
Pembrokeshire Coast National Park

**Management Plan (2015-2019)
Local Development Plan 2
(end date - 2031)**

Background Paper No *: Waste

March 2018

PEMBROKESHIRE COAST NATIONAL PARK AUTHORITY

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European, National, Regional and Local

European

9. The planning system has a role in supporting the implementation of the revised EU Waste Framework Directive [Directive 2008/98/EC]. The revised directive establishes the legislative framework for the handling of waste in the European Union. The Waste Framework Directive marks a shift in thinking about waste from an unwanted burden to a valued resource. The Waste Framework Directive establishes clearer definitions, provides greater emphasis on the importance of preventing waste from arising (through the incorporation of re-use within prevention in the waste hierarchy) and includes preparation for re-use. The Waste Framework Directive also sets more ambitious recycling goals.

National

10. Planning Policy Wales, Technical Advice Note 21 'Waste', Local Development Plans, Towards Zero Waste, and the Sector Plans, taken as a whole, comprise the overall waste management plan for Wales as required under European Union law, particularly Articles 1,4,13, 16, and 28 of the Waste Framework Directive. (TAN 21 (2014) para 1.4).

National Planning Policy

11. Welsh Government updated national planning policy in February 2014 with revisions to Planning Policy Wales Chapter 12 and Technical Advice Note 21: Waste (2014). The main changes comprised the following:
 - Acknowledgement that waste policy targets and drivers have evolved and consequently the Regional Waste Plans, which are based upon land take, are now outdated and have been revoked.
 - Introduction of a requirement for data collection, monitoring, and annual reports. These can be used as evidence to support development plans and planning decisions.
 - Introduction of a requirement to keep a minimum amount of landfill capacity in each region (North, South West & South East) relative to a trigger point. Hitting the trigger will result in a site search and selection process to identify suitable locations for landfill.

- Update of the policy direction to enable waste facilities to move up the waste hierarchy through the introduction of a Waste Planning Assessment (WPA).

Planning Policy Wales, Edition 9 (November 2016)

12. Chapter 12 deals with infrastructure and services, including waste. It sets out the Welsh Government objective for waste “to ensure that appropriate facilities are established to prevent/re-use, prepare for re-use, recycle, recover and, where necessary, safely dispose of waste, so as to meet the Welsh Government’s objectives for waste management” (para 12.1.4). Sections 12.5-7 were revised in Edition 6 to reflect the revised Waste Framework Directive, Welsh Government Policy *Towards Zero Waste* and the *Collection, Infrastructure and Markets Sector Plan* (CIMS):

Technical Advice Note 21: Waste (February 2014)

13. ‘This guidance note provides advice on how the land use planning system should contribute towards sustainable waste management and resource efficiency, reflecting the new waste management drivers at a European Union and Wales level... This document sets out the relevant land use planning considerations necessary to ensure that the new European Union waste management drivers are reflected in Wales when new waste management facilities are proposed.’ (Technical Advice Note 21 (2014) paras 1.3-1.4)

Development Plans and Waste Planning

14. Planning Policy Wales Edition 9 (2016) states the following in relation to development plans:

‘12.5.1 The Welsh Government’s general policy for waste management is contained in its overarching waste strategy document *Towards Zero Waste* and associated sector plans. Planning authorities should, in principle, be supportive of facilities which fit with the aspirations of these documents and in doing so reflect the priority order of the waste hierarchy as far as possible.

12.5.2 The *Collections, Infrastructure and Markets (CIM) Sector Plan* describes the waste management framework considered to provide the best solutions to meet environmental, social and

economic needs to 2050. It indicates a move towards a position where disposal and recovery options are reduced in favour of high volume source segregated collection followed by reprocessing (as well as preparation for re-use and prevention). The reality as we move from where we are now towards these aspirations is the need for planning authorities to facilitate the provision and suitable location of a wide ranging and diverse waste infrastructure which includes facilities for the recovery of mixed municipal waste and may include disposal facilities for any residual waste which cannot be dealt with higher up the waste hierarchy.

12.5.3 The land use planning system has an important role to play in facilitating sustainable waste management by providing a framework for decision making which recognises the social, economic and environmental benefits that can be realised from the management of waste as a resource to meet the needs of society and businesses, whilst at the same time:-

- minimising adverse environmental impacts and avoiding risks to human health;
- protecting areas of designated landscape and nature conservation from inappropriate development; and
- protecting the amenity of residents, of other land uses and users affected by existing or proposed waste management facilities.

12.5.4 There are a number of specific principles, in addition to these general principles, which should guide planning approaches and inform decisions. Of these principles, the waste hierarchy provides the key starting point for all types of waste management proposals and consideration of the hierarchy should be set against the wider social, economic and environmental considerations which are relevant in any given case. The 'Nearest Appropriate Installation' concept and the principle of self-sufficiency will only be applicable in relation to wastes covered by Article 16 of the revised Waste Framework Directive (rWFD)⁸ and should guide the provision of an integrated and adequate network for the treatment of such wastes.¹ 'The network should include all necessary supporting facilities such as waste transfer stations and processing facilities.'

'12.6.1 Development plans should demonstrate how national waste policy, and in particular the CIM Sector Plan, along with any updated position adopted in the waste planning monitoring reports and any other form of waste management priorities relevant to its local area have been taken into account.

