Report

Boston Alternative Energy Facility

Addendum to Fuel Availability and Waste Hierarchy Assessment

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Acronyms

CEP	Circular Economy Package
CIWM	Chartered Institute of Waste Management
DAERA	Department of Agriculture, Environment and Rural Affairs
DCO	Development Consent Order
DECC	Department of Energy and Climate Change
Defra	Department for Environment Food and Rural Affairs
EfW	Energy from Waste
ES	Environmental Statement
EWC	European Waste Catalogue
HGV	Heavy Goods vehicle
RDF	Refuse Derived Fuel
SEPA	Scottish Environment Protection Agency
SNRHW	Stable Non-reactive Hazardous Waste
UK	United Kingdom

1 Introduction

1.1 Context

1.1.1 This document is the '*Addendum to Fuel Availability and Waste Hierarchy Assessment'* for the Boston Alternative Energy Facility (the Facility), with the original Fuel Availability and Waste Hierarchy report being submitted as part of the Development Consent Order (DCO) application (document reference 5.8, APP-037). This report has been prepared on behalf of Alternative Use Boston Projects Limited (the Applicant), to support the application for a DCO (the DCO application) that has been made to the Planning Inspectorate under Section 37 of the Planning Act 2008 (the Act).

1.1.2 The Facility is a proposed Energy from Waste (EfW) plant that would generate approximately 102 megawatts electric (MWe) (gross) of renewable energy and would deliver approximately 80 MWe (net) to the National Grid. The energy recovery plant would be a thermal treatment facility processing up to 1.2 million tonnes of refuse derived fuel (RDF) as the feedstock to generate energy. The Facility is proposed to be located approximately 2 km to the south of Boston town centre, Lincolnshire on land as set out in paragraph 1.3.1.

1.1.3 The DCO, if granted, would be known as 'The Boston Alternative Energy Facility Order'.

1.2 The Applicant

1.2.1 The Applicant is undertaking the development and securing funding for the Facility. The Applicant is a privately-owned company with its core business in Energy from Waste, specifically renewable electricity projects producing "Green Energy" and other products.

1.2.2 The Applicant team have been involved in industrial development at Riverside Industrial Estate, Boston, Lincolnshire since 2004. In March 2005, planning consent was obtained for a Special and Clinical Waste Processing Plant, with conditions discharged and commencement of construction.

1.2.3 In 2010, consent was obtained for a 12 MWe Gasification Power Station that would process waste wood (known as Biomass UK No. 3 Ltd) with enabling works carried out during 2013. This facility was sold to Aviva Investors in November 2015, along with the right to develop the facility, and in September 2016 it was transferred to Biomass UK No. 3 Ltd. The Biomass UK No. 3 Ltd facility is entirely separate to the proposed Facility.

1.3 The Application Site

1.3.1 The Application Site covers 26.8 hectares (ha) and is split in to two components: the area containing operational infrastructure for the Facility (the 'Principal Application Site'); and an area containing habitat mitigation works for wading birds (the 'Habitat Mitigation Area'). The Principal Application Site (NGR TF33950 42241) covers 25.3 ha and is neighboured to the west by the Riverside Industrial Estate and to the east by The Haven, a tidal waterway of the River Witham between The Wash and the town of Boston. The A16 public highway is located approximately 1.3 km to the west. The Habitat Mitigation Area covers 1.5 ha and is located approximately 170 m to the south east of the Principal Application Site, encompassing an area of saltmarsh and small creeks at the margins of The Haven. The Application Site is entirely within the administrative area of Boston Borough Council.

1.3.2 A detailed description of the Application Site location and surroundings is provided in Chapter 5 Project Description of the Environmental Statement (ES) (document reference 6.2.5, APP-043).

1.4 Required Assessment

1.4.1 National Policy Statement EN-3 (Department of Energy and Climate Change (DECC), 2011) sets out specific requirements for EfW facilities, these are detailed in **Table 1-1** below.

Table 1-1 National Policy Statement EN-3 Requirements Relating to Waste Facilities

Para	EN-3 Requirement	Comments
2.5.66	*An assessment of the proposed waste combustion generating station should be undertaken that examines the conformity of the scheme with the waste hierarchy and the effect of the scheme on the relevant waste plan or plans where a proposal is likely to involve more than one local authority.*	This requirement is covered in the *Fuel Availability and Waste Hierarchy Assessment* report (section 3) (document reference 5.8, APP-037) and this document (section 1.6).
2.5.67	*The application should set out the extent to which the generating station and capacity proposed contributes to the recovery targets set out in relevant strategies and plans, taking into account existing capacity.*[1]	Existing capacity is covered in Section 3 of this document.
2.5.68	*It may be appropriate for assessments to refer to the Annual Monitoring Reports published by relevant waste authorities which provide an updated figure of existing*	RDF will be sourced from throughout the UK so waste capacity has been addressed at

[1] It should be noted that draft EN-3 (DBEIS, September 2021) updates this to, *"The application should set out the extent to which the generating station and capacity proposed is compatible with, and supports long-term recycling targets, taking into account existing residual waste treatment capacity and that already in development."*

Para	EN-3 Requirement	Comments
	waste management capacity and future waste management capacity requirements.	Regional level within Section 3 of this document.
2.5.69	*The results of the assessment of the conformity with the waste hierarchy and the effect on relevant waste plans should be presented in a separate document to accompany the application to the IPC.*	This requirement is covered in the *Fuel Availability and Waste Hierarchy Assessment* report (section 3) (document reference 5.8, APP-037) and this document (section 1.6), including Appendix 3.
2.5.70	*The IPC should be satisfied, with reference to the relevant waste strategies and plans, that the proposed waste combustion generating station is in accordance with the waste hierarchy and of an appropriate type and scale so as not to prejudice the achievement of local or national waste management targets in England and local, regional or national waste management targets in Wales. Where there are concerns in terms of a possible conflict, evidence should be provided to the IPC by the applicant as to why this is not the case or why a deviation from the relevant waste strategy or plan is nonetheless appropriate and in accordance with the waste hierarchy.*	This requirement is covered in the *Fuel Availability and Waste Hierarchy Assessment* report (section 3) (document reference 5.8, APP-037) and this document (section 1.6), including Appendix 3.

1.4.2 To address point 2.5.70 that consideration has been given to strategies and plans, a comprehensive review has been undertaken of 189 waste planning authorities within England, Northern Ireland, Scotland and Wales. The results of this are presented in full as Appendix 3 of this report. The review concludes that the proposed Facility would be in compliance with the relevant waste plans of the waste planning authorities from which the Facility is likely to obtain its feedstock.

1.5 Report Aim and Objectives

1.5.1 The aim of this addendum is to present the most up to date information available on the potential availability of waste in the UK that could be processed into refuse derived fuel (RDF) and transported to the proposed Facility.

1.5.2 The objectives of the report are as follows:

- To identify the amount of residual waste currently being landfilled throughout the UK.
- To identify and present the current quantity of RDF being exported from the UK.

- To model waste availability within 2-hour travel times of the proposed ports to be utilised to transfer the feedstock.
- To undertake high-level modelling of the impacts of increased recycling rates on the quantity of residual waste available.
- To present estimated potential long-term residual waste quantities available to be processed into RDF and transferred to the proposed Facility.

1.5.3 The report presents waste data and undertakes high level modelling to demonstrate that there is sufficient fuel available within the UK during the operational life of the proposed Facility.

1.5.4 The report does not identify specific locations that the waste will be contracted from. National Policy Statement EN-3 (DECC, 2011) confirms in paragraph 2.5.17 that commercial issues are not likely to be an important matter for IPC decision-making.

1.6 Source of Wastes

1.6.1 The proposed Facility will source fuel from throughout the UK (but via water transport), as detailed in the Chapter 5 Project Description of the ES (document reference 6.2.5, APP-043). Primary sources of fuel will comprise wastes that are currently being landfilled that will be diverted and processed into RDF, and in doing so will move up the waste hierarchy. Sourcing wastes currently being landfilled and converting these into RDF will demonstrates that wastes are being managed further up the waste hierarchy and meeting the requirements set out in EN-3.

1.6.2 In addition, RDF that is currently being exported out of the UK will be sourced, as indicated in the main *Fuel Availability and Waste Hierarchy Assessment* report (document reference 5.8, APP-037).

1.6.3 A network of UK ports will be utilised to transfer the fuel to the proposed Facility during the operational period. An indicative list of proposed ports has been provided in **Table 1-2**.

Table 1-2 Indicative UK Port Locations Proposed for Waste Transportation

Country	Region	Port
England	North East	Hartlepool
	North West	Fleetwood
	Yorks. & Humber	Hull
	East Midlands	N/A
	West Midlands	N/A

Country	Region	Port
	East of England	Great Yarmouth
	London	N/A
	South East	Ridham Sheerness Southampton
	South West	N/A
Northern Ireland	N/A	Belfast
Scotland	N/A	Glasgow Montrose Grangemouth
Wales	N/A	Port Talbot

Source: APP-043, 6.2.5 Environmental Statement - Chapter 5 - Project Description, Section 5.6

1.6.4 The proposed Facility will accept fuel in the form of baled RDF from 2026 and is initially planned to operate for a period of 25 years.

1.7 Waste Catchment Areas

1.7.1 To inform the potential areas that RDF will be sourced and transferred to the various ports, waste catchment areas have been specified to cover defined travel distances for bulked waste within two hours of the indicative port locations. A two-hour travel time was chosen to represent a practicable limit over which bulk waste transport becomes economically unattractive as part of the overall cost of delivering waste management solutions. This approach is consistent with other DCO applications defining specific catchment areas such as the Wheelabrator Kemsley (K3 Generating Station) and Wheelabrator Kemsley North (WKN) Waste to Energy facility Development Consent Order submission (PINS Ref EN010083)[2].

1.7.2 The methodology for identifying the catchment areas comprised the following steps.

- Base mapping – using ESRIs ArcGIS Pro 2.7.2.
- Identification of the appropriate street network - The street network including the Motorways, Primary Roads, A Roads and B Roads was input. This information was available from ArcGIS Online network analysis service as a street network.

[2] *https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010083/EN010083-000431-EN010083%20-%204.6%20-%20Waste%20Hierarchy%20and%20Fuel%20Availability%20Report%20July%202019.pdf*

- Calculation of travel time areas - The theoretical time taken to drive each segment of each road was calculated. The calculation assumed heavy goods vehicles (HGVs) travelling at the following speeds:
  - Single carriageway roads – 40 miles/hour
  - Dual carriageway roads – 50 miles/hour
  - Motorways – 60 miles/hour

1.7.3 No other impedances were considered in the modelling (e.g. road works, traffic congestion). No hierarchy was given to the different types of road (e.g. where possible choose to go down the motorway instead of an A road).

1.7.4 The results produced waste catchment areas covering a 120-minute drive time to the 12 indicative port locations. The catchment areas map for the UK is presented in **Figure 1**. This also presents the catchment area within a 60-minute drive time. This modelling approach shows which areas of the UK are generally accessible to bulk road transport.

1.7.5 The results of this modelling show that a large proportion of the UK is covered within 2-hr travel times by one or multiple ports. The map in **Figure 1** shows the following.

- England – all regions are fully covered, except for:
  - East Midlands – has around 60% coverage.
  - West Midlands – has around 30% coverage.
  - South West – has around 50% coverage.
- Northern Ireland – has full coverage from the port of Belfast.
- Scotland – has good coverage for the central belt and north east (assuming 85% of the waste in Scotland).
  - The Highlands and Islands are not within the catchment.
- Wales – has around 60% coverage, including South Wales.
  - The north west of Wales is not within a catchment.

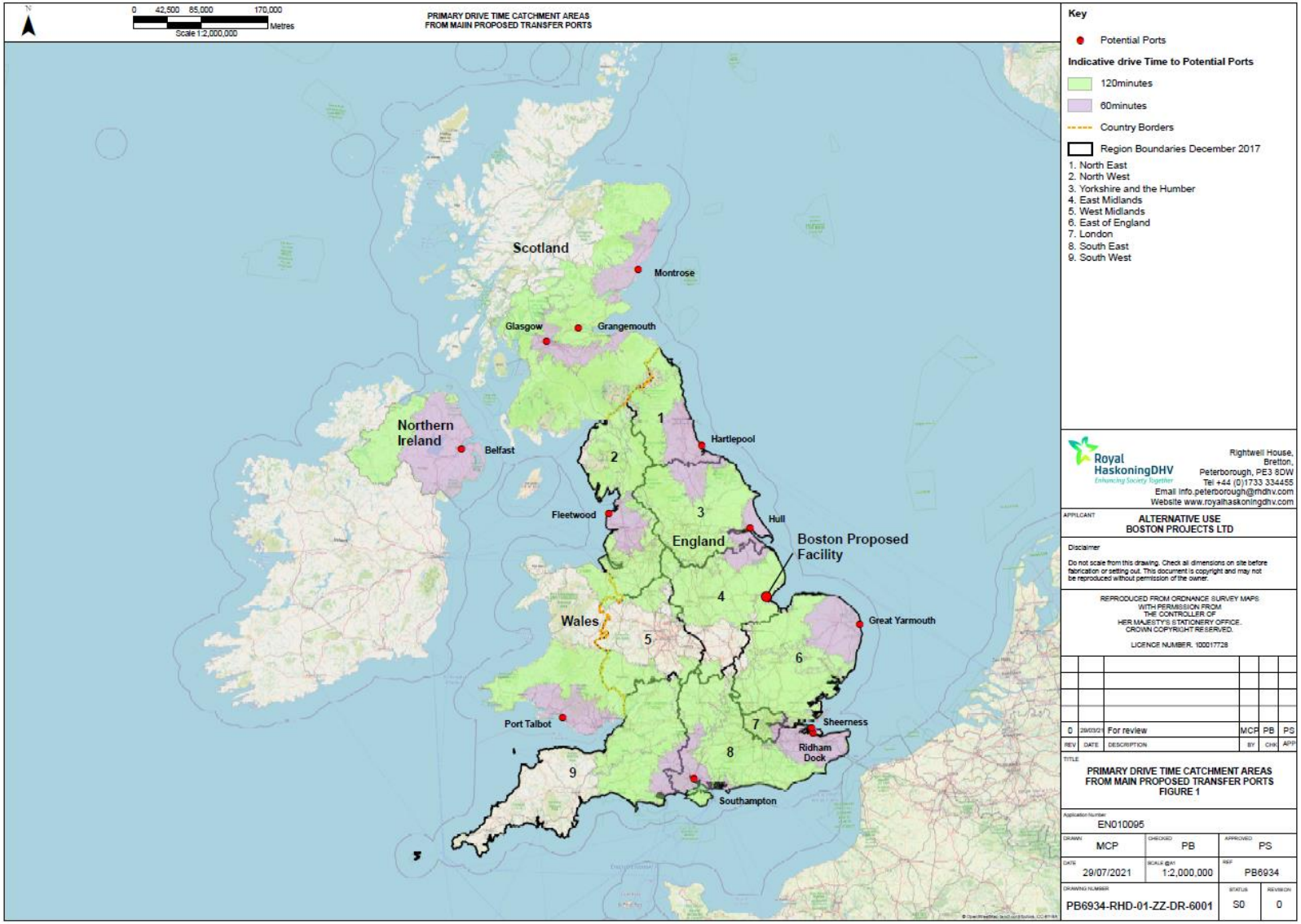

Figure 1 Proposed Port Locations and Indicative Waste Catchment Area Travel Times

2 Fuel Availability from Waste

2.1 Waste Input to Landfills

2.1.1 The Applicant intends to divert waste materials currently being landfilled to utilise as fuel at the proposed Facility. To inform the assessment of the availability of wastes to use as fuel, the most recent landfill input data for the UK has been assessed.

2.1.2 The following sections present the quantities of wastes being landfilled for the following UK countries:

- England;
- Northern Ireland;
- Scotland; and
- Wales.

2.1.3 A summary of the combined quantities being currently landfilled in the UK is provided in **Section 2.6.**

2.2 Landfill Waste Inputs: England

2.2.1 The most up to date data on the quantity of waste inputs deposited in landfills in England is presented in **Table 2-1** below (Environment Agency, 2021a). Data for the whole of England is set out, along with the regional breakdown for all classes of landfill, including inert, non-hazardous and hazardous sites. Further detailed data is provided in **Appendix 1** of this report, providing the detailed breakdown for each region and sub-region to allow the identification of the areas of high reliance of landfilling on residual wastes.

2.2.2 The 2019 data shows that over 45 million tonnes of waste were landfilled. Of this, over 27 million tonnes of non-hazardous waste were landfilled, including those sites with stable non-reactive hazardous waste (SNRHW) cells.

Table 2-1 Waste Inputs to Landfill: England 2019 (000s tonnes)

	Region									
	North East	North West	Yorkshire & Humber	East Midlands	West Midlands	East of England	London	South East	South West	TOTAL
Hazardous Merchant	217	183	104	211	75	8	-	16	51	**865**
Hazardous Restricted	-	-	-	-	-	-	-	22	-	**22**
Non-Hazardous with SNRHW cell*	332	436	518	653	1,262	581	-	2,718	396	**6,896**
Non-Hazardous*	1,506	2,400	2,222	1,282	1,776	5,550	1,298	2,546	1,541	**20,121**
Non-Hazardous Restricted	-	235	255	-	-	-	-	-	-	**490**
Inert	1,138	828	1,739	2,053	2,369	3,414	431	4,270	1,223	**17,465**
TOTAL	**3,193**	**4,082**	**4,838**	**4,199**	**5,482**	**9,553**	**1,729**	**9,572**	**3,211**	**45,859**

Source: Environment Agency (2021a)

Note: * Non-hazardous wastes that will contain combustible wastes.

Table 2-2 Potentially Combustible Waste Inputs to Landfill: England 2019 (000s tonnes)

	Region									
EWC Code and Description	**North East**	**North West**	**York. & Humber**	**East Midlands**	**West Midlands**	**East of England**	**London**	**South East**	**South West**	**TOTAL**
19 12 12 - other wastes (including mixtures of materials) from mechanical treatment of wastes other than those mentioned in 19 12 11	562	455	1,165	570	919	1,711	431	1,545	410	**7,769**
20 03 01 - Mixed municipal waste	79	326	89	250	195	414	28	290	452	**2,124**
20 03 07 - Bulky waste	3	64	9	11	14	18	4	77	22	**223**
TOTAL	**645**	**845**	**1,263**	**832**	**1,128**	**2,144**	**463**	**1,912**	**884**	**10,117**

Source: Environment Agency (2021b) Waste Data Interrogator 2019.

Note: Figures rounded to nearest thousand

2.2.3 It is recognised that only the combustible elements of the non-hazardous wastes will provide potentially suitable fuel for the proposed Facility. Data from the Environment Agency's Waste Data Interrogator allows further analysis of landfilled wastes by European Waste Catalogue (EWC) codes to screen those that are likely to have high combustible content.

2.2.4 Mainly combustible wastes include the following types:

- 19 12 12 - other wastes (including mixtures of materials) from mechanical treatment of wastes other than those mentioned in 19 12 11
- 20 03 01 - Mixed municipal waste
- 20 03 07 - Bulky waste

2.2.5 The breakdown for regional data for England based on the three types of mainly combustible waste is presented in

2.2.6 **Table *2-2*** (Environment Agency, 2021b). This indicates that over 10 million tonnes of predominantly combustible waste that is currently landfilled could potentially be diverted to the proposed Facility.

2.2.7 Further analysis of the data linking it to the waste catchment areas around the indicative ports set out in **Section 1.7** is presented in **Table 2-3**. This indicates that for England, based on the 2-hr catchment areas the indicative ports have access to over 8.5 million tonnes of predominantly combustible wastes that is currently being landfilled.

Table 2-3 Available Landfilled Combustible Waste: English Region Catchments

Sub-region	Regional Port Coverage	000s tonnes	
		Amount Landfilled	Available in Catchment Areas
North East	100%	645	645
North West	100%	845	845
Yorks. & Humber	100%	1,263	1,263
East Midlands	60%	832	499
West Midlands	30%	1,128	338
East of England	100%	2,144	2,144
London	100%	463	463
South East	100%	1,912	1,912
South West	50%	884	442
Total		**10,117**	**8,552**

2.3 Landfill Waste Inputs: Northern Ireland

2.3.1 For Northern Ireland, the quantity of household waste that was landfilled in 2019 was 451,000 tonnes (Defra, 2021), the splits are detailed in **Table 2-5** below. The potentially combustible elements of this comprise 380,000 tonnes (combined total of EWC 19 12 12 and 20 03 01 from table below).

Table 2-4 Municipal Waste Inputs to Landfill: Northern Ireland 2019

Waste Category	Landfill Input (000s tonnes)
19 12 12 - Wastes from mechanical treatment of waste*	187
20 03 01 - Mixed municipal waste*	193
Other (all other EWC codes)	71

Total	**451**

Note: * potentially combustible wastes
Source: Defra, 2021

2.3.2 The whole of Northern Ireland is within the 2-hr waste catchment area set out in **Section 1.7,** therefore all the waste currently landfilled will be available for export via the indicative port in Belfast for transfer to the proposed Facility.

2.4 Landfill Waste Inputs: Scotland

2.4.1 The most recent data on the quantity of waste deposited in landfills in Scotland is presented in **Table 2-5** below (SEPA, 2021).

