

Annual Monitoring Report 2020/21



Background Report

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Behind the Headlines

Welcome to the Background Report - the second part of our Annual Monitoring Report. This document provides the story behind the headlines in our Headline Report. It attempts to explain how we set out to assess how effective our Minerals and Waste Local Plans are at achieving their aims, and how well we are doing as we work to implement the Plans. It also presents the data and other evidence behind the headline statements.

Since April 2018, we have been required to review our Local Plans at least every 5 years to assess whether they are still up to date and relevant. Government guidance sets out a series of tests that should be carried out. [The Staffordshire and Stoke-on-Trent Waste Local Plan \(2010-2030\)](#), referred to hereafter as the Waste Local Plan, was adopted in 2013, and we published a 5-year [review](#), in December 2018. [The Minerals Local Plan for Staffordshire \(2015-2030\)](#), known as the Minerals Local Plan, was adopted in February 2017, and we published an [interim review](#) of this Plan in December 2018.

As much of the information required for such reviews is collected for the Annual Monitoring Report anyway, we now regularly incorporate reviews of both the Minerals Local Plan and the Waste Local Plan in our Annual Monitoring Reports, rather than producing separate reviews at 5-year intervals.

The guidance also says that, where the periodic reviews of Local Plans show that complete or partial revisions are needed, we must publish a programme for the work in a Minerals and Waste Development Scheme (MWDS). We have not found that any revisions are required yet, so we do not intend to publish a new MWDS at this stage.

Minerals

M 1. Does the Plan make steady and adequate provision for Sand and Gravel?

YES

Underlying Questions:

Are sales of sand and gravel on target to meet the planned level of provision - Is 10-year sales average less than planned level of provision i.e., 5 million tonnes per annum?

YES. Ten-year sales average in 2020 (covering period 2011 – 2020) was 4.37 million tonnes per annum. This figure is less than the provision for sand and gravel in the MLP (i.e., 5 million tonnes per annum), so permitted and allocated resources should be adequate to continue to supply at this level for at least the remainder of the plan period.

Are we maintaining at least a 7-year landbank of sand and gravel reserves based on meeting the level of provision?

YES. The landbank of permitted reserves as of 1 January 2021 was 13.5 years based on the 10-year sales average for 2011 - 2020. Alternatively, the landbank would be 11.8 years based on the level of provision of 5 million tonnes per annum used in the preparation of the Minerals Local Plan.

Data Source: SCC Local Aggregate Assessments

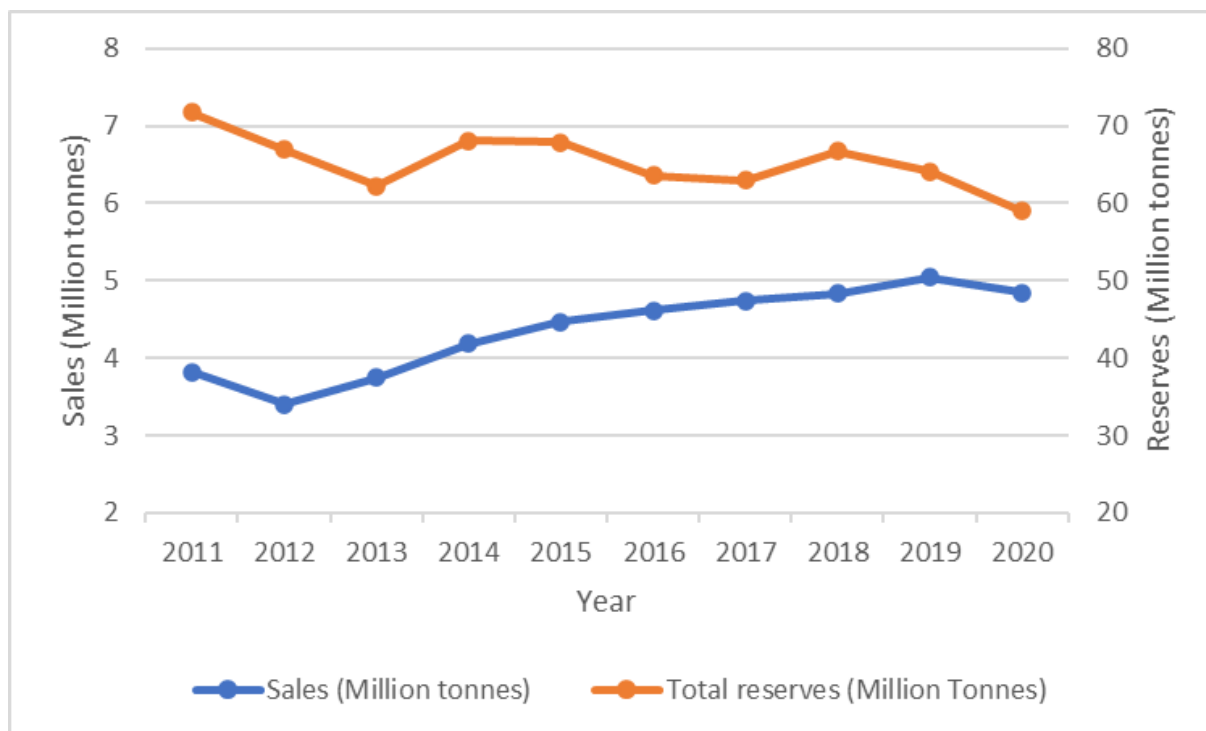
Data Table: Staffordshire Sand and Gravel Sales and Reserves 2011-2020