¹ Wastes covered by Article 16 comprise mixed municipal waste collected from private households including where such collection also covers such waste from other producers

12.6.2 As part of facilitating the provision of sustainable waste management, the identification of suitable locations for such development should be considered as part of plan preparation, recognising that the most appropriate locations will be those with the least adverse impact on the local population and the environment and with the best potential to contribute to a broad infrastructure framework. Further advice on addressing waste issues through development plans is contained in TAN 21 Waste.

12.6.3 In addition, development plan strategies and policies, including any specific allocations, should seek to secure opportunities to reduce or recycle waste as part of the design, construction and operation of new buildings. Further advice on sustainable design can be found in TAN 12 Design and TAN 21 Waste’.

9. Technical Advice Note 21 (2014): Waste provides the following guidance in relation to development plans:

‘As outlined in the previous section, regional monitoring is necessary in relation to installations for those wastes covered by Article 16 of the Waste Framework Directive. However, the locational requirements of these, as far as appropriate and all other types of waste facilities should be considered when preparing local development plans so as to ensure that the provision of a wide range of waste management infrastructure can be facilitated. Local planning authorities should initiate and maintain a close dialogue with waste colleagues when developing the waste policies of their local development plan.... many general employment sites and major industrial areas are likely to be suitable locations for waste facilities, but this will depend on a variety of local factors, including the nature of existing users and the strategy adopted for particular employment sites.’ (Technical Advice Note 21 (2014) para 3.18- 3.19)

‘local development plans should indicate where suitable and appropriate sites exist for the provision of all types of waste management facilities in order to provide some certainty for waste operators interested in fulfilling demand in an area. As part of this, planning authorities should engage directly with the waste industry and their own waste managers to determine whether there are any spatial requirements in their local authority areas... Where necessary criteria

based policies may be used to identify what types of facility may be acceptable as part of a specific allocation or as part of indicating which employment sites may be suitable for waste uses.' (Technical Advice Note 21 (2014) para 3.21-3.22)

10. Discussions have taken place with Pembrokeshire County Council, and Natural Resources Wales to inform the production of this paper. The Authority has considered, in the context of the above national planning policy and national waste strategy, what types and scale of waste management facilities are likely to be appropriate within the National Park, given the statutory duty to conserve and enhance designated landscape. The implications for current Local Development Plan policy has been considered and addressed below.

Development Management and Waste Planning

11. Section 12.7 of Planning Policy Wales (2016) 'Development Management and Waste Planning' highlights that decisions on waste management proposals should be determined in accordance with the relevant development plan for an area and national waste policy, it also highlights the importance of incorporating sustainable design principles including waste prevention and the importance of local authorities working closely with Natural Resources Wales to ensure that conditions attached to planning consents and those attached to Environmental Permits are complementary and do not duplicate one another. Paragraph 12.7.2 states the following:

'12.7.2 The benefits which can be derived from proposals for waste management facilities as well as the impact of proposals on the amenity of local people and the natural and built environment must be adequately assessed to determine whether a planning application is acceptable, and, if adverse impacts on amenity or the environment cannot be mitigated, planning permission should be refused. Further advice on general and specific planning principles and detailed planning considerations can be found in TAN 21 Waste.'

Locating Waste Management Facilities

12. Within Technical Advice Note 21: Waste (2014), the following is stated in relation to locating waste management facilities (para 3.26):

'The suitability of locations should be considered within the context of the aims of Towards Zero Waste and the Collections, Infrastructure and Markets Sector Plan and will be influenced by various factors, **including the regional 'Areas of search maps'** and the overall strategy

of the local development plan. In general, the most appropriate locations will be those with the least adverse impacts on the local population and the environment, and with the best potential contribution to a broad infrastructure framework. Particular care should be taken to avoid locations where new or extended waste facilities may be incompatible with existing land-uses.' (Authority's emphasis).

13. The Areas of Search Maps referred to above are those included as part of the now revoked South West Wales Regional Waste Plan 1st Review 2008. These maps however do remain extant as explained further in the '*Regional*' section below, which specifically considers the Regional Waste Plan. Criterion for where new waste management sites may be considered appropriate is provided in paragraph 3.27 and in summary comprises the following:

- Industrial areas
- Active or worked out quarries
- Degraded, contaminated or derelict land
- Existing or redundant sites or buildings
- Sites previously or currently used by other types of waste management facilities
- Sites where the nature of existing and proposed neighbouring land uses facilitates the location of waste management infrastructure and there are opportunities for co-locating waste management/resource recovery/reprocessing/re-manufacturing facilities to form environmental technology clusters;
- On farms where the output will be used on the farm.