Table 2-5 Waste Inputs to Landfill: Scotland 2019

Waste Category	Landfill Input (000s tonnes)
Soils	1,174
Household and similar wastes*	757
Sorting residues*	670
Mineral wastes from waste treatment and stabilised wastes	235
Mixed and undifferentiated materials	45
Other mineral wastes	31
Other	92
Total	**3,005**

Source: SEPA (2021). Note: * potentially combustible wastes

2.4.2 The data indicates that greater than 3 million tonnes of waste was landfilled in Scotland in 2019, of which 1,427,000 tonnes was household and similar waste types and sorting residues. A large proportion of this was is likely to be combustible and could be processed and routed to one of the proposed Scottish ports detailed in **Table 1-2**, or a closer port, depending on the specific location.

2.4.3 It is recognised that not all the combustible waste landfilled in Scotland will be available, as a proportion is outside of the waste catchment area. This is primarily those wastes generated in the Highlands and Islands which is a small proportion of the total waste generated in Scotland. Assuming the catchment covers 85% of Scotland, 1,213,000 tonnes of combustible waste currently landfilled would be available to the proposed Facility.

2.5 Landfill Waste Inputs: Wales

2.5.1 The most recent data on the quantity of waste inputs deposited in landfills in Wales is presented in **Table 2-6** below (Defra, 2021). The total quantity of household waste landfilled in Wales in 2019 was around 507,000 tonnes. The potentially combustible element of the waste was around 487,000 tonnes (combined total of EWC codes 19 12 12 and 20 03 01).

Table 2-6 Municipal Waste Inputs to Landfill: Wales 2019

Waste Category	Landfill Input (000s tonnes)
19 12 12 - Wastes from mechanical treatment of waste*	326
20 03 01 - Mixed municipal waste*	161
Other (all other EWC codes)	20
Total	**507**

Note: * potentially combustible wastes

2.5.2 As not all of Wales was covered by the waste catchment area, it is assumed that 60% would be available, as detailed in **Section 1.7.** Therefore, around 292,000 tonnes of landfilled household waste would be available for the proposed Facility. This does not include additional quantities of commercial and industrial waste that could also be sourced.

2.6 Summary of Available Landfilled Combustible Wastes

2.6.1 Following the review of the current quantities of waste being landfilled throughout the UK, the primary combustible portion has been established and presented in **Table 2-7** below. This shows that of the 12.5 million tonnes of combustible waste that was landfilled in 2019, just under 10.5 million tonnes would be available to the proposed Facility via a network of ports.

Table 2-7 Combustible Waste Inputs to Landfill in the UK

Country	Waste Quantity (000s tonnes)	
	Combustible Waste	Available in Catchment Areas
England	10,117	8,552
Northern Ireland	451	380
Scotland	1,427	1,213

Wales	507	292
Total	**12,502**	**10,437**

2.7 Exports of Refuse Derived Fuel

2.7.1 Large quantities of RDF and solid recovered fuel (SRF) are currently exported from the UK to various international destinations to be used as feedstock for EfW facilities. Waste is exported from all countries within the UK as noted in a recent report published by the Chartered Institute of Waste Management (CIWM, 2018). The largest quantities of RDF are exported from locations throughout England.

2.7.2 Recent annual data for the quantity of RDF and SRF exports for England is presented in **Table 2-8** below. A more detailed breakdown of monthly exports of RDF and SRF for the years 2018 to 2020 is presented in **Figure 2**.

Table 2-8 Annual RDF and SRF Exports from England

	Tonnes		
Year	**RDF**	**SRF**	**Total**
2018	2,807,041	379,380	**3,186,421**
2019	2,444,980	377,556	**2,822,536**
2020	1,383,622	357,034	**1,740,657**

Source: Environment Agency (2021c)

2.7.3 The data indicates that for England, over 2.8 million tonnes of RDF and SRF was exported to international destinations in 2019, including over 2.4 million tonnes of RDF. Provisional annual data for 2020 indicates a fall in exports to over 1.7 million tonnes, most likely relating to the impact of the COVID-19 pandemic leading to restrictions on transport and travel.

2.7.4 The monthly data presented in **Figure 2**, shows that export quantities fluctuate from month to month, with peak exports of RDF and SRF occurring during the autumn and winter periods.

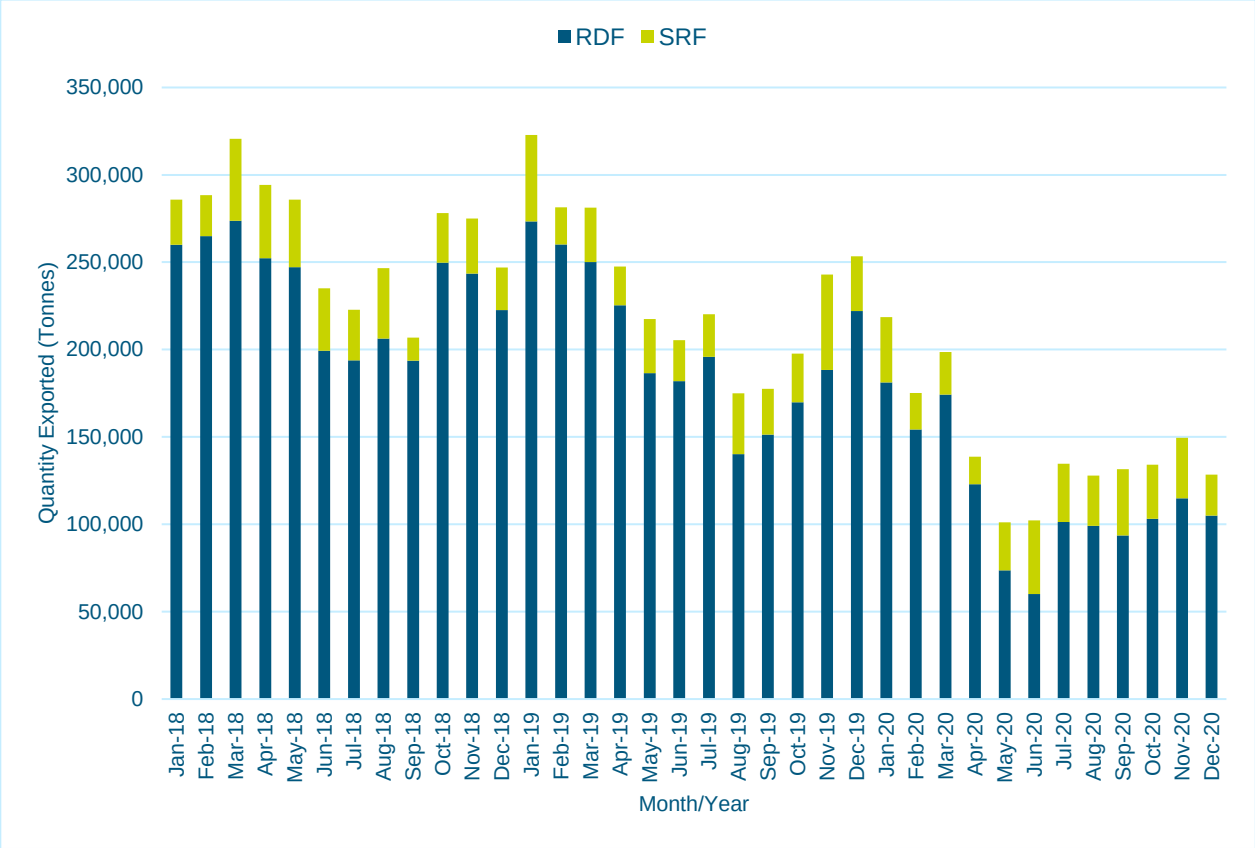

Figure 2 Monthly Exports of RDF and SRF from England (2018-2020)
Source: Environment Agency (2021c)

2.7.5 It is clear that very large quantities of RDF have been and continue to be exported to overseas EfW facilities from the UK. Potentially diverting a proportion of this material to the proposed Facility will be a more favourable solution in terms of both the proximity principle and contributing to UK energy security.

3 Energy from Waste

3.1 EfW Capacity in the UK

3.1.1 The existing capacity of EfW facilities and those that have been consented and are in the process of being built or commissioned is outlined below. EfW facility data for 2020 has been assessed based on information in Tolvik (2021). Summary data for the UK is presented in **Table 3-1** below.

3.1.2 A full breakdown of the specific EfW facilities for both operational and consented facilities is provided in **Appendix 2**.

Table 3-1 Operational and Consented EfW Facilities in the UK

EfW Facility Status	Capacity

	(000s tonnes/annum)
Operational facilities	16,131
Construction & commissioning phase	4,255
Total	**20,386**

Source: Adapted from Tolvik (2021)

3.1.3 The current UK operational installed capacity is 16.13 million tonnes, which processed around 14 million tonnes of waste in 2020. The utilisation rate of the operational sites is therefore around 87%. However, recognising some sites did not accept wastes for the complete year, a higher figure of 90% may be closer to typical UK utilisation.

3.1.4 There are a further 17 EfW facilities in the construction and commissioning phase that will, once fully operational, have a further potential capacity of 4.26 million tonnes. Based on the typical utilisation rate, these facilities would account for a further 3.83 million tonnes of RDF within the UK.

3.2 Impact of Higher Recycling Rates

3.2.1 Recycling rates for the UK have improved in recent years, the most recent data published for household wastes for 2019 indicate the overall UK rate as being 46.2% (Defra, 2021). It is recognised that future recycling rates of wastes from households may increase to recover a greater proportion of materials, improving the overall resource efficiency.

3.2.2 The UK Government has committed to introducing higher recycling rates in its proposed Circular Economy Package (CEP)[3]. The CEP sets a target to recycle 65% of municipal waste by 2035 and to have no more than 10% municipal waste going to landfill by 2035.

3.2.3 Defra's Waste Strategy for England 2018[4] has incorporated these 65% recycling targets for municipal waste.

3.2.4 The Scottish Government has set a target of 70% recycling by 2025[5].

3.2.5 In Wales, the Welsh Government in 2021[6] set a 70% target for recycling by 2025

[3] https://www.gov.uk/government/publications/circular-economy-package-policy-statement/circular-economy-package-policy-statement *[accessed 12 August 2021]*
[4] https://www.gov.uk/government/publications/resources-and-waste-strategy-for-england
[5] https://www.gov.scot/policies/managing-waste/
[6] https://gov.wales/sites/default/files/publications/2021-03/beyond-recycling-strategy-document.pdf

and zero waste by 2050.

3.2.6 Northern Ireland's Department of Agriculture, Environment and Rural Affairs (DAERA) has recently consulted on implementing the requirements of the CEP[7] and whether the 65% recycling rate can be achieved.

3.2.7 The impacts of higher recycling rates on the amount of residual household waste have been modelled in the medium to long-term during the operational phase of the proposed Facility. The approach and assumptions are outlined in the following section. The modelling is focused on household waste only and does not include any recycling of commercial and industrial wastes due to poor data availability.

3.3 Recycling Modelling and Residual Waste Availability

3.3.1 The modelling of the impacts of meeting higher recycling targets for household waste is based on the following assumptions:

- Household waste arisings for the UK countries remain constant into the future based on the same quantity generated in 2019.
  - A conservative approach, not factoring in increased waste from population growth.
- 2026 – The year the proposed Facility becomes operational, recycling rates have increased to:
  - 55% for England and Northern Ireland; and
  - 70% for Scotland and Wales (higher than CEP target).
- 2035 – The year when the CEP targets should be met, recycling rates have increased to the following:
  - 65% for England and Northern Ireland; and
  - 70% for Scotland and Wales (higher than CEP target).

3.3.2 The latest published household waste recycling figures for the UK (Defra, 2021) are presented in **Table 3-2** below. The UK generated around 26.4 million tonnes of household waste in 2019 and recycled just over 46%. Over 14 million tonnes of residual waste required further treatment or disposal across the UK.

Table 3-2 Impact of Increased Recycling Rates on Residual Household Waste (000s tonnes)

Year	Waste & Material Type	England	Northern Ireland	Scotland	Wales	Total
2019	Household waste arisings	22,074	842	2,303	1,223	**26,441**
	Recycling rate (%)	45.5%	50.6%	44.9%	56.4%	**46.2%**

[7] https://www.daera-ni.gov.uk/articles/circular-economy-package-policy-statement

Year	Waste & Material Type	England	Northern Ireland	Scotland	Wales	Total
	Quantity recycled	10,044	426	1,034	690	**12,216**
	Residual household waste	**12,030**	**416**	**1,269**	**533**	**14,225**
2026	Household waste arisings	22,074	842	2,303	1,223	**26,441**
	Recycling rate (%)	55.0%	55.0%	70.0%	70.0%	**57.0%**
	Quantity recycled	12,141	463	1,612	856	**15,072**
	Residual household waste	**9,933**	**379**	**691**	**367**	**11,369**
2035	Household waste arisings	22,074	842	2,303	1,223	**26,441**
	Recycling rate (%)	65.0%	65.0%	70.0%	70.0%	**65.7%**
	Quantity recycled	14,348	547	1,612	856	**17,364**
	Residual household waste	**7,726**	**295**	**691**	**367**	**9,078**

3.3.3 The impact of increased recycling rates across the UK leads to a reduction in the quantity of residual household waste from 14.2 million tonnes in 2019, to 9.1 million tonnes by 2035 assuming all targets were met.

4 Summary and Conclusion

4.1.1 The assessment has identified that around 12.5 million tonnes of potentially combustible waste is landfilled in the UK, with around 10.4 million tonnes being disposed of within a 2-hr drive of the proposed network of ports that may be used to transfer the RDF to the proposed Facility.

4.1.2 Available waste currently being landfilled will be processed into RDF, thus demonstrating that it is moving up the waste hierarchy and in compliance with the requirements of EN-3.

4.1.3 Consideration has been given to the current waste strategies for England, Northern Ireland, Scotland and Wales to ensure that future increased recycling rates are included in high level modelling. As the proposed Facility will source wastes from throughout the UK, this report does not identify residual wastes being landfilled at a local authority level as contracts are not in place. A regional approach has been taken that demonstrates large quantities of suitable wastes are currently being landfilled that will be diverted.

4.1.4 Following the assessment of waste data and existing and consented EfW capacity,

4.1.5	000s Tonnes	

Description	UK	In Catchment	Comments
Landfilled combustible wastes	12,502	10,437	Based on 2019 data
RDF exported	2,450	2,450	English data only from 2019
Available fuel	**14,952**	**12,887**	**-**
Additional new EfW (construction & commissioning phase) capacity	4,255	4,255	-
Fuel demand of additional EfW (construction & commissioning)	3,830	3,830	Based on 90% utilisation
Remaining available fuel (after consented EfW operational)	**11,122**	**9,057**	-
Higher recycling rates reducing residual waste	5,147	5,147	CEP 65% rate met in 2035
Remaining available fuel (after new EfW operational and higher recycling rates met)	**5,975**	**3,910**	After 2035

4.1.6 provides a summary of the potentially available fuel at a UK level and for the defined catchment area within 2-hr HGV travel times from the proposed ports.

4.1.7 The data demonstrates that there are currently nearly 15 million tonnes of waste available at a UK level and around 12.9 million tonnes available in the 2-hour port catchment areas that could be transferred to the proposed Facility via vessel.

Table 4-1 Summary of UK Fuel Availability for the Proposed Facility

	000s Tonnes		
Description	**UK**	**In Catchment**	**Comments**
Landfilled combustible wastes	12,502	10,437	Based on 2019 data
RDF exported	2,450	2,450	English data only from 2019
Available fuel	**14,952**	**12,887**	**-**
Additional new EfW (construction & commissioning phase) capacity	4,255	4,255	-
Fuel demand of additional EfW (construction & commissioning)	3,830	3,830	Based on 90% utilisation
Remaining available fuel (after consented EfW operational)	**11,122**	**9,057**	-
Higher recycling rates reducing residual waste	5,147	5,147	CEP 65% rate met in 2035
Remaining available fuel (after new EfW operational and higher recycling rates met)	**5,975**	**3,910**	After 2035

4.1.8 The data in the table allows for the reduction in fuel availability for consented new EfW facilities. In addition, further allowance has been made reducing the available residual wastes assuming the UK meets the 65% recycling target for household waste in 2035.

4.1.9 The data demonstrates that there will potentially be 3.9 million tonnes of fuel within the defined catchment areas that could be transported to the proposed Facility.

4.1.10 Consideration has been given to strategies and plans and a comprehensive review has been undertaken of 189 waste planning authorities within England, Northern Ireland, Scotland and Wales. The review concludes that the proposed Facility would be in compliance with the relevant waste plans of the waste planning authorities from which the Facility is likely to obtain its feedstock.

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Appendix 1 Landfill Inputs for England: Sub-Region Data

A1.1.1 This Appendix presents data for the following English regions:

- North East
- North West
- Yorkshire and the Humber
- East Midlands
- West Midlands
- East of England
- London
- South East
- South West

Table A 1 Waste Inputs to Landfill in England 2019. North East (000s tonnes)

Landfill Type	Sub-Region				NORTH EAST
	County Durham	Northumberland	Tees Valley Unitary Authorities	Tyne & Wear	
Hazardous Merchant			217		**217**
Hazardous Restricted					**-**
Non-Hazardous with SNRHW cell	152	176	4		**332**
Non-Hazardous	105		606	795	**1,506**
Non-Hazardous Restricted					**-**
Inert	623	136		379	**1,138**
Total	**880**	**312**	**827**	**1,174**	**3,193**

Source: Environment Agency (2021a)

Table A 2 Waste Inputs to Landfill in England 2019: North West (000s tonnes)

Landfill Type	Sub-Region					NORTH WEST
	Cheshire	Cumbria	Greater Manchester	Lancashire	Merseyside	
Hazardous Merchant	-	-	-	183	-	**183**
Hazardous Restricted	-	-	-	235	-	**235**
Non-Hazardous with SNRHW cell	-	128	273	35	-	**436**
Non-Hazardous	1,289	112	199	781	19	**2,400**
Non-Hazardous Restricted	-	-	-	-	-	**-**
Inert	74	57	419	138	140	**828**
Total	**1,363**	**297**	**891**	**1,372**	**159**	**4,082**

Source: Environment Agency (2021a)

Table A 3 Waste Inputs to Landfill in England 2019: Yorkshire and the Humber (000s tonnes)

Landfill Type	Sub-Region				YORKSHIRE AND THE HUMBER
	Former Humberside	North Yorkshire	South Yorkshire	West Yorkshire	
Hazardous Merchant	16	-	-	88	**104**
Hazardous Restricted	-	-	-	-	**-**
Non-Hazardous with SNRHW cell	-	-	-	518	**518**
Non-Hazardous	1,239	144	189	650	**2,222**
Non-Hazardous Restricted	42	202	11	-	**255**
Inert	421	421	84	813	**1,739**
Total	**1,718**	**767**	**284**	**2,069**	**4,838**

Source: Environment Agency (2021a)

Table A 4 Waste Inputs to Landfill in England 2019: East Midlands (000s tonnes)

Landfill Type	Sub-Region					EAST MIDLANDS
	Derbyshire	Leicestershire	Lincolnshire	Northamptonshire	Nottinghamshire	
Hazardous Merchant	-	-	-	211	-	**211**
Hazardous Restricted	-	-	-	-	-	**-**
Non-Hazardous with SNRHW cell	253	353	-	47	-	**653**
Non-Hazardous	455	3	381	256	187	**1,282**
Non-Hazardous Restricted	-	-	-	-	-	**-**
Inert	59	702	78	955	259	**2,053**
Total	**767**	**1,058**	**459**	**1,469**	**446**	**4,199**

Source: Environment Agency (2021a)

Table A 5 Waste Inputs to Landfill in England 2019: West Midlands (000s tonnes)

Landfill Type	Sub-Region						WEST MIDLANDS
	Herefordshire	Shropshire	Staffordshire	Warwickshire	West Midlands Met Districts	Worcestershire	
Hazardous Merchant	-	75	-	-	-	-	**75**
Hazardous Restricted	-	-	-	-	-	-	**-**
Non-Hazardous with SNRHW cell	-	-	361	538	290	72	**1,261**
Non-Hazardous	-	13	1,268	-	352	143	**1,776**
Non-Hazardous Restricted	-	-	-	-	-	-	**-**
Inert	-	27	633	828	714	168	**2,370**
Total	**-**	**115**	**2,262**	**1,366**	**1,356**	**383**	**5,482**

Source: Environment Agency (2021a)

Table A 6 Waste Inputs to Landfill in England 2019: East of England (000s tonnes)

Landfill Type	Sub-Region						EAST OF ENGLAND
	Bedfordshire	Cambridgeshire	Essex	Hertfordshire	Norfolk	Suffolk	
Hazardous Merchant	-	-	-	-	-	8	**8**
Hazardous Restricted	-	-	-	-	-	-	**-**
Non-Hazardous with SNRHW cell	-	281	-	-	-	300	**581**
Non-Hazardous	360	995	3,545	608	42	-	**5,550**
Non-Hazardous Restricted	-	-	-	-	-	-	**-**
Inert	608	400	1,148	925	143	190	**3,414**
Total	**968**	**1,676**	**4,693**	**1,533**	**185**	**498**	**9,553**

Source: Environment Agency (2021a)

Table A 7 Waste Inputs to Landfill in England 2019: London (000s tonnes)

Landfill Type	Sub-Region							LONDON
	Central London	East London Waste Authority	North London Waste Authority	South East London	South London	West London Waste Authority	Western Riverside Waste Authority	
Hazardous Merchant	-	-	-	-	-	-	-	**-**
Hazardous Restricted	-	-	-	-	-	-	-	**-**
Non-Hazardous with SNRHW cell	-	-	-	-	-	-	-	**-**
Non-Hazardous	-	1,250	-	-	49	-	-	**1,299**
Non-Hazardous Restricted	-	-	-	-	-	-	-	**-**
Inert	-	257	-	-	5	168	-	**430**
Total	**-**	**1,507**	**-**	**-**	**54**	**168**	**-**	**1,729**

Source: Environment Agency (2021a)

Table A 8 Waste Inputs to Landfill in England 2019: South East (000s tonnes)

Landfill Type	Sub-Region									SOUTH EAST
	Berkshire	Buckinghamshire	East Sussex	Hampshire	Isle of Wight	Kent	Oxfordshire	Surrey	West Sussex	
Hazardous Merchant	-	-	-	-	-	16	-	-	-	**16**
Hazardous Restricted	-	-	-	-	-	22	-	-	-	**22**
Non-Hazardous with SNRHW cell	280	1,255	-	-	125	190	109	759	-	**2,718**
Non-Hazardous	49	1,077	130	110	-	112	844	84	140	**2,546**
Non-Hazardous Restricted	-	-	-	-	-	-	-	-	-	**-**
Inert	986	560	-	284	64	1,011	477	569	319	**4,270**
Total	**1,315**	**2,892**	**130**	**394**	**189**	**1,351**	**1,430**	**1,412**	**459**	**9,572**

Source: Environment Agency (2021a)

Table A 9 Waste Inputs to Landfill in England 2019: South West (000s tonnes)

Landfill Type	Sub-Region							SOUTH WEST
	Cornwall	Devon	Dorset	Gloucestershire	Somerset	West of England Unitaries	Wiltshire	
Hazardous Merchant	-	-	-	13	-	-	38	**51**
Hazardous Restricted	-	-	-	-	-	-	-	**-**
Non-Hazardous with SNRHW cell	-	59	-	52	224	-	61	**396**
Non-Hazardous	-	158	-	551	187	253	392	**1,541**
Non-Hazardous Restricted	-	-	-	-	-	-	-	**-**
Inert	19	623	67	38	73	141	262	**1,223**
Total	**19**	**840**	**67**	**654**	**484**	**394**	**753**	**3,211**

Source: Environment Agency (2021a)

Appendix 2 EfW: Operational and Construction/Commissioning Phase Capacity

This Appendix provides a breakdown of the current UK operational EfW facilities presented in **Table A 10** and those facilities that are in construction or commissioning phase are detailed in **Table A 11**.

