



Telford & Wrekin
Co-operative Council

Protect, care and invest
to create a better borough

Telford and Wrekin Local Plan Review

PUBLICATION PLAN

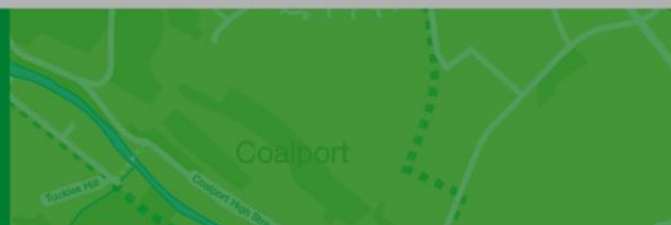
Waste Technical Paper



2020 - 2040



March 2025



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1 Introduction

1.1 This paper sets the national and local planning context for the management of the borough's waste and provides a summary of the evidence used to formulate the policies within the Telford & Wrekin Local Plan. It also reviews relevant submissions received on the evolving plan and explains how the Council has responded to them in the finalisation of its waste policies.

2 Planning Policy Context

2.1 Waste, for the purposes of the Local Plan, can be categorised into types according to the way in which it is managed as follows:

- **Inert Waste** – this is material that does not decay or degrade such as rubble and waste brick and tile;
- **Non-hazardous Waste** – this comprises waste that is not hazardous but that can decay and biodegrade. It is made up of a wide range of materials, for example paper, plastic, wood and organic waste;
- **Hazardous Waste** – this is waste that can pose a danger to the environment or to human health due to the concentration or quantity of hazardous material, such as soil, water and air pollution in the waste.

2.2 The following waste management legislation and policies are relevant to the Local Plan: European Waste Framework Directive 2008 and 2018 amended, EU Review of Waste Policy and Legislation 2014 Planning Act 2008 Localism Act 2011 and Resources and Waste Strategy 2018.

3 Local Planning Policy Context

3.1 Telford & Wrekin became a Unitary Authority in 1998 and at this time took over the waste planning duties from Shropshire County Council.

3.2 The Local Development Plan is made up of the Telford and Wrekin Local Plan and a series of Neighbourhood Development Plans. The Local Plan document and its policies set out the strategic spatial vision and development strategy for the area to 2040.

3.3 The Council carried out a draft Local Plan consultation which gave residents and stakeholders an opportunity to comment on the plan document and policies. This included sharing the draft with the Regional Technical Advisory Board (RTAB) for waste. No specific comments were made on the waste policies and the role of RTAB is addressed in the 'duty to co-operate' section below.

3.4 In May 2024 the Council also wrote to 35 Local Planning Authorities that receive above 5,000 tons of waste outflows from Telford and Wrekin to inform them of the draft plan consultation. The Council considers this to be a proportionate exercise regarding the movement of waste flows. No issues were raised by these authorities in reply.

3.5 The Local Plan has a number of policies that are directly related to how the Council manages and plans for waste as part of new development in the borough. The overarching purpose of the policies is to help deliver on the waste hierarchy of, reduce, reuse, recycle and they include:

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- Policy EC4 – Waste management facilities
- Policy DD5 – Waste planning for residential developments
- Policy DD6 – Waste planning for commercial, industrial and retail developments

4 Duty to Co-operate

4.1 The Localism Act 2011 has introduced a duty to co-operate in relation to the preparation of local plans. This duty requires local authorities to engage constructively, actively and in an ongoing basis with neighbouring authorities and stakeholders of relevance on strategic issues of cross boundary significance. For matters such as waste planning, it is therefore important that local authorities can show that they have worked together in exchanging information and reaching agreement on cross-boundary issues.

4.2 Meeting regularly with officers from all other Waste Planning Authorities in the West Midlands through the Regional Technical Advisory Body (RTAB) is an important aspect of this co-operation. The Council has attended regular meetings with the RTAB and provided updates on the development of the Council's waste policies. RTAB are supportive of the Council's approach to waste and are generally supportive of the content of the policies contained within the draft plan.

4.3 Shropshire and Staffordshire are the borough's immediate Waste Planning Authority neighbours from whom the borough, until recently, imported waste. These waste movements have now reversed, given the closure of local landfill capacity, the cost and environmental burdens of landfill and changes in the local waste disposal strategy which will makes use of new Energy from Waste facilities (EfW) in those neighbouring authorities. The EfW facilities are located at:

1. **Battlefield, Shrewsbury** – a 90,000 ton capacity plant
2. **Four Ashes, Stafford** – a 340,000 ton capacity plant

4.4 As part of duty to co-operate the Council has received formal notification from both Shropshire and Staffordshire that there are no cross-boundary issues to be dealt with in terms of waste arisings as a result of the Local Plan (see Annex A and B below).

4.5 Telford & Wrekin Council will continue to actively engage and cooperate with its neighbours over waste issues throughout the delivery of the Local Plan, through its continued membership of RTAB.

4.6 The Council have also consulted the Environment Agency regarding the waste policies and supporting evidence base. The Environment Agency raise no significant duty to co-operate issues with either the policies or the supporting evidence base.

4.7 On the basis of the above for the purposes of waste planning the Council considers that it has met the requirements of duty to co-operate.

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5 Evidence base

5.1 The government has a general policy objective requiring that Local Authorities are, within reason, self-sufficient in managing their own waste. It is recognised that this is not always achievable given the need for economies of scale in managing waste flows on a commercial basis. Another key driver outlined in government policy is the proximity principle with the aim of waste management taking place where facilities are closest to the source of waste.