And/or where: -

- Site infrastructure is present
- There is a need for sites for small scale community-based reuse and recycling facilities
- There are existing planning permissions/environmental permits

- The cumulative effect of waste management facilities is acceptable on the well-being of the local communities, environmental quality, social cohesion and inclusion or economic potential is acceptable.
14. The Article 16 Waste Framework Directive principle of promoting the nearest appropriate installation whilst ensuring a high level of protection for the environment and human health is highlighted in paragraph 2.9. The aim of which is to manage waste close to where it arises (for example next to areas of high population density). Environmental, economic and social factors need to be taken into account. The proximity of a waste disposal or mixed municipal waste recovery installation will depend upon the quantities and types of arising at local, regional and national levels (Technical Advice Note 21 (2014) para 2.9).
 15. The proportion of the Pembrokeshire population residing within the National Park and its peripheral geographical context should be taken into account when considering waste management facilities for Pembrokeshire.
 16. Technical Advice Note 21 (2014) Waste provides guidance on specific types of facilities and detailed planning considerations to be taken into account. Under section 8 'Nature and Conservation' of Annex C, it is stated that:

'Facilities should not have an adverse impact on areas or sites designated for local, national or international protection, such as:
 World Heritage sites;
 Areas of Outstanding Natural Beauty;
National Parks;
 National Nature Reserves;
 Sites of Importance for Nature Conservation;
 Sites of Special Scientific Interest;
 Special Areas of Conservation;
 SPAs; or
 RAMSAR sites'
 17. This does not preclude suitable proposals for waste facilities located within the boundaries of National Parks and other similar designated areas, provided that they are appropriately designed.' (Technical Advice Note 21 (2014) paras 8.2-8.3) (Authority's emphasis)
 18. Under Section 15 'Visual Impact' of Annex C, it is stated that sites for new buildings should take advantage of existing topography and facilities should not be located where they will have an adverse impact upon statutorily designated landscapes.

Monitoring and Collaboration

19. Planning Policy Wales (Edition 9) states the following:

‘12.5.5 The waste assessments contained within the CIM Sector Plan will not have to be repeated by local planning authorities at a regional or local level. However, to inform planning decisions it will be important that local planning authorities monitor progress towards the provision of an integrated and adequate network of waste disposal installations and of installations for the recovery of mixed municipal waste and similar wastes from commercial and industrial sectors as well as private households. For this reason, monitoring arrangements will be established to ensure an up to date position is available to inform decision making. Further detail can be found on the arrangements for monitoring and the provision of waste planning monitoring reports (and supplementary reports where necessary) in TAN 21 Waste.

12.5.6 Natural Resources Wales has a statutory role in relation to the management and regulation of waste and the collection of waste production and management data. It has a key role in providing expert advice to planning authorities as part of local development plan preparation, as a consultee on certain planning applications and to assist planning authorities in evaluating complex waste information and making technical judgements, where necessary. Natural Resources Wales will contribute to the development and implementation of the monitoring arrangements outlined in more detail in TAN 21 Waste through the provision of data and expertise.’

20. Technical Advice Note 21 (2014): Waste states that collaboration between local planning authorities is necessary to monitor progress towards establishing an integrated network for the disposal of waste and recovery of mixed municipal waste. As part of this monitoring it will be important to identify where the spatial pattern of provision is appropriate to fulfil identified needs and any further action is needed by local planning authorities to address unforeseen issues.

‘Local planning authorities, in conjunction with the Welsh Government and Natural Resources Wales should establish voluntary joint arrangements to undertake annual monitoring for each region. An effective approach will be dependent on collaboration at a regional level (North, South West and South East Wales).’ (Technical Advice Note 21 (2014) para 3.7).

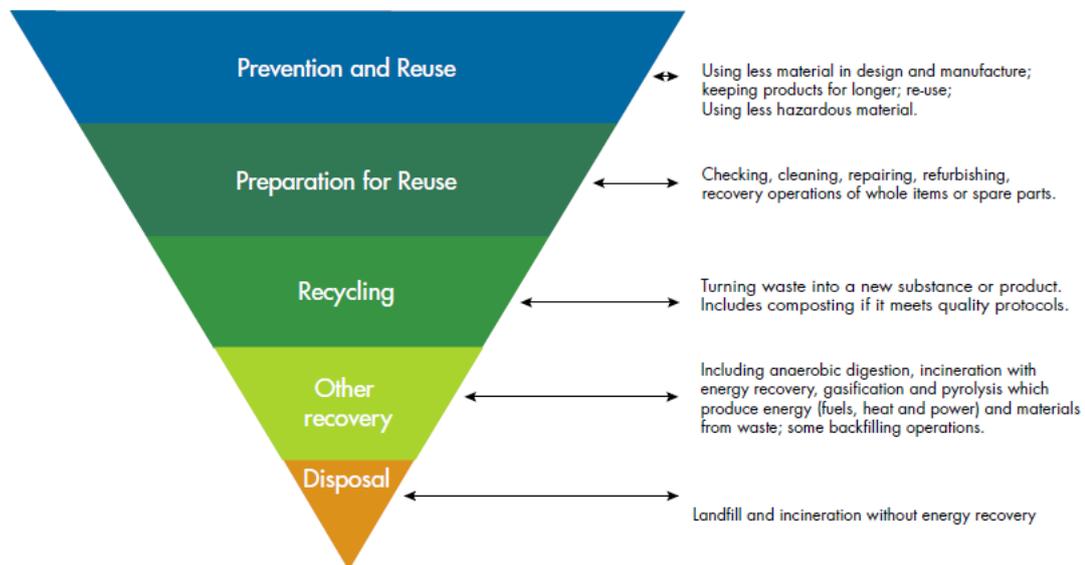
21. The above monitoring arrangements will be centralised on a regional basis, with each local planning authority providing data where relevant.