Table A 10 Operational EfW Facilities in the UK

Facility Name	Capacity (000 tonnes)	Throughput 2020 (000 tonnes)
Runcorn EfW Facility	1,100	943
Riverside Resource Recovery Facility	785	740
Tees Valley – EfW Facility	756	582
Ferrybridge Multifuel 1	675	599
Ferrybridge Multifuel 2	675	615
EcoPark Energy Centre	620	542
Allington Waste Management Facility	560	423
Kemsley Park	550	410
Wilton 11 EfW	500	470
SELCHP ERF	464	369
Lakeside EfW	450	420
Cardiff Energy Recovery Facility	425	379
Tyseley ERF	400	363
Severnside Energy recovery Centre	425	411
Greatmoor EfW	345	300
Staffordshire ERF	340	340
Ardley EfW Facility	326	290
Allerton Waste Recovery Park	320	227
CSWDC Waste to Energy Plant	315	313
Beddington Energy Recovery Facility	347	322
Severn Road RRC	350	68
Dunbar Energy Recovery Facility	325	325
Suez Suffolk EfW	295	291
Devonport EfW CHP	265	261
Sheffield ERF	245	240
Newhaven ERF	242	229
Cornwall Energy Recovery Centre	240	237
EnviRecover EfW Facility	230	213
Integra South West ERF	220	204
Integra South East ERF	210	205

Facility Name	Capacity (000 tonnes)	Throughput 2020 (000 tonnes)
Stoke EfW	210	189
Eastcroft EfW	200	191
Parc Adfer ERF	200	197
Lincolnshire EfW	190	185
Millerhill Recycling and ERC	190	157
Javelin Park ERF	190	183
Leeds Recycling and ERF	190	182
Levenseat Renewable Energy	180	50
Glasgow RREC	150	149
Kirklees EfW	150	124
Bolton ERF	120	53
Baldovie Waste to Energy Plant	120	92
Full Circle Generation EfW	120	76
Wolverhampton EfW Facility	118	114
Integra North ERF	110	98
Dudley EfW Facility	105	98
Battlefield EfW Facility	102	97
Milton Keynes Waste Recovery Park	94	66
Hoddesdon EfW Plant	90	39
Peterborough EfW Facility	85	80
Enviropower Ltd Lansing	75	64
Exeter ERF	60	60
Integrated WMF (NewLincs)	56	54
Energy Recovery Plant (Gremista)	26	23
Total	**16,131**	**13,952**

Source: Adapted from Tolvik (2021) UK Energy from Waste Statistics 2020.

Table A 11 UK EfW Facilities in Construction or Commissioning Phase

Facility Name	Capacity (000 tonnes/yr)
Sinfin IWTC	190
Hull Energy Works	227
Charlton Lane Eco Park	60
Isle of Wight EfW	30
Baddersley EfW	100
Baldovie Waste to Energy Plant	110
Hooton Park Sustainable Energy	266
Bridgewater Resource Recovery	100
Earls Gate Energy Centre	237
Rookery South ERF	545
Lostock Sustainable Energy Plant	600
NESS EfW Facility	150
Newhurst ERF	350
Drakelow Energy Generation Facility	180
Newport Dock EfW	220
Protus Refuse Derived Fuel Plant	410
Slough Multifuel	480
Total	**4,255**

Source: Adapted from Tolvik (2021) UK Energy from Waste Statistics 2020.

Appendix 3 BAEF Effects on Waste Plans

Boston Alternative Energy Facility
Effects on Waste Plans

Alternative Use Boston Projects Limited

19 October 2021

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Contents

1.0 Introduction

1.1 The scope of assessment of the effect of a waste fuelled electricity generation facility at the scale of a nationally significant infrastructure project on waste plans is informed by paragraph 2.5.66 of NPS EN-3 which advises '*An assessment of the proposed waste combustion generating station should be undertaken that examines the conformity of the scheme with the waste hierarchy and the effect of the scheme on the relevant waste plan or plans where a proposal is likely to involve more than one local authority'.*

1.2 A review of the local waste policies in the areas in which the fuel for the Boston Alternative Energy Facility (the Facility) is expected to originate (nationally) has been carried out and is provided (in Appendices 1 to 12). In most cases the waste plans focus on Local Authority Collected Waste (LACW) given that those same authorities are responsible for the collection of those wastes and have access to statistics to develop their plans and strategies, but also commercial and industrial (C&I) wastes.

1.3 The approach adopted to this review follows that adopted by the Ferrybridge Multifuel 2 DCO submission by Multifuel Energy in its Fuel Availability and Waste Hierarchy Assessment (document reference no 5.9 PINS Reference EN010061) and accepted by the Examining Authority (paragraph 4.33.29 of the ExA Recommendation Report). The approach was to establish if there were considerations which reflect upon management in accordance with the waste hierarchy or that waste plans sought to restrict the movement of waste to outside the plan areas.

1.4 As part of the consideration of the Boston Facility, in total, 189 waste planning authorities have been considered within England, Northern Ireland, Scotland and Wales, notwithstanding it is anticipated that the majority of the refuse derived fuels transported to the Facility will be sourced from authority areas located in Yorkshire and the Humber; the North East, North West and the South East of England.

1.5 The review of waste plans is summarised on a regional basis as set out below.

Yorkshire and the Humber

1.6 A summary of the review of the potential effect of the Facility on waste plans in the Yorkshire and Humber area is set out in Appendix 1.

1.7 From this analysis, none of the 15 waste planning authorities in the Yorkshire and Humber Area set out policies in their adopted waste plans or emerging development plan documents which seek to restrict the movement of waste to outside the plan areas. Several plans explicitly acknowledge the possibility that such movement to a facility outside the plan area as being the most sustainable option and way of lifting the management of some residual wastes up the hierarchy. For instance, The North East Lincolnshire Local plan states: '*The principles of self-sufficiency and proximity require, where possible, for waste to be managed and recovered in facilities close to where it was produced, and for area's to manage the waste they produce',* however (16.12) *extensive movements of waste occurs between waste planning authority areas, due to commercial contracts and the location of facilities.'*

1.8 The Bradford Core Strategy mirrors the aspiration to 'achieve net self-sufficiency, managing the waste we generate at the nearest appropriate facilities, putting in place the necessary structures and systems to enable this to happen including cross-boundary working where appropriate'. The DPD notes that 'the lack of recycling treatment and residual management facilities is a key factor in why much of the waste arisings from the District are currently exported'. Bradford's

Objective 4 supports the production of waste derived fuels where it is not possible to reuse or recycle the waste.

1.9 The Barnsley, Doncaster and Rotherham Joint Waste Plan, which was adopted in March 2012, allows "*waste to be imported or exported where this represents the most sustainable option".*

North East England

1.10 A summary of the review of the potential effect of the Facility on waste plans in the North East area is set out at Appendix 2.

1.11 There are 12 waste planning authorities in the former North East region, although in the Teesside area, five authorities have worked together to produce a Joint Minerals and Waste DPD.

1.12 None of the waste planning authorities in this area set out policies that seek to prevent residual waste being moved outside plan area. Durham Council states '*Government policy is clear that while there is a policy aim that waste planning authorities should manage all of their own waste in line with the established waste planning principles of self-sufficiency and the proximity principle that there is no expectation that each local planning authority will be able to do so*. In this regard, the supporting text identifies*: 'County Durham plays an important part in the management of waste in the North East and established flows of waste exist between County Durham and adjoining areas and other areas in the country. This is likely to continue as waste flows are driven by the market.'*

North West England

1.13 A summary of the review of the potential effect of the Facility on waste plans in the North West area is set out in Appendix 3.

1.14 There are 11 waste planning authorities in the North West. None of the authorities have adopted or emerging plan policies that seek to prevent the movement of residual waste to outside the respective plan areas.

1.15 The Cheshire and Chester councils see a key objective of sustainable development to be less waste and if possible, use this as a resource. The Greater Manchester reporting notes: *'In Greater Manchester there is sufficient capacity for the primary treatment of waste, however, wastes may then be sent outside Greater Manchester for secondary or tertiary treatment depending on market demand."*

1.16 The Merseyside and Halton reporting recognises the potential for waste to be managed outside the plan area in Teesside. Whilst striving for Self Sufficiency they need to be satisfied that they do not become net importers of waste on a significant scale, however there is no such aspiration with respect to export of waste. Merseyside and Halton have planning consents for several large-scale thermal treatment facilities with a combined capacity of greater than 1,500,000 tonnes. These are likely to be of regional significance and provide potential capacity to offset the non-inert waste sent to landfills in other waste planning authorities. Strategic Objective SO3 encourages waste management facilities which increase reuse, recycling and value/ energy recovery of all waste types.

1.17 In Lancashire, Blackburn and Blackpool it is noted that it might be reasonable to consider cross boundary movements of waste where "economies of scale point to larger sub-regional or nationally important facilities".

1.18 The Cumbria Minerals and Waste Local Plan notes any plant developed to recover energy from RDF from the LACW stream could also be used to treat commercial and industrial waste.

However, this could not be assumed or planned for, because these would be market led facilities'.

South East England

1.19 A summary of the review of the potential effect of the Facility on waste plans in the South East England is set out in Appendix 4.

1.20 In summary, none of the 16 Waste Planning Authorities identify policies which would restrict the export of waste or refuse derived fuel from their areas. Authorities however wish to plan for new facilities on the basis of being net self- sufficient.

1.21 West Berkshire reports 'It is accepted that West Berkshire will always be reliant on other local authorities to manage some waste arising within West Berkshire'. Windsor and Maidenhead, Wokingham, Bracknell Forest and Reading through emerging policy seek to achieve self-sufficiency but "it is recognised that a certain amount of waste movements in and out of the Plan area will continue'.

1.22 In Hampshire the long-term aim is to enable net self-sufficiency in waste movements but divert 100% of waste from landfill.

1.23 In Surrey there is an expectation that recyclate is recycled within the County and that there is commitment to develop further infrastructure to manage this.

1.24 In East Sussex the Authorities expect residual waste to continue to be exported for management at land disposal facilities beyond the Plan Area, they will therefore seek to reduce, and compensate for, this by a reduction in arisings of waste in the first place, the diversion of waste from landfills and allow additional overall recovery capacity.

1.25 In West Sussex, whilst there are no policies restricting the movement of waste, the Local Plan seeks to be net self-sufficient and seeks to reduce cross border movements, the Plan seeks to maximise the use of rail and water transport for the movement of waste and to minimise lorry movements and the use of local roads for the movement of waste.

London

1.26 A summary of the review of the potential effect of the Facility on waste plans in London is set out in Appendix 5.

1.27 The 33 waste planning authorities in London plan individually or as part of a consortium of waste planning authorities. Whilst supporting the management of waste self-sufficiently and in accordance with proximity principle, they do not set out policy which would restrict the export of waste or refuse derived fuel to the Facility.

1.28 The East London Waste Authority Boroughs support, in accordance with the waste hierarchy, that opportunities for recycling and composting are maximised before energy recovery is considered, energy recovery facilities will play an important role in the future management of London's waste. The movement of waste by rail and water is encouraged.

1.29 Whilst the City of London seeks to reduce waste exports from the City by applying the proximity principle to ensure that residual waste is processed as close as possible to the City, it supports regional self-sufficiency and the proximity principle noting not all regions have specialist recovery, recycling or treatment facilities, it is recognised that the best solution for some waste may be to transport it to another region where it can be dealt with more effectively.

1.30 The London Borough of Hammersmith & Fulham policy seeks, 'where possible, the movement of waste and recyclable materials by sustainable means of transport, maximising the use of the River Thames'.

1.31 *The London Borough of* Lambeth acknowledges that a proportion of residual wastes will travel outside of London.

1.32 The London Borough of Wandsworth encourages the movement of freight, waste and other bulk material by water or rail. Wandsworth waste is currently processed at a Materials Recovery Facility in Kent and used as a fuel feedstock for an energy recovery facility near Slough in Berkshire.

1.33 The West London waste planning authorities acknowledge that waste derived fuel may be sent to the Slough heat and power facility.

1.34 The emerging North London Waste Plan recognises that "Different types of waste require different types of management and facilities need to serve areas large enough to be economically viable. Consequently, the most suitable facility may not be the nearest and may well be outside of North London.

Scotland

1.35 A summary of the review of the potential effect of the Facility on waste plans in Scotland is set out in Appendix 6.

1.36 In Scotland the 32 waste planning authorities do not seek to restrict the export of waste but seek to accord development proposals with the National Zero Waste Plan. In Scotland the Government sets out its Zero Waste Plan vision for a zero-waste society and the planning authorities seek to be consistent with this. In Aberdeen and the neighbouring Aberdeenshire authority areas, the objective is to meet their waste-management needs locally as far as possible and promote the development of a circular economy. The target is to reduce waste going to landfill and support the provision of waste treatment facilities and the recycling of waste. Similarly, the TAYplan covering the areas of Dundee, Perth and Kinross and Angus, the Strategic Development Plan supports the national vision and targets set out in the Zero Waste Plan. The Clydeplan supports the vision and targets set out in the Zero Waste Plan. In East Ayrshire the plan supports and promotes sustainable waste management and acknowledges that it is essential in achieving Scotland's zero waste targets of recycling 70% of household waste and sending no more than 5% of Scotland's annual waste to landfill by 2025. Policies WM1 presumes against new major landfill capacity and supports the efficient use of secondary materials.

West Midlands

1.37 A summary of the review of the potential effect of the Facility on waste plans in the West Midlands is set out in Appendix 7.

1.38 None of the 11 waste planning authorities in the West Midlands seek to restrict the export of waste.

1.39 With respect to Shropshire "Shropshire is likely to remain reliant on the export of some material for specialist processing and disposal but will continue to counterbalance this through the provision of recycling and recovery capacity, particularly for biodegradable wastes, for imported wastes, whilst in Worcestershire the waste core strategy ' will not limit future imports or exports'. In Staffordshire, the Council seeks to minimise the movement of waste by ensuring it is managed as locally as possible.

1.40 The Black Country councils (Dudley, Wolverhampton, Walsall and Sandwell) actively promote the retention of waste within the area where feasible, although no policies prohibit the movement of waste.

Wales

1.41 A summary of the review of the potential effect of the Facility on waste plans in Wales is set out in Appendix 8.

1.42 Against the National backdrop of National Policy, (Towards Zero Waste 2011 and Planning Policy Wales 2021), none of the Local Plans or emerging Local Plans for the 22 Waste Planning Authority areas seek to restrict the export of waste or refuse derived fuel from their areas. All set out policies which are relevant the development of waste management capacity with the respective county boroughs, where there is an emphasis on waste minimisation, reuse, recycling and recovery, with disposal as the last resort.

1.43 In Cardiff, the council is aware that it must be increasing proactive in its approach to managing waste, in line with national policy and its SPG- Locating Waste Management Facilities (2017) where '*Under provision or overprovision of facilities could encourage the import or export of waste over longer distances, contrary to the underlying principles identified above*. The Council is actively seeking solutions and would consider exportation of waste provided it presented no adverse risk to the environment.

East Midlands

1.44 A summary of the review of the potential effect of the Facility on waste plans in the East Midlands is set out in Appendix 9.

1.45 None of the 9 Waste Planning Authorities identify policies which would restrict the export of waste or refuse derived fuel from their areas. Authorities however wish to plan for new facilities on the basis of being net self- sufficient.

1.46 In Leicestershire, the plan identifies that there will be an ongoing requirement for waste to be diverted from landfill after recycling. The plan identifies a recovery shortfall of some 360,000 tonnes per annum by 2030/2031. In the adjoining Rutland area, notes that until a new *facility is provided, it is likely that the exporting of waste to surrounding counties for treatment will continue and that amounts will increase in line with meeting waste management targets.*

1.47 In Nottingham and Nottinghamshire, it is recognised that as far as possible the Authorities want to be self-sufficient in managing their own waste, but this is not always practical as waste movements do not necessarily stop at local authority boundaries.

1.48 By way of demonstration of the transborder flow of waste materials, the Lincolnshire Waste Needs Assessment 2021 (WNA) details that in 2019 approximately 1.29 mt of LACW/ C&I waste arising in Lincolnshire was managed outside the County. Through the Lincolnshire Minerals Waste Local Plan, the intention of the County Council is to ensure that sufficient opportunities are identified to allow for new sites to be developed in Lincolnshire to enable the waste tonnages predicted to arise in Lincolnshire to be managed within the County. This would mean that, purely on arisings, the area would be net self-sufficient.

1.49 Core Strategy Policy WM1 relates to the provision of new facilities to manage wastes arising within the County and correspondingly identifies sites through Site Location Policy SL3 identifies suitable locations where waste management is considered suitable to take place. One such site is the Riverside Industrial Estate in Boston, the location for the Facility. The WNA

concludes that no additional waste management capacity is required until 2045, therefore the Facility will not utilise land which would otherwise be required in connection with policy W1.

1.50 Subject to the necessary contracts being in place, the Facility is open to receiving a refuse derived fuel arising from Lincolnshire which has been baled and imported to site in accordance with the DCO.

1.51 The Lincolnshire Minerals and Waste Local Plan does not make reference to nationally significant infrastructure project development, it places no limitation on energy recovery from wastes delivered to the Facility from outside, or waste arisings within the County.

East of England

1.52 A summary of the review of the potential effect of the Facility on waste plans in the East of England is set out in Appendix 10.

1.53 The 7 Waste Planning Authorities do not set out policy which would restrict the export of waste or refuse derived fuel to the Facility. Authorities however wish to plan for new facilities on the basis of being 'net' self- sufficient.

1.54 With respect to Cambridgeshire and Peterborough, policy relating to the transport of waste provides that any long distance movement of waste should be through sustainable transport means such as rail, but would seek to avoid the long distance transport of waste including from one region to another but notes that it is not possible for all waste to be managed within the boundary of the WPA from which it arises "*due to economies of scale and operational requirements.*"

1.55 In Hertfordshire the plan make reference to the proximity principle, stating that the plan should provide sufficient waste management capacity to manage a quantity of waste equivalent to their own arisings, noting this should not prevent the inter-authority transportation of waste and improves the likelihood that the wider region will be able to manage its own waste without having to transport material further afield.

South West England

1.56 A summary of the review of the potential effect of the Facility on waste plans in South West England is set out in Appendix 11.

1.57 The 11 Waste Planning Authorities do not set out policy which would restrict the export of waste or refuse derived fuel to the Facility. Authorities however wish to plan for new facilities on the basis of being 'net' self- sufficient.

1.58 The West of England joint waste planning authorities' policy seeks to deliver waste treatment infrastructure necessary to meet the demands of a growing sub-region and thereby reduce exporting waste out of the region.

1.59 The Dorset Waste Plan notes that "There is some movement of waste to Somerset, Devon and Wiltshire, and remaining exports are to facilities further afield including materials recovery facilities in Kent and North Wales."

1.60 Within its Waste Core Strategy, the Somerset County Council accepts that a proportion of the county's waste may be treated outside the County if this makes best use of the waste as a resource in economic and environmental terms.

1.61 The Wiltshire and Swindon core strategy note that "The Councils consider that being self-sufficient means that there is sufficient waste management capacity in the Plan area to manage Wiltshire and Swindon's waste arisings. However, it is not considered that this will stop cross

boundary movement of waste due to the very nature of the industry and that the management of waste within the Plan area boundary may not always be the most sustainable option."

