

<b>Date:</b>			
<b>Issue:</b>	<b>Policy 32 – Waste Management</b>		
<b>Objector(s):</b>	Mr and Mrs Sunley	<b>Objection ref(s):</b>	056p
	Badenoch and Strathspey Conservation Group		400g(i)
	Scottish Council for National Parks		434k

<b>Reporter</b>	Mrs Jill Moody
<b>Procedure:</b>	Informal hearing

## 1.0 Overview

1.1 This statement sets out the Cairngorms National Park Authority response to the objections raised to the Deposit Local Plan as modified (CD6.12) in respect of Policy 32: Waste Management, and supplements the response made to those objections by the Cairngorms National Park Authority in its reports to Committee (CD7.3,4,5). In ongoing discussions with SEPA further changes have been informally agreed which have resulted in the conditional withdrawal of their objections to this policy. This statement assumes these changes will go forward as post inquiry modifications, and is based on that assumption. It suggests no further change be made to the policy.

## 2.0 Provision of the Local Plan

2.1 Policy 32: Waste Management within the Deposit Local Plan as modified gives policy guidance to ensure adequate consideration is given to the issue of waste management in all development proposals, and to allow the consistent assessment of applications which contain issues relating to waste management. During the current transitional arrangements set out in the Planning etc. (Scotland) Act 2006 (Development Planning) (Saving, Transitional and Consequential Provisions) Order 2008, the policy is intended to provide an appropriate level of guidance to meet the requirements of SPPI (CD2.2 para 37-38) and Scottish Planning Policy (CD2.1 para 15-18) and ensure that applications are determined in a consistent manner.

2.2 The Policy has been modified in the 1<sup>st</sup> modifications to the Deposit Local Plan with word changes within the policy to draw the policy to better clarify the requirements on developers to take into account issues relating to waste management. Background text has also been modified to clarify the need to comply with area waste plans, national waste strategy and national waste plan. These changes are intended to better reflect the requirements of SPPI0 Waste Management (CD2.9) and PAN 63 Waste Management Planning (CD4.12).

2.3 2<sup>nd</sup> modifications to the policy have also been included to ensure proper demonstration of consistency with Area Waste Plans, National Waste Strategy and National Waste Plan.

2.4 Through ongoing discussions with SEPA further modifications to the policy are now proposed, to highlight the importance of waste management as a potential business within the National Park, and to replace the term landfill site with waste management facility. The supporting text is also to be further changed to reflect the need to exploit emerging technologies, and to recognise the importance of waste as a resource. The changes also link to an additional designation map in Appendix I which will identify SEPA registered waste management sites which should be safeguarded from the development.

2.5 These further changes if accepted through the Inquiry report will be included within post modifications advertised and the statement has been drafted on this basis.

### 3.0 Summary of objection(s)

3.1 Three objections raising five issues have been lodged to this policy and wish to have their objections considered by informal hearing:

- The approach to waste management should change and should be carried out in a consistent manner across the 4 local authorities. The plan should take a lead in this. **(056p, 434k)**
- The policy should make reference to waste as a valuable resource **(400g(i))**
- In c) local recycling centres should be called local reuse and recycling centres **(400g(i))**
- Policy should not include unqualified support for energy from waste **(400g(i))**
- Support should be clarified for community initiatives contributing to area waste plans **(400g(i))**

### 4.0 Summary of Cairngorms National Park Authority response

- The management of waste is influenced by many national and local documents, and the policy intends to clarify the position as it relates to development proposals. The policy is not therefore considered deficient. **(056p, 434k)**
- The wording as proposed in CD7.28 includes wording to clarify the importance of waste as a resource. **(400g(i))**
- Local recycling centres are so called in line with the PAN 63 (CD4.12) and the National Park Plan (CD7.1). Recycling centres and those for exchange and reuse are not the same, and the change would not therefore be considered acceptable. **(400g(i))**
- The reference to energy from waste supports the government aspiration to support innovative and effective technologies and move towards a Zero Waste society, and is the support is therefore considered appropriate. **(400g(i))**
- The policy supports all forms of development that contribute to area waste plans as set out in d) of the policy. Particular support for any particular form of development is not therefore considered necessary and no change is proposed. **(400g(i))**

### 5.0 CNPA Commendation to Reporter

5.1 It is commended to the Reporter that all objections are rejected. No issues are raised that could lead the Cairngorms National Park Authority to consider that the policy was deficient. The wording of the policy and the areas identified on the proposals maps should therefore be retained.

---

### 6.0 Assessment / Scope of Evidence

6.1 **056p** object to the approach taken to waste management across the National Park, and consider the local plan the proper place to draw a more consistent approach together.

6.2 **Response:** The policy has been drawn up in line with SPPI0 (CD2.9) and PAN 63 (CD4.12) and is not the document to influence local or national area waste plans. Rather the local plan is influenced by them, and developers must ensure they are consistent with these strategic documents. The National Park Plan considers the issue of waste management at a more strategic level for the National Park area, and sets out a variety of strategic objectives for waste management (CD7.1 page 76). In delivering the National Park Plan, the National Park Authority

and its partners, including the four local authorities will continue to work together to achieve consistency in all forms of delivery. This work continues outwith the local plan process and no change to the policy is therefore considered necessary.

- 6.3 **400g(i)** objects to the lack of reference to waste as a valuable resource.
- 6.4 **Response:** The modifications presented in CD7.28 clarify that this will now be included as a post inquiry modification, and the objection is now considered to have been addressed.
- 6.5 The objection considers a more appropriate term for recycling centres should include reuse in the title. The term is in line with PAN 63 (CD4.12) in relation to recycling, and the definitions within PAN 63 (CP4.12) clarify that recycling and reuse are separate issues and the terms are not therefore considered appropriate to be joined in this way. No change is therefore proposed.
- 6.6 Objection is also raised to the unqualified support given to energy from waste. In discussions with SEPA additional reference to this is proposed in post inquiry modifications, and this is to reflect the current government aspiration to support innovative and effective technologies and move towards a Zero Waste society. The reference is therefore considered appropriate, taken with the additional protection offered by the other policies of the Plan.
- 6.7 The objection also wishes to see clear support for community initiatives which contribute to area waste plans. The policy as drafted supports all forms of development that contribute to area waste plans and this is clearly set out in part d) of the Policy. Particular support for any particular form of development is not therefore considered necessary and no change is proposed.
- 6.8 **434k** also considers the approach to waste management across the National Park should be carried out in a consistent manner by the 4 local authorities. The arguments and support for the approach taken are as above, and no change to the policy is therefore proposed.

## **7.0 List of documents (including Core Documents)**

- CD2.1 Scottish Planning Policy 2008 Parts 1 and 2
- CD2.2 SPPI The Planning System
- CD2.9 SPPI0 Planning and Waste Management
- CD4.12 PAN73 Waste Management Planning
- CD6.11 Deposit Local Plan
- CD6.12 Deposit Local Plan 1<sup>st</sup> modifications
- CD7.1 Cairngorms National Park Plan 2007
- CD7.3 CNPA Committee Report Consultation May 2008
- CD7.4 CNPA Committee Report 1<sup>st</sup> Modifications October 2008
- CD7.5 CNPA Committee Report 2<sup>nd</sup> Modifications February 2009
- CD7.28 Proposed post Inquiry modifications proposed by officers through statements.

## **8.0 Cairngorms National Park Authority Witnesses for Informal Hearing**

- Karen Major – Local Plan/Policy Officer