5.2 The borough is a relatively small geographic area with a range of waste management facilities within its boundaries, including landfill sites, treatment facilities and transfer stations. There are no residual treatment facilities at present, but a number of strategic facilities in adjoining authorities (EfW plants in Shropshire and Staffordshire), which have confirmed capacity to manage an element of the residual waste from Telford & Wrekin including municipal waste arisings.

5.3 The Local Plan will need to take into account the level of waste arising's forecast to occur through to 2040 and plan for facilities and capacities to accommodate this need. The Council commissioned a Waste Arisings Study as evidence estimating how much waste will be produced in the borough over the plan period up to 2040.

5.4 The study looks at Local Authority collected waste forecasts over the plan period and concluded that the Borough is broadly self-sufficient in non-hazardous waste management as summarised below:

- 250,000 tonnes of non-hazardous waste arisings from Telford and Wrekin, potentially rising to 286,000 tonnes by 2040;
- Of which, 162,500 tonnes (65%) to be collected and sent for reprocessing (this includes 48,750 tonnes pa of organic waste); and
- 87,500 tonnes (35%) to be sent to residual treatment facilities – inc. EfW facilities

5.5 Available annual capacity to service the boroughs waste arisings is summarised below:

- 770,000 tonnes of treatment capacity within Telford and Wrekin
- 90,000 tonnes at Battlefield EfW plant
- 340,000 tonnes Four Ashes EfW plant
- 750,000 tonnes Granville Landfill site

5.6 Therefore, in the Telford and Wrekin Local Plan review, there is policy that supports the delivery of Waste facilities. **Policy EC4 Waste Management facilities** allows for Telford and Wrekin to plan for and safeguard waste infrastructure to meet local needs. The policy plans positively for waste management at source in the borough's Strategic Employment Areas, which contain a high percentage of manufacturing businesses. The policy also recognises the need for specialised waste facilities which may need to be considered on a case by case basis. The policy also seeks to positively protect sites with an existing waste use by making it clear appropriate evidence would be required to demonstrate the use was no longer required and that the site had been marketed for a period of time.

6 Conclusion

6.1 Responses to the Regulation 18 Consultation can be found within the Regulation 18 Consultation Statement.

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6.2 The waste policies in the Local Plan are sufficiently flexible to respond to a range of requirements in terms of the estimated amount of waste that will need to be managed over the period of the Local Plan. The number of sites needed to provide this capacity cannot be determined with certainty since the capacity of each site will depend on the type of waste to be managed, the type of facility to be developed and the market for the waste stream. Therefore, criteria for new waste management sites have been developed against which applications for waste management sites can be assessed.

6.3 In conclusion for the purposes of waste planning:

- Telford and Wrekin is broadly self-sufficient in waste treatment and transfer capacity for the bulk of its needs;
- Overall, additional waste management capacity is not required in Telford & Wrekin, although existing facilities should be safeguarded and additional facilities could be encouraged;
- The Local Plan sets out a positive planning policy framework for waste management to safeguard and develop new waste management facilities in the borough.
- The Council concludes it has met the requirements of duty to co-operate by engaging with directly on cross boundary issues with neighbouring WPA's (Shropshire and Staffordshire); and
- The Council has demonstrated that it has actively and continuously engaged with the West Midlands region through its membership of RTAB and will continue to do so prior to submission of the Local Plan review.

7 Annex A - Duty to co-operate from Staffordshire County Council as regards to waste movements

| Question | Answer |
|---|---|
| Q1: Please confirm that the movements identified in the attached documents are taking place and are of similar scale to that detailed. | We believe the movements identified in the attached document are accurate. |
| Q2: For waste imports to your WPA from Telford and Wrekin – are you aware of any (planning related) reasons as to why waste movements similar to those in the attached documents cannot continue in the future? If so, please state the facility and end dates where possible | <p>There are no specific policies in the Staffordshire and Stoke on Trent Joint Waste Plan about providing for waste from outside the Staffordshire and Stoke on Trent Plan area, but there is an allowance for cross boundary waste flows.</p> <p>There is no reason that waste movements wouldn't be able to continue in the future as with reference to Waste Local Plan Policy 2.2, the Plan supports the development of a network of sustainable waste management facilities, to manage an amount of waste at least equivalent to the amount generated in the plan area, recognising that waste management at and waste contracts with specialist waste facilities do not respect administrative boundaries.</p> |

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| Question | Answer |
|--|--|
| | <p>The Plan aims to ensure that waste is being treated as high up as possible in the waste hierarchy with a network of different types of waste management facilities each playing a separate role.</p> <p>Paragraph 3.3 of the Waste Study (dated September 2021) includes reference to the use of two facilities in the neighbouring counties, one of which is the Four Ashes in Staffordshire (operated by Veolia).</p> <p>Policy 2.4 of the Staffordshire and Stoke on Trent Joint Waste Local Plan safeguards the two existing strategic residual treatment Energy Recovery Facilities (including Four Ashes) for municipal waste; and also a hazardous waste landfill.</p> <p>Policy 2.5 of the plan also requires that proposals for non-waste related development in the vicinity of permitted waste management facilities, should not unduly restrict or constrain the activities permitted at the waste management facility.</p> |
| <p>Q3: Please advise if the waste movements are likely to continue to occur and an indication of the scale and period.</p> | <p>Consideration should be given to future movements of waste for disposal and the availability of landfill capacity in Staffordshire and/or the use of waste management facilities located at landfill or mineral sites in Staffordshire whose permission is tied to an end date.</p> <p>The appendices to the Staffordshire and Stoke on Trent Joint Waste Local Plan lists the operational landfill sites in Staffordshire and Stoke on Trent (Table 13). Similarly, the appendices to the Minerals Local Plan lists quarries requiring backfill with waste. In respect of non-hazardous landfill, it should be noted that capacity would be depleted during the 2030s.</p> <p>Taking the above into consideration, SCC can see no reason why movements between your authority and ours cannot continue. Telford and Wrekin should be able to continue</p> |