Northern Ireland

1.62 A summary of the review of the potential effect of the Facility on waste plans in Northern Ireland is set out in Appendix 12 (pages 100 to 110).

1.63 The 11 Northern Irish Waste Planning Authorities plan for waste in accordance with adopted development plan policies. Not all plans set out waste management policy and instead refer to Planning Policy Statement 11 (PPS11) Planning and Waste Management. No plans seek to restrict the export of refuse derived fuel.

1.64 Emerging waste policy Antrim and Newtonabbey Borough Council affirms the application of the proximity principle.

1.65 Armagh City, Banbridge and Craigavon Borough Council The most recent document contributing to the development of the LDP is the Preferred Options Paper (2019). The POP refers to the role of the RDS and WMS for NI as the existing policy framework. This document affirms the significance of sustainability, the proximity principle.

1.66 Causeway Coast and Glens Borough Council, rely upon Planning Policy Statement 11 (PPS11): Planning and Waste Management, where Regional Self Sufficiency: Self-sufficiency is a central tenet of EC legislation which requires all member states to apply this principle in their waste management practices at national level, and, as far as practicable, also at regional and sub-regional levels. The UK's commitment to self-sufficiency at the national level is outlined in the UK Management Plan for Exports and Imports of Waste.

2.0 Conclusion

Waste Policy

2.1 A waste policy compliance review has been carried out in relation to the Facility and its findings can be summarised as follows.

2.2 Whilst refuse derived fuel for use at the Facility is likely to be sourced via ports from authorities in the North West, North East, Yorkshire and the Humber and the South East, a review of relevant national plans and policies concludes that the proposed energy recovery capacity would contribute to national self-sufficiency (in terms of energy recovery from waste), and that the Facility would become part of a network of facilities in which value could be recovered from both local authority collected waste and commercial and industrial wastes.

2.3 At the local level, a review of the relevant adopted and emerging policies prepared by 189 waste planning authorities in England, Northern Ireland, Scotland and Wales has confirmed that authorities set out policies which reflect upon management in accordance with the waste hierarchy, and do not prevent residual waste being treated outside the plan area for energy recovery.

2.4 It is concluded, therefore, that the Facility would be in compliance with the relevant waste plans of the waste planning authorities from which the Facility is likely to obtain its feedstock.

Appendix 1 Review of the potential effect of the Facility on Waste plans in the Yorkshire and Humber area

Waste Planning Authority	Waste Local Plan	Emerging Plan	Review of the Effect of the BAEF on the Plan
Yorkshire & Humber			
East Riding of Yorkshire Kingston upon Hull City Council	Joint Waste Local Plan adopted in November 2004	Hull City Council is leading on the production of a joint waste development plan (DPD) which will cover Hull and the East Riding of Yorkshire	The Joint Waste Local Plan does not contain any policies restricting the movement of residual waste outside the plan area for energy recovery. The Joint Hull and East Riding of Yorkshire Waste Development Plan will replace the Joint Waste Local Plan adopted in November 2004. At the time of review, it is at the Issues and Options stage, so no adopted or draft policies are available to review. It is considered that the Facility will not have a material effect on the plan
North East Lincolnshire Council	North East Lincolnshire Local Plan 2018 includes waste policies for the area		Paragraph 16.11 states: *The principles of self-sufficiency and proximity require, where possible, for waste to be managed and recovered in facilities close to where it was produced, and for areas to manage the waste they produce* and 16.12 *extensive movements of waste occurs between waste planning authority areas, due to commercial contracts and the location of facilities*. It is considered that the Facility would not have a material effect on this plan.
North Lincolnshire Council	North Lincolnshire Local Development Framework. Core Strategy adopted June 2011, supported by the Minerals and Waste DPD	North Lincolnshire is preparing a single Local plan for North Lincolnshire. The plan has reached a 'call for Sites' stage.	Chapter 12 of the Core Strategy addresses waste management with policy CS20 concerning locations for future sustainable waste management The are no policies restricting movement of residual waste outside of the plan area for energy recovery. It is concluded that the Facility would not have a material effect on compliance with policies in the plan.
North Yorkshire County Council	Waste Local Plan (saved policies version post 2009). Contain no relevant policies.	Together with City of York Council and the North York Moors NPA, North Yorkshire County Council is producing a joint minerals and waste	The Waste Local Plan (saved policies version post 2009) does not contain any relevant policies. The Joint Minerals and Waste DPD has been considered at Examination, though work is still progressing on the Sustainability Appraisal and Habitats Regulations Assessment which will accompany it. It is concluded that the Facility would not have a material effect on compliance with policies in this saved plan.

		plan. Work is still progressing on this.	
York City Council	Local Plan adopted 1998 and updated in 2005.	Together with City of York Council and the North York Moors NPA, North Yorkshire County Council is producing a joint minerals and waste plan. Work is still progressing on this.	The local plan does not contain any policies considered to be of relevance. It is concluded that the Facility would not have a material effect on compliance with policies in this saved plan.
Bradford Council	The Core Strategy 2017 and The Bradford Waste Management DPD were adopted in 2017		Policy W1 Waste Management provides for working collaboratively with other waste planning authorities to provide a suitable network of facilities to deliver sustainable waste management and allow the District to become net self-sufficient. Commentary to Policy WM2 seeks to ensure that less waste goes to landfill and that enough land is allocated for recycling and treatment to take place There is no restriction on RDF being exported from the district. The Waste Management DPD sets out the aspiration to '*achieve net self-sufficiency, managing the waste we generate at the nearest appropriate facilities, putting in place the necessary structures and systems to enable this to happen including crossboundary working where appropriate*'. The DPD notes that '*the lack of recycling treatment and residual management facilities is a key factor in why much of the waste arisings from the District are currently exported*'. Bradford's Objective 4 supports the production of waste derived fuels where it is not possible to reuse or recycle the waste. The are no policies restricting movement of residual waste outside of the plan area for energy recovery. It is concluded that the Facility would not have a material effect on compliance with policies in the plan.
Calderdale Council	Replacement Calderdale UDP adopted 2006	The Core Strategy has been merged with the Land Allocations and Designations document to form the Local Plan. No further work is being	The Replacement UDP does not contain any policies considered relevant to the Proposed Development. The Local Plan Core Strategy is at an early stage of preparation and, as drafted, does not contain any relevant policies. The Waste Policy Options document recognises that some waste will continue to be exported out of the district but proposes support for proposals that maximise self-sufficiency.

		undertaken on this separate document post 2012 with the publication of the Core Strategy Preferred Options summary document.	It is concluded that the intention to maximise opportunities for managing waste in a self-sufficient manner does not seek to prevent some movement of waste outside the district such that the Facility would not have a material effect on compliance with emerging policies in the extant or emerging plan.
Kirklees Council	The Kirklees Local Plan was adopted in 2019		Policy LP43 sets out the Council's encouragement and support the minimisation of waste production and support the re-use and recovery of waste materials including, for example, recycling, composting and Energy from Waste recovery and reduce the need for waste disposal by landfill. Paragraph 16.13 notes that 3 Kirklees does not have sufficient facilities for the recycling of LACW and there is a requirement for additional recycling capacity throughout the plan period. The plan does not contain any other policies of relevance to the Proposed Development. It is concluded that the Facility would not have a material effect on compliance with policies in the plan.
Leeds City Council	Local Plan for Leeds, Adopted Core Strategy 2019	Natural Resources and Waste Local Plan 2013	Policy EN6 sets out the broad strategy for managing waste in Leeds Waste Local Plan Policy Waste 1 states that: *Proposals which meet the future capacity requirements of waste arisings to achieve self-sufficiency and demonstrate they support the waste hierarchy will be supported at safeguarded waste management sites shown on the Policies Map and locations for new waste management facilities set out in WASTE 3.* The Waste Local Plan Policy Waste 1 has a preference for self-sufficiency**.** However, supporting text in the Local Plan acknowledges that some waste will continue to be exported outside Leeds. Proposals for two energy from waste facilities have already been granted permission in Leeds such that the grant of permission for the Facility could have no material effect on the assessment of the applications for these facilities or on compliance with other policies in the Plan.
Wakefield Council	The Council adopted the Core Strategy in 2009.	Core Strategy (2009) Core Strategy (2009) & the Development	The Core Strategy does not have any policies relevant to use of waste as fuel outside the plan area.

	The emerging Wakefield Local Plan 2036	Policies Document (2009). Waste Development Plan Document. Adopted December (2009).	Table on page 30 of the Waste DPD identifies requirement for 136,000tpa thermal treatment or disposal capacity for commercial waste. Policy W1 reinforces this requirement. The emerging Waste Local Plan policies WLP 40 and WLP41 relate to the provision of new waste management facilities, though do not have implications for the proposed development It is concluded that the Facility would be in compliance with policies in the strategy and DPD.
Rotherham Council Doncaster Council Barnsley Council	Barnsley Local Plan 2019 Rotherham Core Strategy (2014) The Doncaster UDP 1998 and Core Strategy 2012 Doncaster Local Plan Publication Draft 2019	Barnsley, Doncaster and Rotherham Joint Waste Plan (March 2012).	The Joint Waste Plan sets out our planning strategy for managing waste, including the provision of new waste facilities, up until 2026. The Joint Waste Plan's Policy WCS1 (part D3) states that: *Proposals will be supported which enable Barnsley, Doncaster and Rotherham's waste to be managed locally, whilst allowing waste to be imported or exported where this represents the most sustainable option.* Policy WCS 1 (Part A1) states that: *existing strategic waste management facilities are safeguarded to maximise their efficiency;* Policy WCS1 (Part E2): *ensure that they* [meaning all types of development] *do not prevent or prejudice either the delivery or continued operation of waste facilities on safeguarded or allocated sites.* It is concluded that the Facility would not have a material effect on compliance with policies in either plan. The Joint Waste Plan acknowledges that transport of residual waste outside the plan area may be the most sustainable option.
Sheffield City Council	The Sheffield Core Strategy 2009 Sheffield Unitary Development Plan 1998		Chapter 13 of the UDP concerns waste matters in addition to Minerals and Reclamation but it does not contain any relevant policies. The Core Strategy does not contain any relevant waste management policies. It is concluded that the Facility would not have a material effect on compliance with policies in either plan.

Appendix 2 Review of the potential effect of the Facility on Waste plans in the North East England area

Waste Planning Authority	Waste Local Plan	Emerging/ Adopted Waste Development Framework and DPD	Review of the Effect of the BAEF on the Plan
North East England			
Stockton on Tees Borough Council (Unitary) Redcar & Cleveland Council (Unitary) Middlesbrough Borough Council (Unitary) Hartlepool Borough Council (Unitary) Darlington Borough Council (Unitary)		Tees Valley Joint Minerals and Waste Development Plan Documents (MWDPDs) adopted on 15 September 2011 covers the five unitary authorities listed in the column to the left. The two DPDs are: Core Strategy DPD &; Policies and Sites DPD	The Core Strategy DPD in relation to Waste Management: Local and National Importance - Pages 11 and 12 note in Para 3.1.4 that: *Waste produced within the sub-region is largely managed within the sub-region and although there are already good recycling and recovery rates, there is opportunity to further improve these. Due to the presence of existing hazardous waste treatment facilities some hazardous waste streams are brought in to the area for management. Whilst recognising the advantages of managing waste close to where it arises, it is accepted that this cannot always be achieved, particularly when dealing with specialised waste streams…*" 3.3 Strategic Objectives include, at Para 3.3.1 the intention "*to promote the management of waste close to its point of production whilst recognising the existing role and future potential of the Tees Valley in specialist waste management*;" At Para 5.2.7, it is noted that "*there will be a shortfall in recovery facilities ….climbing to 76,000 tonnes in 2021 as waste arisings increase and landfill limitations increase" and that "Provision will therefore need to be made to meet these requirements.*" Policy MWC7: Waste Management Requirements states that "*Land will be provided for the development of waste management facilities to meet the identified requirements of the Tees Valley*" The Policies and Sites DPD identifies sites for recovery facilities to meet the identified need. Although the CS DPD plans to maintain near self-sufficiency it does not require it, does it seek to prevent residual waste being transported out of the plan area for energy recovery elsewhere. It is considered, therefore, that the development of the Proposed Development would not have a material effect on the Core Strategy.
South Tyneside Council		South Tyneside LDF, Core Strategy, adopted June 2007 South Tyneside Development	The adopted Core Strategy notes, at Policy EA6, regarding waste management in the Core Strategy that "*South Tyneside generated over 93,000 tonnes of household waste in 2005-2006. Most of the Borough's waste in this and other categories is currently managed or disposed of outside South Tyneside.*"

		Management Policies, adopted December 2011	The Development Management Policies document recognises that here are a number of waste streams produced in the borough that need to be managed, such as construction and demolition, commercial and industrial, municipal (including household), agricultural, and hazardous wastes. Some of these wastes will be managed within the borough, and some outside on a sub-regional and/or regional basis due to efficiency and economies of scale. Neither the Core Strategy nor the Development Management Policies document seek to prevent residual waste being transported out of the plan area for energy recovery elsewhere and indeed the latter document recognises that efficiencies and economies of scale may dictate some wastes being managed outside the plan area. It is considered, therefore, that the development of the Proposed Development would not have a material effect on the Core Strategy or Development Management Policies.
Durham County Council		County Durham Plan (adopted 2020)	Policy 60 sets out criteria to assess proposals for new capacity to manage waste forecast arisings over the Plan period. The supporting text (5.569) notes that waste management is market-led, and waste flows do naturally occur across local authority boundaries through established management routes and this will continue to occur throughout the Plan period. The Plan notes (5.570) waste hierarchy places a priority on the prevention of waste, followed by reuse then recycling, then other recovery (which can include energy from waste). With reference to net self-sufficiency and the proximity principle paragraph 5.571 notes *Government policy is clear that while there is a policy aim that waste planning authorities should manage all of their own waste in line with the established waste planning principles of self-sufficiency and the proximity principle that there is no expectation that each local planning authority will be able to do so*. - In this regard, the supporting text identifies '*County Durham plays an important part in the management of waste in the North East and established flows of waste exist between County Durham and adjoining areas and other areas in the country. This is likely to continue as waste flows are driven by the market*.' It is considered that the Proposed Development will not be contrary to the policies of the adopted County Durham Plan.
Northumberland County Council	Northumberland Consolidated Planning Policy	Northumberland Local Plan Publication Draft (January 2019)	Northumberland Consolidated Planning Policy Framework (incorporating the Northumberland Waste Local Plan 2001), notes that a "small proportion of household waste is exported out of the County" although this was for disposal at that stage.

	Framework (May 2021		The Emerging Northumberland Local Plan Policies WAS1 to WAS2 principally concern development management and locational criteria of facilities for waste reuse, recycling and recovery. There are no policies restricting the movement of residual waste outside the plan area for energy recovery. It is considered that the Proposed Development will not have a material effect on the plan.
Newcastle City Council Gateshead MBC	Core Strategy and Urban Core Plan for Gateshead and Newcastle (Review 2020)		There are no policies restricting the movement of residual waste outside the plan area for energy recovery. It is noted at paragraph 13.26 that Gateshead, as part of the South Tyne and Wear Waste Management Partnership it has secured a contract covering the period 2014-2038 for its residual municipal waste to be managed, primarily through an Energy from Waste Facility in Teesside. It is considered that the Proposed Development will not have a material effect on the plan.
Sunderland City Council	Core Strategy and Development Plan 2020		There are no policies restricting the movement of residual waste outside the plan area for energy recovery. Policy WWE6 Waste Management supports the reuse and recovery of waste materials including for recycling, composting and Energy from waste. It is noted at paragraph 11.30 that Sunderland, as part of the South Tyne and Wear Waste Management Partnership has secured a contract for its residual municipal waste to be managed, primarily through an Energy from Waste Facility in Teesside. It is considered that the Proposed Development will not have a material effect on the plan.
North Tyneside Council	North Tyneside Local Plan 2017		There are no policies restricting the movement of residual waste outside the plan area for energy recovery. It is considered that the Proposed Development will not have a material effect on the plan.

Appendix 3 Review of the potential effect of the Facility on Waste plans in the North West England area

Waste Planning Authority	Waste Local Plan	Emerging/ Adopted Waste Development Framework and DPD	Review of the Effect of the BAEF on the Plan
North West England			
Lancashire County Council Blackburn and Darwen Borough Council Blackpool Borough Council	Joint Lancashire Minerals and Waste Development Framework February 2009 Core Strategy DPD Site Allocations and Development Management Polices Local Plan		The Joint Lancashire MWDF Core Strategy DPD noted that the plan area was a significant net importer of waste going to landfill, and … a net exporter of waste being put through other treatment processes In some cases, it might be reasonable to expect these cross-boundary movements to continue, for example where, [inter alia] : 1) economies of scale point to larger sub-regional or nationally important facilities; 2) locational constraints or opportunities favour certain locations for particular types of waste facilities." There is no reference in either document that seeks to prevent residual waste being transported out of the plan area for energy recovery elsewhere. The Core Strategy document notes it may be appropriate where benefits of scale can be obtained. It is considered, therefore, that the Facility would not have a material effect on the Core Strategy policies.
Cheshire East Cheshire West and Chester	Cheshire East Local Plan Strategy 2017 Cheshire West and Chester Local Plan Strategic Policies (2015) Cheshire West and Chester Local Plan Land allocations and Detailed Policies (2019)	The Minerals and Waste DPD is in the course of preparation.	Whilst the Cheshire East Local Plan sets out one waste management policy (SE11) this does not place restriction on the movement of residual waste to outside the plan area. Paragraph 13.119 states that A key objective of sustainable development is to produce less waste and wherever possible use it as a resource. Policy DM54 – Waste Management Facilities, does not place any restriction on the movement of residual waste to outside the plan area

Greater Manchester WDA	The Greater Manchester Joint Waste Development Plan document was adopted by each of the ten Greater Manchester authorities and came into force on 1st April 2012.		The Joint Waste Development Plan identifies the need for additional recovery and landfill disposal capacity. It contains site specific allocations of land for waste treatment facilities some of which have direct access to rail. The GMWDA Baseline Report notes that "*self-sufficiency and proximity principles are often misunderstood. Many people misinterpret them as meaning waste has to be treated as near as possible to where it is produced. Under the self-sufficiency principle the member states must have sufficient capacity for the disposal and recovery of waste. However, the proximity principle can be met as long as waste is treated in the most appropriate location. This can mean sending the waste abroad where it is technically and economically viable to do so. In Greater Manchester there is sufficient capacity for the primary treatment of waste, however, wastes may then be sent outside Greater Manchester for secondary or tertiary treatment depending on market demand.*" There is no reference in the Joint Waste DPD that seeks to prevent residual waste being transported out of the plan area for energy recovery elsewhere and indeed the baseline Report recognises that this may be appropriate. It is considered, therefore, that the development of Proposed Development would not have a material effect on the Joint Waste DPD's policies.
Warrington Borough Council	The Warrington Local Plan Core Strategy July 2014		The Core Strategy includes two waste policies which support self-sufficiency. However, these do seek to restrict the export of waste from the plan area though policy seeks to achieve a continuing reduction in the amount of waste materials imported into the borough by working with adjacent authorities to help them achieve their own self-sufficiency. It is considered, therefore, that the development of Proposed Development would not have a material effect on the Core Strategy. There is no reference in the plan which seeks to prevent residual waste being transported out of the plan area for energy recovery. It is considered, therefore, that the Facility would not have a material effect on the Local Plan Core Strategy policies
Merseyside Council and Halton Borough Council	Joint Waste Local Plan for Merseyside and Halton 2013.		The Joint Waste Local Plan for Merseyside and Halton adopted in July 2013, (paragraph 2.32) recognises the potential for waste to be managed outside the plan area in Teesside. Whilst striving for Self Sufficiency (paragraph 2.119), the supporting text acknowledges this cannot be fully plan led. Merseyside and Halton districts need to be satisfied that they do not become net importers of waste on a significant scale, however there is no such aspiration with respect to export of waste. It is noted however that Merseyside and Halton have

			planning consents for several large-scale thermal treatment facilities with a combined capacity of greater than 1,500,000 tonnes. These are likely to be of regional significance and provide potential capacity to offset the non-inert waste sent to landfills in other waste planning authorities. Strategic Objective SO3 encourages waste management facilities which increase reuse, recycling and value/ energy recovery of all waste types. There is no reference in the plan which seeks to prevent residual waste being transported out of the plan area for energy recovery. It is considered, therefore, that the Facility would not have a material effect on the Joint waste Local Plan policies
Cumbria County Council	Cumbria Minerals and Waste Local Plan 2017		The supporting text at 3.25 and 3.31 notes that in 2015 the majority of exported material is non-hazardous industrial waste or from the county's Mechanical and Biological Treatment (MBT) plants. This is because much of this waste requires specialist facilities, including thermal treatment/Energy from Waste (EfW) plants for the Refuse Derived Fuel (RDF) produced by MBT plants. It is noted at 3.67 that '*any plant developed to recover energy from RDF from the LACW stream could also be used to treat commercial and industrial waste. However, this could not be assumed or planned for, because these would be market led facilities*' There is no reference in the plan which seeks to prevent residual waste being transported out of the plan area for energy recovery. It is considered, therefore, that the Facility would not have a material effect on the Minerals and Waste Local Plan policies.

