

Review of the Devon Waste Plan

Topic Paper 3: Spatial Strategy Review

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1.1. Introduction

- 1.1.1. This report provides a consideration of whether the spatial strategy underpinning the Waste Plan is being effectively delivered and whether it remains fit for purpose going forward.
- 1.1.2. Whilst inherently linked to the spatial strategy, delivery of the vision and policy objectives are considered in a separate report as part of the review of annual monitoring data (Waste Plan Review Topic Paper 1).

1.2. Evidence informing the development of spatial strategy

- 1.2.1. During the preparation of the Waste Plan, a topic paper was produced¹ to set out how the spatial strategy had been developed and the evidence which had been used to inform its direction. The report was split into three chapters.
- 1.2.2. The first considered the spatial characteristics of Devon. This included a discussion of the geographical and settlement pattern within Devon, highlighting the major centre of population is Exeter (120,000), with the next largest towns being Exmouth (36,000), Newton Abbot (25,000) and Barnstaple (25,000)². With the exception of the cluster of towns in northern Devon, the main settlements are broadly located within the M5/A38 corridor of eastern and southern Devon.
- 1.2.3. It also referred to the spatial strategy set out in the Devon Structure Plan (2004). In this Plan, Exeter was identified alongside Plymouth and Torbay as a 'Principal Urban Area' and as such recommended that these settlements should be the focus for strategic growth. The Structure Plan also identified Barnstaple and Newton Abbot as Sub Regional Centres in recognition of their role in meeting strategic development needs within their areas (while Exmouth's population is greater than either of these towns, its proximity to Exeter and more limited economic base limit its strategic function).
- 1.2.4. The report set out the current pattern of waste management facilities across Devon and included a series of maps to display how facilities were geographically spread across the county. The paper highlighted how the generation of local authority-collected waste and commercial and industrial waste is closely linked to the distribution of Devon's population and businesses, while construction, demolition and excavation waste is generated through new development.
- 1.2.5. The second chapter of the report outlined the options for the spatial approach which had been developed and consulted upon during the preparation of the Waste Plan. This included a centralised, a local and a mixed approach. The outcome of public consultation indicated the mixed spatial approach as the favoured option. The mixed approach could allow for a number of medium-sized facilities with similar capacities, or alternatively one or more medium-sized facilities and a series of smaller facilities reflecting local need. Areas of search were defined around the 14 largest

¹ Waste Topic Paper 8, available to download at <https://www.devon.gov.uk/planning/planning-policies/minerals-and-waste-policy/devon-waste-plan>

² These estimates were from 2012.

market and coastal towns together with Cranbrook and Sherford new communities, and alongside the M5/A38 corridor. All options were subject to sustainability appraisal and Habitat Regulation Assessment and the outcomes of these assessments were used to develop the approach further.

- 1.2.6. The third chapter of the topic paper presented how the mixed spatial approach was refined and policy W3 was developed. It includes a consideration of planned development levels and locations across Devon and anticipated cross boundary movement of waste management.
- 1.2.7. The evidence provided within the Waste Topic Paper and Policy W3 was tested at the Examination of the Devon Waste Plan and found to be sound subject to main modifications. These modifications were consulted upon and incorporated in advance of the adoption of the Plan.

1.3. Policy W3: Spatial Strategy

- 1.3.1. Policy W3 sets out the spatial strategy for the Waste Plan as follows:

Policy W3: Spatial Strategy

The provision of new waste management facilities should accord with the following mixed spatial approach, having regard to the other policies of the Plan:

- (a) strategic recycling, recovery and disposal facilities shall be located:
 - within or close to Exeter, Barnstaple and Newton Abbot; or
 - at other opportunities within Devon for the efficient use of heat and power from energy recovery that are accessible to the settlements identified above;
- (b) non-strategic reuse, recycling and recovery facilities should be located at the settlements identified in (a) or within or close to Devon's other towns; and
- (c) small-scale community-based reuse, recycling and composting facilities should be located within or close to the community they serve and/or at the point of the arising or final use of the waste materials.

For all facilities, regard will be had to the merits of the use of previously-developed land or redundant buildings and/or co-location with other waste management facilities and the potential cumulative effects of doing so.