Year	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	10 yr. mean
Sales (Million tonnes)	3.82	3.406	3.742	4.184	4.47	4.614	4.743	4.836	5.039	4.848	4.37
Total reserves (Million Tonnes)	71.79	66.98	62.26	68.09	67.86	63.63	62.94	66.78	64.11	58.978	
Number of operational sites	16	17	17	18	18	17	16	16	17	14	

Source: WMAWP surveys

Note that figures for 2019 are derived from the Aggregate Minerals Survey.

Graph: Sales and Reserves of Sand and Gravel in Staffordshire 2011 – 2020



Discussion: The 10-year average sales of sand and gravel from Staffordshire sites is 4.37 million tonnes. This is less than the level of provision used as part of Policy 1 of the Minerals Local Plan (MLP) i.e., 5 million tonnes of sand and gravel per annum, used to assess the allocation of additional sand and gravel resources to meet needs up to the end of 2030. Using the MLP level of provision of 5 million tonnes per annum would mean the landbank of permitted reserves as of 1 January 2019 would last for 11.8 years. This exceeds the target of maintaining a 7-year landbank.

Conclusion: It is, therefore, reasonable to conclude that the Minerals Local Plan does make steady and adequate provision for sand and gravel.

M 2. Does the Plan make steady and adequate provision for Cement Minerals

YES

Underlying Questions:**Are we maintaining at least 15 years stock of permitted reserves for cement minerals?**

- Limestone at Cauldon Works

Yes

- Shale at Cauldon Works

No (but an extension is allocated in the MLP)

- Gypsum and anhydrite at Fauld Mine

Yes**Are all sites located in line with location criteria set out in Policy 2?**

N/A. None of the planning applications determined between 1 April 2020 and 31 March 2021 related to new sites for cement minerals, so it is not possible to assess whether they were located in line with Policy 2.

Are all extension areas conditioned to only be worked following cessation of working within existing site?

N/A. None of the planning applications determined between 1 April 2020 and 31 March 2021 related to extensions to cement mineral sites, so it is not possible to assess whether they were conditioned to only be worked following cessation of working within existing site as required by Policy 2.4.

Data Source: Periodic Confidential Survey of Industrial Minerals, carried out by Staffordshire County Council

Discussion: This indicator relies on data collected approximately every 3 years. Last survey dated 2019, so some projection of trends is required.

Permitted reserves of limestone at Cauldon, and of gypsum and anhydrite at Fauld can be reasonably expected to still exceed 15 years supply as required by Policy 2 of the MLP. Permitted reserves of shale at Cauldon do not, but an extension to the shale quarry at Cauldon has been allocated in the MLP which would support maintaining an adequate level of supply, should the operator seek planning permission.

During the monitoring period, no new planning permissions have been granted for new cement mineral sites, or within the allocated extensions. It is, therefore, not relevant to assess whether they were in line with

Policy 2 or conditioned to only be worked once working has ceased within the currently permitted sites.

