

## Comments received on Delivering Zero Waste Supplementary Guidance

### Acronyms

EIA – Environmental Impact Assessment  
 LDP – Local Development Plan  
 PKC – Perth and Kinross Council  
 SEPA – Scottish Environmental Protection Agency  
 SG – Supplementary Guidance  
 SNH – Scottish Natural Heritage  
 SPP – Scottish Planning Policy  
 ZWP – Zero Waste Plan

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Introduction			
General support for the Supplementary Guidance	Member of the Public	Noted	No
Utilise definition from the Scottish Government's Making Things Last – A Circular Economy Strategy for Scotland <a href="http://www.gov.scot/Resource/0049/00494471.pdf">http://www.gov.scot/Resource/0049/00494471.pdf</a>	PKC Waste Services	We welcome the comments made through this consultation. We will update the definition taking into consideration the Circular Economy.	Yes
We strongly support its aims of enabling those living in Perth and Kinross to lead a zero waste lifestyle and the aspirations of creating a circular economy. Reduced reliance on virgin materials will not only cut waste and carbon emissions but can also deliver benefits for biodiversity through reduced pollutant loads and deceleration of the conversion of natural habitats	SNH	Noted.	No
Second sentence should note that it also encourages those who work (not just live) in the area to lead a zero waste lifestyle.	Binn Group	The guidance will be amended to include those who live work and visit Perth and Kinross as this is in line with the LDP.	Yes
Whilst we respect the need to keep the guidance light and fairly simple, we would suggest that this section on the circular economy would benefit from an appreciation of the use of resources and why a circular resource use system is of benefit. To this end, we suggest the above sentence could be drafted as follows to better represent the important use of secondary resources in the development of a more circular economy: Throughout Perth and Kinross	Binn Group	We welcome the comments made through this consultation. We will update the definition taking into consideration the circular economy.	Yes

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<p>we emphasise the importance of creating a circular economy, which recognises the value of secondary resources and waste <b>infrastructure</b> to the economy, including composting facilities, transfer stations, materials recycling facilities, anaerobic digestion, mechanical, biological and thermal treatment plants <b>and where secondary resources are increasingly linked to beneficial secondary uses to derive local, regional and national sustainable economic benefits.</b></p>			
<p>This early section should go further and actively make clear that the Council will actively encourage the location of circular economy, remanufacturing and advanced recycling businesses in the area at a time of significant growth potential in this sector. See comments below on Sites for Waste Management in Perth and Kinross - page 10.</p>	Binn Group	We do not feel the need to change this section of the guidance. The guidance states the importance of a circular economy and allowing people to live a zero waste lifestyle and the policy position currently support this in appropriate locations (see policy EP9).	No
<b>Background</b>			
<p>Highlight the interaction, between the Zero Waste Plan and the Scottish Government's Making Things Last – A Circular Economy Strategy for Scotland. <a href="http://www.gov.scot/Resource/0049/00494471.pdf">http://www.gov.scot/Resource/0049/00494471.pdf</a> And the Waste (Scotland) Regulations 2012</p>	PKC Waste Services	This guidance document will be referenced within the Supplementary Guidance.	Yes
<p>Now replaced by the circular,economy model. See page 6 of the Scottish Governments Making Things Last – A Circular Economy Strategy for Scotland. <a href="http://www.gov.scot/Resource/0049/00494471.pdf">http://www.gov.scot/Resource/0049/00494471.pdf</a></p>	PKC Waste Services	It is our understanding that the Waste Hierarchy has not been replaced. Instead the waste hierarchy and the idea of a circular economy work together to reduce overall waste in Perth and Kinross.	No
<p>The draft supplementary guidance (SG) states on page 6 that there are five policies within the adopted LDP which refer to waste. However, this should be expanded to include reference to Policy ED1A part e which identifies that proposals for waste management facilities can be considered acceptable in employment and mixed use areas subject to detailed site specific considerations.</p>	SEPA	The guidance will be amended to include this policy.	Yes
<p>Para 1 at top of second column. Suggest amendment to: By working collaboratively with Local Authorities <b>and businesses</b> it aims to develop a consistent education and</p>	Binn Group	The guidance will be amended to include businesses.	Yes