Carmarthenshire County Council will lead for the South West Wales region (Pembrokeshire, Carmarthenshire, Ceredigion, Swansea, Neath – Port Talbot and Bridgend), National Park Authorities are not formally included but will be kept involved and informed. The first full Annual Monitoring Report has been produced for the year 2015/16. Further detail is provided below at paragraph 47.

The Waste Hierarchy

22. Technical Advice Note 21 (2014) Waste highlights the importance of ensuring that policies and proposals contribute to the objectives set out in Towards Zero Waste and the relevant sector plans in environmental, economic and social terms. The aim is to ensure the right facilities are provided in the right location.

'The waste hierarchy is a central pillar to inform decisions on waste management options. The objective of the waste hierarchy is to ensure that wastes are managed in a sustainable way. The options for waste management appear in the waste hierarchy as a priority order in waste prevention and management. It should be noted that the waste hierarchy is not absolute and does not mean that all waste should be reduced or recycled where it is not practical to do so, nor does it necessarily mean that there should be no further provision of disposal facilities.' (Technical Advice Note 21 (2014) para 2.6)



(Technical Advice Note 21 (2014) Diagram 2.7)

Towards Zero Waste - One Wales, One planet. (June 2010)

23. Towards Zero Waste is the new overarching waste strategy document for Wales. It sets out how the Welsh Assembly Government will build on the successes achieved through Wise About Waste - The National Waste Strategy for Wales (2002). It sets out a long-term framework for resource efficiency and waste management between now and 2050.

Sustainable Development

24. The main aim of the Wales Waste Strategy is to ensure that waste is reduced and that which is produced is managed in the most sustainable manner. The strategy therefore contributes strongly in this area, including to the prudent use of resources and minimisation, climate change, reducing pollution and alternative energy sources. The strategy has clear commitments to reducing the waste contribution to Wales' ecological footprint and the reduction of greenhouse gas emissions.

Living Communities

25. The strategy also contributes to lowering barriers to employment by providing jobs at many levels, ensuring access to services, supporting volunteering and promoting lower carbon modes of transport.

Collections Infrastructure and Markets Sector Plan (July 2012)

26. 'The Collections, Infrastructure and Markets Sector Plan (CIMS Plan) was published on 10 July 2012 and is particularly relevant for the land use planning process. The CIMS Plan updates the picture of infrastructure requirements, in relation to technology choices and the best overall environmental option for specific waste materials. The waste assessments in the CIMS Plan establish the need for residual waste treatment and disposal, as well as describing the move towards higher levels of re-use and recycling. In order to reach the goal of zero waste there is a difficult balance to be struck between making sure sufficient capacity to deal with our waste arisings is able to come forward in the short term (to avoid environmental impacts) in a way which does not impede the achievement of longer term goals.' (Welsh Government Policy Clarification Letter CL-01-12)
27. It supports 'Towards Zero Waste' by detailing outcomes, policies and delivery outcomes for organisations, companies and individuals involved with the collection and management of waste resources.

28. Under Section 3 (q) '*Criteria for locating waste facilities*' the plan refers to the spatial strategy of the Regional Waste Plans (RWPs), which are underpinned by their 'Areas of Search' maps. These maps are explained further below but they briefly display where sub regional facilities would be considered appropriate. Sub regional facilities are those which would serve more than one local authority area, but not the whole region. They exclude National Parks as it was considered on the basis of clear planning policy, that these areas would be inappropriate for development as waste management sites. The plan advises the following:
29. 'RWPs also provide additional guidance for Local Planning Authorities (LPAs) in identifying appropriate sites for inclusion in Local Development Plans. In particular, it is recognised that B2 (General Industrial) sites and major industrial areas are likely to be suitable locations for new in-building facilities.
30. The Areas of Search Mapping and Report was commissioned to identify potential future sites for waste facilities for strategic purposes, and that the data produced is intended to assist LPAs in identifying specific sites. The identification and adoption of specific sites can only be undertaken at LPA level but must have regard to the Areas of Search locational criteria.
31. Companies applying for planning applications for new waste facilities are encouraged to discuss the location with the LPAs at the earliest stage possible and are encouraged to use the Areas of Search Report and GIS as the starting point for making site choices.' (Collections Infrastructure and Markets Sector Plan 2012, page 134).
32. The Collections Infrastructure and Markets Sector Plan, as with Technical Advice Note 21: Waste (2014), therefore refers to the Regional Waste Plan Areas of Search maps and its guidance for Local Planning Authorities when locating waste management facilities. Certain elements of the now revoked Regional Waste Plan therefore remain relevant in the current national planning policy and waste policy context. The significance of these elements for the replacement Local Development Plan are considered further below.

Municipal Sector Plan (March 2011)

33. 'The Municipal Sector Plan supports 'Towards Zero Waste', the overarching waste strategy document for Wales, by detailing outcomes, policies and delivery actions for this sector. It forms part of the suite of documents that overall comprise the waste management plan/strategy for Wales in accordance with the plan making requirements enshrined in UK and EU legislation...