Note that clay extracted from Keele and Kingsley Quarries in Staffordshire continues to be used to supply Tunstead cement works in Derbyshire.

Conclusion: It is, therefore, reasonable to conclude that the Minerals Local Plan does make steady and adequate provision for industrial minerals.

M 3. Does the Plan make steady and adequate provision for brick clay?

Mixed response

Underlying Questions:

Are we maintaining at least 25 years stock of permitted reserves for clay product works listed in appendix 5?

Data Source: Periodic Confidential Survey of Industrial Minerals, carried out by Staffordshire County Council.

Data Table: Status of clay stocks at Staffordshire quarries supplying works within the Plan area. Note: detailed data are considered to be commercially confidential, and are not available for publication

Works	25-year stock?
Parkhouse, Newcastle	No
Chesterton, Newcastle	No
Keele Works, Newcastle	No
Wilnecote, Tamworth	No
Lodge Lane, Cannock	Yes

Discussion:

This indicator relies on data collected approximately every 3 years. The last survey is dated 2019, so some projection of trends is required.

National planning policy requires that there is a steady and adequate supply of brick clay to support the continued operation of brick and tile works and this means ensuring that the quarries have sufficient permitted reserves for 25 years of supply for each works in Staffordshire. For the

purposes of the Minerals Local Plan, data are collected in a periodic, confidential survey, but the data cannot be made public as they are commercially sensitive.

The latest survey (2019) found that the Lodge Lane Works in Cannock was the only works in the county to have at least 25 years' supply of clay. Wilnecote in Tamworth does not have 25 years' supply but a permission granted on 30 April 2019 (ref: [T.16/02/905 MW](#)) allowed for the extraction of an additional 10 years' supply of clay. The Works also receives clays not locally derived (refer to permission T.18/01/905 MW granted March 2019). Supply of clay to the three works in the north of the county (i.e. Parkhouse, Chesterton and Keele) is based on supply from Knutton Quarry in Newcastle-under-Lyme. The stock of reserves is less than 25 years to maintain supply to all three works.

Note that clay extracted in Staffordshire is also used to support brick and tile manufacturing at works outside the county, some of which do not have associated clay quarries to provide their main supply. Whilst maintaining such supplies to works outside the county is important, it is not a current requirement of the MLP for Staffordshire to monitor the landbanks for clay product works outside the county and is not considered in this assessment.

Conclusion: It is, therefore, reasonable to conclude that the Plan makes steady and adequate provision for brick clay at some, but not all works.

M 4. Are the location policies for sand and gravel sites working?

YES

Underlying Questions:

Are all sites to be located in line with location criteria set out in Policy 1 unless meeting the criteria of Policy 1.6?

YES. One application for new or extended mineral development, permitted between 1 April 2020 and 31 March 2021. This permission involved working an existing site to a greater depth than originally permitted, and is judged to have met the criteria of Policy 1 of [The Minerals Local Plan for Staffordshire \(2015-2030\)](#).

Data Source: Planning Application records**Data Table: Planning applications for the winning and working of sand and gravel, permitted between 1 April 2020 and 31 March 2021 – Compliance with Policy 1**

App. No.	Location	Description	Date granted	Compliant with Policy 1
SM.20/05/171 M	Captains Barn Farm Quarry, Leek Road, Weston Coyney	Application to vary (to not comply with) conditions 1, 4, and 10 of planning permission SM.15/08/171 M to lower working depth from 226 metres AOD to 215 metres AOD; to amend the end date from 6 April 2026 to 30 December 2030	25-Mar-21	Yes. Deepening. No increase in permitted area

Discussion: The permission at Captains Barn Farm Quarry was considered to be consistent with the criteria set out in Policy 1.6 (b) of the MLP as the proposals would: “secure significant material planning benefits that outweighed any material planning objections”.

The location proved satisfactory as an existing site. The revised working scheme at Captains Barn Farm will allow comprehensive recovery of the available resource within the existing working area of the quarry.

Conclusion: It is, therefore, reasonable to conclude that the location policies for mineral sites are working.

M 5. Are we doing all we can to reduce the impacts of mineral developments on the environment?

Yes

Underlying Questions:

Are all applications in line with environmental criteria except where the material planning benefits of the proposals outweigh the material planning objections?

