Review of the Devon Waste Plan

Topic Paper 1: 5 Year Review of Annual Monitoring Report (AMR) data

August 2020

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Contents

1.1. Introduction

1.1.1. Devon County Council is required to undertake a 5 year review of the Devon Waste Plan. The Planning Practice Guidance (PPG)[1] provides advice on what authorities can consider when reviewing a plan. In addition, the Planning Advisory Service (PAS) has published the Local Plan Route Mapper[2] guidance to assist LPAs in undertaking plan reviews and this has also been used to inform the review process.

1.1.2. Both of these guidance documents recommend using evidence gathered through the annual monitoring process as part of any plan review. This report collates and analyses this data to inform whether a plan update may be required.

1.2. Method

1.2.1. As a starting point, data gathered through the annual monitoring process over the last 5 years has been used to consider the effectiveness of the Plan's policies in achieving the vision and objectives. This relates to the Waste Plan's AMRs for period 2014/15 – 2018/19.

1.2.2. The Waste Plan sets out 6 overarching objectives which are threaded throughout policies in the Plan. These are as follows:

Objective 1: Management of waste
Objective 2: Meeting our capacity needs
Objective 3: Climate change
Objective 4: Supporting Devon's communities and businesses
Objective 5: Conserving and enhancing Devon's environment
Objective 6: Transportation of waste

1.2.3. For each objective, the Waste Plan sets out a number of monitoring indicators. These in turn cut across the Plan's policies. For all policies, multiple monitoring indicators are relevant. The relationship between the Plan's indicators, objectives and policies is set out in Table 5.2 Implementation and Monitoring Framework for the Devon Waste Plan (page 95).

1.2.4. As a first step, a '*RAG monitoring'* status was given to each monitoring indicator based upon the criteria below:

Monitoring shows no issues.	Green
Monitoring shows some issues to be reviewed. For example, targets are not being met but performance remains within trigger margin.	Amber

[1] NPPG, Plan making, Plan reviews, paragraphs 061 to 070 (reviewed Oct 2019) https://www.gov.uk/guidance/plan-making

[2] PAS Local Plan Route Mapper & Toolkit - *reviewing and updating local plan policies* | October 2019 https://www.local.gov.uk/pas/plan-making/plan-preparation-project-management/local-plan-route-mapper-toolkit-reviewing-and

Monitoring shows issues to be reviewed and may need to be addressed. For example, due to targets not being met and being outside of trigger margin.	Red

Table 1: RAG Monitoring criteria

1.2.5. Results for a number of indicators suggested there are issues requiring review (amber) and some indicators suggested issues for review which may need to be addressed (red). These were subsequently investigated further.

1.2.6. Where issues were identified, these were reviewed to provide a '*RAG review'* status for the indicators based upon the criteria presented in Table 2 below. Where indicators scored green in step one, they automatically scored green in step two as no issues were identified.

Review shows that the policies relating to this indicator do not need to be updated.	Green
Review shows that the policies relating to this indicator do not need to be updated but should be kept under review.	Amber
Review shows that the policies relating to this indicator trigger the need for the Plan to be updated.	Red

Table 2: RAG Review criteria

1.2.7. For a number of indicators, targets were not included (2.2, 3.1, 3.4, 4.1, 5.1 and 6.2) and therefore a RAG rating was not applied to these indicators.

1.3. Findings

1.3.1. The outcome of the two-stage process outlined above is presented in the summary table below. Appendix 1 and 2 provide the full outcomes of this process, including presentation of how the indicators relate to the Waste Plan policies. Appendix 3 provides the 5 year trend data and explanations informing the ratings awarded. Where ratings have been adjusted through the review process, justification has been provided in the supporting text.

	RAG Monitoring score	RAG Review score
OBJECTIVE 1: Management of waste		
1.1		
1.2		
1.3		
1.4		
1.5		
OBJECTIVE 2: Meeting our capacity needs		
2.1		
2.2		
2.3		
2.4		

OBJECTIVE 3: Climate change		
3.1		
3.2		
3.3		
3.4		
3.5		
OBJECTIVE 4: Supporting Devon's communities and businesses		
4.1		
4.2		
OBJECTIVE 5: Conserving and enhancing Devon's environment		
5.1		
5.2		
5.3		
5.4		
5.5		
5.6		
5.7		
5.8		
5.9		
OBJECTIVE 6: Transportation of waste		
6.1		
6.2		

Table 3: Summary table displaying RAG Monitoring and RAG Review status' for Waste Plan Indicators

1.3.2. As can be seen, step 1 (RAG monitoring) highlighted a number of areas where targets had not been met and, in a number of cases, were outside the trigger margins for review. These were spread across a number of the Plan's objectives.

1.3.3. Following review, no indicators scored a red RAG review status, although 8 indicators scored amber, which require continued monitoring. The main justification and reasoning for altering the ratings through the review process was due to other non-policy based factors being at play which had influenced the outcomes. For example, where assumptions regarding increases in energy recovery when developing the Plan had not materialised as quickly as planned but had since been implemented, or where other measures can be taken to address the issues highlighted instead of changing the policy.

1.3.4. Informed by the process outlined above, none of the Waste Plan policies currently need to be updated as a result of this exercise.

1.4. Limitations

1.4.1. The process outlined above has used readily available waste data in line with guidance. However, there are gaps in information which has meant it is not possible to report on a number of indicators, or it has only been possible to partially report on a number of indicators at this stage. This includes:

- No updated baseline data regarding arisings and management methods for CIW and CDEW. As such the RAG monitoring status' for indicators requiring this data often only refers to outcomes for LACW. This is relevant to indicators:

    - 1.2 recycling of waste (CIW and CDEW)
    - 1.3 energy recovery from waste (CIW)
    - 1.4 disposal of waste (CIW and CDEW)

- No information available regarding the efficiency of operational energy recovery facilities. This is relevant to Indicator 3.2. Operators were contacted regarding this indicator, but no responses were received at the time of writing.

1.4.2. In relation to the first bullet point above, it is necessary to update the Waste Needs Assessment to provide a more comprehensive picture regarding these indicators.

