



"Working for our members to be the voice of government on waste minimisation and recycling issues"

LOCAL AUTHORITY RECYCLING
ADVISORY COMMITTEE

SPP Consultation
Directorate for the Built Environment
The Scottish Government
2-H, Victoria Quay
Edinburgh
EH6 6QQ

24 June 2009

Dear Ms Richardson,

Consultation Response – Scottish Planning Policy

I am writing to present the LARAC response to the Scottish Planning Policy Consultation, which is contained below, and I thank you for the opportunity to respond to the above consultation.

The comments below are sent on behalf of the Local Authority Recycling Advisory Committee (LARAC). LARAC is an association of well over 400 local authorities across England, Scotland Wales and Northern Ireland whose waste management and recycling professionals' co-ordinate and operate waste management services. Membership is drawn from all types of authority including statutory Waste Collection (WCA), Waste Disposal (WDA) and Unitary.

Overall LARAC welcomes the plan to have a single planning policy replacing numerous SPPs as this offers real opportunities to integrate and align different planning policies. However, LARAC does feel the waste management section of the planning policy is less comprehensive than SPP10, and occasionally lacks practical detail. Overleaf are our detailed comments as requested in the consultation.

If you have any queries on this response or would like to discuss the matter further then please contact me on 07748749147 or khelwig@pipex.dsl.com.

Yours faithfully,

Karin Helwig
LARAC Policy Team



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GREEN GLASS

Q22. Have the main elements of national planning policy relating to renewable energy been included and are they clearly explained?

Although decentralised energy and heat supply including district heating are mentioned in par. 137, in par. 149 very little detail is given on what this means for planning. SPP10 had more explicit inclusions of how to support such developments through planning. For example, it states that "siting of plant close to energy grids or users such as manufacturers and processors using heat from their waste will be consistent with this SPP's model policy." LARAC would like to see similar practical recommendations included in the new Planning Policy, with clear explanation of the importance of a nearby heat market. Par. 149 states that "industrial sites with the potential for collection to the electricity grid or other possible users are likely to be suitable locations for energy from waste plants". LARAC feels this gives insufficient emphasis to the fact that without an accessible heat market, energy from waste plans are unlikely to reach high efficiency rates.

LARAC would also like to see separate mention in the same paragraph of the various forms of energy from waste, including incineration, MBT and Anaerobic Digestion. Furthermore, LARAC deems that the full energy potential of AD and MBT would be best realised through direct injection of biogas into the gas grid. Planning policy could support this through encouraging AD/MBT development in suitable locations and through support for proposals for gas scrubbing and other relevant installations.

Q24 Have the main elements of national planning policy relating to waste management been included and are they clearly explained?

LARAC feels it may be of benefit to be more detailed in describing the types of waste management installations required, in particular recycling plant. Currently there is only reference to the waste management plan for the types and capacities required.

Under par. 165 consideration regarding the proximity of a heat market, must be included for all installations capable of being run as CHP. The possibility of district heating may be a positive aspect of the proximity of a thermal treatment, AD or MBT installation, and may, through appropriate community engagement, help engender community acceptance. District heating from thermal treatment is very successfully utilised in other EU countries. For this to be possible plant would need to be sited near population centres and/or large developments such as hospitals, leisure centres and commercial centres, which would also follow the proximity principle as well as create accessible employment.

The proposed policy states that when thermal treatment plans are being considered, the sensitivity of the surrounding uses to pollution, particularly odour, should be taken into account. LARAC agrees, but feels this applies to all industrial development and indeed several other types of waste management plant, not just to thermal treatment. Such sensitivities must be weighed against advantages of locating plant nearby conurbations as pointed out above.



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Composting facilities, especially smaller scale ones, may be appropriately sited on agricultural land, where they may be able to treat both agricultural and other biowaste.

Whereas SPP10 had a proactive approach to the provision and siting of the required waste management installations as identified in the National Waste Plan, and explicitly acknowledged that for some installations the necessary economies of scale may not be achieved at local or even area level. In these cases the proximity principle would be one of a number of considerations. Such economies of scale would perhaps need to be achieved in particular for plastics recycling operations, WEEE dismantlers and other specialised waste treatment plant.

The proposed planning policy does not appear to include water treatment, as covered under SPP10, as far as LARAC can see. Planners should be aware opportunities may exist for combined solid waste and waste water treatment through AD facilities.