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| Question | Answer |
|---|--|
| | movements of Hazardous and Non-hazardous Waste. However, with a lack of exact data on which sites Telford and Wrekin are using within our authority to dispose of waste it is difficult to give warning of potential issues/end dates relating to our facilities without this information. |
| Q4: Do you consider the movements set out in the attached documents to be a strategic matter for your authority? | There is no indication of a strategic dependence of waste management facilities in Staffordshire to manage the waste that arises in Telford and Wrekin. The reverse is also the case. |
| Q5: If you consider the movements to be a strategic matter, do you consider that a Statement of Common Ground is necessary to cooperate on the issue? | Given the quantities of waste movements, Staffordshire County Council does not think there is a need for a statement of common ground between our authority and yours. |

8 Annex B - Duty to co-operate response from Shropshire Council as regards to waste movements

| Question | Answer |
|---|--|
| Q1: Please confirm that the movements identified in the attached documents are taking place and are of similar scale to that detailed. | Shropshire Council is not aware of any factors that would have significantly influenced waste movements between Shropshire Council's administrative area and Telford & Wrekin Council's administrative area since this study was undertaken. As such, it would seem likely that the scale of waste movements identified is comparable to that currently occurring. |
| Q2: For waste imports to your WPA from Telford and Wrekin – are you aware of any (planning related) reasons as to why waste movements similar to those in the attached documents cannot continue in the future? If so, please state the facility and end dates where possible | Shropshire Council is not aware of any planning related reasons as to why waste movements similar to those in the attached document cannot continue in the future. |

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| | |
|---|--|
| Q3: Please advise if the waste movements are likely to continue to occur and an indication of the scale and period. | Shropshire Council is not aware of any factors that are likely to significantly influence waste movements between Shropshire Council's administrative area and Telford & Wrekin Council's administrative area in the future. As such, it would seem likely that the scale of waste movements identified will continue in the future. |
| Q4: Do you consider the movements set out in the attached documents to be a strategic matter for your authority? | Shropshire Council does not consider that these waste movements represent a strategic cross-boundary matter. |
| Q5: If you consider the movements to be a strategic matter, do you consider that a Statement of Common Ground is necessary to cooperate on the issue? | Shropshire Council would be happy to address waste movements as part of a Statement of Common Ground between our two Authorities. |

9 Annex C - Regional Technical Advisory (RTAB) for Waste Regulation 18 response

Dear Sir or Madam,

Consultation on the Draft (Regulation 18) Telford and Wrekin Local Plan West Midlands Resource Technical Advisory Body Observations

The West Midlands Resource Technical Advisory Body (WMRTAB) was formed in 2011 and its overarching aim is to support co-operation between Waste Planning Authorities (WPAs) and others in the West Midlands, by providing objective and authoritative technical advice concerning the sustainable management of material resources and strategic waste management data, issues, and development policies and proposals. In particular, WMRTAB helps WPAs meet their obligations under the Duty to Cooperate for plan making. A copy of the Terms of Reference for WMRTAB is included as Appendix 1. The Terms of Reference also lists the members of WMRTAB.

9.1 The Telford and Wrekin Local Plan area is located wholly within the area covered by WMRTAB and it would therefore like to offer observations on the Regulation 18 draft Telford and Wrekin Local Plan⁽¹⁾ as set out below. These observations have been agreed by members of WMRTAB and are submitted by Cool Planet Resources Ltd which is contracted by WPAs in the West Midlands to provide support to WMRTAB.

9.2 Please note that this submission is made without prejudice to any comments that individual members of WMRTAB may make on the Regulation 18 Draft Telford and Wrekin Local Plan.

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Duty to Cooperate

9.3 WMRTAB notes that the Draft Telford and Wrekin Local Plan generally acknowledges take the Duty to Cooperate requirements in paragraph 1.9 as follows:

- ‘1.9 The Localism Act (2011) and the NPPF require local authorities to fulfil a duty to cooperate on planning issues, to address issues that have cross border implications with neighbouring authorities and key statutory agencies and ensure, where possible, that policy approaches are consistent. The council has engaged with neighbouring authorities and key agencies on specific matters relating to strategic planning and will continue to do so in the preparation and monitoring of the Local Plan. This includes flood risk, the provision of strategic infrastructure, the supply and distribution of housing and meeting employment needs’.

9.4 The Telford & Wrekin Council Waste Study (September 2021)⁽²⁾ discusses this in terms of waste management and includes the following: ‘The planning authority also needs to comply with the Duty to Co-operate in taking account of waste movements across authority boundaries and any waste management requirement identified nationally. The Planning White Paper published in August 2020 proposes that the Duty to Co-operate may be abolished, but in the absence of new legislation and proposals for strategic planning, Telford & Wrekin should engage with other waste planning authorities constructively, actively and on an ongoing basis. This Report provides the basis for such engagement and for the agreement of Statements of Common Ground should these be seen to be necessary’.