1.5. Conclusion

1.5.1. This assessment indicates it is not necessary to update the Waste Plan policies at this time, but continued monitoring is required to ensure any change to this situation is identified and addressed.

1.5.2. This exercise has also indicated that a number of the current indicators are difficult to monitor because of the availability of data, and therefore any update to the Waste Plan should also consider an update to the monitoring indicators.

APPENDIX 1: RAG MONITORING OUTCOMES

		Policy																			
		W1	W2	W3	W4	W5	W6	W7	W8	W9	W10	W11	W12	W13	W14	W15	W16	W17	W18	W19	W20	W21
	OBJECTIVE 1: Management of waste																					
Indicator	1.1	✓	✓		✓	✓	✓	✓	✓	✓												✓
	1.2	✓	✓		✓	✓	✓	✓	✓	✓												✓
	1.3	✓	✓		✓	✓	✓	✓	✓	✓												✓
	1.4	✓	✓		✓	✓	✓	✓	✓	✓												✓
	1.5	✓	✓		✓	✓	✓	✓	✓	✓												✓
	OBJECTIVE 2: Meeting our capacity needs																					
	2.1	✓	✓	✓		✓	✓	✓	✓	✓	✓											✓
	2.2	✓	✓	✓		✓	✓	✓	✓	✓	✓											✓
	2.3	✓	✓	✓		✓	✓	✓	✓	✓	✓											✓
	2.4	✓	✓	✓		✓	✓	✓	✓	✓	✓											✓
	OBJECTIVE 3: Climate change																					
	3.1	✓	✓	✓	✓	✓	✓	✓	✓	✓		✓			✓			✓		✓	✓	
	3.2	✓	✓	✓	✓	✓	✓	✓	✓	✓		✓			✓			✓		✓	✓	
	3.3	✓	✓	✓	✓	✓	✓	✓	✓	✓		✓			✓			✓		✓	✓	
	3.4	✓	✓	✓	✓	✓	✓	✓	✓	✓		✓			✓			✓		✓	✓	
	3.5	✓	✓	✓	✓	✓	✓	✓	✓	✓		✓			✓			✓		✓	✓	
	OBJECTIVE 4: Supporting Devon's communities and businesses																					
	4.1	✓	✓	✓		✓	✓	✓	✓	✓	✓					✓	✓	✓	✓			✓
	4.2	✓	✓	✓		✓	✓	✓	✓	✓	✓					✓	✓	✓	✓			✓
	OBJECTIVE 5: Conserving and enhancing Devon's environment																					
	5.1	✓	✓				✓	✓				✓	✓	✓	✓		✓	✓		✓	✓	
	5.2	✓	✓				✓	✓				✓	✓	✓	✓		✓	✓		✓	✓	
	5.3	✓	✓				✓	✓				✓	✓	✓	✓		✓	✓		✓	✓	
	5.4	✓	✓				✓	✓				✓	✓	✓	✓		✓	✓		✓	✓	
	5.5	✓	✓				✓	✓				✓	✓	✓	✓		✓	✓		✓	✓	
	5.6	✓	✓				✓	✓				✓	✓	✓	✓		✓	✓		✓	✓	
	5.7	✓	✓				✓	✓				✓	✓	✓	✓		✓	✓		✓	✓	
	5.8	✓	✓				✓	✓				✓	✓	✓	✓		✓	✓		✓	✓	
	5.9	✓	✓				✓	✓				✓	✓	✓	✓		✓	✓		✓	✓	
	OBJECTIVE 6: Transportation of waste																					
	6.1	✓	✓	✓		✓	✓		✓									✓	✓			
	6.2	✓	✓	✓		✓	✓		✓									✓	✓			

APPENDIX 2: RAG REVIEW OUTCOMES

		Policy																			
		W1	W2	W3	W4	W5	W6	W7	W8	W9	W10	W11	W12	W13	W14	W15	W16	W17	W18	W19	W20	W21
Indicator	OBJECTIVE 1: Management of waste																					
	1.1	✓	✓		✓	✓	✓	✓	✓	✓												✓
	1.2	✓	✓		✓	✓	✓	✓	✓	✓												✓
	1.3	✓	✓		✓	✓	✓	✓	✓	✓												✓
	1.4	✓	✓		✓	✓	✓	✓	✓	✓												✓
	1.5	✓	✓		✓	✓	✓	✓	✓	✓												✓
	OBJECTIVE 2: Meeting our capacity needs																					
	2.1	✓	✓	✓		✓	✓	✓	✓	✓	✓											✓
	2.2	✓	✓	✓		✓	✓	✓	✓	✓	✓											✓
	2.3	✓	✓	✓		✓	✓	✓	✓	✓	✓											✓
	2.4	✓	✓	✓		✓	✓	✓	✓	✓	✓											✓
	OBJECTIVE 3: Climate change																					
	3.1	✓	✓	✓	✓	✓	✓	✓	✓	✓		✓			✓			✓		✓	✓	
	3.2	✓	✓	✓	✓	✓	✓	✓	✓	✓		✓			✓			✓		✓	✓	
	3.3	✓	✓	✓	✓	✓	✓	✓	✓	✓		✓			✓			✓		✓	✓	
	3.4	✓	✓	✓	✓	✓	✓	✓	✓	✓		✓			✓			✓		✓	✓	
	3.5	✓	✓	✓	✓	✓	✓	✓	✓	✓		✓			✓			✓		✓	✓	
	OBJECTIVE 4: Supporting Devon's communities and businesses																					
	4.1	✓	✓	✓		✓	✓	✓	✓	✓	✓					✓	✓	✓	✓			✓
	4.2	✓	✓	✓		✓	✓	✓	✓	✓	✓					✓	✓	✓	✓			✓
	OBJECTIVE 5: Conserving and enhancing Devon's environment																					
	5.1	✓	✓				✓	✓				✓	✓	✓	✓		✓	✓		✓	✓	
	5.2	✓	✓				✓	✓				✓	✓	✓	✓		✓	✓		✓	✓	
	5.3	✓	✓				✓	✓				✓	✓	✓	✓		✓	✓		✓	✓	
	5.4	✓	✓				✓	✓				✓	✓	✓	✓		✓	✓		✓	✓	
	5.5	✓	✓				✓	✓				✓	✓	✓	✓		✓	✓		✓	✓	
	5.6	✓	✓				✓	✓				✓	✓	✓	✓		✓	✓		✓	✓	
	5.7	✓	✓				✓	✓				✓	✓	✓	✓		✓	✓		✓	✓	
	5.8	✓	✓				✓	✓				✓	✓	✓	✓		✓	✓		✓	✓	
	5.9	✓	✓				✓	✓				✓	✓	✓	✓		✓	✓		✓	✓	
	OBJECTIVE 6: Transportation of waste																					
	6.1	✓	✓	✓		✓	✓		✓									✓	✓			
	6.2	✓	✓	✓		✓	✓		✓									✓	✓			