Appendix 4 Review of the potential effect of the Facility on Waste plans in the South East England area

Waste Planning Authority	Waste Local Plan	Emerging Plan	Review of the Effect of the BAEF on the Plan
South East England			
West Berkshire	The Waste Local Plan for Berkshire (WLPB) was adopted in 1998 following a public inquiry and covers the period up to 2006.	The Council is currently preparing the Development of the Minerals and Waste Local Plan. A consultation on the proposed submission plan was held in January to February 2021.	The WLPB does not contain any policies restricting the movement of residual waste outside the plan area for energy recovery. Policy 3 (Net Self-Sufficiency in Waste Management) of the emerging Minerals and Waste Local Plan states that the Council will *"seek to maintain net self-sufficiency, where the total waste management capacity provided from sites in West Berkshire is greater than the total waste arisings within West Berkshire over the plan period to 2037."* The Policy does not restrict waste movement and the supporting text in paragraph 4.23 acknowledges that there will always be a movement of waste across administrative boundaries: *"It is accepted that West Berkshire will always be reliant on other local authorities to manage some waste arising within West Berkshire."* It is considered that the Facility would not have a material effect on this plan.
Windsor and Maidenhead Wokingham Bracknell Forest Reading	The Waste Local Plan for Berkshire (adopted December 1998).	Bracknell Forest Council, Reading Borough Council, the Royal Borough of Windsor and Maidenhead and Wokingham Borough Council (collectively referred to as the Central and Eastern Berkshire Authorities) are working in partnership to produce a Joint Minerals and Waste Plan which will guide minerals and waste decision making in the Plan area. On Thursday 25 February 2021 the Central and Eastern Berkshire Authorities	The WLPB does not contain any policies restricting the movement of residual waste outside the plan area for energy recovery. There are no policies that restrict waste movement. Emerging Policy W1 (Sustainable waste development strategy) part f and the supporting text (para. 7.14 and 7.15) note that whilst the Plan seeks to achieve self-sufficiency seeks *"it is recognised that a certain amount of waste movements in and out of the Plan area will continue."* The Plan states the Council's will work with other waste planning authorities to provide the most sustainable option for waste management. The emerging Joint Minerals and Waste Plan and Policy DM12 (Sustainable Transport Movements) encourages transportation methods including rail, water, and conveyors to reduce movements by road. It is considered that the Facility would not have a material effect on this plan.

		submitted the Joint Minerals and Waste Plan and supporting documents for independent examination.	
Slough	The Waste Local Plan for Berkshire (adopted December 1998).	N/A	
Buckinghamshire Council (Includes: Aylesbury Vale, Chiltern, South Bucks and Wycombe)	Minerals and Waste Local Plan 2016-2036 (adopted July 2019)	N/A	The Minerals and Waste Local Plan does not contain any policies restricting the movement of residual waste outside the plan area for energy recovery. In terms of movements, the Plan states in para 7.22 that "*It is acknowledged that the majority of minerals and waste movements in the county will continue to be made by road. However, wherever possible, sites should be well located in relation to the intended market and minimise transport movements.*" This is supported by Strategic Objective 6 (Sustainable Transport of Minerals and Waste) which encourages sustainable transport movements and alternative transport methods. It is considered that the Facility would be compliant with the policies of the Minerals and Waste Local Plan.
Hampshire (Includes: Hampshire County Council, Portsmouth City Council, Southampton City Council, New Forest National Park Authority and the South Downs	Hampshire Minerals and Waste Plan (adopted October 2013)	N/A	The Hampshire Minerals and Waste Plan does not contain any policies restricting the movement of residual waste outside the plan area for energy recovery. Para 6.244 notes that Waste may move to and from waste planning authorities further afield but in all cases, Hampshire will continue to support the movement of waste which is in accordance with Policy 25 (Sustainable waste management). Policy 25 (Sustainable waste management) notes that the long-term aim is to enable net self-sufficiency in waste movements and divert 100% of waste from landfill. Part a of Policy 28 (Energy recovery development) states that energy recovery development should: *"be used to divert waste from landfill and where other waste treatment options further up the waste hierarchy have been discounted".*

National Park Authority)			It is considered that the Facility would be compliant with the policies of the Minerals and Waste plan.
Kent	Kent Minerals and Waste Local Plan 2013-30 (adopted September 2020 – as part of the early review)	N/A	The Kent Minerals and Waste Plan does not contain any policies restricting the movement of residual waste outside the plan area for energy recovery. It is considered that the Facility would not have a material effect on this plan.
Medway Council	Kent Waste Local Plan (1998)	Emerging Medway Local Plan (2019 to 2037) is currently being prepared. The Publication Local Plan is set to be published in 2021.	The Kent Waste Local Plan (1998) does not contain any policies restricting the movement of residual waste outside the plan area for energy recovery. The emerging Medway Local Plan also does not contain any policies restricting the movement of residual waste outside the plan area for energy recovery. It is considered that the Facility would not have a material effect on this plan.
Southend-on-Sea	Essex and Southend Waste Local Plan (adopted October 2017)	N/A	The Essex and Southend Waste Local Plan does not contain any policies restricting the movement of residual waste outside the plan area for energy recovery. However, para 6.5 states that limited cross border waste movements would need to be justified on their merits. The Plan explains that cross border movements may be acceptable if they would help to enable waste to be dealt with in one of the nearest appropriate installations and would not prejudice the achievement of net self-sufficiency for Essex and Southend-on-Sea. It is concluded that managing waste in a self-sufficient manner does not prevent some movement of waste outside the district. As such it is considered that the Facility would not have a material effect on the Waste Local Plan.
Thurrock Council	Thurrock Core Strategy (adopted 2011)	Work on the Minerals and Waste Local Plan has been suspended indefinitely.	The Core Strategy does not contain any policies restricting the movement of residual waste outside the plan area for energy recovery. It is considered that the Facility would not have a material effect on this plan.

		The emerging Thurrock Local Plan is currently at the Issues and Options stage.	
Oxfordshire	Oxfordshire Minerals and Waste Core Strategy (adopted September 2017)	N/A	The Minerals and Waste Core Strategy does not contain any policies restricting the movement of residual waste outside the plan area for energy recovery. It is considered that the Facility would not have a material effect on this plan.
Surrey	Surrey Waste Local Plan 2019-2033 (adopted December 2020)	N/A	Para 5.3.4.4 of the Surrey Waste Local Plan states that "*The export of Dry Mixed Recyclate (DMR) for management outside of Surrey is not consistent with the JMWMS that expects household waste arising in Surrey to be managed within the county. It is also inconsistent with the proximity principle as set out in the EU WFD and the NPPF. The WDA therefore has as part of its action plan (Appendix 1 of the JMWMS) a commitment to develop infrastructure within Surrey for recycling of DMR.".* There is however no equivalent policy relating to the export of fuel derived from residual waste. It is considered that the Facility would not have a material effect on this plan.
East Sussex	East Sussex, South Downs, and Brighton & Hove Waste and Minerals Plan (adopted February 2013)	A public consultation on the proposed alterations the Waste and Mineral Local Plan was held during 2020. The next stage will be another public consultation to be held during 2021.	The East Sussex, South Downs, and Brighton & Hove Waste and Minerals Plan Strategic Objectives highlights that a significant proportion of non-inert waste requiring land disposal is currently managed at landfill sites beyond the Plan Area. The Plan states that while the Authorities expect residual waste to continue to be exported for management at land disposal facilities beyond the Plan Area, they will seek to reduce, and compensate for, this by a reduction in arisings of waste in the first place, the diversion of waste from landfills and allow additional overall recovery capacity. Part 5) of the Plans Overarching Strategy for Land Disposal states that the Authorities' strategy for non-inert land disposal includes: "*Planning for flexibility in the provision of capacity for recycling and recovery equivalent to the amount of waste that could be potentially exported out of the Plan Area for land disposal (Policy WMP 5).*" The Emerging Waste and Mineral Local Plan is in the very early stages, however para 3.35 does state that some waste is exported to other areas for management including non-inert waste to landfill. It is considered that the Facility would be compliant with the policies of the Minerals and Waste plan.

West Sussex	West Sussex Waste Local Plan (2031) (adopted in April 2014)	A review of the West Sussex Waste Local Plan 2014 was undertaken in May 2019.	Para 6.2.4 of the West Sussex Waste Local Plan states that a key principle of the Local Plan is net self-sufficiency. This includes having only minor cross border movements with adjoining authorities. The Plan notes that limited cross border waste movements would need to be justified on their merits. Stating that "*they may be acceptable if they would help to enable waste to be dealt with in one of the nearest appropriate installations and would not prejudice the achievement of net self-sufficiency for West Sussex.*" Para 2.9.2 also notes that "*Due to transport costs, waste will only usually be transported to another county if there are strong commercial reasons to do so, for example, if there is a waste site in another county which is actually closer to the source of waste, or if there are no facilities within the County to deal with that particular waste type.*" However, para. 4.6.10 notes that "*As permitted landfill capacity within the County and the region declines, it is considered that the non-inert waste that cannot be treated either within West Sussex or elsewhere, will be deposited to land outside West Sussex.*" The Plan states that non-inert waste has historically been disposed of as far north as Bedford in 2010. Thereby suggesting that it can be cost effective to justify the long-distance movement of waste for landfilling. Strategic Objective 7 of the Plan seeks to maximise the use of rail and water transport for the movement of waste and to minimise lorry movements and the use of local roads for the movement of waste. Whilst there are no policies restricting the movement of waste, the Local Plan seeks to be net self-sufficient and seeks to reduce cross border movements. The Plan does note that waste movement can occur if there are strong reasons and concedes that waste has been transported to Bedford. In light of this it is considered that the proposed development would not have a material effect on this plan.

Appendix 5 Review of the potential effect of the Facility on Waste plans in the London area

Waste Planning Authority	Waste Local Plan	Emerging Plan	Review of the Effect of the BAEF on the Plan
London			
London Borough of Barking & Dagenham	Joint Waste Development Plan for the East London Waste Authority Boroughs (adopted 2012)	N/A	Of note the JWDP particularly encourages the movement of waste by rail and water. Para 5.14 notes that while the Joint Waste DPD supports, in accordance with the waste hierarchy, that opportunities for recycling and composting are maximised before energy recovery is considered, energy recovery facilities will play an important role in the future management of London's waste. It is considered that the Facility would not have a material effect on this plan.
London Borough of Havering			
London Borough of Newham			
London Borough of Redbridge			
London Borough of Tower Hamlets	Tower Hamlets Local Plan 2031: Managing Growth and Sharing Benefits (adopted 2020)	N/A	The THLP does not contain any policies restricting the movement of residual waste outside the plan area for energy recovery. It is considered that the Facility would not have a material effect on this plan.
Royal Borough of Greenwich	The Royal Greenwich Local Plan: Core Strategy (adopted 2014)		The RBG Local Plan does not contain any policies restricting the movement of residual waste outside the plan area for energy recovery. It is considered that the Facility would not have a material effect on this plan.
London Borough of Southwark	Saved Local Plan Policies (as saved in 2007)	New Southwark Local Plan – currently going through examination.	The Saved Local Plan Policies do not contain any policies restricting the movement of residual waste outside the plan area for energy recovery. The NSLP also does not contain any policies restricting the movement of residual waste outside the plan area for energy recovery. It is considered that the Facility would not have a material effect on the saved policies or the emerging Local Plan.
London Borough of Bexley	Bexley Core Strategy (adopted 2012)	Local Plan Review – the Reg 19 version of the Local Plan was published in May 2021.	The Bexley Core Strategy does not contain any policies restricting the movement of residual waste outside the plan area for energy recovery. There are also no policies within the emerging Local Plan that restrict the movement of residual waste outside the plan area for energy recovery.

			It is considered that the Facility would not have a material effect on the Core Strategy or the emerging Local Plan.
London Borough of Bromley	Bromley Local Plan (adopted 2019)	N/A	Policy 112 (Planning for Sustainable Waste Management) of the BLP states that "*The Council will support sustainable waste management by:* *Working in collaboration with the London Boroughs of Bexley, Greenwich, Southwark, Lewisham and City of London to make optimum use of waste management capacity in the south east London sub region."* There are no policies that limit the movement of residual waste, and so it is considered that the Facility would not have a material effect on this plan.
London Borough of Lewisham	Lewisham Core Strategy (adopted 2011)	New Lewisham Local Plan - the Regulation 18 stage "*Main Issues and Preferred Approaches"* document was published in January 2021.	Para 7.117 of the Core Strategy states that "*Adequate waste management sites also need to be provided underpinned by the proximity principle of disposing waste as near to its place of origin as possible. This means waste generated in Lewisham should be dealt with within the borough."* There are however no policies that limit the movement of residual waste or refuse derived fuel. The emerging Local Plan notes that the borough wants to help London achieve net waste self-sufficiency however, the LP does not contain any policies that limits the movement of waste. It is considered that the Facility would not have a material effect on the Core Strategy or the emerging Local Plan.
City of London	City of London Waste Strategy 2013-2020	Local Plan Review – the City Corporation published the Proposed Submission Draft of the City Plan 2036 for consultation (the Regulation 19 consultation) between 19 March 2021 and 10 May 2021. & A new Waste Strategy is being prepared – no	Within the emerging Local Plan, para 6.8.1. states that the Council will seek to reduce waste exports from the City by applying the proximity principle to ensure that residual waste is processed as close as possible to the City. This is supported by Key principle - Regional Self-Sufficiency and The Proximity Principle - which requires that waste should generally be managed as close as possible to where it is produced in order to limit the environmental impact of transportation and create a more responsible approach to waste generation. However, the Strategy notes that not all regions have specialist recovery, recycling or treatment facilities, it is recognised that the best solution for some waste may be to transport it to another region where it can be dealt with more effectively. Emerging Policy CE2 (Sustainable Waste Transport) states that: "*the environmental impact of waste transport will be minimised through:* *• Encouraging the use of rail and waterways for removal of waste, including deconstruction waste and delivery of construction materials;*

		timescales have been provided for its release.	• *Ensuring maximum use of rail and waterways for the transport of excavation waste particularly from major infrastructure projects;* • *Requiring low and zero emissions transport modes for waste movement;* • *Reducing the number of waste vehicles by promoting optimum use of waste transport vehicle capacity through on-site or multi-site consolidation of waste."* There are no policies within the Waste Strategy or within the emerging Local Plan that restricts the movement of residual waste outside the plan area for energy recovery. It is considered that the Facility would not have a material effect on the Waste Strategy of the emerging Local Plan.
Westminster Council	City Plan (adopted April 2021)	N/A	Para 37.7 of the City Plan notes that the Westminster is a net exporter of waste: "*with all of the local authority collected and commercial and industrial waste going to facilities in London including Southwark and Lewisham,"* This is supported by Part E of Policy 37 (Waste Management) states that: "*The council will continue to collaborate with other Waste Planning Authorities in the management of its waste and monitor its waste exports."* It is considered that the Facility would not have a material effect on this plan.
Royal Borough of Kensington and Chelsea (within the Western Riverside waste planning authorities)	RBKC Local Plan (adopted 2019)	N/A	The Local Plan does not contain any policies restricting the movement of residual waste outside the plan area for energy recovery. It is considered that the Facility would not have a material effect on this plan.
London Borough of Hammersmith & Fulham (within the Western Riverside waste planning authorities)	LBH&F Local Plan (adopted 2018)	N/A	Policy CC6 (Strategic Waste Management) states that the Council is "*seeking, where possible, the movement of waste and recyclable materials by sustainable means of transport, maximising the use of the River Thames where possible."* The Local Plan does not contain any policies restricting the movement of residual waste outside the plan area for energy recovery. It is considered that the Facility would not have a material effect on this plan.
London Borough of Lambeth	Lambeth Local Plan (adopted 2015)	Local Plan Review - the London Borough of Lambeth submitted the	The Local Plan does not contain any policies restricting the movement of residual waste outside the plan area for energy recovery.

(within the Western Riverside waste planning authorities)		Draft Revised Lambeth Local Plan to the Secretary of State for examination on 22 May 2020.	Emerging para 9.72. states that "*Although Lambeth is planning for its own waste, some waste will continue to be exported, for example household waste is exported to Wandsworth and Bexley and excavation waste could be exported to be used for beneficial purposes outside of London. It is expected that a small proportion of waste which cannot be reused, recycled, recovered or put to beneficial use will be disposed of to landfill outside of London. Lambeth will continue to work with other waste planning authorities on imports and exports of waste through duty to co-operate and monitor any significant changes in patterns of waste movements.*" Emerging Policy EN7 part vi) states that LBL will continue "*co-operating with the local waste planning authorities that receive waste from Lambeth to address any issues associated with this during the plan period.*" It is considered that the Facility would not have a material effect on this plan.
London Borough of Wandsworth (within the Western Riverside waste planning authorities)	Wandsworth Core Strategy (adopted 2016)	Draft Local Plan - Consultation on the 'Pre-Publication' Draft Local Plan (Regulation 18) was held between 4 January 2021 to 1 March 2021.	Policy IS 1 (Sustainable Development) of the Core Strategy states that "*The movement of freight, waste and other bulk material by water or rail will be encouraged where practical and the retention of rail and water freight facilities supported.*" Para 15.68 of the Draft Local Plan notes that "*Wandsworth has a duty to cooperate with other local authorities on strategic matters that cross administrative boundaries. Waste is exported from Wandsworth as well as imported and is a strategic cross-boundary issue. Wandsworth will continue to engage with other waste planning authorities on imports and exports and to monitor any significant changes to waste movements.*" Draft Policy LP13 (Waste Management) part I. states that "*Wandsworth will continue to co-operate with waste planning authorities in areas which receive significant waste exports from the borough to address any cross-boundary waste issues.*" It is considered that the Facility will not affect the policies within the adopted and emerging Local Plan.
London Borough of Croydon London Borough of Sutton London Borough of Merton Royal Borough of Kingston upon Thames	The South London Waste Plan (adopted 2012)	The draft South London waste plan 2020 was submitted to the Secretary of State for examination on 19 January 2021.	Para 3.7 of the SLWP states that "*Regarding cross-boundary waste movements, unlike the regional context, the majority of municipal waste produced in the South London Waste Plan area has historically been managed within the partner boroughs' boundaries.*" Para 3.70 notes that "*the aim of the South London Waste Plan is to manage more waste within the plan's borders, thus supporting the Mayor of London's targets for greater self-sufficiency, the need to transfer waste to facilities outside the plan area will naturally reduce as more facilities are developed.*" However, para 3.10 notes that "*The remainder of the boroughs' recyclable waste (i.e. the dry recyclables such as tins, plastic bottles, card and paper) is treated at a Materials Recycling Facility (MRF) in Kent. In addition, since 2008, 10,000 tonnes per year of residual waste has been sent to an energy recovery facility near Slough, Berkshire.*"

			Para 3.6 of the emerging SLWP notes that "*different types of waste are managed in different facilities which often need a wide catchment to be economically viable so to achieve net self-sufficiency every area will have some waste imports and exports.*" However, the emerging SLWP notes that the boroughs are working towards net self-sufficiency. There are no policies within the emerging and adopted SLWP to prevent the movement of waste. Both the adopted and emerging SLWP concede that despite seeking net self-sufficiency waste is being treated outside the boroughs.
London Borough of Richmond London Borough of Brent London Borough of Ealing London Borough of Harrow London Borough of Hillingdon London Borough of Ealing	West London Waste Plan (adopted 2015)	N/A	Para 3.9.4 notes that the majority of waste exported in 2012 was sent to Buckinghamshire (31%), Milton Keynes (20%), Slough (19%) followed by Oxfordshire (11%) with the bulk of the remaining 19% divided between 6 other authorities. With waste being previously sent to Central Bedfordshire. Para 4.2.10 of the WLWP notes around 70,000 tonnes of waste (as refuse derived fuel) may be sent to the Slough Heat & Power facility or exported abroad for energy recovery. As such the exportation of waste occurs within the West London Boroughs. Waste has historically been transferred out of the borough, moreover there are no policies within the emerging and adopted SLWP to prevent the movement of waste. It is considered that the Facility would not have a material effect on this plan.
London Borough of Barnet London Borough of Camden London Borough of Enfield London Borough of Hackney London Borough of Haringey London Borough of Islington		The emerging North London Waste Plan (NLWP) is currently going through examination. The main modifications NLWP was published in March 2021 following a consultation on the main modifications from October to December 2020.	Under the emerging NLWP, para 4.10 recognises that "*net self-sufficiency does not mean that the North London Boroughs will deal solely with their own waste, nor promote use of the very closest facility to the exclusion of all other considerations. While it is desirable for waste to be treated as close as possible to its source in line with the proximity principle, the complexity of the waste management business poses challenges. Different types of waste require different types of management and facilities need to serve areas large enough to be economically viable. Consequently, the most suitable facility may not be the nearest and may well be outside of North London.*" The Over-arching Policy for North London's Waste states that "*The North London Boroughs will continue to co-operate with waste planning authorities who receive significant quantities of waste exports from North London.*" It is considered that the Facility would not have a material effect on this plan.