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awareness programme and develop schemes to drive reductions in waste and increase recycling rates.			
There is a typing error in the final paragraph of page 4.	Binn Group	Noted, this will be corrected.	Yes
A link could be added here to Scotland's new plan on the Circular Economy – Making Things Last – A Circular Economy Strategy for Scotland. <a href="http://www.gov.scot/Resource/0049/00494471.pdf">http://www.gov.scot/Resource/0049/00494471.pdf</a>	Binn Group	This guidance document will be referenced within the Supplementary Guidance.	Yes
How Much Waste Is Generated In Perth And Kinross?			
The figures quoted only relate to household waste generated in Perth and Kinross and collected by Perth and Kinross Council. The data needs to take cognisance of all waste generated in the Perth and Kinross area including commercial and industrial, construction and demolition etc. This information can be found via SEPA: <a href="http://www.sepa.org.uk/environment/waste/waste-data/waste-data-reporting/waste-data-for-scotland/">http://www.sepa.org.uk/environment/waste/waste-data/waste-data-reporting/waste-data-for-scotland/</a>	PKC Waste Services	The data used in this piece of guidance was provided by SEPA through the interactive waste data tools. The data will be updated to cover a wider range of waste data.	Yes
It is not helpful to only address household waste metrics. This gives only a partial view and the reader will remain largely unsure of the other part of the picture. We think it is crucial that this page represents all waste arisings in the area. On what basis of logic do we only focus on household waste? The page is headed 'How Much Waste is Generated in Perth and Kinross?', but then completely fails to answer its own question.	Binn Group	The data will be updated to cover a wider range of waste data.	Yes
Waste Management Infrastructure In Perth And Kinross			
Page 8 mentions Binn landfill is still open with capacity. This site closed on 30 September 2014, therefore there are no operational landfill sites in Perth and Kinross. Binn Farm is also now operating a solid recovered fuel facility from the Binn Farm site. It would be best to update the table with more recent data. SEPA should be able to provide this through records of Waste Management activities subject to pollution, prevention and control, waste management license or holding exemptions.	PKC Waste Services	The information regarding Binn farm will be updated accordingly.	Yes

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<p>On page 8, it is stated that there is currently a landfill in operation at Binn farm. The site is still permitted by us however approximately 2 years ago the site ceased accepting waste, with the exception of inert materials for restoration purposes. We are unaware of any proposal to alter this position. We recommend that contact is made with your waste management colleagues with regards landfill capacity in Perth and Kinross Council Area and that the text of this SG is updated.</p>	SEPA	The information regarding Binn farm will be updated accordingly.	Yes
<p>The document states that there is currently only one landfill site in operation in Perth and Kinross at Binn Farm, this site still has capacity for 687,255 tonnes of waste. It should be noted that the above statement is incorrect. Binn Farm landfill closed to waste on 30 September 2014 and despite the landfill having some capacity remaining, the continued operation of the landfill had become economically unviable, due to the increased rates of recycling and recovery of waste. As a result, SUEZ recycling and recovery UK are now only importing soils and inert wastes to facilitate the restoration of the site to a suitable landform.</p>	Suez	The information regarding Binn farm will be updated accordingly.	Yes
<p>The first para of page 8 states there is only 1 landfill in PKC and describes the capacity as over 687,000 tonnes. This site closed in October 2015.</p>	Binn Group	The information regarding Binn farm will be updated accordingly.	Yes
<p>It is not clear from the infrastructure table what the actual types of infrastructure are. For example there is no mention of material reclamation facilities. Metal recyclers are noted but plastic recyclers are not for example. The way the guidance represents infrastructure needs to be re-thought. The representation of infrastructure on the map would suggest that the Binn site is only a landfill. This highlights the inadequacy of the design and information content of this page.</p>	Binn Group	This data within this table was provided by SEPA (2014) through the Waste Data interactive tool. SEPA is responsible for reporting national waste statistics to the Scottish Government and European Union among others.  We are content with the way this data is presented as it contains all the information available to us through SEPA and the waste data tools.	No
<b>Sites For Waste Infrastructure In Perth And Kinross</b>			
<p>Restoration and aftercare needs to take account of the recent SEPA consultation on financial provision for waste</p>	PKC Waste Services	The section detailing restoration and after care has been written in consultation with SEPA who are content	No