APPENDIX 3: 5 YEAR TREND DATA AND RAG MONITORING AND REVIEW ASSESSMENT

OBJECTIVE 1: MANAGEMENT OF WASTE

Indicator 1.1: Waste Audit Statements

Baseline	Target	Trigger for Review of the Plan/Policy
Not available	100% of major planning permissions supported by or requiring a waste audit statement	Less than 75% of major planning permissions supported by or requiring a waste audit statement

5-year trend

2014/15: 10%
2015/16: 26%
2016/17: Data not collected
2017/18: 37%
2018/19: 29%

Further detailed information regarding this indicator is provided in Appendix 4.

RAG Monitoring status

Red

Review

It is clear from the monitoring data that the requirement set out in Policy W4: Waste Prevention for all major planning permissions to be supported by a waste audit statement has not been complied with in the majority of cases since the adoption of the Waste Plan.

Despite the poor performance in relation to this indicator, the policy requirement is in place and there are mechanisms available which can be pursued to ensure that this requirement is complied with which does not require a change to the policy itself. For example, this could include:

- further training of LPA planning officers;
- seeking the requirement included in district validation checklists;
- DCC officers checking weekly lists of planning applications and responding accordingly if a WAS has not been provided.

RAG Review status

The measures outlined above should be pursued in advance of any change to the Plan in relation to this indicator.

Amber

Indicator 1.2: Recycling of Waste

Baseline	Target	Trigger for Review of the Plan/Policy
LACW: 54% (2012/13) CIW: 55% (2009) CDEW: 87% (2010)	LACW: at least 57% by 2016 61% by 2021 64% by 2026 64% by 2031 CIW: at least 58% by 2016 60% by 2021 62% by 2026 64% by 2031 CDEW: at least 88% by 2016 89% by 2021 89% by 2026 90% by 2031	Failure to reach a recycling target by a margin of 5 % points

5-year trend

It should be noted that a review of data has indicated that incorrect figures relating to household waste (rather than LACW) have been reported on a number of occasions for this indicator. This has been rectified in the data presented below. This has resulted in very minor changes to the overall results.

	LACW	CIW	CDEW
2014/15:	54.6%	Data not available	Data not available
2015/16:	54.0%		
2016/17:	54.3%		
2017/18:	52.9%		
2018/19:	54.7%		

The 2016 target for LACW has still not been met although rates have remained within the 5% trigger margin.

Data relating to CIW and CDEW is not available meaning it is not possible to establish recent trends.

RAG Monitoring status

Amber

Review

LACW recycling rates have remained broadly consistent since the adoption of the Waste Plan. Despite this, the Plan's policies continue to provide a framework to facilitate the achievement of a higher recycling rate. Amending the Waste Plan to increase the recycling target does not necessarily mean a higher rate will be achieved. The recycling rate achieved depends on a number of factors including district collection regimes and education campaigns influencing householder behaviour. Linked to Indicator 2.1, there is significant recycling capacity available within Devon to support a growth in the recycling rate and the policies in place support the delivery of additional facilities.

RAG Review status

Policies relating to this indicator do not need to be updated but should be kept under review.

Amber

Indicator 1.3: Energy Recovery from Waste

Baseline	Target	Trigger for Review of the Plan/Policy
LACW: 0% (2012/13) CIW: 12% (2009)	LACW: up to 31% by 2016 39% by 2021 36% by 2026 36% by 2031 CIW: up to 18% by 2016 40% by 2021 38% by 2026 36% by 2031	Failure to reach an energy recovery target for LACW or CIW by a margin of 5 % points

5 year trend

It should be noted that a review of data has indicated that incorrect figures relating to household waste (rather than LACW) have been reported in 2014/15 and 2016/17 for this indicator. This has been rectified in the data presented below. This has resulted in very minor changes to the overall results.

	LACW	CIW
2014/15:	12.1%	Data not available
2015/16:	24.7%	
2016/17:	28.1%	
2017/18:	29.2%	
2018/19:	30.8%	

RAG Monitoring status

Red

Review

When establishing the targets for this indicator when developing the Waste Plan the following assumptions were incorporated:

- The majority of unavoidable waste will be sent for recycling in accordance with the targets set out in Indicator 1.2
- All residual waste not being recycled would be sent for energy recovery. This would be achieved during 2016/17 for LACW and 2017/18 for CIW.
- Whilst the two assumptions above would account for 100% of LACW and CIW, it would be prudent to plan for a small amount of waste, 5% of the total, to continue requiring landfill.

In relation to the assumption that all residual LACW would be sent for energy recovery by 2016/17, this was based on plans at the time by DCC as the Waste Disposal Authority to let a contract for northern Devon's residual waste during that year which would divert this waste from landfill to an energy recovery facility. In

advance of this contract arrangements were already established for the rest of Devon's residual waste to be managed through contracts at energy from waste facilities (at the Exeter and Plymouth Dockyard energy from waste facilities).

This contract was delayed and did not commence until February 2019. This delay has had a knock-on impact upon the achievement of the LACW targets for this indicator. However, the fact that the contract has now been awarded means that going forward, a higher percentage of residual LACW will be diverted from landfill and in turn, the energy recovery targets above will be achieved. For example, during the first half of 2019/20 (Q1 and 2, April – September), the percentage% of total LACW being sent for energy recovery stood at 37.4%[3].

Whilst there is no specific data available to indicate the amount of CIW currently being sent to energy recovery, the increase in operational merchant energy recovery capacity since the adoption of the Plan suggests that additional CIW is being managed in this way.