9.5 The following tables give a summary of waste movements between Telford & Wrekin and other waste planning authorities where liaison may be necessary’.

9.6 These tables below (taken from the Waste Study) set out the non-hazardous, inert and hazardous waste sent from, and received into, Telford and Wrekin in 2019.

Table 12: Non-hazardous waste sent from Telford & Wrekin to other authorities in 2019

| WPA | Birmingham | Sandwell | Shropshire | Staffordshire | Warrington |
|--------|------------|----------|------------|---------------|------------|
| Tonnes | 4,705 | 34,585 | 52,987 | 30,173 | 10,952 |

Table 13 Non-hazardous waste received into Telford & Wrekin from other authorities in 2019

| WPA | Beford | Cambridges | Cheshire | Sandwell | Shropshire | Staffordshire |
|--------|--------|------------|----------|----------|------------|---------------|
| Tonnes | 5,564 | 12,113 | 15,136 | 13,283 | 132,644 | 5,696 |

Table 14 Inert waste sent from Telford & Wrekin to other authorities in 2019

| WPA | Walsall |
|--------|---------|
| Tonnes | 14,966 |

Table 15 Non-hazardous waste received into Telford & Wrekin from other authorities in 2019

| WPA | Shropshire |
|--------|------------|
| Tonnes | 49,624 |

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Table 16 Hazardous waste sent from Telford & Wrekin to other authorities in 2019

| | | | | | | | |
|--------|------------|------------------|----------------|------------|--------------|---------------|----------------|
| WPA | Sandwell | Staffords | Stoke-on-Trent | Walsall | Warwickshire | Wolverhampton | Worcestershire |
| Tonnes | 2,275 | 625 | 103 | 1,587 | 481 | 9,042 | 339 |
| WPA | Derbyshire | Northamptonshire | Cheshire | Lancashire | Leeds | Salford | Sefton |
| Tonnes | 916 | 532 | 485 | 903 | 360 | 446 | 307 |

Table 17 Hazardous waste received into Telford & Wrekin from other authorities in 2019

| | | | | | | |
|--------|----------|------------|-------------|-----------|---------------|-------------|
| WPA | Bridgend | Bristol | Cambridges | Cheshire | Coventry | Croydon |
| Tonnes | 153 | 9,239 | 110 | 5,612 | 386 | 923 |
| WPA | Devon | Essex | Gloucesters | Hampshire | Hertfordshire | Kirklees |
| Tonnes | 171 | 525 | 544 | 3,628 | 676 | 856 |
| WPA | Leeds | Leicesters | Luton | Norfolk | North | Northampton |
| Tonnes | 1,432 | 119 | 337 | 493 | 355 | 609 |
| WPA | Rochdale | Sandwell | Shropshire | Slough | Staffordshire | Wigan |
| Tonnes | 796 | 1,428 | 226 | 282 | 238 | 186 |

9.7 WMRTAB notes that by relying on a single year's data (in this case 2019), only a snapshot of waste movements is obtained and, on this basis, recommends that movements over a period of at least 3 years are considered to gain a more robust assessment of likely future waste movements. Indeed, paragraph 20 of the 'Duty to Cooperate on Waste – Practice Guide for Waste Planning Authorities in England, May 2021' states: *'When contacting the receiving WPA it would be useful to include trend data of the scale of imports for at least the last 3 years but ideally 5 years as this helps identify any anomalous years.'*

9.8 In any event, in light of the quantum of waste exports from, and imports into, Telford and Wrekin (as considered below) a Statement(s) of Common Ground may be needed that addresses any significant future reliance on other areas for the management of waste arising in Telford and Wrekin. Indeed, the Study notes that *'there is no dedicated Energy from Waste (incineration) capacity in the Telford & Wrekin but there are two facilities in the neighbouring counties'*, these 'neighbouring counties' being 'Shropshire and Staffordshire'. In light of this, the Study recognises that: *'In accordance with the Duty to Co-operate, it will be necessary to liaise with the neighbouring Waste Planning Authorities of Shropshire and Staffordshire to ensure that the necessary capacity remains available in future years.'*

9.9 Although the Telford & Wrekin Council Waste Study discuss the Duty to Cooperate for waste management and movements with other Waste Planning Authorities, there is a lack of detailed information concerning the nature and outcomes of any Duty to Cooperate engagement and so it is not possible to comment on whether this engagement has been sufficient to meet the legislative requirements.

9.10 A Duty to Co-operate Statement was prepared in June 2016⁽³⁾, however WMRTAB was unable to locate any more recent evidence relating to this matter. WMRTAB therefore recommends that the DtC Statement be updated to reflect the latest strategic waste management

3 Telford and Wrekin Local Plan – Duty to Co-operate Statement (published June 2016)
https://www.google.co.uk/url?sa=t&rct=j&q=&esrc=s&source=web&cd=&cad=rja&uact=8&ved=2ahUKewjWm_m5tQ6CAxVkyEEAHVjhBwEQFnoECBcQAQ&url=https%3A%2F%2Fwww.telford.gov.uk%2Fdownload%2Fdownloads%2Fid%2F4493%2Fa6_telford_and_wrekin_local_plan_duty_to_cooperate_statement.pdf&usg=AOvVaw2xW4Hsa4LaredX8zQ2Qpcl&opi=89978449

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issues which may exist between Telford and Wrekin and other Waste Planning Authorities. This statement should set out what engagement has taken place, on which matters and what outcomes resulted, in terms of the content of the Local Plan.