- 1.3.2. The Waste Plan defined strategic facilities for recycling and recovery as those capable of managing a minimum of 40,000 tonnes of LACW, CIW and/or CDEW, or in excess of 10,000 tonnes of hazardous or radioactive waste.
- 1.3.3. The spatial strategy is illustrated in Figure 3.1 on page 55 of the Waste Plan and replicated in Figure 1 below.



Figure 1: The Spatial Strategy for the Devon Waste Plan

1.4. The location of operational waste management facilities

- 1.4.1. Figures 2.6, 2.7, 2.8 and 2.9 of the Waste Plan display the locations of existing facilities at the time the plan was adopted. As part of the Waste Plan review, this has been reconsidered and updated using the Waste Data Interrogator³ (WDI) published by the Environment Agency. This database includes details of sites operating under an environmental permit which received waste for the given year. The latest dataset available is for 2018.
- 1.4.2. This data indicates that during 2018, 159 sites in Devon received waste. Of these, 142 (89%) were located within the area identified as forming the

³ <https://data.gov.uk/dataset/312ace0a-ff0a-4f6f-a7ea-f757164cc488/waste-data-interrogator-2018>

spatial strategy embedded within the Waste Plan. This is displayed in Figure 2 below.

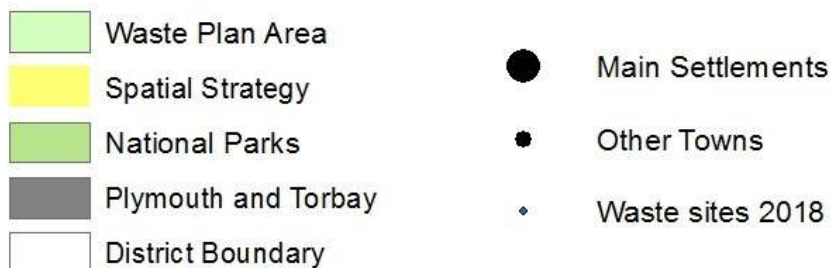
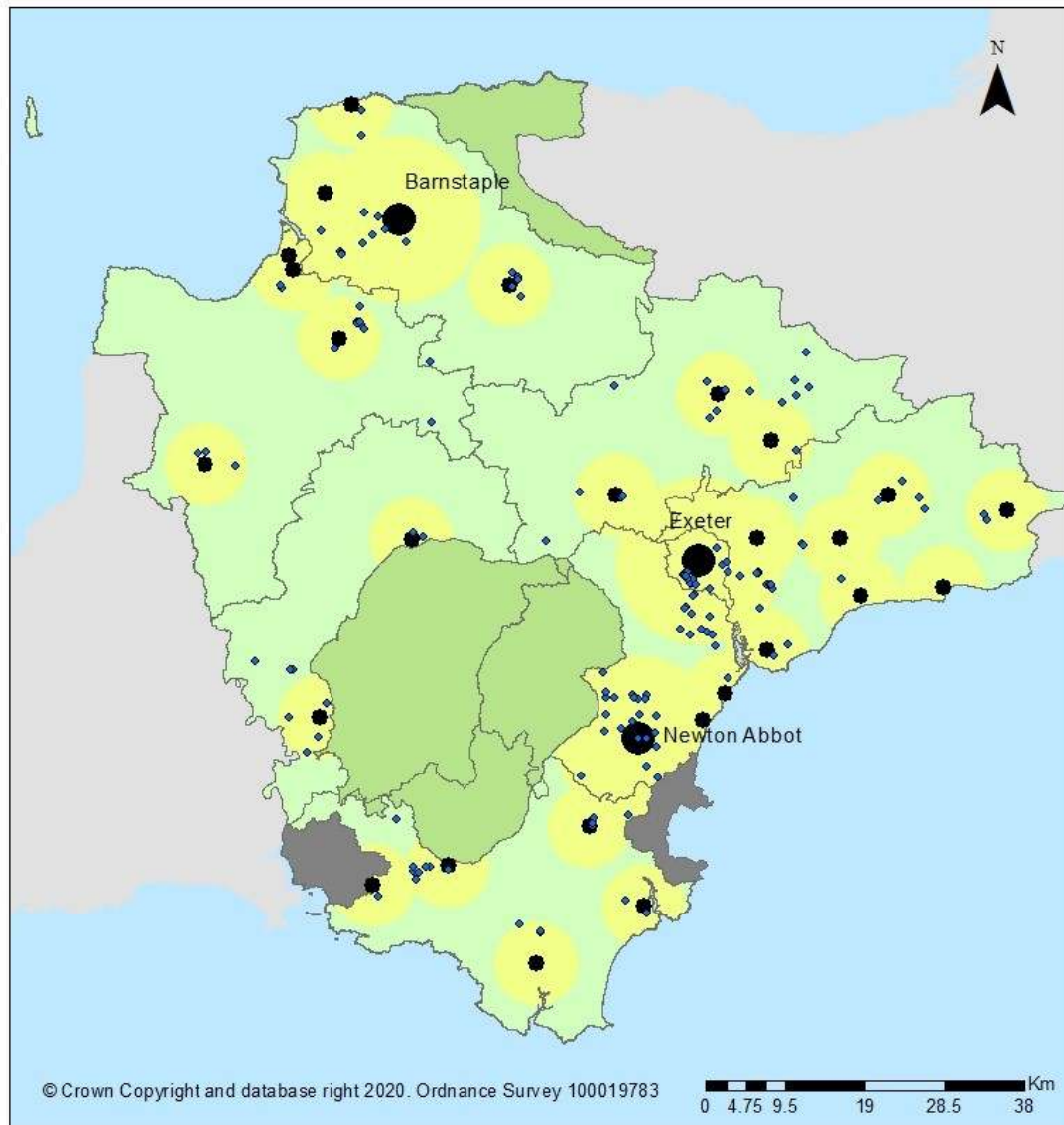


