

NPF4: call for views

Response of the Scottish Environmental Services Association

The Scottish Environmental Services Association (ESA) is the voice of the resource and waste management industry in Scotland. Our Members turn waste into valuable resources while protecting the environment. We help raise industry standards and lobby constructively for a (planning) policy framework which enables SESA Members to operate profitably and responsibly for the benefit of the environment.

What development will we need to address climate change?

Waste management infrastructure is clearly an essential component of sustainable development, and in enabling more of Scotland's waste to be returned back into the economy as recycled material and using the remaining, residual waste for the generation of low carbon energy it also helps Scotland towards meeting its climate change objectives. Recognition of this within the National Planning Framework (NPF) would be welcome, along with acknowledgment that there will be an increased requirement for additional waste management and recycling infrastructure as a result of Scotland's ambitious waste policy, which requires the separate collection of an increasing range of waste streams and closer alignment with the circular economy agenda.

In responding to higher volumes of material collected through recycling systems, the waste management industry will be required to increase capacity at existing recycling facilities or provide a greater number of additional facilities to manage these segregated waste streams. The planning system clearly has a role in facilitating this change, by making provision for new waste management capacity.

How can planning best support our quality of life, health and wellbeing in the future?

Waste management can make a positive contribution to the development of sustainable communities and should be considered alongside other spatial planning issues, such as economic growth and delivery of new housing.

What does planning need to do to enable development and investment in our economy to benefit everyone?

A stronger link between planning and the circular economy in the NPF would assist our industry to invest in the infrastructure needed to return more of our society's waste back into the economy in the form of recycled or secondary raw materials and local carbon energy.

The NPF should therefore ensure that local plans deliver the new waste treatment facilities Scotland critically needs as landfill sites close around the country. In the longer term, as the circular economy evolves over time and matures the planning system needs to be flexible enough to allow the waste and recycling industry to adapt to new business models, new ways of thinking and meeting the demands of an increasingly environmentally conscious customer base. In seeking to fulfil circular economy objectives, the planning system needs to enable the waste industry to position itself to optimally manage material flows and source sustainable end markets for materials produced by the wider economy.

How can planning improve, protect and strengthen the special character of our places?

While there is no general push to develop waste management facilities on the greenbelt, in recognising the strategic nature of sustainable waste infrastructure it is important that local planning authorities should take account of the specific benefits arising from modern waste management development and apply added weight when considering the special circumstances for proposals located within the greenbelt. Some waste development has unique locational needs: anaerobic digestion (for the treatment of food and organic waste streams) for example, is generally more suited to (semi) rural rather than urban environments.

What infrastructure do we need to plan and build to realise our long term aspirations?

The circular economy rightly places an emphasis on shifting the management of waste further up the waste hierarchy. But this is not to suggest that waste management options towards the bottom of the waste hierarchy have no role to play in Scotland's circular economy, rather each stage of the waste hierarchy should be considered as dealing with a certain waste stream in a particular way. NPF should therefore ensure that planning authorities make provision for waste management capacity across *all* levels of the waste hierarchy.