9.11 Notwithstanding the above, WMRTAB is pleased to confirm that Telford and Wrekin Council is an active member of WMRTAB and an officer from the Council regularly attends the group's meeting and contributes to its work. WMRTAB has therefore facilitated discussion between Telford and Wrekin Council and other neighbouring waste planning authorities to assist with meeting its Duty to Cooperate (DtC) on matters pertaining to planning for future waste management.

Planning for sufficient waste management capacity

9.12 WMRTAB notes that the Telford & Wrekin Council Waste Study (September 2021) states: *'The key issue for the Local Plan is to ensure that there are **sufficient facilities available** to manage the bulk of the waste arising within the Plan area.'* Key findings of this study regarding existing waste management capacity include the following:

- *'Granville Landfill site remains operational'.*
- *There is no dedicated Energy from Waste (incineration) capacity in the Telford & Wrekin*
- *The waste treatment facilities located within Telford & Wrekin are varied in nature, with a significant quantity of organic waste treatment capacity, which is important for the treatment of food and green wastes. There is a strategically important facility for the recycling of white goods operated by AO Recycling which receives feedstock from a wide geographical area.*

9.13 The consideration of required capacity for the management of non hazardous waste over the Plan period is summarised in the Waste Study as follows:

9.14 Summary of Non-Hazardous Waste Management Capacity Required (tonnes per annum)

| | Annual capacity for capacity gap calculations | Maximum Capacity Requirement in 2020 2040from⁴ | Capacity Gap |
|--|--|--|---------------------|
| Organic treatment capacity – anaerobic digestion | 21,345 | 52,800 | 31,455 |
| Transfer capacity | 136,300 | 61,600 | N/A |
| Residual recovery capacity | 130,000 | 61,600 | N/A |
| Total non-hazardous waste arisings | | 176,000 | Sent to EFW |

9.15 Regarding transfer facilities the Study concludes (with emphasis added):

9.16 *'The capacity of transfer facilities in the Borough is in excess of the non-hazardous waste arisings and therefore is **likely to be sufficient** for the sustainable management of waste in the area'.*

9.17 Regarding 'other recovery capacity' the Study concludes (with emphasis added): *'there is **no dedicated Energy from Waste (incineration) capacity in the Telford & Wrekin but there are two facilities in the neighbouring counties.** These are both operated by Veolia who have the contracts for collecting and disposing of household waste for the local authority. These facilities are at Battlefield in Shropshire which has a capacity of approximately 90,000*

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*tonnes per annum, and at Four Ashes in Staffordshire which has a capacity of approximately 340,000 tonnes per annum. In 2019, the Battlefield facility received just over 26,000 tonnes of residual waste from Telford & Wrekin and the Four Ashes facility received just over 17,000 tonnes from Telford & Wrekin. **There is therefore sufficient residual waste capacity in the wider locality to manage the residual waste arising from the Borough at present**.*

9.18 In light of the above paragraph 6.26 of the draft Telford and Wrekin Local Plan states: *'The significant quantity of waste recycling and treatment capacity means that the Borough is broadly **net self-sufficient in waste management capacity overall**, notwithstanding that residual waste thermal treatment facilities are located in neighbouring authorities. **The scale at which these facilities are developed means that this is the most economic way of delivering this type of treatment and the quantity of waste arising in Telford & Wrekin would be insufficient to justify investment of this scale in the Borough**'.*

9.19 Regarding the treatment of organic waste (taken as waste that can be composted and/or treated by anaerobic digestion), the Draft Local Plan notes, in paragraph 6.26 (with emphasis added):

- *'The council, through the Waste Arising Study (2021), has **identified potential waste capacity gap for organic treatment capacity** which includes anaerobic digestion and composting facilities'.*

9.20 WMRTAB has the following observations on the above:

- The Data Study relies on data from 2019 whereas data for 2022 is now available. Planning Practice Guidance expects the best available data to be utilised and it is recommended that the Data Study and its conclusions be revisited before the Plan is published at Reg 19 stage.
- While there may be sufficient 'residual waste' capacity 'at present' (noting that this will have been in 2019), it is important to assess whether capacity is likely to be sufficient, and available, over the Plan period.
- In calculating capacity gaps, WMRTAB notes that existing capacity has been established as follows: *'The throughput of facilities in the most recent year has been taken as a proxy for the annual capacity of each facility. This could result in an under- estimate of total available capacity, but from a planning point of view gives a good guide to available capacity and an indication of whether additional sites might be needed for more facilities'*.
- As noted above, one year's data provides only a snapshot and therefore WMRTAB recommends that existing capacity be established by taking the highest throughput value achieved over at least the last 3 years.
- While capacity gaps are identified in the Waste Study, they are not included in the draft Telford and Wrekin Local Plan. It is recommended that the quantum of waste management capacity being planned for is clearly stated in the Plan.
- The future management of hazardous waste does not appear to have been given the same level of consideration as non-hazardous waste. It is understood that the principle of net self sufficiency does not apply to hazardous waste but nevertheless it is important to consider the types of hazardous waste arising and ensure that appropriate management routes have been identified, and planned for over the plan period.
- Notwithstanding the fact that the maintenance of net self-sufficiency (in terms of provision for waste management) is a principle that appears to have been adopted when estimating capacity requirements, it does not appear to be an objective, indeed it is not even mentioned

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within the draft Telford and Wrekin Local Plan. WMRTAB consider that an overarching objective of achieving net self-sufficiency in the management of waste should be clearly set out within the draft Telford and Wrekin Local Plan. While residual waste may be managed beyond the area for good reasons, adopting this objective would help support the development of such capacity within the Plan area if proposals were to come forward.