Figure 2: The location of operational waste sites in 2018

- 1.4.3. As can be seen there are large clusters of facilities centred around Barnstaple, Exeter and Newton Abbot, with smaller clusters around a number of the 'other towns' including Bideford, South Molton, Tiverton, Honiton, Axminster, Totnes, Tavistock, Okehampton and Holsworthy.
- 1.4.4. Of the 17 facilities located outside of the area identified as part of the spatial

strategy, the majority of these are small in scale, 12 of the 17 sites received less than 10,000 tonnes of waste in 2018. Part (c) of Policy W3 allows for small scale facilities within or close to the communities they serve. As such the policy makes provision for small scale facilities at locations which are not in or close to the main settlements or other towns.

- 1.4.5. The site accepting the largest amount of waste outside of the area identified was Broadpath landfill site. This site is located with a cluster of other facilities close to the M5 north of Cullompton. This site has since closed.
- 1.4.6. Other site types included on farm anaerobic digestion, waste transfer, compositing, construction, deposit of waste to land, MRF, physical treatment and vehicle depollution.
- 1.4.7. This analysis demonstrates that the location of operational waste facilities meeting Devon’s waste management requirements is largely in conformity with the spatial strategy set out within the Waste Plan.

1.5. Implementation of Policy W3 since the adoption of the Waste Plan

- 1.5.1. To consider whether the spatial strategy has been effectively implemented since the adoption of the Waste Plan, a review of sites where planning permission has been granted has been undertaken.
- 1.5.2. Firstly, this has considered whether proposals for strategic waste management facilities have been at the locations envisaged through Policy W3. Table 1 and Figure 3 below presents the findings from this exercise. The numbering of sites in Figure 3 reflects the order of the discussion presented below.