YES. Potential environmental impacts were identified and discussed in the reports presented to Planning Committee, or Delegated Reports, as each application was determined. In each case, the conclusion was that adverse impacts could be avoided or mitigated.

Do all new approvals have appropriate restoration plans?

YES. Three applications were approved which allowed the extraction of additional mineral reserves, or which allowed workings to continue beyond their original extraction cessation date (one for sand and gravel, one for clay, and one for building stone). In each case, permission was granted subject to restoration and aftercare conditions based on plans submitted with the applications.

Have there been any new proposals for hydrocarbon extraction? If so, are they in line with plan policies including Policy 4

N/A. There have been no new proposals for hydrocarbon extraction.

Data Source: Planning Application Records

Data Tables:

App. No.	Location	Date granted	In line with environmental criteria	Restoration plan?	Hydrocarbon extraction?
SM.20/03/169 M	Broadmoreside Quarry, Hollington	10 Dec 2020	Yes	Yes	No
SM.20/05/171 M	Captains Barn Farm Quarry	25 Mar 2021	Yes	Yes	No
N.19/07/294 MW	High Carr Farm, Chesteron	21 Dec 2020	Yes	Yes	No

Discussion: Overall, we are taking available steps to reduce the impact of mineral workings on the environment in accordance with Policies 4 and 6 of the MLP.

Conclusion: It is, therefore, reasonable to conclude that we are doing all we can to reduce the impacts of mineral developments on the environment.

M 6. Are we doing all we can to safeguard minerals sites and infrastructure?

YES

Underlying Questions:

Have we avoided the sterilisation of mineral resource contrary to the requirements of policy?

YES. We were consulted on 25 applications where mineral sterilisation could have been an issue. All were carefully assessed, but none were considered to warrant any form of objection.

Have we avoided any loss of Minerals Infrastructure sites contrary to policy?

YES. We are not aware of any loss of mineral infrastructure sites during the reporting period. Of the 25 applications referred to us by the LPAs, none were considered to directly affect, or threaten the continued operation of, any mineral infrastructure sites.

Data Source: Planning Application Data

Data Table: MSA Applications determined 1 April 2020 to 31 March 2021 (From Applications Register)

Summary
Total MSA Applications: 25
No Objection: 25.
Objections: None
No consultations were considered to merit any form of objection.

During 2020/21, we were consulted by District/ Borough Councils on 25 planning applications for non-mineral development which fell within Mineral Safeguarding Areas and were not exempt from consideration or subject to [Standing Advice](#). In all cases, we were able to conclude that the proposals would be unlikely to lead to the sterilisation of significant mineral resources and therefore did not conflict with the requirements of Policy 3 of the MLP.

Conclusion: It is, therefore, reasonable to conclude that we are doing all we can to safeguard minerals sites and infrastructure.

M 7. Are we co-ordinating our work with other minerals planning authorities across the region?

YES

Underlying Questions:

Have we attended all AWP meetings?

Yes. Staffordshire County Council has been represented at all the meetings.

Data Source: Minutes of AWP meetings**Data Table: SCC representation at West Midlands Aggregates Working Party AWP meetings**

Date	SCC Represented?
16 April 2021	Yes
23 April 2020	Yes

Discussion: The West Midlands Aggregates Working Party exists to provide a forum to bring Minerals Planning Authorities together to produce “fit-for-purpose” and comprehensive data on aggregates, to support local planning on the provision of aggregates, and to ensure compliance with the Duty to Cooperate. We continue to be represented at all the meetings.

Note also the findings for headline statement 7 under the waste section below regarding attendance of the RTAB.

Conclusion: It is, therefore, reasonable to conclude that we are co-ordinating our work with other minerals planning authorities across the region.

M 8. Are all aggregate mineral sites subject to a restoration strategy/ plan that has been considered in the last 10 years?

Almost

Underlying Questions:

Were restoration plans provided when planning applications were submitted for each aggregate mineral site?

Have restorations strategies/ plans been submitted subsequently, or updated as required?

Data Source: SCC Data obtained from planning permissions relating to 26 quarry sites.