London Borough of Waltham Forest			

Appendix 6 Review of the potential effect of the Facility on Waste plans in the Scotland area

Waste Planning Authority	Local Plan	Emerging Plan	Strategic Development Plan	Review of the Effect of the BAEF on the Plan
Scotland				
Aberdeenshire	Aberdeenshire Local Development Plan 2017	Proposed Local Development Plan 2022	Aberdeen City and Shire Strategic Development Plan 2020 Para 6.18 states that in terms of waste, the objective is to meet their waste-management needs locally as far as possible and promote the development of a circular economy. The target is to reduce waste going to landfill and support the provision of waste treatment facilities and the recycling of waste.	PR2 of both the adopted and emerging LDPs protects development sites for waste management facilities. Policy P3 supports waste management facilities on existing sites, neighbouring sites and land allocated for employment and mixed-use development. There are no policies or supporting commentary which seeks to restrict the export of refuse derived fuel. It is concluded that the Facility will not have an impact upon the Development Plan.
Aberdeen	Aberdeen Local Development Plan 2017	Aberdeen Local Development Plan 2022		Policy R3 and Policy R4 of the LDP 2017 highlight that proposals for waste management facilities within the city must comply with the waste hierarchy and identify a number of sites for waste-related uses. Paragraph 3.135 identifies that landfill is the option of last resort. There are no policies or supporting commentary which seeks to restrict the export of refuse derived fuel. It is concluded that the Facility will not have an impact upon the Development Plan.
Midlothian	Midlothian Local Development Plan 2017		SESplan Strategic Development Plan 2013 Policy 16 of SESplan sets out that Local Development Plans will encourage the recycling and recovery of waste and consider proposals for landfill development	Policy WAST 1 states the Council will support the formation of new facilities for waste in principle, where they contribute to the sustainable treatment of waste set out in the waste hierarchy and the Zero Waste Plan. There are no policies or supporting commentary which seeks to restrict the export of refuse derived fuel. It is concluded that the Facility will not have an impact upon the Development Plan.

East Lothian	East Lothian Local Development Plan 2018		where the proposals are in accordance with the Zero Waste Plan. The policy safeguards sites for waste treatment facilities.	Policy W1 safeguards existing and consented waste management site identified on the Proposals Map. Policy W2 supports waste management development in principle on site allocated for employment uses. There are no policies or supporting commentary which seeks to restrict the export of refuse derived fuel. It is concluded that the Facility will not have an impact upon the Development Plan.
West Lothian	West Lothian Local Development Plan 2018			Policy MRW 8 safeguards existing waste management facilities and the criteria to which new waste management facilities will be assessed against. There are no policies or supporting commentary which seeks to restrict the export of refuse derived fuel. It is concluded that the Facility will not have an impact upon the Development Plan.
Edinburgh	Edinburgh Local Development Plan 2016			Policy RS 2 safeguards existing management facilities and Policy RS 3 identifies the locations where new waste management facilities will be supported. There are no policies or supporting commentary which seeks to restrict the export of refuse derived fuel. It is concluded that the Facility will not have an impact upon the Development Plan.
Scottish Borders	Scottish Borders Council Local Development Plan 2016			The supporting text (paragraph 7.20) to the Plan's waste policy highlights Scotland's Zero Waste Plan vision for a zero-waste society. The plan highlights the objectives Policy IS10 concerns the planning for new waste management facilities in the planning authority area. The supporting text notes that there is a shortage of capacity to manage waste arisings. There are no policies or supporting commentary which seeks to restrict the export of refuse derived fuel.

				It is concluded that the Facility will not have an impact upon the Development Plan.
Fife	Fife Plan			The are no policies or supporting commentary which seeks to restrict the export of refuse derived fuel. It is concluded that the Facility will not have an impact upon the Development Plan.
Dundee	Local Development Plan 2019		TAYplan Policy 7 sets out the objectives to deliver a low/zero carbon future and contribute to meeting Scottish Government energy and waste targets and prudent resource consumption.	Policy 43 safeguards existing waste management installations and new waste management installations should be located in General Economic Development Areas in the first instance. Policy 44 sets out the waste management requirements for development. The are no policies or supporting commentary which seeks to restrict the export of refuse derived fuel. It is concluded that the Facility will not have an impact upon the Development Plan.
Perth and Kinross	Perth and Kinross Local Development Plan 2019			Policy 36 sets out a presumption in favour of retention of the waste management facilities identified in the Plan and criteria for new waste management infrastructure. The are no policies or supporting commentary which seeks to restrict the export of refuse derived fuel. It is concluded that the Facility will not have an impact upon the Development Plan.
Angus	Angus Local Development Plan 2016	Angusplan		Policy PV17 safeguards waste management facilities and sets out criteria where proposals will be supported. The are no policies or supporting commentary which seeks to restrict the export of refuse derived fuel. It is concluded that the Facility will not have an impact upon the Development Plan.
West Dunbartonshire	Local Development Plan 2		Clydeplan (2017) Policy 11 (Planning for Zero Waste) supports the vision and targets set out in the Zero Waste Plan. Proposals for waste	Policy ZW1 require all development to meet with the aims of the Zero Waste Plan and follow the principles of the Waste Hierarchy. It also sets out the accepted locations for the management of waste. The are no policies or supporting commentary which seeks to restrict the export of refuse derived fuel.

			management facilities will be acceptable subject to local considerations within certain locations.	It is concluded that the Facility will not have an impact upon the Development Plan.
East Dunbartonshire	Local Development Plan	Local Development Plan 2		Policy 16 of the adopted LDP sets out the criteria for managing waste. The are no policies or supporting commentary which seeks to restrict the export of refuse derived fuel. It is concluded that the Facility will not have an impact upon the Development Plan.
North Lanarkshire	North Lanarkshire Local Plan 2012	North Lanarkshire Local Development Plan Modified Proposed Plan		Policy EDI3 of the adopted Local Plan sets out the criteria to which waste management facilities will be supported. The are no policies or supporting commentary which seeks to restrict the export of refuse derived fuel. It is concluded that the Facility will not have an impact upon the Development Plan.
South Lanarkshire	South Lanarkshire Local Development Plan 2			The supporting text to the Plans waste policy highlights Scotland's Zero Waste Plan vision for a zero-waste society. Policy 17 Waste sets out land use considerations and criteria to be met in determining planning applications for waste development. The are no policies or supporting commentary which seeks to restrict the export of refuse derived fuel. It is concluded that the Facility will not have an impact upon the Development Plan.
Glasgow City	City Development Plan 2017	Glasgow City Development Plan 2		Policy CDP 4 safeguards existing waste transfer stations and recycling centres. The are no policies or supporting commentary which seeks to restrict the export of refuse derived fuel. It is concluded that the Facility will not have an impact upon the Development Plan.
East Renfrewshire	Local Development Plan	Local Development Plan 2		Policy E7 of the LDP and emerging policy E11 of the LDP 2 safeguards existing waste management facilities and sets out criteria to which new and extended facilities will be assessed against.

				The are no policies or supporting commentary which seeks to restrict the export of refuse derived fuel. It is concluded that the Facility will not have an impact upon the Development Plan.
Renfrewshire	Renfrewshire Local Development Plan 2014	Proposed Renfrewshire Local Development Plan 2021		Policy I8 of the LDP and emerging Policy I5 recognises the potential of waste management in contributing to the delivery of a green economy and sustainable economic growth within Renfrewshire. New development will need to demonstrate how it delivers the objectives of the waste management plan and meets criteria set out in the policy. The are no policies or supporting commentary which seeks to restrict the export of refuse derived fuel. It is concluded that the Facility will not have an impact upon the Development Plan.
Inverclyde	Inverclyde Local Development Plan 2019			Criteria for waste management facilities is set out within Policy 7. The are no policies or supporting commentary which seeks to restrict the export of refuse derived fuel. It is concluded that the Facility will not have an impact upon the Development Plan.
Clackmannanshire	Clackmannanshire Local Development Plan 2015			Policy EA16 sets out criteria to which proposals for waste management facilities will be assessed against. Policy EA17 sets out criteria for proposals to generate energy from waste. The are no policies or supporting commentary which seeks to restrict the export of refuse derived fuel. It is concluded that the Facility will not have an impact upon the Development Plan.
Comhairle nan Eilean Siar	Outer Hebrides Local Development Plan 2018			Policy E1 4 sets out criteria to which new waste management facilities are required to follow. The are no policies or supporting commentary which seeks to restrict the export of refuse derived fuel. It is concluded that the Facility will not have an impact upon the Development Plan.

Orkney	Orkney Local Development Plan 2017			Section D of Policy 4 sets out that waste management facilities will be supported on business and industrial allocations. The are no policies or supporting commentary which seeks to restrict the export of refuse derived fuel. It is concluded that the Facility will not have an impact upon the Development Plan.
Falkirk	Falkirk Local Development Plan 2 2020			A network of appropriately located waste management facilities will deal with waste sustainably to assist in meeting the LDP2 objectives. The Local Plan sets out the waste hierarchy under Policy IR17 and the factor new proposals will be assessed against. The are no policies or supporting commentary which seeks to restrict the export of refuse derived fuel. It is concluded that the Facility will not have an impact upon the Development Plan.
Argyll and Bute	Local Development Plan 2015	Proposed Local Development Plan 2		Emerging Policy 63 safeguards existing waste management sites and sets out criteria than new developments should meet. The are no policies or supporting commentary which seeks to restrict the export of refuse derived fuel. It is concluded that the Facility will not have an impact upon the Development Plan.
Stirling	Local Development Plan 2018			Primary Policy 6 is committed to reduce the amount of waste. Policy 6.1 concern the development of new waste management infrastructure and the delivery of the objective s outlined in the national Zero Waste Plan. The are no policies or supporting commentary which seeks to restrict the export of refuse derived fuel. It is concluded that the Facility will not have an impact upon the Development Plan.
Shetland	Shetland Local Development Plan 2014			The Local Plan supports waste management facilities that fulfil the requirements of the national and local waste strategies. Policy W2 encourages waste management actives and waste related industries in certain locations and support

				new or intended facilities where there is no acceptable alternative sites. The are no policies or supporting commentary which seeks to restrict the export of refuse derived fuel. It is concluded that the Facility will not have an impact upon the Development Plan.
North Ayrshire	Local Development Plan 2 2019			Policy 30 supports development for waste management facilities which align with Scotland's Zero Waste Plan and the Council's Waste Management Strategy and meets criteria set out in the policy. The are no policies or supporting commentary which seeks to restrict the export of refuse derived fuel. It is concluded that the Facility will not have an impact upon the Development Plan.
South Ayrshire	South Ayrshire Local Development Plan 2014	Proposed Local Development Plan 2		Priority will be given to waste management sites under the LDP and proposals must meet specific criteria. The are no policies or supporting commentary which seeks to restrict the export of refuse derived fuel. It is concluded that the Facility will not have an impact upon the Development Plan.
East Ayrshire	East Ayrshire Local Development Plan 2017			The supporting text at paragraph 6.4.2 states that the plan supports and promotes this approach to sustainable waste management and acknowledges that it is essential in achieving Scotland's zero waste targets of recycling 70% of household waste and sending no more than 5% of Scotland's annual waste to landfill by 2025. Policies WM1 presumes against new major landfill capacity and supports the efficient use of secondary materials. The are no policies or supporting commentary which seeks to restrict the export of refuse derived fuel. It is concluded that the Facility will not have an impact upon the Development Plan.
Dumfries and Galloway	Dumfries and Galloway Local			Supporting text to the plan at 4.111 highlights that the Council is committed to reducing waste through prevention, followed by recycling energy recovery with disposal as the

	Development Plan 2 2019			last option in accordance with the waste hierarchy. Policy IN3 to IN6 concern the development of new waste management infrastructure and the delivery of the objective s outlined in the national Zero Waste Plan. The are no policies or supporting commentary which seeks to restrict the export of refuse derived fuel. It is concluded that the Facility will not have an impact upon the Development Plan.
Highland	Highland Wide Local Development Plan			Policy 70 (Waste Management Facilities) sets out the preferred sites. Proposals for waste management facilities will also be acceptable where they are located on existing or allocated industrial land, specifically Classes 5: General Industrial and Class 6 Storage or Distribution provided they meet criteria and Policy 71 safeguards existing, former and allocated strategic waste management facilities. There are no policies or supporting commentary which seeks to restrict the export of refuse derived fuel. It is concluded that the Facility will not have an impact upon the Development Plan.
Moray	Moray Local Development Plan 2020			Policy PP3 outlines that measures that implement the waste management hierarchy as defined in the Zero Waste Plan for Scotland including the provision of local waste storage and recycling facilities designed into the development in accord with policy PP1 Placemaking. There are no policies or supporting commentary which seeks to restrict the export of refuse derived fuel. It is concluded that the Facility will not have an impact upon the Development Plan.

Appendix 7 Review of the potential effect of the Facility on Waste plans in the West Midlands area

Waste Planning Authority	Waste Local Plan	Emerging Plan	Review of the Effect of the BAEF on the Plan
West Midlands			
Shropshire	Shropshire Local Development Framework: Adopted Core Strategy 2011	The Local Plan Review is currently at the Reg 19: pre-submission stage. A consultation on the reg. 19 version was held between December 2020 and February 2021.	The Core Strategy (2011) does not contain any policies restricting the movement of residual waste outside the plan area for energy recovery. Within the emerging Local Plan Review there are no policies limiting the movement of waste and para 3.169 notes that "*Shropshire is likely to remain reliant on the export of some material for specialist processing and disposal but will continue to counterbalance this through the provision of recycling and recovery capacity, particularly for biodegradable wastes, for imported wastes.*" It is considered that the Facility would not have a material effect on this plan.
Herefordshire	Herefordshire's Unitary Development Plan (Saved Policies)	Emerging Minerals and Waste Local Plan (MWLP)	Policy S10 (Waste) of the UDP states that: *"The sustainable and efficient management of waste will be sought by:* *1. basing waste management decisions on the Best Practicable Environmental Option (BPEO) Assessment results, the principles of the waste hierarchy (including reduction and minimisation, re-use, recovery, recycling and landfill), the proximity principle, and regional local self-sufficiency."* UDP Policy W3 (Waste transportation and handling) also states that "*Development that is likely to give rise to the transportation and handling of waste materials will only be permitted where appropriate measures to protect the public and the environment can be implemented and enforced."* The emerging MWLP does not contain any policies restricting the movement of residual waste outside the plan area for energy recovery. It is considered that the Facility would not impact the policies within the adopted UDP and the emerging MWLP.
Worcestershire	Worcestershire Waste Core Strategy Local Plan (2012)	N/A	Para. 2.60 of the Core Strategy states that: "*The Waste Core Strategy will not limit future imports and exports. However, in line with the West Midlands RSS and to reflect the consultation comments received, the Waste Core Strategy will aim for 'equivalent self-sufficiency' in waste management capacity."* It is considered that the Facility would not have a material effect on this plan.
Warwickshire	Waste Core Strategy Adopted	N/A	Core Strategy Policy 5 (Proposals for reuse, recycling, waste transfer/storage and composting) states that: "*Proposals for re-use, recycling, waste transfer/storage and*

	Local Plan (July 2013)		*composting will be encouraged provided that the proposal accords with all other relevant policies.* *The Council will seek to meet identified capacity gaps for each waste stream (and where applicable treatment gaps to meet landfill diversion targets) where a shortfall is indicated through the Authority's Annual Monitoring Report process."* Core Strategy Policy 6 (Proposals for other types of recovery) states that "*Proposals for anaerobic digestion, mechanical-biological treatment and other energy or value recovery technologies will be encouraged provided that the development accords with all other policies and* *- energy or value recovery products are maximised; and* *- it is demonstrated that any resulting residues are satisfactorily managed and disposed of.* *The Council will seek to meet identified capacity gaps for each waste stream (and where applicable, treatment gaps to meet landfill diversion targets), where a shortfall is indicated through the Authority's Annual Monitoring Report process."* Core Strategy Policy DM3 (Sustainable Transportation) states that: "*Waste management proposals should use alternatives to road transport where feasible. Developers must demonstrate that the proposal facilitates sustainable transportation by:* *minimising transportation distances;* *minimising the production of carbon emissions; and* *where road is the only viable method of transportation, demonstrating that there is no unacceptable adverse impact on the safety, capacity and use of the highway network."* It is considered that the Facility would not impact the policies within the adopted Waste Core Strategy.
Staffordshire	Staffordshire and Stoke on Trent Joint Waste Local Plan 2013	N/A	Policy 1.5 (Energy recovery) states that: *"Proposals for energy recovery should demonstrate that they:* *Are consistent and comply with the requirements of Policy 4;* *Will not undermine the provision of waste management facilities operating further up the waste hierarchy. The waste to be treated therefore cannot practically be suitable for reuse, recycling or processing to recover materials;*

			Are in close proximity to the source of waste in order to obtain reliable and regular supply of feedstock and minimise transport emissions; *Include maximum energy recovery, either by combined heat and power (CHP) or electricity generation, or be CHP ready, with a realistic prospect of a market for the energy in the area; and* *Meet the locational approach of the Strategy set out in Policy 2"* Policy 2.3 (Broad locations) states that: "*In order to minimise the impact of our waste infrastructure, and provide a network of sustainable waste management facilities which enable the movement of waste to be minimised, ensure that waste is being dealt with as close as possible to where it arises, and reduce the need to transport waste great distances, preference will be given to such developments on general industrial land (including urban and rural general industrial estates (alongside B2& B8 uses)), previously developed (provided that it is not of high environmental value) land and existing waste management sites, within or close to the hierarchy of urban areas defined below and shown on the Policy Map".* The Council seeks to minimise the movement of waste by ensuring that it is managed as locally as possible.
Birmingham	The Birmingham Development Plan (BDP) (adopted 2017).	Birmingham City Council submitted its Development Management in Birmingham Development Plan Document (DMB) to the Secretary of State for Housing, Communities and Local Government on Friday 17 July 2020 for independent examination.	The BDP (2017) and the emerging DMB do not contain any policies restricting the movement of residual waste outside the plan area for energy recovery. It is considered that the Facility would not have a material effect on the adopted BDP or the emerging DMB.
Dudley Wolverhampton Walsall Sandwell	Black Country Core Strategy (adopted 2011)	Black Country Plan - the Draft Black Country Plan will be considered by each of the Black Country (Dudley, Sandwell, Walsall and	Core Strategy Policy: Achieving Sustainable Waste Management notes that the Black Country will aim to achieve zero waste growth by 2026. This is to be achieved by: *3. Providing guidance on the number, type and capacity of new waste management facilities needed by 2026, for the Black Country to achieve "equivalent self-sufficiency" and minimise the export of wastes that can be managed locally;*

		Wolverhampton) local authority cabinets on different dates in early July 2021. The Plan is due to go to consultation in August 2021.	*4. Protecting existing strategic waste management capacity and enabling existing waste management infrastructure to expand or relocate where appropriate;"* Core Strategy Policy: Key Locational Considerations for All Waste Management Proposals also states that "*Waste arising in the Black Country should be managed within the Black Country where feasible and should be managed as close as possible to its source of origin. Proposals involving on-site management of waste will be supported where this would not have unacceptable impacts on neighbouring uses. To minimise impacts on the highway network, wherever possible, opportunities should be taken to transport waste by rail or inland waterway, particularly where freight opportunities have been identified (see TRAN3)".* The Black Country Councils are actively promoting the retention of waste within the region. although it is noted that there are no policies that prohibit the movement of waste. There are no policies available at this stage for the emerging Black Country Plan. It is considered that the Facility would not have a material effect on the adopted Core Strategy emerging BCP
Coventry	Coventry City Local Plan (adopted 2017)	N/A	The Coventry City Local Plan (2017) does not contain any policies restricting the movement of residual waste outside the plan area for energy recovery. It is considered that the Facility would not have a material effect on this plan.

