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Dear Emma,

Scotland's Zero Waste Plan: Consultation

Thank you for this opportunity to comment Scotland's Zero Waste Plan.

At its meeting of 18 September 2009 and in recognition of the imminent closure of the current consultation, the Aberdeen City and Shire Strategic Development Planning Authority (SDPA) agreed to delegate this response to officers in consultation with the chair and vice-chair. However, this response will be reported to the SDPA on 4 December and I will forward any additional comments after the meeting.

This response has sought to avoid duplication with any responses from Aberdeen City or Aberdeenshire Councils by concentrating on those matters of particular interest to the SDPA.

As a consequence of the above, I do not propose a response in relation all the consultation questions, and I will only focus on numbers 4 and 6.

Q4 What should be the future role of Area Waste Groups and Area Waste Plans?

Both Area Waste Groups and Area Waste Plans have in the past provided a regional forum for planning and discussion on waste issues. In theory the group/plans present the potential to provide a significant role in delivering both the National Planning Framework 2 and the Zero Waste Plan. However, in the Northeast the role and importance of the group has diminished over time. While this may reflect the particular circumstances in the area it is clear that in the current form the Area Waste Group is not functioning and is failing to reach the potential required to progress the waste dialogue in the area.

If, as the Zero Waste Plan states, the planning system is to deliver much of the required waste management infrastructure and to rise to the challenges facing waste, it is clear that the future production of development plans (especially Strategic Development Plans) and the implementation of the Zero Waste Plan will require strategic discussion between relevant stakeholders.

Fundamentally, a strategic vision is needed at the regional level in order to facilitate the implementation of national figures outlined in the Zero Waste Plan.

Q6 Development plans have not always identified sites and/or locational criteria for waste management plants. What can be done to ensure that development plans do so in future?

The government, through the reform of the planning system and the production of Circular 1/09 (Development Planning) states that waste management is a topic that is expected to be covered by both Strategic Development Plan and Local Development Plans. Additionally it confirms that planning authorities should have regard to the National Waste Plan in the production of development plans.

Within the National Planning Framework 2 and through consultative draft Scottish Planning Policy (SPP) there are strong, proactive policies on waste management. The consultative draft SPP states that where waste management infrastructure is required development plans must identify suitable sites. Considering these points it is clear that there is ample guidance and policy to support the identification of sites or the inclusion of locational criteria in development plans should they be required.

However, the fact that the current Area Waste Plan for the area is so out of date and the National Waste Plan being under review; considerably hampered the ability of the structure plan to address detailed waste management needs at a strategic level. It is vital that a useful information base exists to inform strategic development plans in the future.

In the preparation of development plans it is important that all relevant stakeholders engage from the earliest opportunity to help produce effective plans. Planning Authorities must work closely with the waste industry, SEPA and the Scottish Government to ensure effective delivery of waste infrastructure. Again, it is essential to emphasise the importance of strategic dialogue between these stakeholders to ensure that infrastructure is planned effectively. Such a grouping could replace the Area Waste Groups in strategic development plan areas.

Within this framework the planning system is crucial to the delivery of waste infrastructure and it is agreed that we must plan for waste “to help deliver significant environmental, energy and economic benefits for Scotland at the local and national level”.

The key message from the Zero Waste Plan accord well with the newly adopted Aberdeen City and Shire Structure Plan. The plan recognises that further policy material is needed and the SDPA is committed to the production of waste supplementary planning guidance that will provide further clarification and strategic guidance on the location of the waste management infrastructure. Additionally the first strategic development plan for the Aberdeen City and Shire will reflect the new framework outlined in the finalised Zero Waste Plan.

I trust that these comments are helpful and I look forward to seeing the final publication of the Zero Waste Plan.

Yours sincerely,

David Jennings
Strategic Development Plan Manager