Data Table: Details relating to the restoration of aggregate mineral sites (as of 1 April 2021)

Quarry	Operator	Grid Ref	Cessation Date for Mineral Working [Red if next 2 years, amber if next 5]	Restoration Guarantee - Bond/Fund	MPA/ BAA Member	Is there an approved restoration 'concept' ?	Is there an approved detailed restoration/ aftercare scheme?	Is there a restoration/ aftercare review requirement?	Is there an approved reviewed restoration/ aftercare scheme?	Date of latest/next 'review' of the restoration/ aftercare scheme	AMR Assessment: Is the site subject to a restoration strategy / plan?
Operational sand and gravel quarries											
Newbold Quarry (Tucklesholme)	Aggregate Industries	SK 205 195	2029	No	Yes	Yes	Yes	Yes	No	09/06/17	YES
Leasowes Farm, Uttoxeter	Aggregate Industries	SK 097 351	2023	No	Yes	Yes	No	No	N/a	N/a	YES
Barton	Hanson Aggregates	SK 195 155	2030	No	Yes	Yes	Yes	Yes	No	23/4/18	YES
Freehay/ Mobberley	Hanson Aggregates	SK 015 411	2025	No	Yes	No	Yes	No	No	n/a	YES
Pottal Pool	Hanson Aggregates	SJ 973 147	2034	No	Yes	Yes	No	No	n/a	n/a	YES
Alrewas	Tarmac Limited	SK 175 125	2029	No	Yes	Yes	No	Yes	Yes	17/5/22	YES

Quarry	Operator	Grid Ref	Cessation Date for Mineral Working <small>[Red if next 2 years, amber if next 5]</small>	Restoration Guarantee - Bond/ Fund	MPA/ BAA Member	Is there an approved restoration 'concept' ?	Is there an approved detailed restoration/ aftercare scheme?	Is there a restoration/ aftercare review requirement?	Is there an approved reviewed restoration/ aftercare scheme?	Date of latest/next 'review' of the restoration/ aftercare scheme	AMR Assessment: Is the site subject to a restoration strategy / plan?
Rugeley	Cemex	SK 010 181	2031	No	Yes	Yes	Yes	No	No	n/a	YES
Weeford	H.D.Ricketts	SK 133 026	2042	No	No	Yes	No	No	No	n/a	YES
Moneymore	Hanson Aggregates	SK133 026	2025/2042	No	Yes	Yes	No	No	N/a	n/a	Yes
Hints	Tarmac Limited / Cemex	SK 163 462	2025	Yes	Yes	Yes	No	Yes	No	20/10/19	YES
Croxden	Tarmac Limited	SK 033 417	2023	Yes	Yes	Yes	No	No	No	n/a	YES
Brownhills Quarry (formerly known as Cranebrook)	MAC Quarries	SK 070 064	2033	No	Yes	Yes	No	Yes	No	n/a	YES
Captains Barn Farm	C.E. & J.M. Dale	SK 950 455	2030	Yes	Yes	Yes	No	Yes	No	16/6/23	YES
Shire Oak	JPE Holdings	SK 063 042	2025	No	Yes	Yes	No	Yes	No	31/3/25	YES
Saredon Quarry	NRS Waste Care/ Breedon	SJ 944 80	2030	Yes	Yes	Yes	No	Yes	No	16/12/25	YES

Quarry	Operator	Grid Ref	Cessation Date for Mineral Working <small>[Red if next 2 years, amber if next 5]</small>	Restoration Guarantee - Bond/ Fund	MPA/ BAA Member	Is there an approved restoration 'concept' ?	Is there an approved detailed restoration/ aftercare scheme?	Is there a restoration/ aftercare review requirement?	Is there an approved reviewed restoration/ aftercare scheme?	Date of latest/next 'review' of the restoration/ aftercare scheme	AMR Assessment: Is the site subject to a restoration strategy / plan?
Non-operational sand and gravel quarries											
Poolhouse Road	N/a	SO 853 927	2042	No	No	No	No	No	No	n/a	No
Hilton Park	Hanson Aggregates	SJ 952 45	2042	No	Yes	No	No	No	No	n/a	No
Manor Park	Hanson Aggregates	SK 144 172	2014	No	Yes	No	No	No	No	n/a	No
Trentham	Hanson Aggregates	SJ 750 380	2042	No	Yes	No	Yes	No	n/a	n/a	Yes
Whittington Hall Lane	N/a	SO 870 820	2042	No	No	No	No	No	No	n/a	No
Weavers Hill	GRS Roadstone	SJ 794 203	2022	No	Yes	No	No	No	No	n/a	No
Operational crushed rock quarry											
Cauldon Low	Aggregate Industries	SK 084 474	2042	No	Yes	No	No	No	No	n/a	No
Non-operational crushed rock quarry											
Kevin	Bamford Excavators	SK 086 465	2028	Yes	No	Yes	No	Yes	No	10 years after working restarts	Yes