Landfill

9.21 Table 2 of the Telford & Wrekin Council Waste Study (September 2021) (see below) indicates that in 2019, 54,329 tonnes of waste arising in Telford were landfilled and 51,656 tonnes of this was landfilled in Staffordshire.

| Location | Tonnes |
|-------------------|-------------|
| T&W to T&W | 2,619 |
| T&W to Shropshire | 54 |
| T&W to | 51,656 |
| T&W to elsewhere | (no figure) |
| Total | 54,329 |

9.22 In 2019 there was 1,850,000 tonnes of capacity at the Granville Landfill Site in the Plan area. 75,538 tonnes was received at this site in 2019,

9.23 The study concludes that: ‘Landfill use has reduced significantly and only a nominal amount was sent to Candles Landfill in 2019. The waste arising in Telford & Wrekin that is sent to landfill comprises mainly street cleansing residues.’

9.24 The Waste Study notes that: ‘while landfill remains the least preferable option for managing waste, it is still required for the disposal of some materials that cannot be recycled or processed’.

9.25 Paragraph 6.26 of draft Telford and Wrekin local plan states that: ‘Landfill will only be considered where evidence is provided for why a more sustainable option cannot be used’.

9.26 Clause 2 of Policy EC3 Waste Management Facilities, mentions ‘Landfill’ as follows:

9.27 ‘2. New landfill(or land raise) sites or extensions to existing landfill sites will only be considered where there is an established need and provision will only be made for waste that cannot practicably be recycled, composted or recovered’. Paragraph 6.26 of draft Telford and Wrekin local plan states that: ‘Landfill will only be considered where evidence is provided for why a more sustainable option cannot be used’.

9.28 Clause 2 of ‘Policy EC3 Waste Management Facilities’ mentions landfill as follows: ‘2. New landfill (or land raise) sites or extensions to existing landfill sites will only be considered where there is an established need and provision will only be made for waste that cannot practicably be recycled, composted or recovered’.

9.29 WMRTAB wishes to make the following observations on this matter:

- It is not clear how the conclusion regarding the future need for landfill set out in the Study is based on evidence provided elsewhere. WMRTAB suggest that some further explanation would be helpful. Indeed, there seems to be a tension between the data that suggests 54,329 tonnes of waste were landfilled and the statement that ‘only a nominal amount of

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waste' was landfilled. Perhaps the 'nominal amount' relates solely to Local Authority Collected Waste?

- Although at the bottom of the waste hierarchy, non-hazardous landfill is still an important type of waste management that needs to be planned for and the requirement for future landfill capacity is not clearly stated within the Plan.
- It is not clear which landfill capacity will be relied on in future e.g. is it assumed that waste from Telford and Wrekin will mainly go to Staffordshire in future or will it be managed at the Granville Landfill in the Plan Area?

Locations for Waste Management

9.30 Policy EC1 Employment developments in the urban area and Strategic Employment Areas (SEAs) of the draft Telford and Wrekin Local Plan states that:

9.31 *'1. The SEAs, as identified on the Policies Map, will be the primary focus for employment development. The development strategy for proposals in the SEAs is as follows:....*

9.32 *b. Development proposals for sui generis uses associated with B Use Class activity, such as **waste management facilities**, will be supported in SEAs where they are compatible with neighbouring uses;'*

9.33 Paragraph 6.21 within the draft Telford and Wrekin Local Plan states (with emphasis added): *'Policy EC3 identifies the most **favourable areas for waste processing and recycling facilities on existing industrial estates and on previously developed land**'.*

9.34 Furthermore, paragraph 6.25 states that for waste sites... *'**Strategic employment areas are considered the most appropriate locations for new waste facilities** due to their existing mix of uses and land availability. Tweedale also has a cluster of similar businesses. Due to the concentration of certain industrial sectors on the strategic employment areas, such as plastics and polymers and hi-tech, there will be a need for specialist waste facilities to meet the needs of new, expanding and existing businesses. These industrial areas are segregated from residential areas and benefit from excellent highway connections for waste transportation'.*

9.35 Within the evidence base there is a document titled 'Schedule of Allocations to be Carried Forward' (October 2023)⁽⁴⁾, but this does not include any allocations for the development of waste management facilities.

9.36 WMRTAB wishes to make the following observations on this matter:

- The Plan does not appear to include any specific allocation so land for the management of waste.
- It is not clear whether any assessment of the suitability of the SEAs for accommodating and organic waste treatment facility has been undertaken. WMRTAB consider that this is important in light of the fact that a capacity gap has been identified relating to this form of waste management.
- WMRTAB questions whether an approach of identifying general employment land, which, it assumes could still be developed for additional employment uses, provides sufficient certainty that the identified capacity gap will be met. This is particularly so in light of the

4 Telford and Wrekin Local Plan Review: Schedule of Allocations to be Carried Forward (published October 2023)' [Schedule of Allocations to be Carried Forward - Local Plan \(telfordandwrekinlocalplan.co.uk\)](https://www.telfordandwrekinlocalplan.co.uk)

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fact that waste management may struggle to compete with higher value employment land uses.