RAG Review status

Review shows that the policies relating to this indicator do not need to be updated.

Green

[3] Please note this is a provisional figure which remains subject to change.

Indicator 1.4: Disposal of Waste

Baseline	Target	Trigger for Review of the Plan/Policy
LACW: 46% (2012/13) CIW: 33% (2009) CDEW: 13% (2010)	LACW: up to 12% by 2016 5% by 2021 5% by 2026 5% by 2031 CIW: up to 24% by 2016 5% by 2021 5% by 2026 5% by 2031 CDEW: up to 12% by 2016 11% by 2021 11% by 2026 10% by 2031	A level of disposal of waste that is 5 % points above the target

5-year trend

It should be noted that a review of data has indicated that incorrect figures relating to household waste (rather than LACW) have been reported on a number of occasions for this indicator. This has been rectified in the data presented below. This has resulted in very minor changes to the overall results.

	LACW	CIW	CDEW
2014/15:	33.4%	Data not available	Data not available
2015/16:	21.3%		
2016/17:	17.7%		
2017/18:	17.9%		
2018/19:	14.5%		

Data relating to CIW and CDEW is not available meaning it is not possible to establish recent trends.

RAG Monitoring status

Red

Review

The RAG Monitoring status for this indicator is intrinsically linked to the result for Indicator 1.3 above. The delay in awarding the northern Devon residual waste contract which diverts LACW from landfill has resulted in a higher level of waste being landfilled for a longer period of time than envisaged when preparing the Waste Plan. This has now been resolved. For example, during the first half of 2019/20 (Q1

and 2, April – September), the % of total LACW being sent for disposal stood at 4.8%[4].

RAG Review status

Review shows that the policies relating to this indicator do not need to be updated.

Green

[4] Please note this is a provisional figure which remains subject to change.

Indicator 1.5: Growth in Waste

Baseline	Target	Trigger for Review of the Plan/Policy
LACW: 0.04% 2011/12 to 2012/13 (no reliable data for CIW and CDEW)	No target	An increase in the rate of growth of LACW above 5% for two consecutive years

5 year trend

2014/15: +2.0%
2015/16: -3.2%
2016/17: +1.0%
2017/18: -1.3%
2018/19 +0.1%

RAG Monitoring status

Green

OBJECTIVE 2: MEETING OUR CAPACITY NEEDS

Indicator 2.1: Capacity of operational waste management facilities

Baseline	Target	Trigger for Review of the Plan/Policy
Non-hazardous recycling: 2.16 million tonnes (2013)	Non-hazardous recycling: at least 2016: 490,000 tonnes 2021: 560,000 tonnes 2026: 625,000 tonnes 2031: 690,000 tonnes	Current operational capacity is less than target figure
Inert recycling: 1.52 million tonnes (2013)	Inert recycling: at least 2016: 912,000 tonnes 2021: 810,000 tonnes 2026: 720,000 tonnes 2031: 640,000 tonnes	Current operational capacity is less than target figure
Non-hazardous energy recovery: 92,800 tonnes (2013)	Non-hazardous energy recovery: up to 2016: 154,000 tonnes 2021: 356,000 tonnes 2026: 361,000 tonnes 2031: 377,000 tonnes	Current operational capacity is less than 75% of target figure

5-year trend

	Non-hazardous recycling capacity	Inert recycling capacity	Non-hazardous energy recovery
2014/15:	2.16mt	1.43mt	152,800
2015/16:	1.73mt	1.47mt	152,800
2016/17:	1.81mt	1.72mt	160,000
2017/18:	1.45mt	1.48mt	168,000
2018/19:	1.43mt	1.19mt	223,000

Capacity available for non-hazardous and inert recycling has remained comfortably in excess of the 2016 and 2021 targets throughout the 5-year review period.

Non-hazardous energy recovery capacity is in excess of the 2016 target. In addition to the 223,000 tonnes available in Devon, there are contracts in place to recover energy from a further 100,000 tonnes of Devon's waste at sites outside of the Waste Plan's area. This includes 60,000 tonnes of southern Devon's waste going to the Devonport Dockyard energy from waste facility and 40,000 tonnes per annum of northern Devon's waste going to the Cornwall energy recovery facility.

The targets included within this indicator already take account of the 60,000 tonnes going to Plymouth (as illustrated in Figure 3.2 of the Waste Plan) but do not include the 40,000 tonnes going to Cornwall. As such, in order to consider whether the operational capacity available for Devon's waste is on track with the targets set out in this indicator, a total of 263,000 tonnes has been considered (223,000 +40,000). This represents 74% of the target for 2021.

Furthermore, a planning application to increase the capacity of the Willand anaerobic digestion plant from 55,000 tonnes per annum to 120,000 has recently been approved.

RAG Monitoring status

Green

Indicator 2.2: Capacity of permitted non-operational energy recovery facilities in Devon

Baseline	Target	Trigger for Review of the Plan/Policy
Non-hazardous energy recovery: 215,000 tonnes (2013) **Facility type** / **Permitted annual capacity** Gasification (Hill Barton) — 72,000 tonnes Energy from waste incineration (Exeter) — 60,000 Advanced anaerobic digestion (Lee Moor) — 75,000 Pyrolysis (Hill Barton) — 8,000 **Total** — **215,000 tonnes**	N/A	Capacity to be considered in review of Indicator 2.1

5-year trend

Facility	*2013 baseline*	2014/15	2015/16	2016/17	2017/18	2018/19
Advanced anaerobic digestion (Lee Moor)	*75,000*	Lapsed	Lapsed	Lapsed	Lapsed	Lapsed
Energy from Waste incineration (Exeter)	*60,000*	Operational	Operational	Operational	Operational	Operational
Gasification (Hill Barton	*72,000*	72,000	72,000	72,000	72,000	72,000
Pyrolysis (Hill Barton) (later amended to incineration)	*8,000*	8,000	12,000	12,000	4,000	4,000
Anaerobic digestion (Willand)	-	-	25,000	25,000	55,000	Operational
Biorefinery (AD) (Willand)	-	-	10,000	10,000	10,000	Lapsed 29/6/18
Anaerobic digestion (Warleigh Barton)	-	-	7,500	7,500	7,500	Lapsed 16/11/18
Review Total	***215,000***	**80,000**	**126,500**	**126,500**[5]	**148,500**[6]	**76,000**

RAG Monitoring status

N/A as no target included

[5] 2016/17 AMR contained a typo and reported 136,500 instead of 126,500
[6] 2017/18 AMR reported a figure of 131,000 as it did not include the Willand Biorefinery or the Warleigh Barton AD.