Quarry	Operator	Grid Ref	Cessation Date for Mineral Working <small>[Red if next 2 years, amber if next 5]</small>	Restoration Guarantee - Bond/ Fund	MPA/ BAA Member	Is there an approved restoration 'concept' ?	Is there an approved detailed restoration/ aftercare scheme?	Is there a restoration/ aftercare review requirement?	Is there an approved reviewed restoration/ aftercare scheme?	Date of latest/next 'review' of the restoration/ aftercare scheme	AMR Assessment: Is the site subject to a restoration strategy / plan?
Wardlow / Wredon	Bamford Excavators	SK 087 572	2046	Yes	No	Yes	No	Yes	No	When working restarts	Yes

Discussion: Restoration plans are important to ensure that quarries are reinstated at the earliest opportunity and that works are carried out to high environmental standards.

The pattern remains unchanged from the last year, with 7 of the 24 permitted aggregate sites within the Plan area having no approved restoration strategy or detailed plan. This is mainly because the quarries are non-operational and have not been subject to a recent review.

Conclusion: It is, therefore, reasonable to conclude that almost all operational aggregate mineral sites are subject to a restoration strategy/plan.

M 9. Does the Minerals Local Plan need to be revised?

NO

Underlying Questions:

Are the policies working as we intended?

Yes, analysis of applications during the reporting period has not raised any concerns that policies are failing to work as intended.

How is the plan performing against targets?

Fine, as reported above, we are maintaining steady and adequate provision of minerals as planned, and none of the trigger points for the review of the MLP have been met.

Have there been any relevant changes to National Planning Policy?

No. There have been no changes to the NPPF and the MLP remains consistent. At the time of writing, changes to the planning system are being discussed by government, but we await details of how they may impact on planning for minerals.

Have there been any changes to our Strategic Priorities?

No, there have been no changes to our Strategic Priorities since the Minerals Local Plan was adopted.

Have there been any changes to local circumstances?

No, there have been no major changes, though we continue to be aware of potential impacts of the development of HS2 on the demand for aggregate and anticipate that this may lead to further proposals for aggregate production.

Data Source: Interim review of the Minerals Local Plan

Discussion: An [interim review of the Minerals Local Plan](#) was published as an appendix to the Annual Monitoring Report in December 2018, concluding that there was no need for a revision.

Since then, there have been no significant changes to national policy as they might affect the MLP. The Plan policies are working as intended. Plan targets are being met, and there have been no significant changes to strategic priorities, or local circumstances.

As before, we are aware of the continuing need to monitor the provision of aggregates in the light of anticipated additional demands resulting from the construction of the HS2 railway.

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Conclusion: It is, therefore, reasonable to conclude that the Minerals Local Plan does not need to be revised at present.

Waste

W 1. Is the rate of growth of waste production within the range that we have planned for?

YES

Underlying Questions:

Are the latest survey data for waste arisings consistent with forecasts used when preparing the Waste Local Plan?

Probably. Assessing waste arisings is not straightforward. Original estimates as the plan was being prepared suggested that Staffordshire and Stoke-on-Trent produced around 4.2 million tonnes of waste each year, but surveys of total waste production have not been repeated.

The 5-year [review of the Waste Local Plan](#) (adopted in 2013), published in December 2018, concluded that waste arising might be expected to correlate with population, and this is rising at a lower rate than was assumed in the preparation of the Plan.

Figures from the latest [Environment Agency 2020 Waste Data Interrogator](#) (last updated May 2022) show that a total of 3,502,003 tonnes of waste originated from the Plan area (3,022,780 tonnes (86%) from Staffordshire, and 479,223 tonnes (14%) from Stoke-on-Trent).