34. The Municipal Sector Plan covers only the waste collected specifically by “municipalities”, that is all of the Welsh Local Authorities, in accordance with their statutory duties as Waste Collection and Disposal Authorities as laid down in Part II of the Environmental Protection Act 1990 (as amended). For clarity, the wastes covered in this document are those collected by a local authority under sections 45 and 51 of the Environmental Protection Act 1990.² (Municipal Sector Plan 2011, page 3)
35. For the short term (until 2015), the plan identifies that the key objective is to deliver waste prevention, preparing for reuse, recycling, composting and landfill targets up to 2015 through:
- ‘Behavioural change campaigns led by Local Authorities.
 - Changes in municipal waste collection service provision by Local Authorities – including expanding the type and quantities of recyclate collected, increasing reuse, and making it less convenient to not recycle.
 - Procuring food waste treatment services (anaerobic digestion plants) to be operational from 2012.
 - Participating in the Collaborative Change Programme to deliver efficiency savings and meet the sustainable development outcomes identified in Towards Zero Waste and in this plan.’
36. For the long term (2015-2025), the plan identifies that the key objective is to deliver the waste prevention, preparing for reuse, recycling, composting and landfill targets up to 2025 through:
- ‘Further enhancing behavioural change campaigns.
 - Further expanding the type and quantities of recyclate collected, increasing reuse.
 - Implementing changes to the collection service under the Collaborative Change Programme.
 - Procuring residual waste treatment services (high energy efficiency EfW) to be operational by 2019-20.’

(Municipal Sector Plan 2011, pages 128-129)

The Construction and Demolition Sector Plan (November 2012)

37. ‘This sector plan contains a number of proposals for discussion about how the construction & demolition sector manages and treats its waste to achieve more sustainable and affordable outcomes. It focuses on the key role that the construction and demolition sector plays through working with their clients, customers, suppliers, trades people and the

² E.g. household waste including where such collection also covers such waste from other producers.

wider communities to achieve the twin goals of 'One Planet living' and zero waste.' (The Construction and Demolition Sector Plan 2012, Ministerial Foreword)

The Industrial and Commercial Sector Plan (December 2013)

38. 'This sector plan covers products and wastes produced by the industrial and commercial sectors in Wales and contains a number of actions on how we manage and treat this waste to achieve more sustainable and affordable outcomes. It focuses on the key role that sectors play in reducing these key waste streams both produced from their own premises and generated further along the chain, including by the ultimate consumer – the public. It focuses on the waste produced directly by the sectors and products produced by the sectors. These sectors have an extremely influential role in transforming the behaviour of those they serve.' (The Industrial and Commercial Sector Plan 2013, Ministerial Foreword)

Food Manufacture, Service and Retail Sector Plan (September 2014)

39. 'This sector plan covers food and associated packaging waste produced within the food supply chain and contains a number of objectives and actions about how we manage and treat this waste to achieve more sustainable and affordable outcomes. It focuses on the key role that the food manufacturers, wholesale and retailers and service sector play in reducing these key waste streams both produced from their own premises and generated further along the chain, including the ultimate consumer – the public.' (Food Manufacture, Service and Retail Sector Plan 2014, Ministerial Foreword)

Regional

Wales Spatial Plan Pembrokeshire Haven Key Settlement Framework 2021 (as at 7 February 2007)

40. Identifies the challenge of finding alternative waste disposal options by the end of the plan period for more than 87% of waste, and identifies the need for strategic infrastructure for hazardous and non hazardous waste management.

South West Wales Regional Waste Plan 1st Review (August 2008) - Areas of Search Maps

41. As part of the revisions to national waste policy, this plan has been revoked; however the Areas of Search Maps for open air and in building facilities remain extant and are referred to in national waste strategy and policy. The general guidance for locating waste management facilities contained within the Regional Waste Plan is also referred to in the Construction Infrastructure and Markets Sector Plan. Whilst these maps should not be used in isolation by local planning authorities as a definitive guide against which planning applications are judged, they do provide a locational strategy for sub-regional facilities, to be used as a guide for local planning authorities in Local Development Plan production. The three Welsh National Parks are excluded as appropriate areas for these facilities. The Areas of Search were identified through a Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) process (South West Wales Regional Waste Plan 2008, page 70).
42. A sub-regional facility would provide a facility serving a small group of local authorities, whilst a regional facility would serve the whole region. The South West Wales Region comprises Ceredigion, Pembrokeshire, Carmarthenshire, Swansea, Neath Port Talbot and Bridgend authorities. Whilst the traditional sub regional groups still exist there have been non-traditional groupings such as the Central Wales Group, comprising Ceredigion, Powys and Pembrokeshire for the Regional Anaerobic Digestion Contract.
43. As the Areas of Search maps remain extant in current policy, the rationale used for their preparation is also still considered relevant. As part of the Sustainability Appraisal process that informed the production of the Areas of Search maps, one objective was to '*Protect and enhance the landscape, townscape and cultural heritage of Wales*'. As part of fulfilling this objective, National Parks were allocated a weighting value of 5 (Exclusion – where the development of a waste management facility is disqualified on the grounds of sustainability/policy and/or impracticality). Furthermore, land less than 1km from National Parks was allocated a weighting of 3 (Areas of some constraint). (South West Wales Regional Waste 2008 Figure 21 and Appendix I).
44. The overall objective to protect and enhance the landscape of the National Park, by resisting the development of inappropriate waste management facilities, is one which must be retained within the replacement Local Development plan, to accord with national planning and waste policy.