- It is unclear whether a specific invitation to operators and landowners to nominate land for waste management has been undertaken ('Call for Sites') and whether this has been used to inform the remaining capacity gap. Such an invitation could, for example, demonstrate that no specific parcels of land have been promoted for waste management development which in turn might help justify the lack of specific site allocations. In any event WMRTAB recommends that related activity should extend beyond passive consultation e.g. landowners have been specifically invited to promote sites for waste management development.

Waste management development considerations

9.37 WMRTAB notes that the draft Telford and Wrekin local plan sets out several policies concerning the management of waste as follows::

9.38 *Policy EC3 Waste Management Facility*

9.39 *Policy DD5 Waste planning for residential developments*

9.40 *Policy DD6 Waste planning for commercial, industrial and retail developments*

9.41 Policy EC3 'Waste Management Facility' states:

1. *The council will assess applications for and affecting waste management facilities against the following criteria:*
 - a. *Whether they add value to and help deliver on the principles of the circular waste economy (re-use, repair, recycle, compost and transfer of energy) by moving waste further up the waste hierarchy;*
 - b. *Applications for a change of use from waste management to other uses will need to demonstrate that the relevant waste capacity is no longer required;*
 - c. *Proposals for new and altered facilities should demonstrate that they have been designed to operate in a way that will help increase rates of recycling (and /or re-use of materials), create new employment opportunities, minimise the impact of the facility on the local environment and positively contribute to the local community;*
 - d. *General waste management facilities and developments associated with such facilities should be located in the Strategic Employment Areas as well as Tweedale. Exceptions to this include:*
 - *Where waste facilities meet specialised needs that could not be appropriately located in the above mentioned areas;*
 - *The need for specialised waste facilities; or*
 - *The use of previously developed sites that might not be suitable for residential developments or commercial and industrial uses and facilities that can co-locate close to waste producers or users of treated materials;*

9.42 For proposals for new waste sites, paragraph 6.28 of the draft Telford and Wrekin local plan states that '*In order to minimise the impact of new and expanded waste facilities on the environment new site proposals for waste management should, at application stage, demonstrate:*

9.43 *No adverse impact on water quality;*

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9.44 *Protection of water resources (all non-waste operational area such as roofs and roads should, where possible, be directed towards a sustainable surface water outfall in accordance with the Drainage Hierarchy);*

- *Vehicle routing and site access is appropriate to the scale and nature of the development;*
- *The site is within reasonable proximity to the source of waste to be managed;*
- *No adverse impacts on the natural environment, open space or biodiversity;*
- *The location and operation of the site does not adversely impact the historic environment;*
- *Visual intrusion of/from the site is minimised;*
- *No potential land use conflicts in the local area;*
- *Air emissions, including dust are minimised;*
- *Odours are minimised;*
- *Measures are in place to prevent vermin and birds;*
- *Noise, light and vibration from the operation of the site are minimised;*
- *Measures to prevent the spread of litter originating from the operation of the site; and*
- *The site does not create conditions for land instability.*

9.45 WMRTAB wishes to make the following observations on this matter:

- While Policy EC3 clause 1 b attempts to safeguard existing waste capacity, a more general objective or statement of intent concerning the safeguarding of all waste facilities should be included to confirm the position of the Plan.
- The matters identified in paragraph 6.28 are rightly this that should be addressed by proposals, however this text should form part of a planning policy, against which applications will be determined rather than in the supporting text. This would help clarify what is meant in Policy EC3 clause 1 c by the term '*minimise the impact of the facility on the local environment*'.

9.46 WMRTAB supports the inclusion in the Plan of Policy DD5 '*Waste planning for residential developments*' that sets out how the management of waste arising in new residential developments should be considered, and Policy DD6 that sets out the approach to waste management in non-residential development.

Climate Change

9.47 WMRTAB supports Paragraph 6.20 of the draft Telford and Wrekin Local Plan that states: '*Waste management is part of the circular economy and a positive approach to recycling and re-use falls in line with the council's Climate Change Action Plan.*

9.48 *Waste management offers a range of employment opportunities, both skilled and non-skilled labour. Telford and Wrekin have a larger percentage of the working population in manufacturing, 15% compared to 10% across the West Midlands, and therefore we need to plan for waste management facilities as part of our employment mix'.*

9.49 WMRTAB also supports paragraph 9.29 of the draft Plan that states: '*In order to improve climate change outcomes construction and excavation waste from residential development should be managed in a way that minimises its environmental impact. Developers need to consider issues such as the appropriate re-use of materials on-site. Where waste needs to travel off-site, local opportunities for recycling and reuse which will support the local economy and local infrastructure provision should be considered*'.

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9.50 WMRTAB hope these comments are of use. Please do not hesitate to contact me if you wish to discuss further. I'd be grateful if you would notify WMRTAB, via the email address provided above, of any future consultation relating to the Telford and Wrekin Local Plan.

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Appendix 1

West Midlands Resources Technical Advisory Body Terms of Reference

Updated June 2021 (Final)

1.0 Introduction

1.1 The West Midlands Resource Technical Advisory Body (WMRTAB) is a group consisting of: Waste Planning Authorities (WPAs), primarily from the former West Midlands Region; representatives from the waste management industry; and other interested parties. Member organisations are listed in Appendix 1.