Indicator 2.3 Permitted capacity available at Devon's Landfill sites

Baseline	Target	Trigger for Review of the Plan/Policy
Non-hazardous (including SNRHW): 2.89 million m^3 Inert: 2.68 million m^3	Non-hazardous (including SNRHW): 2015: 1.54 million m^3 2016: 1.20 million m^3 2017: 0.88 million m^3 2018: 0.71 million m^3 2019: 0.54 million m^3 Inert: 2015: 2.28 million m^3 2016: 2.15 million m^3 2017: 2.03 million m^3 2018: 1.92 million m^3 2019: 1.81 million m^3	Immediate review of Plan required if capacity falls below target

5 year trend

The Environment Agency publishes data annually on the availability of permitted landfill capacity and this data has been used to inform this indicator. These figures have been compared to the forecast available capacity set out in the Waste Plan. The 5 year trend is set out in the tables below. Figures presented are in cubic metres.

Non-Hazardous	2014/15	2015/16	2016/17	2017/18	2018/19
Forecast available capacity	1,543,000	1,196,000	880,000	711,000	543,000
Actual available capacity	1,832,000	1,084,000	887,000	640,000	1,184,000
Difference	**289,000**	**-112,000**	**7,000**	**-71,000**	**641,000**

Inert	2014/15	2015/16	2016/17	2017/18	2018/19
Forecast available capacity	2,277,000	2,153,000	2,033,000	1,918,000	1,807,000
Actual available capacity	2,446,000	2,619,000	2,436,000	1,879,000	1,669,000
Difference	**169,000**	**466,000**	**403,000**	**-39,000**	**-138,000**

RAG Monitoring status

Red

Review

As can be seen, since the adoption of the Waste Plan the level of permitted capacity for non-hazardous landfill has fluctuated above and below the forecast amount. The most recent monitoring data indicates a significantly higher availability of capacity than forecast.

For the first few years following the adoption of the Waste Plan the level of inert landfill capacity remained above the forecast amount however for the last couple of years data indicates less capacity than predicted is available. Despite this, the

difference between the forecast and actual amounts remains a relatively small figure when considered in the context of the overall amount remaining.

Policy W7: Waste Disposal does not include specific sites for future disposal operations but instead sets out criteria which would enable the delivery of additional disposal capacity if required.

Since the Plan's adoption, proposals for additional landfill capacity have been forthcoming. This includes extending the permitted lifespan of non-hazardous capacity at an existing site and the reopening of a former non-hazardous landfill site. There have also been proposals for new inert landfill sites, and a new inert landfill at Challonsleigh in south Devon was recently granted permission. As such it is considered that Policy W7 provides an effective framework to support the positive determination of planning applications for waste disposal and therefore it is not necessary to update the policy at this time.

RAG Review status

Policies relating to this indicator do not need to be updated but should be kept under review.

Amber

Indicator 2.4: Proportion of Devon's waste managed in the Plan area

Baseline	Target	Trigger for Review of the Plan/Policy
Non-hazardous waste: 62% (2011) Hazardous Waste: 28.7% (2011)	Non-hazardous waste: 2016: at least 68% 2021: at least 73% 2026: at least 79% 2031: at least 85% Hazardous waste: at least 30% from 2016 to 2031	Failure to reach a target by a margin of 5 % points

5 year trend

The indicator specifically refers to non-hazardous waste, however since 2016/17 reporting on this indicator as part of the annual monitoring process has grouped non-hazardous waste with inert waste. As such, as part of this review a reassessment has been undertaken displaying the following results. Whilst inert waste is not included as part of the indicator, this has been set out below for information.

The non-hazardous and inert results are taken from the Waste Data Interrogator. Non Hazardous waste is take from the HIC waste type category. The Hazardous waste results are from the Hazardous Waste Data Interrogator.

	Non-hazardous	Inert	Non-hazardous and Inert combined	Hazardous
2014	75	91	83	29
2015	72	87	79	34
2016	74	93	83	31
2017	75	90	83	30
2018	76	93	84	54

Proportion (%) of Devon's waste managed in the Plan area

RAG Monitoring status

Green

OBJECTIVE 3: CLIMATE CHANGE

Indicator 3.1: Energy capacity for energy recovery facilities (including landfill gas) (classed by type of energy, e.g. heat, electricity)

Baseline	Target	Trigger for Review of the Plan/Policy
20MW electricity (2013)	No target as level of energy is dependent on the capacity of energy recovery facilities developed	N/A

As part of the review process, operators of energy recovery facilities and sites where landfill gas is generated were contacted and information regarding this indicator was requested in order to update the baseline information. However, no responses have been received at the time of writing.

Since the adoption of the Waste Plan the AMRs have focused upon an additional 3 MW of capacity becoming available at the Exeter Energy in addition to a small amount of additional capacity comping from the partially operational energy from waste incineration plant (formerly pyrolysis) at Hill Barton.

RAG Monitoring status

N/A as no target included

Indicator 3.2: Efficiency of operational energy recovery facilities (including measurement for each energy recovery facility of input waste and energy content, input energy and efficiency of the energy recovery process).

Baseline	Target	Trigger for Review of the Plan/Policy
N/A	40% efficiency from 2018	Failure to achieve 35% from 2018

Monitoring of this indicator over the 5 year review period has proved challenging and no up to date information about the efficiency of operational energy recovery facilities has been provided as part of this process.

Linked to indicator 3.1 above, operators of energy recovery facilities were contacted as part of this review in order to identify the current efficiency rates being achieved. However, no information was provided and therefore it has not been possible to report on this indicator. It is therefore unknown whether the 40% target or 35% trigger is being achieved.