45. Appendix L7 of The Regional Waste Plan stated the following policy approach for locating waste management facilities within National Parks:

- 'National Park Authorities may plan for new facilities serving only the National Park area to be sited within the National Park area; and
- National Park Authorities and Unitary Authorities which cover the same area may work closely together to plan for new facilities serving both the National Park Authority and Unitary Authority areas to be sited outside the National Park. The provision of data on capacity requirements broken down by Unitary Authority area facilitates this arrangement.'

(South West Wales Regional Waste 2008, Appendix L7)

46. This section has now been revoked. This approach is mirrored in the current Pembrokeshire Coast National Park Local Development Plan Policy 27 Local Waste Management Facilities and so this policy will require updating within the replacement Local Development Plan. Further consideration of this is provided below under the 'Local' section.

South West Wales Region Waste Planning Monitoring Report April 2016

47. The principle role of this report will be to collate and present all available data to enable the effective monitoring of both the region's waste arisings and waste management facilities and to assess the region's performance against the targets set out in Towards Zero Waste. Specifically, the report's purpose is:

- To collate and assess available data on all waste arisings in the region in order to monitor trends in past arisings and ultimately monitor performance against the targets set out in Towards Zero Waste;
- To collate and assess available data on landfill void with a view to predicting the remaining landfill capacity of the region;
- To collate and assess available data on the arisings and management of residual waste and comment on progress being made towards meeting targets regarding alternatives to landfill;

- To collate and assess information on the development of waste policies in Development Plans to monitor the implementation of the provisions of TAN 21 Waste;
- To collate information on current local authority waste management / resource recovery schemes and future procurement;
- To identify any data gaps that exist;
- To provide recommendations that can be carried forward and utilised in the production of future WPMRs.

48. The report concludes that overall, the region is meeting targets in respect of reducing local authority collected waste, increasing recycling and composting, reducing landfilled biodegradable municipal waste, reusing, recovering and recycling industrial and commercial waste and construction and demolition waste and reducing the amounts of hazardous waste landfilled.

49. There is insufficient capacity in 'other recovery' facilities for residual waste arisings in the region. Only two facilities for residual waste treatment obtained planning permission in the SW Wales region in recent years – and one was never implemented. More recently, another residual waste project within the region was refused planning permission, partly on the grounds that there was insufficient waste within the region to make it viable. This raises important questions with regards to whether there is any actual need for new residual treatment facilities in the SW Wales region, bearing in mind that authorities within the region have already engaged in contracts, some of which involves their residual waste being transported outside the UK for treatment. Generally, there is a lot of waste processing capacity in Europe and consequently those authorities who are sending their residual waste to Europe have found that it is more cost effective to do so than sending it to facilities within Wales or England. Hence the economic case for creating further capacity within the region is further weakened.

50. The case for food waste is similar to that of other residual wastes noted above. Some authorities within the region have entered into joint contracts with each other (and other Welsh authorities outside the SW region) whilst others are still treating their food waste in-county. In terms of facilities, there have been a number of new applications for AD plants of various capacities, from single farm proposals to larger proposals such as Agrivert's Stormy Down facility, which will take the food waste from several authorities in the region. The question remains, as with that of residual waste, is there any capacity available for any further AD facilities in the region? This is something that will need to be monitored over the next few years and will be partly dependent upon whether the constituent authorities decide on a more

coordinated approach in the future (beyond their current contracts) or whether the markets will continue to dictate the situation.

51. The predicted remaining landfill capacity for the SW Wales region points to 15 years. Whilst this is safely above the threshold set out in TAN21 - whereby a new site for landfill should be considered for the region - the figure is dependent upon several assumptions, such as the individual circumstances of the landfills currently operating (e.g. potential contracts coming to an end), new landfills or alternative residual treatment plants becoming operational, and actual quantities of residual waste produced. Further monitoring will be necessary over coming years to assess the situation.
52. The report makes four recommendations in relation to improving data gathering, the interface between waste planning, permitting and management and clarification from national policy on the future procurement strategy.

Local

Pembrokeshire Coast National Park Local Development Plan (adopted September 2010, end date 2021)

53. National Park authorities do not have responsibilities in relation to waste collection and disposal. National Park authorities act as local planning authorities within the boundaries of their national park and as such are expected to collaborate in planning for waste facilities.
54. It is considered that the overall strategy of the Local Development Plan policy remains consistent with the new suite of national waste policy and strategy documents. As mentioned above, the 'Areas of Search' maps from the Regional Waste Plan remain extant, which exclude National Parks from being appropriate locations for sub regional facilities (those which serve more than one local authority area), on a strategic level, stemming from the supporting Sustainability Appraisal objective to 'Protect and enhance the landscape, townscape and cultural heritage of Wales'.
55. In accordance with national planning policy, as highlighted in this paper, the Authority should seek to permit 'appropriate' or 'suitable' waste management facilities within its area. The nearest appropriate installation principle outlined in Technical Advice Note 21 suggests that larger scale facilities should be located close to the county's higher population density areas. This principle, when combined with the peripheral nature of the Pembrokeshire Coast National Park and its relatively low population density would seem to further reduce the

National Park's potential for more significant waste management facilities that would perhaps serve the county as a whole.