	December 11 th 2014-31st March 2015	2015-16	2016-17	2017-18	2018-19	Total
Within or close to Exeter, Barnstaple, Newton Abbot	1	0	1	4	1	7
Not within or close to Exeter, Barnstaple, Newton Abbot	0	1	1	3	0	5

Table 1: The locations of planning permissions granted for strategic waste management facilities since the adoption of the Waste Plan

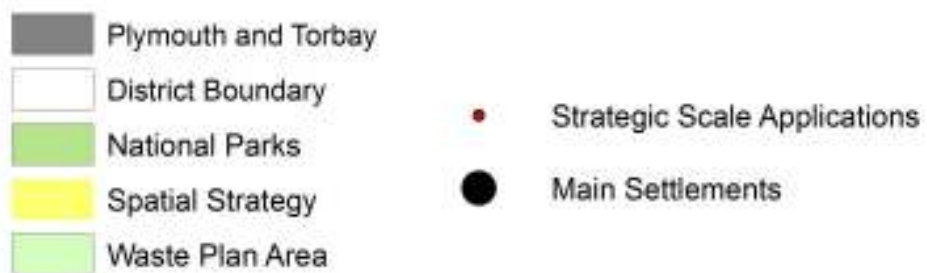
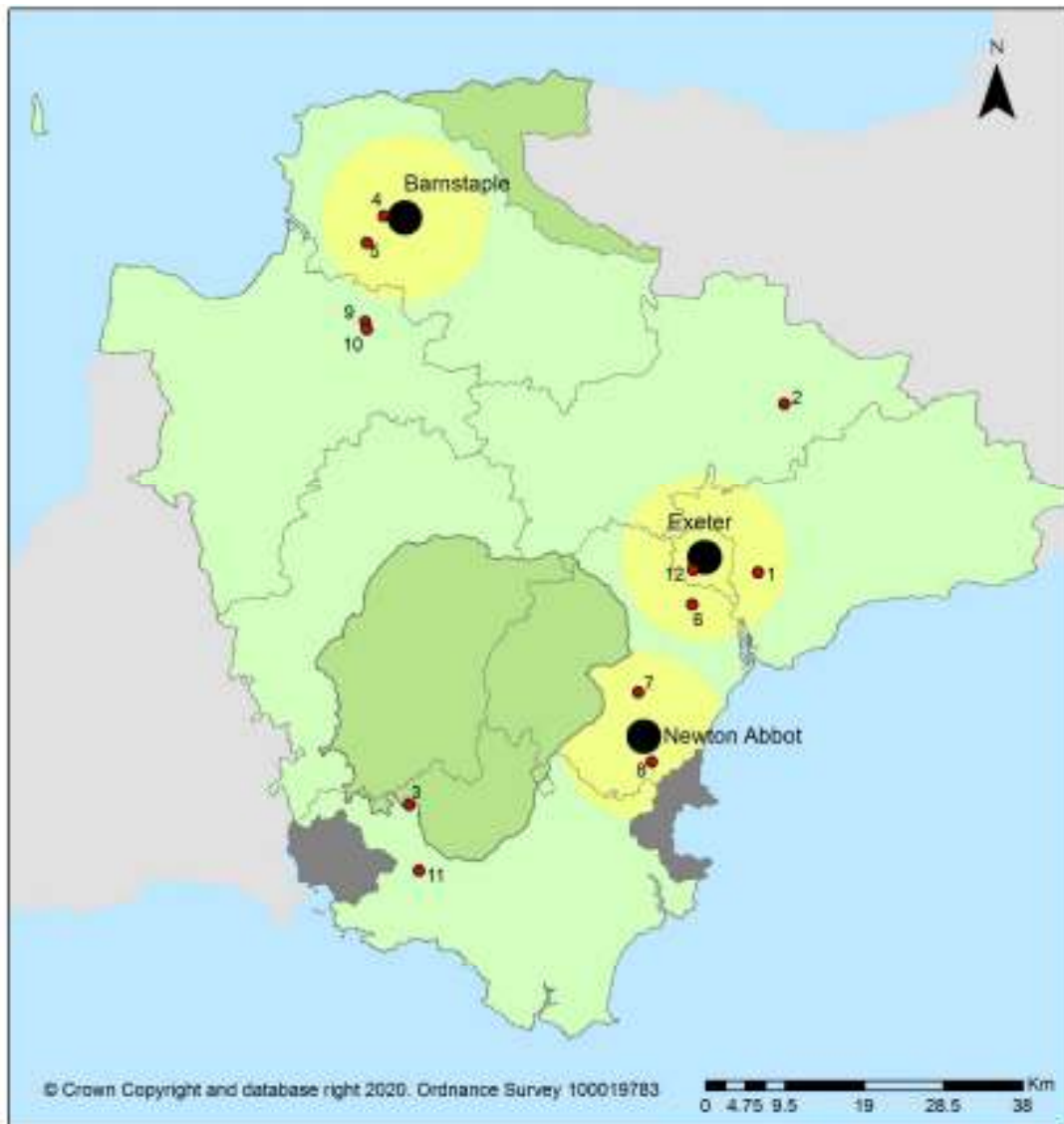