RAG Monitoring status

Amber

Review

Making changes to the Plan as a result of this lack of information would not result in the information becoming available, and therefore it is not considered necessary to review policies as a result of this indicator, however, further engagement with operators will be undertaken to establish the efficiency rates currently being achieved. As such the RAG monitoring status for this indicator is amber

RAG Review status

Policies relating to this indicator do not need to be updated but should be kept under review.

Amber

Indicator 3.3: Number of planning applications determined contrary to the Environment Agency's advice on flood risk

Baseline	Target	Trigger for Review of the Plan/Policy
0 (2012/13)	0	One planning application

5-year trend

2014/15: 0
2015/16: 0
2016/17: 0
2017/18: 0
2018/19: 0

The indicator refers to the number of planning applications that were determined contrary to the advice from the Environment Agency regarding flood risk. The target to trigger a review of the Waste Plan is one planning application. The five-year trends shows that none of the determined planning applications during that time qualified for a review of the plan.

RAG Monitoring status

Green

Indicator 3.4: Inclusion of energy efficiency measures and use of low-carbon energy in planning applications for waste management facilities

Baseline	Target	Trigger for Review of the Plan/Policy
N/A	No specific target as delivery will be dependent on the forms of waste management facility delivered	N/A – applications will be monitored for delivery of measures

5-year trend

Number of planning applications incorporating energy efficiency measures or the use of low carbon energy

2014/15: 1
2015/16: 6
2016/17: 1
2017/18: 0
2018/19: 0

RAG Monitoring status

N/A as no target included

Indicator 3.5: Proportion of non-hazardous waste disposed of through landfill

Baseline	Target	Trigger for Review of the Plan/Policy
38.4% (2011)	Up to: 20% by 2016 5% by 2021 5% by 2026 5% by 2031	A level of disposal of waste that is 5 % points above the target

5-year trend

2014/15:	22%
2015/16:	18%
2016/17:	15%
2017/18:	15%
2018/19:	14%

RAG Monitoring status

Red

Review

Whilst the target has not been met, this is partly due to the delay in letting the northern Devon residual LACW contract which has meant a higher level of waste has continued to be disposed via landfill for a longer period of time than envisaged when producing the Waste Plan (linked to indicators 1.3 and 1.4 discussed above). This situation has now been resolved so a smaller proportion of LACW will be sent for landfill going forward.

RAG Review status

Policies relating to this indicator do not need to be updated but should be kept under review.

Amber

OBJECTIVE 4: SUPPORTING DEVON'S COMMUNITIES AND BUSINESSES

Indicator 4.1: The number and % of proposals where cumulative impact on amenity or quality of life is a reason for refusal

Baseline	Target	Trigger for Review of the Plan/Policy
N/A	No specific target as performance will be dependent on the type of applications submitted	N/A

5-year trend

2014/15: 1
2015/16: 0
2016/17: 0
2017/18: 0
2018/19: 0

Within 2014/15, one waste planning application was refused for reasons including impacts of the proposed development upon the amenity of local residents as a result of noise. However, the application was determined prior to the adoption of the Devon Waste Plan, Policy W18 (Quality of Life) of the emerging Devon Waste Plan was used within the reason for refusal.

As can be seen, since the adoption of the Waste Plan the remaining trends did not refuse any waste planning applications based on cumulative impact on amenity or quality of life. Policy W18 (Quality of Life) of the Waste Plan looks for development proposals to demonstrate adverse impacts that will be strictly controlled to avoid any significant nuisance being caused to dwellings and other sensitive properties close to the site or its transportation routes. Therefore, development proposals can provide mitigation measures to address any cumulative impacts rather than refusing a waste planning application.

RAG Monitoring status

N/A as no target included

Indicator 4.2: Change in extent of public rights of way network attributable to waste development

Baseline	Target	Trigger for Review of the Plan/Policy
N/A	No net loss	Any loss in extent not offset by equivalent provision

5-year trend

2014/15: 0
2015/16: 0
2016/17: 0
2017/18: 0
2018/19: 0

The five-year trend indicates that none of the approved applications resulted in the any loss in the extent of the Public Right of Way (PROW) network.

RAG Monitoring status

Green

OBJECTIVE 5: CONSERVING AND ENHANCING DEVON'S ENVIRONMENT

Indicator 5.1: Planning permissions that provide for biodiversity enhancement

Baseline	Target	Trigger for Review of the Plan/Policy
N/A	No specific target as delivery will be dependent on the forms of waste management facility delivered	N/A – applications will be monitored for delivery of measures

5-year trend

2014/15: 10
2015/16: 8
2016/17: 12
2017/18: 5
2018/19: 11

The five-year trend shows that a number of approved planning permissions were supported by landscaping or planting schemes, or schemes were requested by condition to deliver biodiversity enhancement. However, not every application provided biodiversity enhancement, this is because it was not feasible to enhance biodiversity for some operations.

Overall, this is considered to be an appropriate outcome for this indicator and biodiversity enhancement has been provided when necessary.

RAG Monitoring status

N/A as no target included

Indicator 5.2: Change in area and condition of designated and county nature conservation and geological sites caused by waste development

Baseline	Target	Trigger for Review of the Plan/Policy
N/A	No net loss of area or deterioration in condition	One planning permission failing to meet target

5-year trend

2014/15: 0
2015/16: 0
2016/17: 0
2017/18: 0
2018/19: 0

The five-year trend shows that none of the approved applications resulted in any adverse change to designated and county wildlife and geological sites. Therefore, a review of this indicator is not triggered.

RAG Monitoring status

Green

Indicator 5.3: Change in area, type and condition of Devon BAP habitats caused by waste development

Baseline	Target	Trigger for Review of the Plan/Policy
N/A	No net loss of area or deterioration in condition	One planning permission failing to meet target

5-year trend

2014/15: 0
2015/16: 0
2016/17: 0
2017/18: 0
2018/19: 3

In 2018/19 there were three applications located within Devon BAP habitats. Two applications were located within UK Bap Undetermined Woodland and the other was located within UK BAP Coastal Floodplain Grazing Marsh. The applications that fell within Devon BAP habitats were all on previously developed waste land. Two of the applications were located at Kenbury Wood Landfill Site and the other application was located at the Anaerobic Digestion plant in Willand.