Overall, it is safe to conclude that total waste arisings have not increased significantly, and remain within the forecasts used to prepare the Plan.

Are the latest survey data for waste management types consistent with MWMS targets?

In 2020 - 21, a total of 426,114 tonnes of municipal solid waste (MSW) was treated in Staffordshire (excluding Stoke-on-Trent). Of this, 98,053 tonnes was recycled; 97,274 tonnes was composted; 224,839 tonnes was burned with heat, power or other energy recovery; and the remaining 5,948 tonnes was landfilled.

The total figure is well below the original Regional Waste Forecast for both 2015/16 and 2020/21 (See Table 20 of the [Appendices to the Waste Local Plan](#), while the landfill diversion percentages are significantly higher than originally forecast.

That said, the target for minimum diversion from landfill has not been met, and is unlikely to be met at any point in the foreseeable

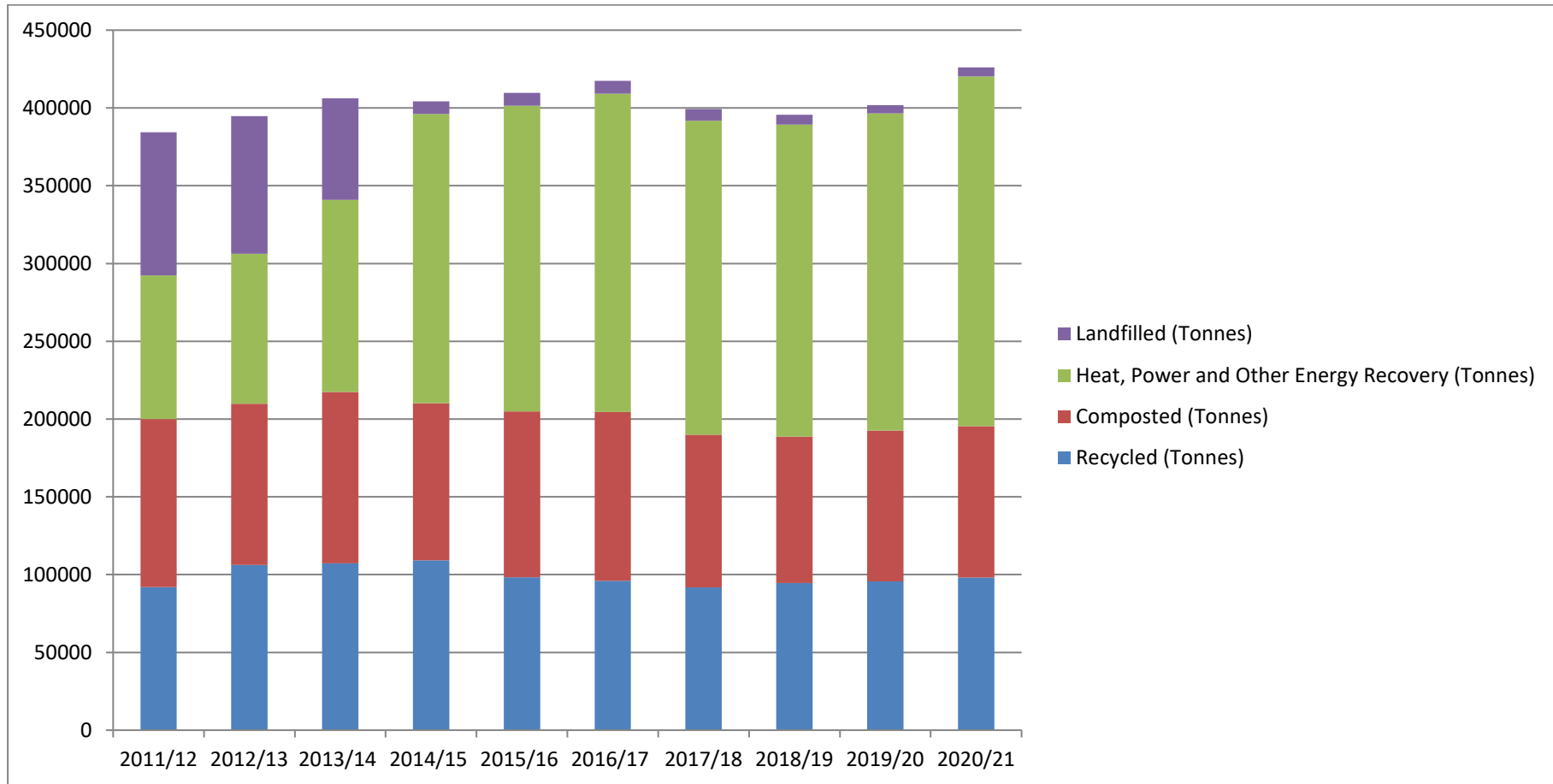
future, as it is set as a tonnage, rather than a percentage, and the total tonnage of waste arising has been much lower than forecast. 97.8% of waste has been kept away from landfill, but even 100% diversion would not have been sufficient to meet the tonnage target.