Appendix 8 Review of the potential effect of the Facility on Waste plans in the Wales area

Waste Planning Authority	Local Plan	Emerging Plan	Review of the Effect of the BAEF on the Plan
Wales			
Blaenau Gwent CBC	Blaenau Gwent Local Development Plan 2012	Local Development Plan First Review 2016	Existing Policy: Policies SP13 and DM 20 concern Delivering Sustainable Waste Management in the county borough. There is no policy or supporting text which seeks to restrict the export of refuse derived fuel from the County Borough. Emerging Policy: It is considered that the Facility will not have a material effect on the plan.
Bridgend CBC	Bridgend Local Development Plan 2013	Bridgend Local Development Plan 2018 to 2033	Existing Policy: Policy SP8-Renewable Energy: *'Development proposals which contribute to meeting national renewable energy and energy efficiency targets will be permitted where it can be demonstrated that there will be no significant adverse impacts on the environment and local communities*.' The LDP recognises the Borough Council's role in meeting national renewable energy strategy and policy. The LDP outlines its central focus to contribute to the Welsh national energy need through the promotion of renewable energy in Obj.2e. There are no policies or supporting text in the plan which would restrict the export of refuse derived fuel from the plan area. Emerging Policy: It is considered that the Facility will not have a material effect on the plan
Caerphilly CBC	Local Development Plan 2010	Local Development Plan Up to 2021	Existing Policy: South East Wales Regional Waste Plan- There is an existing framework integrating waste management, treatment, and disposal in South East Wales. SP9- Commitment to '*maximising the use of unavoidable waste as a resource*'. There is no specific policy to suggest the export of waste or refuse-derived fuel. Member of Project Gwyrdd, working with Viridor at Trident Park, Cardiff. There are no policies or supporting text in the plan which would restrict the export of refuse derived fuel from the plan area. Emerging Policy: 4.82 The Regionalisation Agenda: *'Given that waste management is addressed through regional consortia means that each local authority is already working jointly with the others within its region*.'- Welsh Councils are already set up for regional integration

			which should aid exportation measures, though the regionalisation may endure greater bureaucracy in attaining the waste. None of the proposed policies will have a material effect on the exportation of waste. The regionalisation of waste management and waste quotas at a regional level should be noted in relation to export estimates. It is considered that the Facility will not have a material effect on the plan
Cardiff Council	Cardiff Local Development Plan 2006-2026	Replacement Local Development Plan 2021 to 2036 (To be adopted in 2024)	<u>Existing Policy:</u> Policy W2- Cardiff Council are aware that they must be increasing proactive in their approach in managing waste, in line with national policy (Wise about Waste 2002/ Towards Zero Waste 2010) SPG- Locating Waste Management Facilities (2017)- '*Under provision or overprovision of facilities could encourage the import or export of waste over longer distances, contrary to the underlying principles identified above. It is also important to ensure that need outweighs any potential adverse harm to the environment or human health.*' –Cardiff Council are actively seeking solutions and would consider exportation of waste provided it presented no adverse risk to the environment Member of Project Gwyrdd, working with Viridor at Trident Park, Cardiff. There are no policies or supporting text in the plan which would restrict the export of refuse derived fuel from the plan area. <u>Emerging Policy:</u> Draft Objective 6 states a commitment to waste management. It is considered that the Facility will not have a material effect on the plan
Camarthenshire CBC	Camarthenshire Local Development Plan 2006-2021	Camarthenshire Local Development Plan 2018-2033	<u>Existing Policy:</u> Policy WPP1- '*Proposals for waste management operations not considered under policies SP12 and WPP1 will only be permitted, where there would be no significant adverse impacts on the environment, human health, local amenity and the local transport network. Proposals should, wherever possible, demonstrate how the waste hierarchy has been adhered to (see Policy SP12). Proposals will also be required to accord with the policies and provisions of this Plan.'…' Proposals should set out clearly how the potential visual impact of operations will be minimised through good quality design.*' Policy SP12 states that waste management and disposal of waste should be close to where it is generated. However, there are no policies or supporting text in the plan which would restrict the export of refuse derived fuel from the plan area. <u>Emerging Policy:</u>

			LDP: Sp19: Waste Management 11.156- The report recognises the need to adopt new methods of waste management, with an open-mind to increasing the number of facilities. SP19 (d)- *'acknowledging that certain types of waste facility may need to be located outside the development limits of settlements'* It is considered that the Facility will not have a material effect on the plan
Conwy CBC	Conwy Local Development Plan 2007-2022	Replacement Local Development Plan	<u>Existing Policy:</u> Policy MWS/5 Proposals for Waste Management- '*where possible, the proposal recovers value from the waste*' Policy MWS/7 affirms that not all waste management will be suitable with the plan area and '*the policy therefore permits, in exceptional circumstances, proposals for waste management facilities outside the settlement boundaries.*' (Note: the scheme must meet the requirements of Policy MWS/5) There are no policies or supporting text in the plan which would restrict the export of refuse derived fuel from the plan area. <u>Emerging Policy:</u> RLDP/Evidence Base/Minerals and Waste- BP36 Waste Management-5.1: [With reference to Abergele WM Site] *'Significantly, the site now produces a Refuse Derived Fuel (RDF) which is exported off site for recovery and this capacity is significant in a local context'* Review of Policy MWS/7 maintains that the council remain open to utilising sites outside the development boundaries and that 'retaining a degree of flexibility is essential because not all waste management facilities are appropriate on industrial sites.' It is considered that the Facility will not have a material effect on the plan
Denbighshire CBC	Local Development Plan 2006-2021	Replacement Local Development Plan 2018-2033	<u>Existing Policy:</u> Policy VOE8- Denbighshire Council affirm that proposals for waste management proposals arising outside the development boundary will be permitted provided they're in line with sustainability and development guidelines. There are no policies or supporting text in the plan which would restrict the export of refuse derived fuel from the plan area. <u>Emerging Policy:</u> The emerging LDP 2018-2033 retains the core policy of the existing plan. It is considered that the Facility will not have a material effect on the plan

Flintshire CC	Unitary Development Plan 2000-2015	Local Development Plan (2015-2030) under Progress-Awaiting Review from the Planning Inspector from Early 2021	<u>Existing Policy:</u> Policy EWP6 demonstrates the active search of the Flintshire Council to identify areas for new waste management facilities Appendix 2 of the DSP Areas of Search for New Waste Management Facilities '*There is no need to consider sites which are too far away from the area that the facility is intended to serve*', though it should be noted that this is not directly in reference to the exportation of waste outside of the district. In line with the national planning policy, the UDP outlines the need to manage waste sustainably (EWP7) and aim to manage waste locally; however, the Flintshire UDP does not present any policy that would halt the exportation of waste. Policy EWP8 outlines that 'the first priority in managing waste should be to reduce the quantities produced or alternatively to encourage ways of recycling and re-use at source where they are economically feasible. Only waste that cannot be managed through such means should be dealt with centrally or disposed of through incineration (with energy recovery) or landfill.' There are no policies or supporting text in the plan which would restrict the export of refuse derived fuel from the plan area. <u>Emerging Policy:</u> It is considered that the Proposed Development will not have a material effect on the plan
Gwynedd Council	Anglesey and Gwynedd Joint Local Development Plan 2011-2026	No current emerging plan as JLDP was adopted in July 2017	<u>Existing Policy:</u> The Draft Annual Monitoring Report 2 (March 2020) illustrates that the Council deems no changes to SO18 (Encouragement of Sustainable Waste Management) necessary. The JLDP outlines that the limited road infrastructure that connects rural settlements should encourage sustainable transfer of waste. Policy GWA2 outlines the '*extremely important*' nature of collaboration between planning authorities to meet regional targets. There are no policies or supporting text in the plan which would restrict the export of refuse derived fuel from the plan area. <u>Emerging Policy:</u> N/a
Isle of Anglesey	Anglesey and Gwynedd Joint Local Development Plan 2011-2026	N/a	<u>Existing Policy:</u> Please see above summary of the Gwynedd Council notes as Isle of Anglesey and Gwynedd devised a collaborative LDP.

			There are no policies or supporting text in the plan which would restrict the export of refuse derived fuel from the plan area. Emerging Policy: N/a
Merthyr Tydfil CBC	Merthyr Tydfil Replacement Local Development Plan 2016-2031	No emerging plan as RLDP was adopted in January 2020.	Existing Policy: The Merthyr Tydfil LDP states that the county borough has capacity for its waste in LDP Obj. 18 (Waste Management) There is no policy that would suggest that the exportation of waste-derived fuel would be restricted. There are no policies or supporting text in the plan which would restrict the export of refuse derived fuel from the plan area. Emerging Policy: N/a
Monmouthshire CC	Monmouthshire Adopted Local Development Plan 2011-2021	Replacement Local Development Plan 2018-2023- Adoption due in Late 2023	Existing Policy: Section 6.3.80 states that UDP Waste Chapter was '*amended to explain the long-standing difficulties of finding suitable facilities for landfill and waste treatment in the County Monmouthshire has entered the 'Project Gwyrdd' with Caerphilly, Cardiff, Newport and the Vale of Glamorgan to deliver a long-term waste procurement plan, in an attempt to limit the amount of municipal waste exported to landfill.* It should be noted that the Project Gwyrdd alliance into a 25-year contract with Viridor Waste Management Ltd to treat municipal residual waste at their Energy from Waste Facility at Trident Park in Cardiff. Monmouthshire CC clearly demonstrate the need for sustainable solutions to the current exportation of waste to landfill. There is no current policy that would restrict the exportation of refuse-derived fuel, aside from the potential of the impact of Viridor (Waste is already be exported to landfill) There are no policies or supporting text in the plan which would restrict the export of refuse derived fuel from the plan area. Emerging Policy: It is considered that the Proposed Development will not have a material effect on the plan
Neath Port Talbot CBC	Neath Port Talbot Adopted Local Plan 2011-2026	N/a No current emerging plan	Existing Policy: Policy W1-Neath Port Talbot CBC remain open to the development of regional scale facilities within the district, provided transportation is sustainable and utilises key

			transport corridors. This would indicate that the district views the transportation as waste as viable within the CBC. There are no policies or supporting text in the plan which would restrict the export of refuse derived fuel from the plan area. Emerging Policy: It is considered that the Proposed Development will not have a material effect on the plan
Newport City Council	Newport Local Development Plan 2011-2026	N/a No current emerging plan	Existing Policy: SP20 offers no relevant policy in regard to the export of refuse-derived fuel. Member of Project Gwyrdd, working with Viridor at Trident Park, Cardiff. There are no policies or supporting text in the plan which would restrict the export of refuse derived fuel from the plan area. Emerging Policy: It is considered that the Proposed Development will not have a material effect on the plan.
Pembrokeshire County Council	Pembrokeshire CC Local Development Plan 2013-2021	PCC Deposit Plan is being submitted to the full council in Summer 2021 Pembrokeshire Replacement Local Development Plan 2022-2033 (estimated)	Existing Policy: GN.40 New Waste Management facilities- Pembrokeshire do not express a need for additional waste facilities over the duration of the plan due to the combinations between the existing waste facilities and the proposed sites listed with the policy GN.41- Policy outlines that if targets are not met then Pembrokeshire CC are aware that they must work on a regional basis. There are no policies or supporting text in the plan which would restrict the export of refuse derived fuel from the plan area. Emerging Policy: The emerging Pembrokeshire Review Report suggest that regional integration will have a greater impact in the future. Furthermore, the emerging RLDP does not refer to any changes to the waste policy at this stage. It is considered that the Proposed Development will not have a material effect on the plan.
Powys County Council	Powys Local Development Plan 2018		Existing Policy: Policies W1 and Policy W2 concern the location of proposed waste development within the county. There is no policy or supporting text which seeks to restrict the export of refuse derived fuel from the County Council area.

			There are no policies or supporting text in the plan which would restrict the export of refuse derived fuel from the plan area. Emerging Policy: N/a
Rhondda Cynon Taf CBC	Adopted Local Development Plan 2006-2021	Revised Local Development Plan 2020-2030	Existing Policy: There is no policy that appears to impede the export of waste-derived fuel. The County operates under the 2008 Regional Waste Plan. Emerging Policy: The emerging RLDP 2020-2030 intends to manage waste within the boundaries of the County Borough but it is considered that the Proposed Development will not have a material effect on the plan.
Swansea Council	Swansea Local Development Plan 2010-2025(Adopted in 2019)	N/a No current emerging plan	Existing Policy: Swansea Council illustrate a willingness to adapt to new forms of renewable energy, even if they incur management environmental risks: '*the acceptance of landscape change together with the requirement to meet national targets for renewable energy provision outweighs the importance of protecting landscape of local significance*' There are no policies or supporting text in the plan which would restrict the export of refuse derived fuel from the plan area. Emerging Policy: N/a
Torfaen CBC	Torfaen CBC Local Development Plan 2013-2021	Replacement Torfaen Local Development Plan 2018-2033	Existing Policy: Adherence to the South East Wales Regional Waste Plan, conveying an existing commitment to cross-borough border collaboration. There are no policies or supporting text in the plan which would restrict the export of refuse derived fuel from the plan area. Emerging Policy: *'As such, no specific need for such waste management facilities has currently been identified at a regional level.*' Emerging Strategic Policy S15- *'Proposals for renewable energy generation and storage as part of a wider development will be encouraged subject to the proposal not giving rise to unacceptable impacts assessed under other policies of the RLDP*' It is considered that the Proposed Development will not have a material effect on the plan.

Vale of Glamorgan Council	Vale of Glamorgan Local Development Plan 2017	Replacement Local development Plan 2021 -2036	Existing Policy: Policies SP8 Sustainable waste management, and MD20 Assessment of Waste Management Proposals 1concern proposals for waste management development within the council area. Member of Project Gwyrdd, working with Viridor at Trident Park, Cardiff. There are no policies or supporting text in the plan which would restrict the export of refuse derived fuel from the plan area. Emerging Policy: It is considered that the Proposed Development will not have a material effect on the plan.
Wrexham	Wrexham Unitary Development Plan 2005	Wrexham Local Development Plan 2013- 2028	Existing Policy: The UDP includes policy relating to locational considerations for new waste management facilities within the district (MW12). Emerging Policy: SP18 notes that Wrexham will contribute to sustainable management of waste and support proposals which move the management of waste up the waste hierarchy, whilst recognising that the treatment of some waste types may need to eb located outside development boundaries There are no policies or supporting text in the plan which would restrict the export of refuse derived fuel from the plan area. Emerging policy: It is considered that the Proposed Development will not have a material effect on the plan.
Brecon Beacons National Park	Local Development Plan 2007-2022	Replacement Local Development Plan (Progress disrupted by covid-19 pandemic- review set for September 2021)	Existing Policy: SP7 Waste- The NPA will not allocate land for a Regional Waste Facility or related development Policy 62- Promotion of Local Waste Management Facilities *'Under current WAG waste policy, the adaption of sustainable waste processing is being promoted (Gasification, Thermal depolymerisation, Pyrolysis, Plasma arc gasification PGP, Anaerobic digestion, fermentation production, Mechanical biological treatment, MBT +anaerobic digestion, MBT to Refuse derived fuel)* However, these proposals should only serve local waste needs. There are no policies or supporting text in the plan which would restrict the export of refuse derived fuel from the plan area.

			<u>Emerging Policy:</u> There is no emerging policy that changes the current waste management processes in the county. It is considered that the Proposed Development will not have a material effect on the plan

Appendix 9 Review of the potential effect of the Facility on Waste plans in East Midlands area

Waste Planning Authority	Waste Local Plan	Emerging Plan	Review of the Effect of the BAEF on the Plan
East Midlands			
Derby City Council Derbyshire County Council	Derby City and Derbyshire County Councils adopted a Joint Waste Local Plan in 2005.	A new Waste Local Plan is being jointly prepared and will replace the existing Waste Local Plan	Policy W1A which related to sustainable development, key considerations of which were: the waste hierarchy, the proximity principle and self- sufficiency has now expired. The plan does not contain any policies which seek to prevent waste being moved from the plan area for energy recovery elsewhere. It is considered that the Facility would not have a material effect on these plans.
Leicestershire County Council	Leicestershire Mineral and Waste Local Plan 2019		Strategic objective 5. To attain the maximum possible reuse, recycling, composting and recovery of value from waste within the County of Leicestershire and thereby minimising the disposal of waste. Paragraph 4.4 identifies that there will be an ongoing requirement for waste to be diverted from landfill after recycling. The plan identifies a recovery shortfall of some 360,000 tonnes per annum by 2030/2031. Paragraph 4.47 notes that there are no major waste incinerators in the County. Policy W7 i) provides that pre-sorting is carried out ensuring that residual waste is recovered and ii) value recovery from by-products of the processes is maximised. The plan does not contain any policies which seek to prevent waste being moved from the plan area for energy recovery elsewhere. It is considered that the Facility would not have a material effect on these plans
Leicester City Council	Leicestershire and Leicester Waste Core Strategy and Development Control Policies (2009) Leicester City council Core Strategy 2014		The Leicestershire & Leicester Waste Core Strategy notes (paragraph 4.3) that the amount of residual municipal and C&I waste requiring treatment or disposal after recycling at the end of the WDF Period is estimated at around 900,000 tonnes per annum (938,095tpa). The Strategy did not seek to control residual waste being moved from the plan area for recovery elsewhere. It is considered that the Facility would not have a material effect on this plan.
Rutland County Council	Rutland Local Development Framework Core Strategy DPD 2011	The Council is in the early stages of a Local Plan review. This was subject to consultation	The plan (paragraph 5.35) notes that *the majority of Rutland's waste is exported to surrounding counties where it is recycled, composted or disposed of to landfill.* Paragraph 5.42 notes that *Regional Self Sufficiency will be promoted sustainable patters of waste movements in relation to urban areas in neighbouring counties* – as further referenced within policy CS25.

		concluding in November 2020	The local plan review consultation document paragraph 9.78 notes that until a new *facility is provided, it is likely that the exporting of waste to surrounding counties for treatment will continue and that amounts will increase in line with meeting waste management targets* Neither the plan or review contain any policies which seek to prevent waste being moved from the plan area for energy recovery elsewhere. It is considered that the Facility would not have a material effect on the development plan
Lincolnshire County Council	Lincolnshire Minerals and Waste Local Plan Core Strategy and Development Management Policies 2016 Lincolnshire Minerals and Waste Local Plan Site Locations 2017		By way of demonstration of the transborder flow of waste materials, the Lincolnshire Waste Needs Assessment 2021 (Page 3 Table 1) details that in 2019 approximately 1.3 mt of LACW/ C&I waste arising in Lincolnshire was managed outside the County. Through the Lincolnshire Minerals Waste Local Plan, the intention of the County Council is to ensure that sufficient opportunities are identified to allow for new sites to be developed in Lincolnshire to enable the waste tonnages predicted to arise in Lincolnshire to be managed within the County. This would mean that, purely on arisings, the area would be net self-sufficient. Core Strategy Policy WM1 relates to the provision of new facilities to manage wastes arising within the County and correspondingly identifies sites through Site Location Policy SL3 identifies suitable locations where waste management is considered suitable to take place. One such site is the Riverside Industrial Estate (WA22-BO) in Boston, the location for the proposed Facility. Policy SL3 allocates sufficient sites and areas for waste management facilities to meet identified capacity gaps, in accordance with Policy W1 of the Core Strategy and Development Management Policies document. Those sites have been allocated on the basis that they are acceptable for waste management development and in the case of the Riverside Industrial Estate (WA22-BO) for Energy Recovery (Appendix 1 of Lincolnshire Minerals and Waste Local Plan Site Location document). Paragraph 5.3 of the Lincolnshire Minerals and Waste Local Plan - Site Locations notes that '*Areas allocated in Policy SL3 as suitable for waste management facilities are not safeguarded solely for this use because they are likely to be*

			suitable for a range of industrial or employment uses and therefore these alternative uses should not be prejudiced. The Lincolnshire Waste Needs Assessment (WNA) (issued 24.6.2021) determines whether a predicted need for additional waste management capacity exists in Lincolnshire by quantifying and characterising the principal waste streams arising and producing forecasts/estimates of the amount of waste that needs to be managed, whilst taking into account the potential contribution of the existing available waste management capacity within Lincolnshire. The WNA update has found that 'there appears to be sufficient existing consented waste management capacity to meet predicted waste management requirements for Lincolnshire through to 2045, with surpluses identified in built waste management capacity, and sufficient combined void space across the consented inert and non-inert landfill estate.' The BAEF, is a form of waste management development which is wholly consistent with potential waste management development identified by the allocation of WA22-BO. In the light of the 2021 Lincolnshire Waste Needs Assessment which concludes that there is sufficient existing consented capacity to meet predicted waste management needs in the County until 2045 , the development of allocated site WA22-BO for the proposed BAEF would not displace any other waste management development / capacity anticipated by policy W1 or SL3. The LMWLP - Site Locations however acknowledges that other forms of development could take place on the site in any event as set out above. The Lincolnshire Minerals and Waste Local Plan does not make reference to nationally significant infrastructure development, it places no limitation on energy recovery from wastes delivered to the Facility from outside, or waste arisings within the County. Subject to the necessary contracts being in place, the Facility is open to receiving a refuse derived fuel arising from Lincolnshire which has been baled and imported to site in accordance with the DCO. It is considered that the Facility would not have a material effect on the waste plan.

Nottinghamshire County Council Nottingham City Council	Nottinghamshire and Nottingham Waste Local Plan 2002 Nottinghamshire and Nottingham Waste Core Strategy 2013	Nottinghamshire County Council and Nottingham City Council are working together to prepare a new Waste Local Plan. This is at Issues and Options.	The Waste Local Plan does not contain any policies considered relevant to the Proposed Development. The Waste Core Strategy policy WCS 3 states that: *The Waste Core Strategy will aim to provide sufficient waste management capacity for its needs; to manage a broadly equivalent amount of waste to that produced within Nottinghamshire and Nottingham.* At 7.53 the CS states '*As far as possible we want to be self-sufficient in managing our own waste, but this is not always practical as waste movements do not necessarily stop at local authority boundaries. This is recognised in PPS10 which states that waste should be managed at one of the nearest appropriate installations, which, in some cases, may not be within the local authority area where it was produced. It may make environmental and economic sense for the waste to be managed at a facility in a neighbouring county, if this is closer or means that the waste will be managed further up the waste hierarchy*.' Although the WCS plans to deliver self-sufficiency it does not require it nor to seek to prevent waste being transported out of the plan area for energy recovery elsewhere.
Northamptonshire County Council	Minerals and Waste Local Plan update 2017		Paragraph 5.4 expressed through policy 10 states *Waste forecasts are based on arisings for Northamptonshire. Subsequently the indicative capacity requirements represent the need to manage at least the equivalent amount of waste produced within the county, i.e. net self-sufficient. The movement (imports and exports) of waste across authority boundaries has been be taken into consideration*. The Strategy did not seek to control residual waste being moved from the plan area for recovery elsewhere. It is considered that the Facility would not have a material effect on this plan.

