and waste planning policies) is still valid today, by reviewing conformity with national planning policy ([National Planning Policy for Waste](#) (published October 2014) and the [revised National Planning Policy Framework](#) (published July 2018) and updated [Planning Practice Guidance](#)).

### 3. Overview of the Plan

[The Staffordshire and Stoke-on-Trent Joint Waste Local Plan 2010 – 2026](#) (adopted in March 2013) was prepared with the aim of addressing four key issues:

<b>Four Key Issues</b>
<ul style="list-style-type: none"><li>• Taking steps to minimise the negative effects of waste management on climate change by: greater resource efficiency; encouraging waste operators to treat waste further up the 'Waste Hierarchy'; and, continuing to reduce our reliance and use of landfill.</li><li>• Continuing to take responsibility for managing the waste we generate by ensuring we have the facilities and capacity to manage an amount of waste as least equivalent to that generated within our areas.</li><li>• Encouraging waste operators to raise the standard of our waste infrastructure by ensuring new waste management facilities meet modern design standards; and, supporting proposals to improve the quality of existing waste management facilities.</li><li>• Developing the right type of facilities, in the right place and at the right time by ensuring that proposals make a positive contribution to people's lives; address the legitimate concerns and interests of local communities and businesses; and protect and/or enhance the natural, historic and waste environments and conserve the countryside and open spaces.</li></ul>

These inspired a Vision which identified what we wanted to happen:

<b>Vision</b>
<p>By 2026 the people and businesses of Staffordshire and Stoke-on-Trent will be actively minimising waste and regarding waste as a resource.</p> <p>To support this, 'our waste infrastructure' will comprise a network of existing, enhanced and new sustainable waste management facilities that are in the right place to contribute to the local economy, and to minimise and/or mitigate any impacts on climate change, people, transportation systems, and the built, natural, historic and water environment.</p> <p>More specifically 'our waste infrastructure' will:</p> <p>Have the capacity to manage an amount of waste at least equivalent to the amount we generate. This capacity will be higher up the "waste hierarchy" so that we can minimise our reliance on and use of landfill. In order to maintain this capacity, we will have used our planning powers where necessary to try to protect our waste infrastructure from constraints that may be imposed by non-waste related development in the vicinity;</p> <p>Be located close to the main urban areas, as far as practicable, to minimise the impacts of transporting waste and recycled materials; and,</p> <p>Meet modern design standards and, wherever practicable and environmentally acceptable, be located within buildings or enclosed structures appropriate to the technology or process, on general industrial or previously developed land.</p>

To achieve this Vision, the plan set out four Strategic Objectives which are summarised below:

**Strategic Objective 1:** To support new waste development that helps minimise greenhouse gas emissions and incorporates appropriate measures to mitigate and adapt to the unavoidable impacts of climate change.

**Strategic Objective 2:** To encourage the maintenance of the network of new or enhanced sustainable waste management facilities ('our waste infrastructure') so that we can continue to manage an amount of waste, at least equivalent to the amount we generate ('our waste'). In addition, to support the development of new waste treatment facilities so that we can reduce our reliance on and use of landfill, and conserve our mineral resources.

**Strategic Objective 3:** To encourage appropriate siting and modern design standards and provide opportunities to enhance existing waste management facilities

**Strategic Objective 4:** To support job creation, economic growth and investment in Staffordshire and Stoke-on-Trent by providing sufficient opportunities to develop new waste management infrastructure of the right type, in the right place and at the right time, and by minimising and mitigating any adverse impacts and avoiding any unacceptable impacts.

The Strategic Objectives, in turn, were to be delivered by four broad policy areas in addition to the National Policy of presumption in favour of sustainable development:

**Policy 1: Waste as a resource;**

**Policy 2: Targets and broad locations for waste management facilities;**

**Policy 3: Criteria for the location of new and enhanced waste management facilities; and,**

**Policy 4: Sustainable design and protection and improvement of environmental quality.**

## 4. How has the plan area changed?

To assess how well the [Waste Local Plan](#) is performing, we need to understand how the circumstances in Staffordshire and Stoke-on-Trent have changed since the Plan was prepared.

### 4.1. Predictions for population growth

Paragraphs 3.7 to 3.11 of the [Waste Local Plan](#) set out a demographic profile of the plan area at the time of preparing the Plan. In 2009 Staffordshire had a population of 828,700 and the population of Stoke-on-Trent was 238,900 (ref. ONS, 2009 Mid-Year Estimates). These figures were predicted to rise to 909,100 and 254,600 respectively by 2026 (ref. ONS, 2006 Based Sub-National Population Projections). This equated to a growth of around 9% over the plan period (2008 to 2026).

Since the [Waste Local Plan](#) was adopted in 2013, population growth estimates have been revised through the ONS Subnational Population Projections in 2014 and 2016. The latest estimates show lower rates of growth for Staffordshire than previous projections, with the population now projected to rise to 887,591 by 2026. According to the [Staffordshire Observatory](#), the population also appears to be ageing faster than the national average, and household formations are also expected to be lower, in part due to limited house building and therefore housing affordability becoming an issue for more young people looking to start a family.

By contrast, the population for Stoke-on-Trent is growing faster than the 2009 forecast (254,600) and is now expected to increase to 261,283 by 2026.

Comparing these estimates with the figures which were included in the Waste Local Plan, the population for Staffordshire is likely be just over 21,500 (2%) lower than originally anticipated, while the population of Stoke-on-Trent is likely to be nearly 6,700 (3%) higher. Combining the two together, the latest projections show that Staffordshire and Stoke-on-Trent will have just over 14,800 (1%) fewer residents in 2026 than was anticipated when the Waste Local Plan was prepared. This forecast change, if correct, is unlikely to have any significant impact on waste arisings, and would not necessitate a revision of the waste treatment capacity requirements identified in the [Waste Local Plan](#) (Policy 2.2).