56. As such, it is considered that local scale facilities, as currently defined within the reasoned justification of Local Development Plan Policy 27, comprise an appropriate scale of facility within the National Park in the context of the current national waste strategy and planning policy.
57. An updated approach, that permits appropriately scaled and located local facilities within the National Park, is considered to be a reasonable approach for the replacement Local Development Plan. This will maintain a local policy context upon which to determine proposals on a case by case basis, whilst remaining consistent with national waste strategy and planning policy. Given the cancellation of Appendix L7 of the Regional Waste Plan, it would no longer seem appropriate to maintain a policy that would permit facilities that would only serve the National Park area. However, given that facilities should still be local in nature, replacing the Local Development Plan reference to 'serve only the National Park area' to 'predominantly serving the National Park area' is considered appropriate. This would provide flexibility for accommodating facilities that would serve the National Park Authority and parts of neighbouring Authority areas, whilst ensuring the any permitted development is of an appropriate local scale.

Pembrokeshire County Council Local Development Plan (adopted February 2013, end date 2021)

58. Within this plan, policy SP 11 'Waste' provides the strategic planning policy for Pembrokeshire County Council. It states:

It is considered that the overall strategy of the Local Development Plan policy remains consistent with the new suite of national waste policy and strategy documents. As mentioned above, the 'Areas of Search' maps from the Regional Waste Plan remain extant, which exclude National Parks from being appropriate locations for sub regional facilities (those which serve more than one local authority area), on a strategic level, stemming from the supporting Sustainability Appraisal objective to 'Protect and enhance the landscape, townscape and cultural heritage of Wales'.

59. The reasoned justification to this policy states:

'The LDP provides a choice of potentially suitable sites for various waste management activities and will rely on the market to make choices over whether to locate within the Plan area or elsewhere within the region. The sites allocated by policy GN.40 plus the available Class B2 land within the B2 sites listed in the same policy meet the Regional

Waste Plan's requirements for the Plan area.' (Pembrokeshire County Council Local Development Plan 2013, page 62)

60. Policy GN24 'Recycled Waste Materials and Secondary Aggregates' provides a similar policy criterion to assessing proposals to use recycled waste as the Pembrokeshire Coast National Park Local Development Plan's Policy 25, explained above.
61. Policy GN40 lists allocated employment sites within the plan where waste management facilities would be considered appropriate and are considered to meet the requirements for the plan period.
62. Policy GN41 provides criteria-based policy upon which applications for waste management facilities will be considered. The following criteria apply:
 - '1. The site is located at an existing waste management site or at a unit / on a site allocated or protected for B2 uses or if appropriate, at the type of site otherwise indicated by Welsh Government Technical Advice Note 21 (TAN 21) Waste, paragraph C36³: or
 2. The site can be readily accessed from A or B class roads where transport by road is the only available option; and In all cases;
 3. There is an identified national, regional or local need for the facility;
 4. All waste arisings from the new facility have been considered and mitigated; and
 5. The co-location of the new facilities with potential energy users has been considered and incorporated where possible. In addition, for the development of specialist facilities to process or dispose of hazardous waste:
 6. It must be demonstrated that no significant adverse impacts will be caused to the health and safety of the public, the economy or the environment.' (Pembrokeshire County Council Local Development Plan 2013, page 133)

Pembrokeshire Municipal Waste Management Strategy, February 2017

63. The following is taken from Pembrokeshire County Council's website; it outlines the waste management strategy for the authority, as the waste collection authority for Pembrokeshire as a whole.

³ Technical Advice Note 21: Waste has been revised since the adoption of the Pembrokeshire County Council Local Development Plan, consequently paragraph C36 no longer exists in this revised Technical Advice Note.

‘Our plans for Waste

Pembrokeshire County Council's waste plans are driven by European legislation which sets targets for Wales and other Member states.

The Welsh Government has published **Towards Zero Waste**, the new Waste Strategy for Wales, which forms part of a suite of documents which sets out how Wales will comply with European law. Towards Zero Waste is the overarching waste strategy for Wales and identifies high level principles, policies and targets. More detailed delivery plans are provided in "sector plans".

Pembrokeshire County Council's waste is covered by the **Municipal Sector Plan** which sets the agenda for the management of local authority municipal waste. Waste that is not municipal waste is covered by other sector plans.

The following targets affecting Pembrokeshire County Council's waste have been set in the Municipal Sector Plan:

| *Municipal Waste collected by local authorities | 09/10 | 12/13 | 15/16 | 19/20 | 24/25 |
|--|---------------|---------------|---------------|---------------|------------------------------|
| Minimum levels of preparing for reuse and recycling / composting (or Anaerobic Digestion) for municipal waste. | 40% | 52% | 58% | 64% | 70% |
| **BMW (Biodegradable Municipal Waste) Allowances | 29,481 | 19,497 | 17,008 | 13,689 | 13,698 ^[1] |

^[1] No allowances given beyond 19/20. We have assumed the allowance will remain the same.

The Welsh Government has new legislative powers making targets statutory (Statutory means imposed by law) for the percentage of a local authority's municipal waste which must be recycled, prepared for reuse or composted. Failure to achieve these targets could result in fines of £200 per tonne for every tonne of waste by which Pembrokeshire fails. Further, failure to divert BMW (Biodegradable Municipal Waste) from landfill attracts an additional penalty of £200 per tonne over the allowance.