Figure 3: The location of strategic scale waste planning applications approved from 11th December 2014 – 31st March 2019

1.5.3. Findings are as follows:

- 2014/15 Waste Plan adopted three quarters into this annual monitoring period. Only one strategic scale application⁴ granted during the

⁴ DCC/3677/2014 Proposed extension to the area of the existing inert tip – 110,000 tonnes.

remainder and this was at Hill Barton Business Park which is close to Exeter (1 in Figure 3).

- During 2015/16 a single strategic scale application was approved for an anaerobic digestion plant at Willand (2 in Figure 3). Whilst not at or close to one of the three settlements stated in policy W3, the site is immediately adjacent to 50% of the anticipated input (100% of the waste to be input), will remove existing waste movements from the road network and will provide scrubbed biogas directly into the national gas grid rather than needing to use it on the site. The site is also in close proximity to the strategic road network (M5).
- During 2016/17, two strategic scale applications were granted. The first was a temporary permission at Lee Moor China Clay works (3 in Figure 3) for the importation, storage and treatment of waste materials which would assist in the restoration of the quarry. As such, this is considered an appropriate location. The remaining strategic application which was approved during this monitoring period was for a material recycling facility (MRF) and skip storage site in Barnstaple⁵ (4 in Figure 3), therefore according with the spatial strategy in policy W3.
- 2017/18 saw the largest number of applications for strategic planning applications in a single year since the adoption of the Waste Plan. A total of 7 were granted permission during this year. Four of these were for proposals that were at or close to Exeter, Barnstaple or Newton Abbot, including a new waste transfer station west of Brynsworthy Environment Centre in Barnstaple⁶ (5 in Figure 3), a consolidating application for operations at Kenbury Wood landfill site close to Exeter⁷ (6 in Figure 3), change of use for the in-vessel composter at Heathfield landfill site near Newton Abbot⁸ (7 in Figure 3) and an application at Yannon Lane inert landfill site also near Newton Abbot (8 in Figure 3). Three strategic proposals were approved which were not located at the named settlement. Two of these were located at Deep Moor landfill site⁹ (9 and 10 in Figure 3) which is a long-established significant waste management facility. The remainder was at Challonsleigh Farm¹⁰ located in South Devon (11 in Figure 3) which is also a long-established waste management site located close to Plymouth and the strategic road network (A38).
- In 2018/19 a single strategic waste management application was approved. This was located on Marsh Barton industrial estate in Exeter¹¹ (12 in Figure 3).

1.5.4. This review demonstrates that whilst the majority (58%) of new permissions for strategic waste management facilities are being approved at the locations set out in Policy W3, there are still examples where alternative sites have been considered appropriate and approved. These largely relate to sites where there were already significant waste management operations

⁵ DCC/3913/2016

⁶ DCC/3951/2017

⁷ DCC/3868/2016

⁸ DCC/3968/2017

⁹ DCC/3956/2017 and DCC/3995/2017

¹⁰ DCC/4003/2017

¹¹ DCC/4042/2018

or where they are for a location specific purpose e.g. restoration of a quarry.

- 1.5.5. Additional analysis has been undertaken to consider whether the non-strategic and small-scale waste applications approved since the adoption of the Waste Plan have been in conformity with the spatial strategy.
- 1.5.6. Part (b) of Policy W3 indicates non-strategic reuse, recycling and recovery facilities should be located at the settlements identified in (a) or within or close to Devon's other towns and part (c) of Policy W3 states small-scale community-based reuse, recycling and composting facilities should be located within or close to the community they serve and/or at the point of the arising or final use of the waste materials.
- 1.5.7. The findings from this exercise is presented in Figure 4 below. Please note permissions that were not deemed to constitute waste development, for example new site offices, weighbridges etc have not been included in this list.