### 4.2. Waste production and management

At the time of preparing the [Waste Local Plan](#), the best available forecasts of waste arisings were based on modelling undertaken at a regional level, which were subject to examination in public ([RSS Phase 2 Revision, Quality of the Environment Part 4 – Waste Policies, Policy W2 Tables 5 and 6 \(MSW and C&I waste diversion by Waste Planning Authority\)](#)). These indicated that Staffordshire and Stoke-on-Trent produced around 4.2 million tonnes of waste each year. Of that, 44% came from Construction, Demolition and Excavation (C, D & E) activities, and 39% from Commercial and Industrial (C & I) sources, with Municipal Solid Waste (MSW), mainly from households, making up less than 15% of the total.

As of 1 May 2012, there were 268 permitted waste management facilities within Staffordshire and Stoke-on-Trent which were classified as operational or known to be pre-

operational (i.e. with planning permission but which has not yet been implemented). Tables 18 and 19 in the [Appendices to the Joint Waste Local Plan](#) provided information on the number, type and permitted capacity of existing waste management facilities.

Based on the growth predictions and the waste apportionment for Staffordshire and Stoke-on-Trent as identified in the [West Midlands Regional Spatial Strategy Phase 2 Review](#), and the strategic priorities of the [Municipal Waste Management Strategy 2007](#), the [Waste Local Plan](#) set targets for new waste management facilities (Policy 2.2).

*Table 1: Total Additional Capacity Requirements identified in Waste Local Plan*

Waste Management Types	Total Additional Capacity Required By 2025/26 (Tonnes per annum (tpa))	Equivalent No. of Facilities Required
Recycling / Material Recovery (mechanical sorting)	380,000 tpa required by 2020/21 or 389,000 tpa by 2025/26	Minimum of 6 - 8 facilities
Organic Waste Treatment	60,000 - 80,000 tpa required by 2020 capable of treating co-collected municipal green and kitchen waste.	2 – 3 facilities. 1 facility is specifically required to serve the North Staffordshire Conurbation and Staffordshire Moorlands.
Recycling / Material Recovery	Minimum of 200,000 tpa required by 2020/21.	2 - 4 facilities. Facilities are required in or close to large areas of development/ construction.
Contaminated Soils (Storage, Treatment and Remediation)	Not possible to quantify	Not possible to quantify what is required to serve the regeneration of the North Staffordshire conurbation.

Since the [Waste Local Plan](#) was adopted, no new methodology has yet been developed, agreed and endorsed by the West Midlands Resource Technical Advisory Board for Waste on which to update waste forecasts for plan making and monitoring purposes. The original regional waste forecasts on which the Waste Local Plan targets for new waste management capacity is based remain therefore the best available.

Given that the population appears to be growing more slowly than originally predicted, it is reasonable to anticipate that waste arisings are unlikely to exceed the levels originally predicted in the [Waste Local Plan](#). The additional capacity requirements identified in the Plan, therefore, remain relevant, so the review of the Plan has assessed the development of new waste management infrastructure against these requirements.

#### 4.3. Location policy

The [Waste Local Plan](#) aims to direct new waste management facilities to general industrial land, previously developed land, and existing waste management sites, within or close to the urban areas (Policy 2.3). A review and sustainability appraisal of sites available at the time, confirmed that there was no shortage of sites that would be suitable to support new waste management facilities of all sizes and types. As a consequence, there was no need to allocate specific sites for new facilities. [National Planning Policy for Waste](#), which supersedes PPS10 on which the Waste Local Plan and locational policy was based, was published after the Plan adoption. The location policy is still in conformity (refer to section 8.1 below).

## 5. Waste Treatment Capacity

### 5.1. Measuring Waste Treatment Capacity

There is no single measure of waste management capacity. It is often considered as either notional capacity or actual capacity. Notional capacity is the potential throughput which could be achieved if operations were to work to the maximum levels permitted in the planning permission or waste management licence or permit or exemption. Actual capacity is the quantity of waste which the facility manages i.e. the throughput /input recorded into the site, which tends to vary due to the market and other commercial factors. In assessing the existing waste infrastructure within the plan area, this Waste Local Plan review considered a combination of both notional capacity (when the planning permission for a site set out the maximum throughput by condition) and actual capacity (using the latest Environment Agency data on waste input into a site).

All operators of regulated waste management facilities provide the Environment Agency with details of the quantities and types of waste they deal with i.e. waste received into site and waste sent on from site to other facilities or processes. The Environment Agency provide the data to waste planning authorities to assist them with the planning for new waste management facilities and for monitoring against statutory targets. The Environment Agency's Waste Data Interrogator (WDI) provides combined data for Household and Commercial and Industrial Waste and is the best available data, although there are limitations as it does not record the geographical origin of the waste managed; it does not record waste managed under an Environment Agency exemption; and, it does not record Construction and Demolition & Excavation Waste managed through mobile plant or on construction sites.

### 5.2. Changes in the overall quantities of waste treated

The latest data from the [Environment Agency's 2017 Waste Data Interrogator](#) (published 10 September 2018) shows that the total amount of waste received into a waste management site within the plan area was 4,232,907 tonnes (3,672,503. tonnes for Staffordshire, and 560,404 tonnes for Stoke-on-Trent). In the same period the amount of waste sent on from waste management sites within the plan area to other facilities or processing beyond the plan area was 1,340,070 tonnes (1,035,046 tonnes for Staffordshire, and 305,024 tonnes for Stoke-on-Trent).

This demonstrates that the quantity of waste treated in waste management facilities in the plan area, regulated by the Environment Agency, far exceeds exports (only 32%) from these sites. However, waste still leaves the plan area for treatment for commercial reasons e.g. the availability of specialist facilities and spare capacity.