1.2 Under the Planning and Compulsory Purchase Act 2008, WPAs are required to prepare Local Plans which set out how and where waste can be managed in their areas over a 15 year period.

1.3 National Planning for Waste states that: *“In preparing Local Plans, waste planning authorities should:....work collaboratively in groups with other waste planning authorities, and in two-tier areas with district authorities, through the statutory duty to cooperate, to provide a suitable network of facilities to deliver sustainable waste management;”*

1.4 Waste arising in one WPA area will frequently be managed in another. For example, in order to achieve economies of scale, waste management facilities will often have a catchment which extends beyond the boundary of the planning area within which it is situated. Planning to ensure that sufficient capacity is available to meet future requirements for the management of waste therefore constitutes a ‘strategic matter’ and falls under the ‘Duty to Cooperate’ (DtC). The DtC requires local planning authorities to engage ‘constructively, actively and on an ongoing basis’ when addressing strategic waste planning matters in their Waste Local Plans.

1.5 The need for cooperation between WPAs and other bodies on waste is reflected in National Planning Policy for Waste and the Waste Management Plan for England 2021 which states: *‘Strategic policy-making authorities should cooperate with each other, and other bodies, when preparing, or supporting the preparation of policies which address strategic matters, including policies contained in local waste plans. In particular, joint working should help to determine where additional infrastructure is necessary, and whether development needs that cannot be met wholly within a particular plan area could be met elsewhere. Further consideration is to be given as to the optimal way in which strategic cross-boundary issues, such as major infrastructure or strategic sites, can be adequately planned for, including the scale at which plans are best prepared in areas with significant strategic challenges.’*

2.0 Aims

2.1 The overarching aim of WMRTAB is to support co-operation between WPAs and others, by providing objective and authoritative technical advice concerning the sustainable management of material resources and strategic waste management data, issues, and development policies and proposals. In particular, WMRTAB will help WPAs meet their requirements under the DtC.

3.0 Specific areas of activity

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3.1 In order to meet the above aims, WMRTAB will:

- Bring together a wide range of expertise in what is a very specialist area of planning through a wide membership including waste planning and management officers of the Waste Planning Authorities (WPAs) in the West Midlands, the Environment Agency, representatives of industry including the waste management industry, and representatives of environmental organisations;
- Identify strategic issues affecting the sustainable management of waste e.g. waste hierarchy, proximity principle and self-sufficiency;
- Undertake and/or commission technical work where there are identified benefits from work being undertaken at larger than local scale;
- Prepare guidance and best practice to be followed by Member WPAs;
- Formally respond, as a body, to the technical evidence base and policy documents of member authorities and other strategic and national consultations⁽⁵⁾. Responses will be based on any guidance/best practice notes prepared by WMRTAB;
- Notwithstanding the above, provide comments on member WPA compliance with the Duty to Cooperate when its waste planning policy is published for representations;
- Raise awareness of waste management as an integral part of the circular economy/climate change agenda and contribute to the waste/resource management planning agenda on a national level and within the WMRTAB geographic area;
- Raise awareness of the role of WMRTAB generally e.g. by attendance at relevant meetings and events and also through the preparation of articles for relevant publications.
- Where invited, provide WMRTAB representation on groups and at workshops where strategic waste planning matters are discussed e.g. Local Enterprise Partnerships, West Midlands Combined Authority, National Waste TAB Chairs;
- Take part in online discussion/information sharing groups to help build skills and knowledge with the WMRTAB membership;
- Provide and/or commission training and support for Member organisations related to waste planning;

3.2 Member WPAs engaging each other (and other WPAs) on strategic waste management matters may have regard to WMRTAB Duty to Cooperate Guidance.

3.3 To assist with the effective running of the group WMRTAB shall:

- Publish evidence documents, guidance, meeting minutes, agendas etc online for member authorities to access and use at public examination as required;
- Prepare and monitor an annual business plan that identifies specific activities to take place with a 12 month period under the above categories;
- Meet twice a year;
- Contribute to the preparation of meeting agendas to ensure discussion of relevant strategic matters (Minutes will be prepared by a designated minute-taker on a rotating basis);
- Review and update (as necessary) these Terms of Reference on an annual basis.

5 This will not fetter the ability of Member authorities to make their own representations as appropriate.

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3.4 Member WPAs will make a financial contribution to the organisation and running of the group. This will include the costs of employing an independent Chair.

4.0 Member agreement

4.1 All organisations listed in Appendix 1 agree to membership of the group on the basis of the terms set out in this document.

Appendix 1 WMRTAB Member Organisations

N.B. This list is subject to change but was correct at 30 June 2021

Waste Planning Authorities:

- Birmingham City Council;
- Coventry City Council;
- Dudley Metropolitan Borough Council;
- Herefordshire Council;
- Sandwell Metropolitan Borough Council;
- Solihull Metropolitan Borough Council;
- Shropshire Council;
- Staffordshire County Council;
- Stoke on Trent City Council;
- Telford & Wrekin Council;
- Warwickshire County Council;
- Walsall Metropolitan Borough Council;
- Wolverhampton City Council; and,
- Worcestershire County Council

Waste Management Industry:

- Biffa and Veolia (nominated by the Environmental Services Association),
- MVV
- Robert Hopkins Ltd and NISP/ International Synergies

Other Interested Parties:

- Waste Disposal Authorities
- Adjoining Waste Planning Authorities
- Environment Agency
- Friends of the Earth on behalf of Sustainability West Midlands
- Representatives from other (R)TAB groups