DCC's Ecologist commented on two of the applications and didn't raise any concerns about the BAP habitats.

RAG Monitoring status

Amber

Review

The developments are located on existing waste sites. Kenbury Wood Landfill Site is located on the outskirts of Exeter, immediately off of the A38. The Anaerobic Digestion Plant in Willand shares the site with the 2 Sisters Food Group and is adjacent to the M5.
These sites are already well-established, and the proposed applications were minor. Therefore, it's not considered the proposals will harm the BAP habitats and the review shows that the policies relating to this indicator do not need to be updated.

RAG Review status

Review shows that the policies relating to this indicator do not need to be updated.

Green

Indicator 5.4: Planning permissions that result in the loss of, or harm to, assets of heritage value

Baseline	Target	Trigger for Review of the Plan/Policy
N/A	No significant adverse impact	One planning permission

5-year trend

2014/15: 0
2015/16: 0
2016/17: 0
2017/18: 0
2018/19: 0

The five-year trends show that none of the consents granted resulted in the loss of, or harm to, assets of heritage value. Therefore, a review of the indicator is not triggered.

RAG Monitoring status

Green

Indicator 5.5: Planning permissions for waste development having a significant landscape impact on an AONB or National Park

Baseline	Target	Trigger for Review of the Plan/Policy
N/A	No significant adverse impact	One planning permission

5-year trend

2014/15: 0
2015/16: 1 (refused by DCC, allowed on appeal)
2016/17: 0
2017/18: 0
2018/19: 0

One application in 2015/16, for an anaerobic digestion facility at Tamerton Foliot, was refused due to its adverse impact on the Tamar Valley AONB; however, an appeal against this decision was allowed, with the inspector concluding that any detrimental impact of its location within the AONB could be moderated. As such, the final decision on this proposal was that a significant landscape impact on the AONB would not occur as a result of the development. This facility has since not been built and the planning permission has now lapsed.

RAG Monitoring status

Green

Indicator 5.6: Planning permissions for new waste development on previously-developed land

Baseline	Target	Trigger for Review of the Plan/Policy
N/A	50% of permissions for the development of new sites	Less than 25% of permissions for new sites

5-year trend

2014/15: 59%
2015/16: 73%
2016/17: 45%
2017/18: 91%
2018/19: 25%

Within 2018/19, 8 of the 19 approved permissions were classed as new waste development. There were a high number of applications for variation of condition and ancillary facilities at existing waste sites, which did not increase the capacity of an existing operation.
Of the 8 applications constituting new development, only 2 (25%) were located on previously developed land. The remaining 6 were either proposals for on-farm composting or re-profiling on agricultural land through the importation of inert waste.

The 50% target has not been met, but this is largely due to the nature of the types of applications that came forward. However, the 25% result remains within the trigger margin.

RAG Monitoring status

Amber

Review

The 5-year trend shows that two of the years didn't meet the 50% target, however, this is influenced by the nature of the applications that were received. For example, 2018/19 saw 6 applications for new waste development, however they weren't situated on previously developed land. They were located on agricultural land and were either for on-farm compositing or re-profiling of the land.

RAG Review status

The review shows that the policies relating to this indicator do not need to be updated but should be kept under review.

Amber

Indicator 5.7: Area of best and most versatile agricultural land lost to waste development

Baseline	Target	Trigger for Review of the Plan/Policy
N/A	No loss	One planning permission

5-year trend

2014/15: 0
2015/16: 0
2016/17: 2
2017/18: 0
2018/19: 1

RAG Monitoring status

Over the 5 years, three of the approved applications resulted in the loss of best and most versatile agricultural land.

In 2016/17, two applications resulted in a combined loss of approximately 0.84 hectares of the best and most versatile (grade 3a) agricultural land. The applications both involved land formation works utilising excavated materials arising from construction of the South Devon Link Road.

In 2018/19, one application resulted in the loss of best and most versatile agricultural land. The application was for the 'remodelling of field ground profiles to reposition a spoil heap'. The northern part of the site was the storage location of the inert wastes in question and the proposal looked to relocate these materials to a field south of the site, which is already in agricultural use. Following the relocation and remodelling the field will be returned to its current use.

As part of the planning process, DCC's Landscape Officer was consulted on the application and commented saying 'the proposals for the northern part of the site are unsympathetic to the locally distinctive landscape character, and that scope to mitigate adverse landscape and visual impacts to acceptable levels has not been taken. There would be loss or degradation of the best and most versatile agricultural land. These issues provide grounds for refusal as contrary to relevant policies of the Devon Waste Plan and South Hams Local Plan, to be considered in the planning balance.' Following this, the agent submitted revised plans for the northern section of the site, which reflected the already approved levels under application no. 2482/17/FUL and the planning officer, considered these revisions to be sympathetic to the locally distinctive landscape character.

Red

Review

The target for best and most versatile agricultural land lost to waste development is no loss.

Three applications over the five years were subject to the loss of best and most versatile agricultural land. Even though one of the applications proposed to reinstate the land to its current use following the remodelling of the field, two of applications still resulted in the loss of best and most versatile land.
However, these applications both involved land formation works utilising excavated materials arising from the construction of the South Devon Link Road. Given these circumstances, it is considered that the construction of the South Devon Link Road that has resulted in the loss of this agricultural land and not these associated permissions for landscaping works.

RAG Review status

The review shows that the policies relating to this indicator do not need to be updated but should be kept under review.

Amber

Indicator 5.8: Number of pollution incidents recorded by the Environment Agency for permitted waste sites

Baseline	Target	Trigger for Review of the Plan/Policy
N/A	No increase in annual number of incidents	10% increase in annual number of incidents

5-year trend

2014/15: Data not collected
2015/16: 0
2016/17: 0
2017/18: 2
2018/19: 3

Incidents recorded above relate to those classed as category 1 (Major Impact) and Category 2 (Significant Impact).