The best available data on hazardous waste is the [Environment Agency's Hazardous Waste Interrogator 2016](#) (published in September 2017) and shows that 154,821 tonnes of hazardous waste was received into sites within the plan area for management (Staffordshire - 103,779 tonnes and Stoke-on-Trent - 51,041 tonnes). In comparison 91,627 tonnes of hazardous waste was sent from sites in the plan area to specialist waste management facilities elsewhere.

Data collated by the Environment Agency ([Waste Management 2016 in West Midlands: Data Tables](#)) indicated that in 2016 within the plan area:

- 1,652,000 tonnes of Construction, Demolition & Excavation Waste was managed
- 1,074,000 tonnes of waste was processed at materials recycling and treatment sites and 43,000 tonnes of waste was processed by the Metal Recycling Sector
- 670,000 tonnes of waste was incinerated
- 740,000 tonnes of waste passed through transfer stations
- 1,193,000 tonnes of waste was deposited at landfill sites

Environment Agency data on waste input trends into Staffordshire landfills shows 2,302,000 tonnes of waste landfilled in 2000/01, with inputs peaking at 2,460,000 tonnes in 2004/05, and inputs then decreasing to 1,193,000 tonnes in 2016 (refer to [EA Waste Management 2016 in West Midlands: Data Tables](#)).

The proportion of household waste that is landfilled has decreased steadily, from 51% in 2004/05, to 29% in 2009/10, and to 16% in 2013/14, before dropping to just 2% for the subsequent years to 2017/18. Similarly, in 2014/2015 46% of household waste was managed by heat, power or other energy recovery, compared to 23% in 2009/2010 (Refer to [Annual Monitoring Report 2016-2017](#) Appendix 2 Waste, Table 12: Household Waste Management 2007/08 – 2016/17). This corresponds with the opening of the Four Ashes Energy Recovery Facility in March 2014 (current permitted capacity - 340,000 tonnes per annum). This facility, in conjunction with the Hanford Energy Recovery Facility (current permitted capacity - 120,000 tonnes per annum), has enabled maximum recovery of residual municipal waste and a significant step towards meeting the target of zero municipal waste sent to landfill as set in the [Municipal Waste Management Strategy](#).

### **5.3. Changes to waste management facilities**

Since the [Waste Local Plan](#) was adopted in 2013, Staffordshire County Council have determined 65 waste planning applications (affecting 49 sites) proposing new waste management facilities, or modifications to existing permissions that had the potential to affect waste treatment capacity. In the same time period, they also received 208 non-material amendments or submissions of detail. Equivalent figures for Stoke-on-Trent City Council show 13 planning applications at 10 sites, of which 4 facilitated an increase in treatment capacity.

Table 2: Waste-related planning applications determined each year

Year	Staffordshire County Council		Stoke-on-Trent City Council	
	Total applications and submissions	No. Affecting capacity	Total applications	No. Affecting capacity
2013/14	45	9	4	1
2014/15	60	9	3	2
2015/16	59	17	1	0
2016/17	62	20	1	0
2017/18	47	10	1	1
Total	273	65	10	4

The table below shows how the new waste management capacity is spread across different categories of treatment

Table 3: Distribution of waste planning applications determined by type of facility

	Recycling	Organic Treatment	Residual Treatment	Transfer Stations	Aggregate Recycling	Landfill	Total
<b>Staffordshire</b>							
No. Sites	16 (12 new)	5 (2 new)	2 (1 new)	13 (11 new)	6 (5 new)	7 (2 new)	49 (33 new)
Capacity (t)	447,100	73,500	130,000	167,470	231,000	454,272	n/a
<b>Stoke-on-Trent</b>							
No. Sites	2 (1 new)	n/a	n/a	1 (existing)	2 (1 new)	n/a	5 (2 new)
Capacity(t)	30,000	n/a	n/a	n/a	75,000	n/a	n/a
<b>Combined</b>							
No. Sites	18 (13 new)	5 (2 new)	2 (1 new)	14 (11 new)	8 (6 new)	7 (2 new)	54 (35 new)
Capacity(t)	477,100	73,500	130,000	164,470	306,000	454,272	n/a

In order to assess the impact of these new permissions on overall waste management capacity, we need to recognise that, within the same time period, some waste management facilities have also ceased operating.

During the production of the [Waste Local Plan](#) treatment capacity was calculated from a combination of actual capacity using 2009 Environment Agency data for inputs into sites and permitted capacity if the planning permission specified a maximum annual throughput for a

site. However, in updating the list of waste infrastructure for this First Review of the Waste Local Plan, the [Environment Agency's 2017 Waste Data Interrogator](#) has now been used to update waste inputs into sites. Therefore, in addition to site closures, changes in capacity may reflect lower site inputs than recorded at 2009.

Also, whilst our Annual Monitoring Reports have listed changes in waste treatment capacity, these have only reliably reflected new permitted capacity. The list of waste infrastructure has not been checked consistently against the Environment Agency's Waste Data Interrogator, so sites that have ceased operation / had no waste inputs may not have been excluded.