How well are we performing?

| <i>Pembrokeshire County Council Performance</i> | <i>Actual</i> <i>2013/14</i> | <i>Actual</i> <i>2014/15</i> |
|--|---|---|
| Levels of preparing for reuse and recycling/composting (or Anaerobic | 60.33% | 65.39% |

| | | |
|--|----------------------|---------------------|
| Digestion) for municipal waste. | | |
| BMW (Biodegradable Municipal Waste) Landfilled | 13,543 tonnes | 7,091 tonnes |

Whilst this is a commendable achievement we can see that there is still much to do if we are to continue these trends and meet the targets of 2019/20 and beyond.

If we continue to recycle the same percentage in 2019/20 as we did in 2013/14 we would fail the statutory target of 64% by 3.7% equating to approximately 2,500 tonnes.

The financial penalty incurred could be:

2,500 tonnes x £200/tonne = £500,000

What would this mean to Pembrokeshire?

This would divert valuable resources from other services that Pembrokeshire County Council delivers on behalf of the community.

Additionally, failing to divert waste from landfill will incur charges associated with landfill disposal. In 2014 landfill tax alone stood at £80 per tonne but further financial penalties of £200 per tonne could also be applied if we landfill more biodegradable waste than our allowance.

Improvements to Waste and Recycling Services

A review of our services and the waste arisings and population spread in Pembrokeshire has brought about the following key service changes.:

- Our fleet was replaced with twin stream vehicles in early 2012 (Black bag waste & glass collected on one vehicle, orange bags & food on another).
- Food waste collections are available to all households
- Glass collections are available to all households
- A separate chargeable fortnightly green waste collection service has been introduced.
- Bulking facilities have been developed at certain depots and CA sites and other waste transfer locations to reduce tipping downtime.
- Residual waste and glass collections are fortnightly with orange bags and food waste collected weekly
- Bring site provision across the County has been reviewed and wheeled bins in bespoke housings are being introduced at the

majority of sites which will allow them to be serviced by the refuse and recycling fleet.

- Opportunities have and will continue to be sought for the more efficient procurement of goods and services by working regionally.
- Pembrokeshire County Council has entered into a 13 year Contract with the Central Wales hub, comprising Powys and Ceredigion, for the Anaerobic Digestion of collected food wastes. We have been able to utilise Welsh Government funding towards the processing of the food waste.
- Pembrokeshire County Council has entered into a Regional Contract with Ceredigion County Council to process residual waste into refuse derived fuel (RDF) for export to Sweden where the waste will be disposed of at a reduced cost using combined heat and power technology (CHP) to extract energy.

Where do we go from here?

Towards Zero Waste and the Municipal Sector Plan form the basis of Pembrokeshire County Council's Municipal Waste Strategy. In order to achieve both of the statutory targets for 2019/20 and also to prepare the service for even greater challenges of future targets in an increasingly difficult financial climate the Council needs to continue to introduce changes and efficiencies to the way in which the service operates and goods and services are procured.

Another key to achieving success is a targeted programme of education and awareness to ensure households engage with our schemes and participate.

*Municipal waste is the waste that the County Council has responsibility for collecting and disposing. It mainly comprises wastes produced by households, wastes produced by trade premises and collected by the Council, and litter and street sweepings.

**BMW - Biodegradable Municipal waste - is a type of waste, typically originating from plant or animal sources, which may be broken down by other living organisms.'

(Pembrokeshire County Council Municipal Waste Strategy, website accessed 2nd March 2018)

64. The Strategy also highlights the importance for people to reduce, reuse and recycle for the above targets to be met.

65. In a consultation response received for the replacement Local Development Plan Preferred Strategy consultation (June-July 2017), Pembrokeshire County Council advised that updated data for 2015/2016 was now available for the above Strategy. The level of

preparing for reuse and recycling / composting (or anaerobic digestion) for municipal waste was 64.92%. The BMW (biodegradable municipal waste) landfilled was 6,523 tonnes. In 2016 the landfill tax stood at £84.40 per tonne.

Officers Appraisal for First Review:

66. The above strategy does not outline any specific requirements for new waste management facilities to serve Pembrokeshire. Further collaboration with Waste management colleagues is required to discuss future waste management provision within Pembrokeshire.
67. Given the level of information currently available it is not considered necessary to allocate additional sites within the National Park area, as part of the replacement Local Development Plan.

Replacement facility for Tenby Civic Amenity Site

68. The need to replace the existing Civic Amenity Site at Tenby to establish a larger facility in the area with improved customer access, better traffic management and a wider range of facilities is acknowledged within the reasoned justification to the Pembrokeshire Coast National Park Local Development Plan Policy 27 'Local Waste Management Facilities' at paragraph 4.120. This requirement is also acknowledged within the reasoned justification to Pembrokeshire County Council's Local Development Plan policy GN 40 'New Waste Management Facilities' at paragraph 6.162.
69. Since the adoption of these plans, an application for a replacement facility, located at Devonshire Drive, Saundersfoot, within the Pembrokeshire County Council area, has been approved (application reference 13/1110/PA approved in June 2014). The new facility has been constructed and is now operational. The reasoned justification for Policy 27 will therefore need to be updated in this respect.

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Wales Spatial Plan Pembrokeshire Haven Key Settlement Framework 2021 (as at 7th February 2007);

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