RAG Monitoring status

Red

Review

The Waste Plan seeks to ensure unacceptable planning impacts do not occur as a result of development. However, alongside this, the Environment Agency are responsible for issuing permits to ensure pollution levels remain within regulated limits. Paragraph 7 of the NPPW states:

"When determining waste planning application, waste planning authorities should:

- *concern themselves with implementing the planning strategy in the Local Plan and not with the control of processes which are a matter for the pollution control authorities. Waste planning authorities should work on the assumption that the relevant pollution control regime will be properly applied and enforced."*

Furthermore, paragraph 183 of the NPPF states:

> *"The focus of planning policies and decisions should be on whether proposed development is an acceptable use of land, rather than the control of processes or emissions (where these are subject to separate pollution control regimes). Planning decisions should assume that these regimes will operate effectively. Equally, where a planning decision has been made on a particular development, the planning issues should not be revisited through the permitting regimes operated by pollution control authorities."*

Pollution incidents occur when conditions agreed by the Environment Agency are breached. This can be for a number of reasons and is usually due to unforeseen

and/or during atypical circumstances. The responsibility to address these pollution incidents lies with the Environment Agency as the regulating body.

During the 5 years since the adoption of the Waste Plan only a very small number of major and significant pollution incidents have been recorded by the Environment Agency. Changes to the Waste Plan policies would not assist in reducing the number of pollution incidents and therefore it is not deemed necessary to update policies as a result of this indicator at this time.

RAG Review status

Policies relating to this indicator do not need to be updated but should be kept under review.

Amber

Indicator 5.9: The number of waste planning applications incorporating Sustainable Drainage Systems

Baseline	Target	Trigger for Review of the Plan/Policy
N/A	50% of permissions for the development of new sites	Less than 25% of permissions for new sites

5-year trend

2014/15: 2 (15%)
2015/16: 4 (50%)
2016/17: 4 (57%)
2017/18: 10 (83%)
2018/19: 4 (50%)

RAG Monitoring status

Amber

Review

The five-year trend shows that 2014/15 did not meet the 50% target, and instead only reached 15%. However, during 2014/15 there were significantly more applications within Flood Zones (and where appropriate Flood Risk Assessments were provided) or were within Areas Susceptible to Surface Water Flooding but were not of a significant enough scale to constitute a requirement for a Sustainable Drainage System.

Additionally, during 2014/15 changes were being made to validation requirements for applications, the changes reflected the adoption of the Waste Plan as well as wider changes regarding local authority responsibility for Flood Risk Management. Meaning that within the next monitoring period, it was predicated that a more significant number of applications would require the inclusion of Sustainable Drainage Systems.

The 5-year trend clearly demonstrates that after 2014/15 there was an increase in applications incorporating Sustainable Drainage Systems and the 50% target has been met. Therefore, it is not considered that a review of the plan is needed.

RAG Review Status

Green

OBJECTIVE 6: TRANSPORTATION OF WASTE

Indicator 6.1: Planning permissions that accord with highways advice

Baseline	Target	Trigger for Review of the Plan/Policy
None	100%	5% of planning applications in one year not according with highways advice

5-year trend

2014/15: 100%
2015/16: 75%
2016/17: 75%
2017/18: 100%
2018/19: 100%

RAG Monitoring status

Amber

Review

The five-year trend shows that 2015/16 and 2016/17 did not meet the 100% target for planning permissions to accord with highways advice. In 2015/16 and 2016/17, two applications (25%) did not follow the highways advice received.

In the cases where highways advice (recommending construction or traffic management plans) was not followed, alternative measures were taken in order to address the concerns raised. This included through the incorporation of conditions to the permission granted which adequately addressed the advice.

Therefore, the review shows that the policies relating to this indicator do not need to be updated.

RAG Review status

Green

Indicator 6.2: Transportation of waste by rail or water

Baseline	Target	Trigger for Review of the Plan/Policy
None	N/A as dependent on location of future waste development in relation to transportation infrastructure	The proportion of waste transported by rail or water will be monitored

5-year trend

2014/15: 0
2015/16: 0
2016/17: 0
2017/18: 0
2018/19: 0

RAG Monitoring status

N/A as no target included

APPENDIX 4: INDICATOR 1.1: WASTE AUDIT STATEMENTS – MONITORING OUTCOMES

	2014/15		2015/16		2017/18		2018/19	
District	**Major permissions granted**	**Percentage supported by WAS**	**Major permissions granted**	**Percentage supported by WAS**	**Major permissions granted**	**Percentage supported by WAS**	**Major permissions granted**	**Percentage supported by WAS**
East Devon	32	0%	25	20%	8	0%	6	33%
Exeter	33	9%	16	25%	12	25%	22	23%
Mid Devon	18	44%	15	47%	26	85%	15	80%
North Devon	41	20%	20	25%	22	27%	20	40%
South Hams	Data not available		27	37%	Data not available		Data not available	
Teignbridge	42	0%	11	9%	6	0%	31	16%
Torridge	24	0%	15	20%	20	20%	19	21%
West Devon	Data not available		4	25%	Data not available		Data not available	
Totals	**190**	**10%**	**133**	**26%**	**94**	**37%**	**113**	**29%**

APPENDIX 5: INDICATOR 2.4

The total waste originating in Devon being managed at a facility operating under an environmental permit issued by the Environment Agency. Figures shown are in million tonnes.

Non-hazardous, i.e. HIC (taken from the WDI)

	Total produced in Devon	Total also managed in Devon	%
2014	1.205	0.907	**75**
2015	1.259	0.909	**72**
2016	1.263	0.941	**74**
2017	1.305	0.978	**75**
2018	1.386	1.048	**76**

Inert (taken from the WDI)

	Total produced in Devon	Total also managed in Devon	%
2014	1.015	0.928	**91**
2015	1.248	1.082	**87**
2016	1.136	1.055	**93**
2017	1.319	1.190	**90**
2018	1.512	1.400	**93**

Non-hazardous and Inert combined (Taken from the WDI)

	Total produced in Devon	Total also managed in Devon	%
2014	2.220	1.835	**83**
2015	2.507	1.991	**79**
2016	2.399	1.996	**83**
2017	2.625	2.169	**83**
2018	2.898	2.449	**84**

Hazardous (taken from the Hazardous WDI)

	Total produced in Devon	Total also managed in Devon	%
2014	40,500	11,900	**29**
2015	38,722	13,018	**34**
2016	37,343	11,644	**31**
2017	48,964	14,574	**30**
2018	75,213	40,422	**54**