Combining the newly added treatment capacity, and the losses identified by cross checking against Environment Agency data, overall changes to waste management capacity are summarised in the table below:

*Table 4: Changes in overall waste management capacity since adoption of the Waste Local Plan*

	Recycling	Organic Treatment	Residual Treatment	Transfer Stations	Aggregate Recycling	Total
<b>Staffordshire</b>						
May 2012	62	13	11	74	22	182
	888,970	522,595	544,843	1,332,730	708,401	3,997,539
March 2018	46	14	3	50	27	140
	1,178,983	513,500	505,000	887,583	882,000	3,967,066
Change (No.)	-16	+1	-8	-24	+5	-42
Capacity (T)	+290,013	-9,095	-39,843	-445,147	+173,599	-30,473
<b>Stoke-on-Trent</b>						
May 2012	24	1	4	28	5	62
	523,193	39,784	335,952	429,761	312,039	1,640,729
March 2018	17	1	3	22	8	51
	393,321	40,000	335,566	336,367	461,599	1,566,853
Change (No.)	-7	0	-1	-6	+3	-11
Capacity (T)	-129,872	+216	-386	-93,394	+149,560	-73,876
<b>Combined</b>						
May 2012	86	14	15	102	27	244
	1,412,163	562,379	880,795	1,762,491	1,020,440	5,638,268
March 2018	63	15	6	72	35	191
	1,572,304	553,500	840,566	1,223,950	1,343,599	5,533,919
Change (No.)	-23	+1	-9	-30	+8	-53
Capacity (T)	+160,141	-8,879	-40,229	-538,541	+323,159	-104,349

Landfill sites are not recorded in the table above as their void capacity is generally measured differently. The number of operational landfill sites in the plan area has reduced from 24 to 23. Whilst research undertaken in 2017 by the Environmental Services Association on [UK residual waste](#) identifies a future gap in residual waste treatment capacity, our evidence however shows that we have remaining landfill capacity in the plan area which will continue to receive waste, potentially from greater distances as waste travels further for disposal as landfill sites are restored around the country. Environment Agency data shows that landfill capacity in the plan area has declined from 28,579,000 cubic metres in 1998/99 to 14,542,000 cubic metres in 2016 (refer to [Environment Agency's Waste management 2016 in West Midlands: Data Tables](#)). [The Environment Agency's 2016 Remaining Landfill Capacity data](#) also confirms that in Staffordshire at the end of 2016 the 14,542,000 cubic metres of remaining landfill capacity equated to: Non-hazardous with Stable Non-Reactive Hazardous Waste cell 2,780,000m<sup>3</sup>; Non-Hazardous 7,955,000m<sup>3</sup>; and Inert 3,807,000m<sup>3</sup>. It is important to note however that the Environment Agency's calculation is based on sites where there is a current Environmental Permit. This does not include all mineral sites with planning permission to accept imported waste for restoration purposes as some sites have not reached a stage when restoration is taking place and therefore do not currently hold an Environmental Permit. For example, two recent Periodic Reviews of Mineral Permissions in Staffordshire have shown that there is future landfill capacity of 11.4 million cubic metres, however it is unlikely that landfilling will commence in the next fifty years.

The Energy Recovery Facilities in the plan area also provide capacity to receive residual waste. Therefore, it is reasonable to conclude that there is not a gap in residual waste treatment capacity in the plan area. Furthermore, no new methodology has yet been developed, agreed and endorsed by the West Midlands Resource Technical Advisory Board for Waste on which to update waste forecasts for plan making and monitoring purposes. The original regional waste forecasts on which the Waste Local Plan targets for new waste management capacity is based therefore remain the best available.

Appendix 1 provides a list of the 214 permitted and operational waste management facilities within the plan area as at end of March 2018. Capacity per waste management category has used a combination of actual capacity ([Environment Agency's 2017 Waste Data Interrogator](#)) and notional capacity (planning permissions up to 31 March 2018).

Note that there are data limitations. Sites that are exempt from the requirement to hold an Environment Agency permit have not been included. Also sites from the original list of waste infrastructure (Waste Local Plan Appendix 5: Staffordshire and Stoke-on-Trent Waste Infrastructure at May 2012) have been excluded if they could not readily be found in the [Environment Agency's 2017 Waste Data Interrogator](#). This may be part of the reason for the changes in capacity and the drop in the number of facilities since 2012. Further detailed checking may reveal that some of these sites still provide capacity.

Table 5: Sites and capacity that could not be cross-matched with Environment Agency data.

	Recycling	Organic Treatment	Residual Treatment	Transfer Stations	Aggregate Recycling	Landfill	Total
No. Sites	45	1	11	40	5	3	105
Capacity (tonnes)	586,444	n/a District permission not implemented	245,229	742,943	129,257	n/a Sites restored	1,703,873

## 6. How is the plan performing against targets?

### 6.1. How are we progressing with provision of additional treatment capacity?

The [Waste Local Plan](#) assessed the minimum additional waste management capacity that would be required in order to manage an amount of waste, at least equivalent to the amount generated in the Plan area, moving towards a situation where landfill is only used for wastes for which there is no better use (N.B. the plan includes a landfill diversion target of 100% by 2020/21 for MSW and C&I waste streams and 70% for C,D&E waste streams). Progress against those targets is shown in the table below:

Table 6: Progress against targets for additional waste treatment capacity

	Recycling (tonnes per annum)	Organic Treatment	Residual Treatment	Transfer Station	Aggregate Recycling
Staffordshire	1,181,483	513,500	505,000	887,583	882,000
Stoke-on-Trent	393,321	40,000	335,566	336,367	461,599
Total	1,574,804	553,500	840,566	1,223,950	1,343,599
Interim Target (Target year 2010/11)	952,620 Achieved	272,970 Achieved	451,410 Achieved		
Interim Target (Target year 2015/16)	1,370,913 Achieved	382,977 Achieved	620,160 Achieved		
Interim Target (Target year 2020/21)	1,792,659	478,641 Achieved	744,700 Achieved		
Interim Target (Target year 2025/26)	1,800,919	484,381 Achieved	758,700 Achieved		

All targets have been met so far, and the provision of organic and residual treatment already exceeds the levels expected for the end of the plan period. In this respect, the Waste Local Plan can be seen to be performing satisfactorily.

It is important to note, however that the targets are minimum additional treatment capacity requirements, and that the actual available capacity can go down as well as up. Sites may close, and some recently permitted sites, which have been included in the capacity assessments, may never be developed.