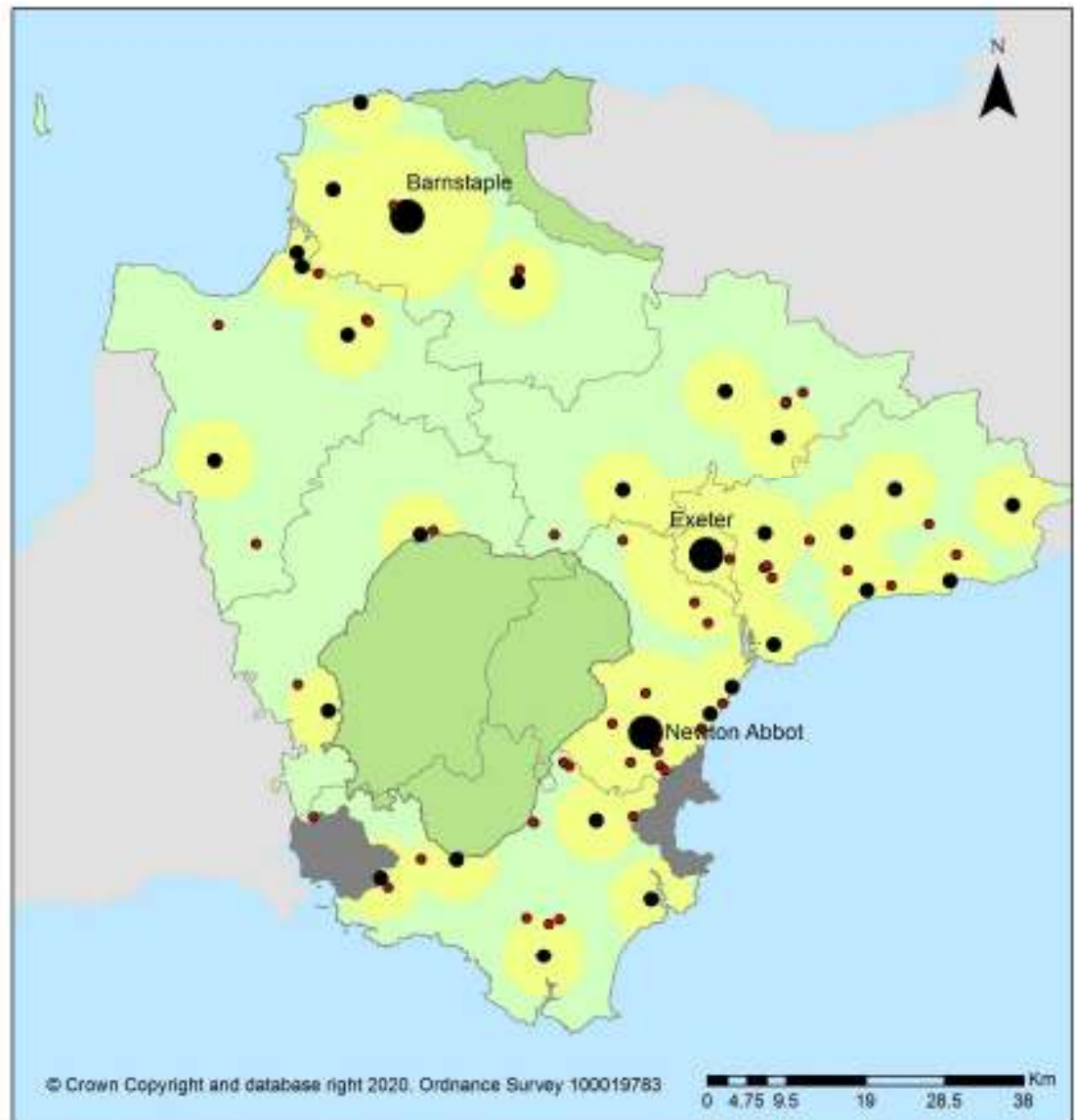


Figure 4: The location of other waste planning applications approved from 11th December 2014 – 31st March 2019

1.5.8. This analysis demonstrates that the large majority (73%) of planning applications for waste development were located within the area identified as part of the Spatial Strategy. The remainder mainly consisted of small

scale proposals such as on farm composting or related to agricultural waste requirements such as slurry stores.