Appendix 10 Review of the potential effect of the Facility on Waste plans in East of England area

Waste Planning Authority	Waste Local Plan	Emerging Plan	Review of the Effect of the BAEF on the Plan
East of England			
Cambridgeshire Peterborough	Cambridgeshire and Peterborough Minerals and Waste Core Strategy and Proposals Map C 2011	Submission Draft Cambridgeshire and Peterborough Minerals and Waste Local Plan 2019	A strategic objective of the Cambridgeshire and Peterborough Minerals and Waste Core Strategy includes CS2 (Strategic Vision and Objectives for Sustainable Waste Management Development. Which states recognises that waste is to also be accommodated from London, or from authorities in the East of England which adjoin the Plan area. CS2 does however note that: "*Any long-distance movement of waste should be through sustainable transport means such as rail, and such facilities will be safeguarded through the designation of Transport Zones.*" This is supported by para 8.10 which states that "*The method of transporting waste to and from a waste management facility should consider proximity. Waste should generally be managed as near to its place of origin as possible and should seek to avoid the long-distance transport and / or export of waste, including the movement of waste from one region to another.*" The emerging Minerals and Waste Local Plan 2019 notes in para 3.32 that there is a national policy direction for WPAs to increase their waste management capacity to the extent of meeting the needs of their own area. Thereby reducing cross -border movements. However, the plan notes that it is not possible for all waste to be managed within the boundary of the WPA from which it arises *"due to economies of scale and operational requirements."* Emerging Policy 3 (Waste Management Needs) states that the WPAs will seek to achieve net self-sufficiency in relation to the management of wastes arising from within the plan area, plus additional provision until 2026 in order to accommodate needs arising from London (specifically regarding non-apportioned household and commercial & industrial waste). The policy does not however restrict the movement of waste. It is considered that the Facility would not have a material effect on this plan.
Norfolk	Norfolk Minerals and Waste Local Plan 2011	Norfolk Minerals and Waste Local Plan review	The Norfolk Minerals and Waste Plan (2011) does not contain any policies restricting the movement of residual waste outside the plan area for energy recovery. The emerging Local Plan review notes in para W1.12 acknowledges that there will be some cross-boundary movement of waste, as it is sometimes more sustainable to take waste to a facility out of Norfolk where the source of waste arisings is close to an administrative boundary. It is considered that the Facility would not have a material effect on this plan.

Suffolk	Suffolk Minerals and Waste Local Plan 2020	N/A	The Suffolk Minerals and Waste Plan (2020) does not contain any policies restricting the movement of residual waste outside the plan area for energy recovery. It is considered that the Facility would not have a material effect on this plan.
Hertfordshire	Hertfordshire Waste Core Strategy and Development Management Policies Document 2012	Draft Waste Local Plan was last consulted on from January-March 2021.	The Hertfordshire Waste Core Strategy and Development Management Policies Document (2012) notes that the majority of the residual Local Authority Collected waste was exported to surrounding waste authorities (including Berkshire, Buckinghamshire, Cambridgeshire and North London) for disposal to either landfill or energy from waste facilities. Noting in para 2.38 that the existing waste management facilities in Hertfordshire have insufficient capacity to secure the maximum recovery of waste (recycling, composting or energy generation). The emerging Local Plan Review refers to the proximity principle, stating that the plan should provide sufficient waste management capacity to manage a quantity of waste equivalent to their own arisings. It does note in para 3.13 that this should not prevent the inter-authority transportation of waste and improves the likelihood that the wider region will be able to manage its own waste without having to transport material further afield. Under the emerging Hertfordshire Vision, the plan notes that in accordance with the Duty to Cooperate, the County Council will engage with relevant authorities, including London, to monitor waste movements, both into and out of the county. It is considered that the Facility would not have a material effect on this plan.
Essex	Essex and Southend Waste Local Plan (adopted October 2017)	N/A	The Essex and Southend Waste Local Plan does not contain any policies restricting the movement of residual waste outside the plan area for energy recovery. However, para 6.5 states that limited cross border waste movements would need to be justified on their merits. The Plan explains that cross border movements may be acceptable if they would help to enable waste to be dealt with in one of the nearest appropriate installations and would not prejudice the achievement of net self-sufficiency for Essex and Southend-on-Sea. It is concluded that the intention to maximise opportunities for managing waste in a self-sufficient manner does not seek to prevent some movement of waste outside the district such that the Facility would not have a material effect on compliance the Waste Local Plan.
Bedfordshire	Bedford Borough, Central	N/A	The WLP (2014) does not contain any policies restricting the movement of residual waste outside the plan area for energy recovery.

	Bedfordshire and Luton Borough Councils Minerals and Waste Local Plan 2014		It is considered that the Facility would not have a material effect on this plan.

Appendix 11 Review of the potential effect of the Facility on Waste plans in South West England area

Waste Planning Authority	Waste Local Plan	Emerging Plan	Review of the Effect of the BAEF on the Plan
South West England			
Bristol City Council Bath & NE Somerset South Gloucestershire North Somerset	West of England Joint Waste Core Strategy (adopted 2011)	N/A	Section 2.2 of the WE Joint Waste Core Strategy notes that some municipal waste has historically travelled by train to landfills in Buckinghamshire. Whilst the Core Strategy does not contain any policies restricting the movement of residual waste outside the plan area for energy recovery, Para 3.2.2 notes that the existing arrangements for the exportation of waste may be maintained in the short term, but will not be a suitable long term solution. The Core Strategy seeks to deliver waste treatment infrastructure necessary to meet the demands of a growing sub-region and thereby reduce exporting waste out of the region. There is however no equivalent policy relating to the export of fuel derived from residual waste. It is considered that the Facility would not have a material effect on this plan.
Cornwall	Cornwall Local Plan (adopted 2016)	N/A	Local Plan Policy 19 (Strategic waste management principles) states that Proposals must show best solution having regard to the 'waste hierarchy'. The Council will support energy recovery facilities where options higher up the waste hierarchy cannot reasonably be realised. In light of Policy 19, there may be some hesitation to the loss of waste that could be used elsewhere within the waste hierarchy. However, the Council does support energy recovery if options listed higher on the waste hierarchy cannot be met. There is however no policy relating to the export of fuel derived from residual waste. It is considered that the Facility would not have a material effect on this plan.
Dorset	The Bournemouth, Christchurch, Poole and Dorset Waste Plan (adopted 2019)	New Waste Local Plan	Para 2.35 of the Waste Plan states that "*Some cross-boundary movements of waste are inevitable and reflect the normal working of the economy. Some types of waste also require specialised management method and for such facilities to be viable they often operate at a regional or national level. This accounts for some of the imports and exports that occur.*" Para 2.39 also notes that "*There is some movement of waste to Somerset, Devon and Wiltshire, and remaining exports are to facilities further afield including materials recovery facilities in Kent and North Wales.*" Highlighting that there is already a reliance on exporting waste further than the neighbouring counties. There are no policies that limit the movement of waste for energy recovery. However, Policy 6 (Recovery Facilities) does state that Energy Recovery facilities will be supported where: "*they will not displace the management of waste which is already*

			managed, or likely to be managed, by a process which is further up the waste hierarchy than that being proposed, unless the Waste Planning Authority is satisfied that the proposal would result in benefits sufficient to outweigh the displacement;"
Devon	Devon Waste Plan (adopted 2014)	N/A	Waste Plan Policy W6 (Energy Recovery) - states that "*Sustainable waste management in Devon will aim to achieve and maintain sufficient capacity to recover energy from all local authority-collected and commercial and industrial waste that cannot be reused or recycled."* This is supported by Policy W2 (Sustainable Waste Management) which states that "*In the period to 2031 the waste capacity needs of Devon and its functional waste catchment area will be met through the provision of sufficient capacity to manage waste by applying the waste hierarchy sequentially through waste prevention, preparing for reuse, recycling and recovery, with disposal as a last resort. This capacity will be monitored to ensure that it has sufficient flexibility to respond to future changes in the quantity, nature and composition of waste and the techniques available to manage the waste."* The policy also seeks to "*avoid adverse impacts of waste management development on the transport network;"* Policy W3 (Spatial Strategy) notes that "*the provision of new waste management facilities should accord with the following mixed spatial approach, having regard to the other policies of the Plan: (b) non-strategic reuse, recycling and recovery facilities should be located at the settlements identified in (a) or within or close to Devon's other towns; and"* Whilst there are no policies that restrict the movement or exportation of waste, the Council is proactively working towards being self-sufficient.
Gloucestershire	Gloucestershire Waste Core Strategy (adopted 2012)	Waste Local Plan for Gloucestershire – in the very early stages of development. Currently in the scoping stage, the Reg. 19 version is	Para 4.31 of the Waste Local Plan recognises that "*a lot of recycled material for example ends up being exported overseas such as paper to China. This is not very sustainable, so we need to try and encourage the development of more local markets for any recycled and composted material produced in Gloucestershire."* Para 4.283 also notes that the Council is considering whether more waste can be transported by alternative modes of transport e.g. rail and water. It is considered that the Facility would not have a material effect on this plan.

		planned for release in 2023/2024.	
Somerset	Somerset Waste Core Strategy (adopted 2013)	New Somerset Waste Plan	Within the Waste Core Strategy, the County Council accepts that a proportion of the county's waste may be treated outside Somerset if this makes best use of the waste as a resource in economic and environmental terms. This is supported by para 2.27. which states that *"Due to the large variety of waste streams and the level of investment needed to build and operate a treatment facility, it is highly unlikely that every local area will contain all the facilities needed to process every waste type that it generates. Some movement of waste to appropriate waste management facilities is therefore inevitable*." It is considered that the Proposed Development would not have a material effect on this plan.
Wiltshire Swindon	Wiltshire & Swindon Core Strategy (adopted 2009)	N/A	Core Strategy Policy WCS1 (The Need for Additional Waste Management Capacity and Self Sufficiency) states that *"Need will be met locally whilst balancing the importation and exportation of waste within the principles of sustainable development and in accordance with the principles of sustainable transport."* This is supported by para 4.6 which notes that "*the Councils are committed to the principles of reducing the impacts associated with the management and movement of waste. Encouraging and promoting the sustainable transport of waste and minimising crossboundary movement of waste are essential to meeting this objective."* Whilst para 5.3 notes that "*The Councils consider that being self-sufficient means that there is sufficient waste management capacity in the Plan area to manage Wiltshire and Swindon's waste arisings. However, it is not considered that this will stop cross boundary movement of waste due to the very nature of the industry and that the management of waste within the Plan area boundary may not always be the most sustainable option."* As such, it is considered that the Proposed Development would not have a material effect on this plan.

Appendix 12 Review of the potential effect of the Facility on Waste plans in Northern Ireland area

Waste Planning Authority	Local Plan	Emerging Plan	Review of the Effect of the BAEF on the Plan
Northern Ireland			
Antrim and Newtownabbey Borough Council	Antrim Area Plan 1984-2001 Belfast Metropolitan Area Plan 2015 was quashed. Metropolitan Newtonabbey. remains under Belfast Urban Area Plan 2001	Antrim and Newtownabbey Borough Council Local Development Plan 2030 (June 2019) Draft Belfast METROPOLITAN Area Plan 2015	<u>Existing Policy:</u> (Member of Arc 21) Municipal waste is sent to Alpha Resource Management's Mullaghglass Landfill near Lisburn. There is no policy or supporting text which seeks to restrict the export of refuse derived fuel from the County Borough. <u>Emerging Policy:</u> Affirmation of the proximity principle and intention to protect existing waste management facilities. It is considered that the Facility will not have a material effect on the plan.
Ards and North Down Borough Council	Ards and Down Area Plan 2015 BMAP was quashed by the Court of Appeal in 2017 but remains a material consideration.	Ards and North Down Borough Council Local Development Plan 2028 (Currently in the process of devising a Draft Plan Strategy- July 2021)	<u>Existing Policy:</u> Ards and Down Area Plan 2015 outlines that it does not hold the jurisdiction to dictate policy as that is the purpose of the Waste Management Strategy for NI. <u>Emerging Policy:</u> The most recent document contributing to the development of the LDP is the Preferred Options Paper (2019). The publication of the Draft Plan Strategy remains in the very early stages, and the Council have only released the Preferred Options Paper at this stage. The POP affirms the role of the Waste Management Strategy and it is considered that the Facility will not have a material effect on the plan'
Armagh City, Banbridge and Craigavon Borough Council	Banbridge,Newry and Mourn Area Plan 2015	Armagh City, Banbridge and Craigavon Borough Council's Local Development Plan 2030	<u>Existing Policy:</u> Former member of Southern Waste Management Partnership until dissolution in March 2015. Joint Waste Management Plan was devised between ACBCBC and Omagh and Fermanagh Council, and Mid Ulster DC. The BNMAP affirms the role of the Regional Development Strategy and PPS 11 Waste Management in determining regional strategy and policy. This literature provides no policy or supporting text which seeks to restrict the export of refuse derived fuel from the County Borough. <u>Emerging Policy:</u>

			The most recent document contributing to the development of the LDP is the Preferred Options Paper (2019). The POP refers to the role of the RDS and WMS for NI as the existing policy framework. This document affirms the significance of sustainability, the proximity principle. However, it is considered that the Proposed Development will not have a material effect on the plan.
Belfast City Council	Belfast Urban Area Plan (2001)- Belfast Metropolitan Plan (2015) was quashed by court appeal in May 2018 so BUAP remains statutory development plan. However, BMAP is still considered as the '*most advanced and up-to-date collection of development management policies*'	Belfast Local Development Plan 2035	<u>Existing Policy:</u> [BUAP is unavailable online] One of the 6 members of ARC21 in the East of NI and constitutes the sole reference to waste management policy. ARC21 does not provide any policy or supporting text which seeks to restrict the export of refuse derived fuel. <u>Emerging Policy:</u> Policy W2- Port locations are considered favourable for WMFs. Paragraph 9.2.14 supporting Policy W2 outlines that the '*treatment and transfer or special waste*' is considered as a 'Waste Treatment Project' and must conform to Waste Management Strategy for NI and relevant Waste Management Plan. It is considered that the Proposed Development will not have a material effect on the plan.
Causeway Coast and Glens Borough Council	Northern Area Plan 2016	Causeway Coast and Glens Local Plan 2035	<u>Existing Policy:</u> The Northern Area Plan 2016 does not provide specific waste management policies and solely references the regional guidance PPS 11: Planning and Waste Management, and the RDS 2015. PPS 11 does not provide any policy or supporting text which seeks to restrict the export of refuse derived fuel. <u>Emerging Policy:</u> A Draft Plan Strategy is anticipated for publication in Spring/Summer 2022 and the Preferred Options Paper makes no reference to waste management policy. The POP affirms *'PPS 11: Planning and Waste Management: The general thrust of the PPS appears to be working well. There is no evidence that it requires substantial change.'*

			It is considered that the Proposed Development will not have a material effect on the plan.
Derry City and Strabane District Council	Derry Area Plan 2011 Strabane Area Plan 2001	Local Development Plan 2032 (Consultations and Counter Representations closed in February 2020)	Existing Policy: Derry Area Plan 2011: The DAP does not present localised waste management strategies and adopts the policy guidance of the Waste Management Strategy for Northern Ireland. There is no policy or supporting text which seeks to restrict the export of refuse derived fuel from the County Borough. Strabane Area Plan 2001: The Strabane Area Plan predates many of the current regional approaches to waste management and is of minor significance There is no policy or supporting text which seeks to restrict the export of refuse derived fuel from the County Borough. Emerging Policy: The emerging LDP aims to combine Derry and Strabane into a single development scheme. The LDP Draft Plan Strategy 2020 is comprehensive but does not make reference to specific waste management policies, identifying the role of the RDS 2035. It should be noted that the DPS 2020 has been constructed with PPSs in mind though these will be reviewed over transitional period leading into the formal adoption of the LDP. It is considered that the Proposed Development will not have a material effect on the plan.
Fermanagh and Omagh District Council	Fermanagh Area Plan 1992-2007 Omagh Area Plan 2002	Fermanagh and Omagh Local Development Plan 2030	Existing Policy: The FAP and OAP are unavailable online and remain outdated. Considering the context of the WMS, RDS PPSs, there is no policy or supporting text which seeks to restrict the export of refuse derived fuel from the County Borough. Emerging Policy: The Draft Policy Plan presents affirmation of PPS 11 and the Proximity Principle. It is considered that the Proposed Development will not have a material effect on the plan
Lisburn and Castlereagh City Council	-	Lisburn and Castlereagh Local	Existing Policy: There is no existing local plan. Emerging Policy:

		Development Plan 2030	SP23 Waste Management: affirmation of Proximity Principle and WMP. *'A joined-up approach between relevant government departments, agencies and the Council with responsibility for various aspects of waste management will be necessary in securing an overall sustainable approach to waste management. This joined up approach will also extend to neighbouring councils under the arc21 arrangements'* (Member of Arc 21) Policy WM1 Waste Management Facilities: *'Incineration is an established method of reducing volumes of waste prior to landfilling or for the treatment of hazardous waste. The process of incineration and other thermal treatment facilities such as pyrolysis and gasification should maximise energy recovering in the form of heat or electricity. In such cases the facilities associated with these processes, particularly incineration, are a material consideration as they often have significant environmental impacts requiring suitable mitigation, including traffic arrangements and landscaping schemes to aid integration'* It is considered that the Proposed Development will not have a material effect on the plan.
Mid and East Antrim Borough Council	Ballymena Area Plan 1986-2001 Larne Area Plan 2010	Mid and East Antrim Local Development Plan 2030 (Submission of Draft Plan Strategy in March 2021)	<u>Existing Policy:</u> Member of Arc 21 Ballymena Area Plan is not available online' Larne Area Plan 2010: Waste policy is not localised in approach, rather the plan adopts the policy of the Waste Management Strategy. The WMS does not contain policy or supporting text which seeks to restrict the export of refuse derived fuel from the County Borough. <u>Emerging Policy:</u> Draft Plan Strategy affirms the role of Northern Ireland Waste Management Strategy (WMS) and SPPS. Paragraph 9.6.4 suggests that efforts to recover energy from waste will be actively encouraged., whilst Policy WMT2 states industrial or port areas are favourable for WMT plants. Applications must be consistent with WMS and Council's WMP. It is considered that the Proposed Development will not have a material effect on the plan

Mid Ulster District Council-Dugannon	Cookstown Area Action Plan 1995-2010	Mid Ulster Local Development Plan 2030	Existing Policy: The Cookstown AAP is unavailable online. Emerging Policy: Affirmation of the role of WMS for NI, SPPs, and the RDS 2035. Policy WM2: 'Incinerators have the potential for energy recovery in the form of electricity and / or heat and power which may provide additional environmental benefits, and which is higher up the waste hierarchy than treatment without recovery. The applicant will be required to demonstrate how energy is to be recovered from the incineration process either in the form of electricity and / or heat and power' It is considered that the Proposed Development will not have a material effect on the plan
Newry, Mourne and Down District Council	Newry, Mourne and Down Local Development Plan 2015 (Attained formal control for Department of Environment in April 2015)	Newry, Mourne and Down Local Development Plan 2030 (This plan will combine and replace the existing 'Banbridge, Newry and Mourne Area Lan 2015' and 'Ards and Down Area Plan 2015' The second revision of the LDP timetable was agreed by the Department for Infrastructure on 12th January 2021, estimating adoption of the Plan in 2027.	Existing Policy: The NMDLDP was adopted in 2009 but online access is no longer available. Emerging Policy: The most recent document contributing to the development of the LDP is the Preferred Options Paper (2018) but the POP does not make specific reference to Waste Management Policy. It is considered that the Proposed Development will not have a material effect on the plan. There is very limited localised information regarding waste management policy within this District.

NI Policy References

Planning Policy Statement

1 (PPS 11): Planning and Waste Management

The Planning Policy Statements (PPS) set out the waste management policies of the Department on particular aspects of land-use planning and apply to all of NI. Paragraph 1.13 states:

'The WMS encourages District Councils to form partnerships for the preparation of WMPs which will be the basis for the stablishment of an integrated network of sub-regional waste management facilities. This has resulted in the formation of three groups:

- The Eastern Region Waste Management Group with 11 councils
- The North West Region Waste Management Strategy Group with 7 councils; and
- The Southern Waste Area Management Group with 8 councils.'

Paragraph 1.14 states: '*The needs identified in the WMPs will provide the basis for the development of proposals by District Councils and private operators with respect to the nature, character and location of the new generation of waste management facilities'*

Paragraph 1.15 states '*PPS11 has an important role in supporting the development of a range of waste management facilities consistent with the principles and objectives of the WMS and WMPs. Consequently, both the WMS and WMPs are important material considerations in assessing development proposals for waste management facilities.'*

Paragraph 1.24 states *'Regional Self Sufficiency: Self-sufficiency is a central tenet of EC legislation which requires all member states to apply this principle in their waste management practices at national level, and, as far as practicable, also at regional and sub-regional levels. The UK's commitment to self-sufficiency at the national level is outlined in the UK Management Plan for Exports and Imports of Waste*.'

Paragraph 1.25 states '*The principle of regional self-sufficiency cannot always be rigidly applied given that commercial considerations may override boundary issues*.'

With reference to policy:

Policy WM1 concerns: Environmental Impact of a Waste Management Facility (Sustainability, No Demonstrable Harm, Control Traffic etc).

Policy WM2 concerns: Waste Collection and Treatment Facilities Waste Collection or Treatment Centres must d) '*in the case of a regional scale waste collection or treatment facility, its location relates closely to and benefits from easy access to key transport corridors and, where practicable makes use of the alternative transport modes of rail and water;*

Arc 21 Waste Management Plan

Arc21 is an umbrella waste management group in Northern Ireland representing 6 councils in the east of the Province. It was established in 2003 and formally incorporated in 2004 after a gradual process of closer co-operation between its councils which numbered 11 at that time prior to local government reform in 2015. arc21 works on behalf of its member councils to guide, support and help them meet their legal requirements and drive forward innovative waste management programmes including the development of infrastructure. The six constituent councils of arc21 are Antrim and Newtownabbey Borough Council, Belfast City Council, Ards and North Down Borough Council, Lisburn & Castlereagh City Council, Mid and East Antrim Borough Council and Newry, Mourne and Down District Council. arc21's work is governed by a legally binding collaborative agreement between all of its councils. Arc21's Waste Management Plan covers the legislative context and offers options and arrangements for municipal and non-

municipal waste (commercial, industrial, packaging, hazardous, and agricultural waste). The Plan the looks to the future requirements of waste management, along with setting out criteria for site selection. It is anticipated for the Plan to run to 2020, with formal reviews and consultations every six years (or more frequently if deemed necessary).

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