### 6.2. Are we doing all we can to facilitate new waste development?

We have seen above that, across Staffordshire and Stoke-on-Trent, sufficient additional waste treatment capacity has been added to meet the minimum targets set out when the

Waste Local Plan was first adopted. However, it is important to note that, with few exceptions, additional waste treatment capacity generally arises as a result of investment which is not controlled by the County or City Councils, so this review also needs to look at how well the policies within the Waste Local Plan are being implemented, whether they are facilitating the right kind of development, and whether they are helping to meet the plan objectives.

The policy analysis focuses only on those applications that relate to new waste management facilities or modifications to existing permissions that create additional capacity. Of the overall total of 283 applications processed in Staffordshire and Stoke-on-Trent, 75 have therefore been considered. Appendix 2 provides a policy analysis of waste applications determined April 2013 to March 2018.

Permission was granted in 57 cases overall (76%). 3 applications were refused (4%), though one of these was subsequently granted a temporary planning permission on appeal (and later this permission was made permanent). The remaining 17 applications were withdrawn prior to determination (of those 9 were facing the prospect of refusal, while in 3 cases, the applicant could not provide information that was necessary for the application to proceed). At the simplest level, this suggests that the Waste Local Plan policies is not presenting a barrier to the development of new or enhanced waste treatment facilities.

A more detailed assessment of the applications where permission was granted shows a high level of compliance with the locational criteria set out in Policy 2.3 (77% in Staffordshire, 100% in Stoke-on-Trent). The proportion of permissions relating to enclosed treatment facilities appears somewhat lower than might be expected (40% in Staffordshire and 60% in Stoke-on-Trent), given the requirement of Policy 3.1, but 18% of Staffordshire applications were specifically exempt from the requirement. As expected, no applications were granted where sites were in conflict with locational policies or where adverse environmental impacts were anticipated.

Table 7: Compliance with policies where planning permission is granted - Staffordshire

Year	Total Apps	In line with locational criteria	Not in line with locational criteria	Granted under exemptions?	Temporary Planning permission	Phased improvements of existing site	Enclosed facility	Exempt from enclosure	Adverse environmental impacts anticipated?	Specific environmental improvements achieved?	Investment in new facilities
2013-14	9	9	0	0	0	4	7	0	0	0	3
2014-15	9	7	0	0	0	0	4	0	0	0	0
2015-16	17	12	0	0	1	0	5	0	0	0	2
2016-17	20	15	0	0	4	3	7	7	0	4	11
2017-18	10	7	0	2	0	0	3	5	0	0	4
Total	65	50	0	2	5	7	26	12	0	4	20
%		77%	0%	3%	8%	11%	40%	18%	0%	6%	31%

Table 8: Compliance with policies where planning permission is granted – Stoke-on-Trent

Year	Total Apps	In line with locational criteria	Not in line with locational criteria	Granted under exemptions?	Temporary Planning permission	Phased improvements of existing site	Enclosed facility	Exempt from enclosure	Adverse environmental impacts anticipated?	Specific environmental improvements achieved?	Investment in new facilities
2013-14	2	2	0	0	0	0	2	0	0	0	0
2014-15	1	1	0	0	0	1	0	0	0	0	1
2015-16			0	0	0	0	0	0	0	0	0
2016-17	1	1	0	0	0	0	1	0	0	0	0
2017-18	1	1	0	0	0	1	3	0	0	0	1
Total	5	5	0	0	0	2	0	0	0	0	2
%		100%	0%	0%	0%	40%	60%	0%	0%	0%	40%

Looking at the applications which were refused, lack of enclosure was the key factor in two cases, though temporary permission was granted on appeal in one of those cases, invoking the option provided by policy 3.4. Adverse impacts on local amenity accounted for the third refusal. There were no refusals in Stoke-on-Trent over this time period.

Overall, it is reasonable to conclude that policies to facilitate the development of new waste management facilities are working well and helping us to achieve the vision and strategic

objectives in the Waste Local Plan. Therefore, there is no need for any of the policies to be revised or deleted.

## **7. Are we doing all we can to avoid the loss of existing treatment capacity?**

### **7.1. Are safeguarding policies working? Do we need to adjust safeguarding policies or practice to reduce loss of treatment capacity?**

The Policies of the Waste Local Plan can be shown to adequately support the development of new waste management facilities and capacity, but it is equally important that the existing facilities are able to continue to thrive. Their operation or expansion can be constrained if inappropriate development is permitted in the vicinity.

Paragraph 8 of the [National Planning Policy for Waste](#) requires planning authorities, when determining planning applications for non-waste development, to ensure that the likely impact on existing waste management facilities, and on sites and areas allocated for waste management, is acceptable and does not prejudice the implementation of the waste hierarchy and/or the efficient operation of such facilities.

The Waste Local Plan also seeks to safeguard all waste infrastructure, and specifically lists those facilities which would be hardest to replace – the landfill sites and energy recovery facilities. Stoke-on-Trent City Council, as a unitary authority, can weigh those matters when it makes decisions on planning applications which are close to significant waste infrastructure. In Staffordshire, the County Council relies on the Borough and District/ Councils to consult us.

On most occasions, impacts can be ruled out, but some proposals are considered to have the potential for significant impacts and have prompted holding objections from the County Council, mostly pending the supply of sufficient information to demonstrate that adverse impacts were either avoidable or unlikely to be significant.

The system has largely been effective to date, however, with the increasing demand for housing there is pressure to build on brownfield land, and this can bring housing closer to industrial estates and existing waste management facilities. Future conflict cannot be ruled out. However, changes to the safeguarding policy alone would not be sufficient to avoid this situation as is always the case that the final planning decision will be a matter of balance.