1.6. Other considerations

Location of future housing and employment growth

- 1.6.1. Page 17 of Waste Topic Paper 8 considered how spatial patterns of waste generation are strongly related to the locations of waste generators – in the case of LACW, this is the location of households, while CIW is related to the locations of businesses and finally CDEW is related to the pattern of new development which, in turn, is centred on the main settlements. Figure 11 on page 18 of that report highlighted the scale and distribution of residential development planned across the county to consider how future patterns of waste generation may change. The locations of significant employment allocations are also outlined.
- 1.6.2. Since the adoption of the Waste Plan, a number of Devon’s Local Planning Authorities have adopted updated Local Plans. These include:
- East Devon Local Plan 2013-2031 (adopted January 2016)
 - North Devon and Torridge Local Plan 2011-2031 (Adopted October 2018)
 - Mid Devon Local Plan Review – awaiting Inspector’s report
 - Plymouth and South West Devon Joint Local Plan (Adopted March 2019)
- 1.6.3. Whilst the precise level of development at some settlements has changed, overall the planned distribution of future development remains largely unchanged from when the Waste Plan was adopted and as such in this regard, the spatial strategy remains appropriate.
- 1.6.4. The most significant change relates to an increased level of growth planned east of Cullompton in the longer term (up to 5,000 homes) as this area has been identified for growth as a Garden Village as part of the Government’s Garden Town programme. Furthermore, a new area of development for 2,000 homes on the outskirts of Plymouth in the South Hams at Woolwell has been identified. Despite this, it is not considered that these additional developments warrant a change to the spatial strategy of the Waste Plan.
- 1.6.5. Finally, Devon County Council is currently working in partnership with East Devon District Council, Exeter City Council, Mid Devon District Council and Teignbridge District Council to prepare the Greater Exeter Strategic Plan (GESP). This Plan will set out the scale and locations for strategic development in the period to 2040. Locations for growth have not yet been identified, however an initial consultation upon potential sites is scheduled for September 2020.

The pattern of cross boundary movements of waste

- 1.6.6. In developing the Waste Plan, an assessment of cross boundary waste movements was undertaken. This was published as part of the evidence

base for the Plan¹² and informed the Duty to Cooperate Statement submitted alongside the Plan. It also affected the outcomes for the Plan itself, as particular relationships with Torbay Council, Plymouth City Council and Somerset County Council were identified.

- 1.6.7. On a strategic level, the pattern of waste movements to and from Devon remains unchanged from when the Plan was prepared. For example, in 2011 96% of the waste managed in Devon originated in the south west. In 2018 equivalent figure is 98%. In 2011, taking the waste originating within the south west, the amount generated in Devon accounted for 82.5%. This outcome remained the same in 2018. The only other WPAs accounting for more than 1% of the total in 2011 and 2018 is the adjacent authorities of Plymouth, Torbay, Cornwall and Somerset.
- 1.6.8. Looking at the destination of waste produced within the Plan area, in 2011 98% remained in the south west. In 2018 the equivalent figure was 97%. Of this quantity remaining in the region, 80.3% was managed within the DCC Plan Area compared to 87% in 2018. This updated analysis demonstrates that the pattern cross boundary movements of waste remains unchanged and therefore it is not necessary to update the spatial strategy in this regard.

1.7. Conclusion

- 1.7.1. This report has considered whether the spatial strategy embedded within the Waste Plan is being effectively delivered and remains appropriate in the context of the Waste Plan review.
- 1.7.2. The evidence collated and presented demonstrates that the strategy is being effectively implemented through the granting of planning permission at waste sites which accord with Policy W3.
- 1.7.3. Furthermore, the spatial strategy remains appropriate when considering the factors which informed its development. As such, it is not necessary to update the Waste Plan spatial strategy at this time.

¹² Waste Topic Paper 2: Cross-boundary waste movements assessment (October 2013) available at: <https://www.devon.gov.uk/planning/planning-policies/minerals-and-waste-policy/devon-waste-plan>