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<p>management activities. It was proposing to change the way in which SEPA calculate financial liability for waste management sites and how they require applicants to demonstrate adequate financial provision for waste management activities.</p> <p>The current status of this can be found by contacting: Chris <a href="mailto:Daily_03000996699_waste@sepa.org.uk">Daily_03000996699_waste@sepa.org.uk</a></p>		<p>(with the exception of minor rewording) with our position.</p>	
<p>We object to the fact that the first sentence on page 9 because as drafted it does not accord with the policy coverage in EP9 as it states that the Council does not believe there is a need for further waste management sites in the Council area.</p> <p>Policy EP9B identifies that development of waste management infrastructure will be supported by the plan where the proposals accord with the principles of the ZWP and make a positive contribution to the provision of a network of waste management installations, in addition to a number of other aspects.</p> <p>The ZWP sets out, on page 11, that we must continue to pursue other treatment approaches to recover greater value from the resources we use in addition to recycling performance improving. Paragraph 176 of SPP also states that the planning system should support the emergence of a diverse range of new technologies and investment opportunities to secure economic value from secondary resources, including reuse, refurbishment, remanufacturing and reprocessing.</p> <p>Therefore, as the guidance is to expand on policy EP9, the wording in the SG should reflect the flexibility provided in the policy coverage and the fact that new waste management infrastructure may be appropriate for new technologies in this evolving industry as well as established waste management processes. With regards</p>	SEPA	<p>The section will be reworded to clarify the Council's position in line with SEPA's recommendations.</p>	Yes

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<p>established waste management processes identified in the table on page 8 of the draft SG it is noted that the capacity available within the Council area could well alter due to commercial decisions and therefore additional sites may also be required in the future to maintain the network of installations. We would be happy to revise our position on receipt of an amended draft of the SG which accounts for Policy EP9.</p>			
<p>The determination as to whether or not infrastructure is required needs to be taken on the mass balance of waste generated in Perth and Kinross, flowing into it, being treated here and flowing out of the area. This needs to be based on appropriate data sets (see comments on Page 7 &amp; 8). The requirement for waste infrastructure also needs to take account of future waste growth which is linked to household, commercial and industrial growth in the Perth and Kinross area.</p>	PKC Waste Services	This section will be reworded to clarify the Council's position. We are not allocating future sites for waste infrastructure within the next LDP, instead we are emphasising the importance of encouraging flexibility as established in policy EP9. This is in line with SEPA's recommendations.	Yes
<p>We support the commitment on page 9 to safeguard land around existing waste management sites for expansion of waste management operations.</p>	SEPA	Noted	No
<p>We support the link on page 11 to the forthcoming SG on renewable Energy</p>	SEPA	Noted	No
<p>With regards the text on restoration and aftercare on page 11, the text in the second paragraph could be expanded to clarify that it is the pollution, prevention and control permit conditions that are referred to and an amendment from "then this will be reviewed" to "then financial provision will be reviewed.</p>	SEPA	The wording here will be amended accordingly.	Yes
<p>In terms of restoration and aftercare of waste management sites (p11), as a general principle we recommend that restoration includes habitat creation/enhancement, and provides connectivity with surrounding habitat networks.</p>	SNH	The wording here will be amended to include habitat creation/enhancement and connection to surrounding habitat networks.	Yes
<p>The final bullet point in particular needs to take cognisance of SEPA's Thermal Treatment of Waste Guidelines 2014: <a href="http://www.sepa.org.uk/media/28983/thermal-treatment-of-waste-guidelines_2014.pdf">http://www.sepa.org.uk/media/28983/thermal-treatment-of-waste-guidelines_2014.pdf</a></p>	PKC Waste Services	The guidance will be amended to include reference to these guidelines.	Yes

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<p>The EP9 policies are those derived from the draft LDP presumably.</p> <p>In this case it would be useful to have a policy that was specifically focused on the development of circular economy processes beyond the actual material processing stages. This should focus on encouraging activities that utilise recovered materials for the manufacture of new products and on the emerging concept of remanufacturing (an advanced and more industrial form of re-use). In this respect these types of businesses should be allowed with a relaxation of the part of the EP9 policies (as set out in the 9th indent as follows):</p> <ul style="list-style-type: none"> <li>The proposal is located close to an existing waste management installation and/or within an area identified within the plan for existing and new uses;</li> </ul> <p>Perth and Kinross by its geography is actually an ideal location for the development of these new advanced circular economy concepts and should proactively encourage such developments as a means of growing the local PKC economy.</p>	Binn Group	Policy EP9 is an adopted policy within the LDP. At this stage we are not proposing to redraft the policies within the LDP. However these comments will be considered in the preparation of the proposed plan.	No
Can we ask for sight of this supplementary guidance on Renewable Energy once it is ready for consultation?	Binn Group	Yes we will be conducting a public consultation on this guidance before it is formally adopted.	No
<b>Waste Infrastructure In New Developments</b>			
This connects day-to-day operational perspective with driving up recycling rates, therefore we would propose including the Waste Services planning guidance as an appendix to this document and specifically this section.	PKC Waste Services	Reference to this has been included within the guidance.	Yes
We support the link to the Sustainable Design and Zero Carbon Development SG to ensure readers are aware that there is guidance available with regards minimising waste and maximising recycling during construction and operation.	SEPA	Noted.	No