## **8. Do policies need to be reviewed?**

### **8.1. Have there been any relevant changes in national planning policy?**

[National Planning Policy for Waste](#) was published in October 2014 which superseded PPS10 on which the Waste Local Plan was based. The [Industrial Strategy](#) was published in November 2017. The Government's [25 year Environment Plan](#) was published on 11 January 2018, the sister document the [Clean Growth Strategy](#) was published on 12 October 2017, and the [Resources and Waste Strategy](#) was published on 18 December 2018. A [revised National Planning Policy Framework](#) was published in July 2018 which superseded the 2012 document to which the plan refers. [Planning Practice Guidance](#) has also been updated since the adoption of the [Waste Local Plan](#). Table 11 compares the Waste Local Plan with relevant changes to national planning policies to assess conformity.

Table 9: Conformity of Waste Local Plan Policies with the National Planning Policy for Waste and the revised National Planning Policy Framework.

Waste Local Plan Policy	National Planning Policy for Waste (October 2014) (NPPW)	Revised National Planning Policy Framework (July 2018) (NPPF)	Comment on conformity
Section 5 of the Waste Local Plan. National Policy: Presumption in favour of sustainable development		Paragraph 8 – achieving sustainable development  Paragraph 10 – Presumption in favour of sustainable development	This policy in the Waste Local Plan remains in conformity with the revised NPPF.
Vision Waste Policy 1.1 General principles	Paragraph 1 – driving waste management up the waste hierarchy (Appendix A)		This policy in the Waste Local Plan remains in conformity with the revised NPPW.
Waste Policy 2.2 Targets for new waste management facilities required by 2026 to manage municipal, commercial & industrial, and construction, demolition & excavation waste streams.  Waste Policy 2.3 Broad locations  Figure 4: Key Diagram	Paragraph 1 – communities and businesses taking more responsibility for their own waste	Paragraph 20 – strategic policies should set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision for .....b) waste management....  Paragraph 23 – broad locations for development should be indicated on a key diagram, and land-use designations and allocations identified on a policies map...	These policies in the Waste Local Plan remain in conformity with the NPPW and the revised NPPF.
Waste Policy 4.2 Protection of environmental quality	Paragraph 1 – helping to secure the re-use, recovery or disposal of waste without endangering human health and without harming the environment		This policy in the Waste Local Plan remains in conformity with the revised NPPW

Waste Local Plan Policy	National Planning Policy for Waste (October 2014) (NPPW)	Revised National Planning Policy Framework (July 2018) (NPPF)	Comment on conformity
Waste Policy 1.2 Make better use of waste associated with non-waste related development.	Paragraph 1 – ensuring the design and layout of new residential and commercial developments and other infrastructure complements sustainable waste management, including the provision of appropriate storage and segregation facilities to facilitate high quality collections of waste		This policy in the Waste Local Plan remains in conformity with the revised NPPW.
Waste Policy 2.1 Landfill diversion targets  Waste Policy 2.2 Targets for new waste management facilities required by 2026 to manage municipal, commercial & industrial, and construction, demolition & excavation waste streams.	Paragraph 2 – In preparing Local Plans ensure that the planned provision of new capacity is based on robust analysis of best available data ...spurious precision should be avoided	Paragraph 31 – The preparation and review of all policies should be under-pinned by relevant and up-to-date evidence. This should be adequate and proportionate....	These policies in the Waste Local Plan remain in conformity with the NPPW and the revised NPPF
Waste Policy 2.2 Targets for new waste management facilities required by 2026 to manage municipal, commercial & industrial, and construction, demolition & excavation waste streams.	Paragraph 3 – Identify the tonnages and percentages of municipal, and commercial, and industrial waste requiring different types of management in their area over the period of the plan		This policy in the Waste Local Plan remains in conformity with the revised NPPW

Waste Local Plan Policy	National Planning Policy for Waste (October 2014) (NPPW)	Revised National Planning Policy Framework (July 2018) (NPPF)	Comment on conformity
<p>Waste Policy 2.3 Broad locations</p> <p>Waste Policy 3.1 General requirements for new and enhanced facilities</p> <p>Waste Policy 3.2 Exceptions criteria for organic treatment in farm locations close to the urban areas/broad locations</p> <p>Waste Policy 3.3 Exceptions criteria for facilities recycling construction, demolition &amp; excavation waste or comparable industrial wastes</p> <p>Policy 1.3 Construction, demolition and excavation waste</p> <p>Policy 1.4 Use of waste for landscaping, screening, engineering purposes or for the improvement of agricultural or forestry land.</p> <p>Policy 1.5 Energy recovery</p> <p>Policy 1.6 Landfill or landraise</p>	<p>Paragraph 4 – Identify sites and/or areas for new or enhanced waste management facilities in appropriate locations.</p>	<p>Section 12 – Achieving well-designed places.</p> <p>Paragraph 124 – Good design is a key aspect of sustainable development.....and helps make development acceptable to communities.</p> <p>Paragraph 125 – Plans should set out a clear design vision and expectations, so that applicants have as much certainty as possible about what is likely to be acceptable.</p> <p>Paragraph 130 – Permission should be refused for development of poor design that fails to take the opportunities available for improving the character and quality of an area.....</p>	<p>These policies in the Waste Local Plan remain in conformity with the NPPW and the revised NPPF.</p>

Waste Local Plan Policy	National Planning Policy for Waste (October 2014) (NPPW)	Revised National Planning Policy Framework (July 2018) (NPPF)	Comment on conformity
<p>Waste Policy 4.1 Sustainable design</p> <p>Waste Policy 4.2 Protection of environmental quality</p> <p>Waste Policy 3.4 Temporary planning permissions for open air facilities</p>	<p>Paragraph 5 – Assess the suitability of sites and/or areas against criteria :....neighbouring land uses; transport infrastructure capacity; cumulative impact ...</p>	<p>Section 12 – Achieving well-designed places.</p> <p>Paragraph 124 – Good design is a key aspect of sustainable development.....and helps make development acceptable to communities.</p> <p>Paragraph 125 – Plans should set out a clear design vision and expectations, so that applicants have as much certainty as possible about what is likely to be acceptable.</p> <p>Paragraph 130 – Permission should be refused for development of poor design that fails to take the opportunities available for improving the character and quality of an area.....</p>	<p>These policies in the Waste Local Plan remain in conformity with the NPPW and the revised NPPF.</p>
<p>Waste Policy 4.2 Protection of environmental quality</p>	<p>Paragraph 6 – Green Belt .... Recognise the particular locational needs of some types of waste management facilities ....</p>	<p>Section 13 – Green Belt land</p> <p>Paragraph 143 – Inappropriate development should not be approved except in very special circumstances</p>	<p>These policies in the Waste Local Plan remain in conformity with the NPPW and the revised NPPF.</p>

Waste Local Plan Policy	National Planning Policy for Waste (October 2014) (NPPW)	Revised National Planning Policy Framework (July 2018) (NPPF)	Comment on conformity
Waste Policy 4.2 Protection of environmental quality	Paragraph 7 – consider likely impact on local environment and on amenity against the criteria set out in Appendix B	Section 14 – Meeting the challenge of climate change, flooding and coastal change  Section 15 – Conserving and enhancing the natural environment  Section 16 - Consider and enhancing the historic environment	These policies in the Waste Local Plan remain in conformity with the NPPW and the revised NPPF.
Waste Policy 2.4 Strategic waste facilities to be safeguarded  Waste Policy 2.5 The location of development in the vicinity of waste management facilities	Paragraph 8 – when determining planning applications for non-waste development .....ensure that the likely impact on existing waste management facilities, and on sites and areas allocated for waste management, is acceptable and does not prejudice the implementation of the waste hierarchy and/or the efficient operation of such facilities.		This policy in the Waste Local Plan remains in conformity with the revised NPPW.
Waste Local Plan Section 6 – Implementation and Monitoring – Performance Indicators set out in Table 4  Annual Monitoring Report	Paragraph 9 – Monitoring and Report		This policy in the Waste Local Plan remains in conformity with the revised NPPW.
Review of Waste Local Plan 2018		Paragraph 31 – reviewing plans	This policy in the Waste Local Plan remains in conformity with the revised NPPF.

Having regard to table 11, it is reasonable to conclude that our waste planning policies continue to conform with national planning policy.

## 8.2. Have there been any changes to our strategic priorities

When writing the [Waste Local Plan](#) the key requirement of national planning policy for waste (PPS10) was for the [Waste Local Plan](#) to both inform and in turn be informed by any relevant [Municipal Waste Management Strategy](#) (MWMS). Following extensive public consultation in 2007, the Staffordshire Waste Partnership (8 Borough or District Councils in Staffordshire, Stoke-on-Trent City Council; and, Staffordshire County Council) completed and published the Staffordshire and Stoke on Trent Municipal Waste Strategy together with the Zero Waste Strategy 2020. This set an ambitious target of zero primary municipal waste to landfill and a household waste recycling performance target of 55%. [Appendix 6](#) (Table 27) to the Waste Local Plan sets out the strategic priorities for the Waste Disposal and Waste Collection Authorities reflected in action plans supporting the Municipal Waste Management Strategy 2007.

Significant infrastructure delivered included the opening of the Four Ashes Energy Recovery Facility in 2014 (current permitted capacity 340,000 tonnes per annum). It should be recognised that the site had not been allocated. Instead the site selection process and subsequent planning application reflected the general location criteria for waste management facilities set out in the Waste Local Plan (Policies 2.3 and 3.1).

Since this time, to meet the targets set in 2007, and to address the changing landscape of waste management, including amendments to legislation and changing national priorities (Government Waste Policy review in 2011), constraints on public sector finance and the need to ensure provision of an efficient and affordable service for residents and businesses, the Staffordshire Waste Partnership collaborated to produce a refreshed [Joint Municipal Waste Management Strategy](#). The refreshed document was written in 2013 to create additional outcomes for the remaining years of the Waste Management Strategy and focused on waste prevention whilst maintaining the Zero Waste objective. Whilst the delivery plan determines new actions needed up to 2020 (when the original strategy ceases), this does not identify any specific infrastructure needs, and therefore no changes to policies within the Waste Local Plan are required to enable delivery.

A new Municipal Waste Management Strategy is now being written. It is still at a very early stage and the overall vision for the sustainable management of municipal waste in the plan area, and the overarching principles have not yet been updated. As the Municipal Waste Management Strategy acts as a route-map for the further investment required to meet the authorities' needs, once the new Municipal Waste Management Strategy has been finalised, it may be necessary for the Waste Local Plan to be reviewed in respect of Policy 2.2. to identify any new waste management facilities to meet the authorities' needs, in particular for the management of residual municipal waste, or changes required to take account of the [Resources and Waste Strategy](#) (published on 18 December 2018).

It should however be noted that the Waste Local Plan is already based on ensuring sufficient facilities higher up the waste hierarchy to enable 100% of waste arising in the plan area to be diverted from landfill, whilst recognising that the destination of some waste can only be to landfill. It should also be acknowledged that the general location criteria for new and enhanced waste management facilities is general industrial estates, existing waste sites, and suitable brownfield sites. Given the available brownfield land and general industrial land in the plan area, the current criteria for selecting sites would still be sufficient to enable the

delivery of sites without the need for allocation. Furthermore, the target policy sets minimum rather than maximum targets and would not be a barrier should the new Municipal Waste Management Strategy identify the need for further recycling, organic treatment, or residual treatment facilities. No policy changes are therefore considered to be necessary at this time.

### **8.3. Have there been any changes to local circumstances?**

Population growth forecasts have changed little since the Waste Local Plan was prepared. The latest projections suggest that, by the end of the Plan period in 2026, the population of Staffordshire will be slightly lower than originally anticipated, while the population for Stoke-on-Trent will be slightly higher. Overall, this does not indicate any significant change to local circumstances.

The Municipal Waste Management Strategy, currently being written, will need take account of the [Resources and Waste Strategy](#) (published 18 December 2018), and also assess whether the new and emerging Local Plans have made any significant housing allocations that would require alterations to the waste management infrastructure managing household waste. As stated above it is considered that should new infrastructure be required, the current policies are sufficient to guide the development of new and enhanced waste management facilities without the need for any site allocations.

## 9. Overall conclusions

The Vision and Strategic Objectives in the Waste Local Plan remain consistent with national planning policy and national waste planning policy. The analysis of applications determined since the adoption of the Waste Local Plan shows that new waste management facilities and/or new capacity has been delivered to manage waste further up the waste hierarchy meeting minimum additional waste management capacity targets (Waste Local Plan Policy 2.2). This has resulted in a significant reduction in the amount of waste, particularly household waste, sent to landfill, and means that our existing landfill sites should now only be receiving waste for which there is no better use.

New or expanded waste management facilities permitted since the adoption of the Waste Local Plan have created new types of facilities and additional capacity to recycle and treat waste. Many of these new facilities meet modern design standards, by being within buildings or enclosed structures appropriate to the technology or process; and, the facilities meet our locational criteria by treating waste close to the main urban areas on general industrial land, previously developed land, and existing waste management sites. Recent waste developments at new and existing sites also operate to higher environmental standards. For example, fewer new operations are taking place in the open air, with the exception of aggregate recycling, and where necessary temporary planning permissions have been granted and only made a permanent permission where the operator has demonstrated that there are no unacceptable adverse effects. The Waste Local Plan is therefore addressing the key issues identified above and delivering the Vision and Strategic Objectives.

There is no evidence to suggest that the waste planning policies provide a barrier to development in Staffordshire and Stoke-on-Trent and this is confirmed by the very low number of refusals (3) and appeals (1) since plan adoption. There is also no evidence to suggest that specific site allocations are required to deliver new waste management facilities, as considerable new capacity has been delivered since 2013. The site selection process and subsequent planning application for the Four Ashes Energy Recovery Facility demonstrates that the general location criteria for waste management facilities set out in the Waste Local Plan (Policies 2.3 and 3.1), provides sufficient direction for the development of facilities. The Staffordshire Borough and District Local Plans do not rule out the provision of waste management facilities on general industrial land and previously developed land and there have been no significant changes in local planning policy or in the refresh of the Municipal Waste Management Strategy to require revision to our strategy for managing the development of waste management facilities.

Overall it is therefore reasonable to conclude that there is no need to change our Vision, Strategic Objectives or waste planning policies in our Waste Local Plan at this time and therefore they can continue to carry weight in the determination of planning applications for waste development.

The [new statutory requirement](#) to complete the review Local Plans every 5 years firms up what was already our stated intention (refer to paragraph 6.9 of the [Waste Local Plan](#)).

A second review of the Waste Local Plan will be required before March 2023 (i.e. 10 years from adoption), unless an earlier review is deemed necessary. At this stage it is anticipated that the next review of the Waste Local Plan will have to take account of the following matters:

- Changes to Government waste planning and waste management policy (post Brexit) including the [Resources and Waste Strategy](#) published 18 December 2018, and any resulting changes to the Municipal Waste Management Strategy (currently being updated by the Staffordshire Waste Partnership) and across the waste management industry;
- The latest population growth and waste arising forecasts;
- The updated Local Plans produced by the Stoke-on-Trent City Council and the Staffordshire Borough and District Councils e.g. new large-scale housing and industrial land allocations;
- The County Council's Strategic Infrastructure Plan (currently being commissioned); and,
- Waste Local Plans produced by our neighbouring Waste Planning Authorities and Waste Management Strategies produced by the Staffordshire Waste Partnership and our neighbouring Waste Disposal Authorities (in accordance with the Duty to Cooperate).

Any future changes to the policies in our Waste Local Plan would have to be supported by an updated evidence base, follow a published programme, be drafted, then made available for public consultation and discussion with our neighbouring authorities (in accordance with the Duty to Cooperate) before being examined by a Planning Inspector.

## **10. Ongoing Review**

Our Annual Monitoring Reports (AMRs), (prepared in accordance with [The Planning and Compulsory Purchase Act 2004](#)) will continue to monitor the implementation and effectiveness of the policies in both the adopted [Minerals Local Plan for Staffordshire \(2015 – 2030\)](#) and in the [Staffordshire and Stoke-on-Trent Joint Waste Local Plan \(2010 - 2026\)](#) in respect of targets which will influence the need to review policies. The structure of the AMR will be modified in future years to incorporate a clearer reporting method which will conclude / trigger when a review of either plan is required.

## **11. Appendices**

See separate document.

Appendix 1: Permitted and operational waste management facilities within the plan area at March 2018.

Appendix 2: Policy analysis of Waste Applications - April 2013 to March 2018.

Planning, Policy & Development Control  
Staffordshire County Council  
2 Staffordshire Place  
Tipping Street  
Stafford  
ST16 2DH  
E-mail: [planning@staffordshire.gov.uk](mailto:planning@staffordshire.gov.uk)

Stoke-on-Trent City Council  
Civic Centre  
Glebe Street  
Stoke-on-Trent ST4 1HH  
Tel: 01782 235438  
E-mail: [localplan@stoke.gov.uk](mailto:localplan@stoke.gov.uk)