Data Sources:

- [Review of the Waste Local Plan](#) (published December 2018);
- [Environment Agency's 2020 Waste Data Interrogator](#) (Last updated May 2022);
- Staffordshire County Council and Stoke-on-Trent City Council municipal waste management data;
- Appendices to the Waste Local Plan.
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Data Table: Municipal Waste Management Routes in Staffordshire (excluding Stoke-on-Trent) 2011 - 2021

Waste Management Routes	2011/12	2012/13	2013/14	2014/15	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21
Recycled (Tonnes)	91,890	106,184	107,227	109,164	98,318	96,026	91,863	94,523	95,608	98,053
Composted (Tonnes)	108,123	103,568	110,203	101,078	106,510	108,552	98,045	94,123	97,011	97,274
Heat, Power and Other Energy Recovery (Tonnes)	92,418	96,557	123,415	185,983	196,635	204,579	201,805	200,558	203,872	224,839
Landfilled (Tonnes)	91,988	88,380	65,302	8,087	8,193	8,350	7,639	6,352	5,235	5,948
Total (Tonnes)	384,419	394,689	406,147	404,312	409,656	417,507	399,352	395, 556	401,726	426,114



Data Table: Regional waste forecasts (tonnes) and regional targets for landfill diversion (% and tonnes) for Municipal (MSW) and Commercial & Industrial (C&I) waste streams for the Staffordshire and Stoke-on-Trent sub-region. (1)

	2015/16 Forecast		2020/21 Forecast		2020/21 Actual	
MSW Regional waste forecast (tonnes)	744,000 tonnes		771,000 tonnes		519,722 tonnes Below predicted level	
MSW Minimum diversion %rate / Maximum landfill % rate	75% Min. diversion from landfill	25% Max. landfill	80% Min. diversion from landfill	20% Max. landfill	97.5 % diversion from landfill Above target	2.5 % landfilled Below target
MSW Minimum diversion tonnes / Maximum landfill tonnes	559,000 tonnes min. diversion from landfill	185,000 tonnes max. landfill	613,000 tonnes min. diversion from landfill	158,000 tonnes max. landfill	506,583 tonnes diverted from landfill Below target ¹	13,139 tonnes landfilled Below target

¹ Note that target for minimum tonnage of MSW diverted from landfill was based on total arisings of 744,000 tonnes for 2015/16, and 771,000 tonnes for 2020/21. Actual arisings were 519,722 for 2020/21, so tonnage diversion target of 613,000 could not be met. Percentage targets were met with a significant margin.

Assessing the total waste arising is not straightforward, and the original estimate 4.2 million tonnes per annum at the beginning of the plan period has not been repeated. However, other methods, including the Environment Agency's Waste Data Interrogator, suggest that waste production has not grown significantly over the plan period, so actual arisings may be lower than predicted.

Discussion: Reliable estimates of total waste arisings have been difficult to produce, though the Environment Agency's recently modified Waste Data Interrogator has proved useful, and a new methodology is being prepared by the Regional Technical Advisory Body on Waste (RTAB). A 5-year [review of the Waste Local Plan](#) (published in December 2018) relied on population as a proxy. This suggested that arisings were unlikely to exceed forecasts within the plan period. This appears to be consistent with Environment Agency data for the total amount of waste treated in the Plan area, though the origin of this waste is not recorded.

More reliable figures are available for Municipal Solid Waste, which makes up less than 10% of total arisings. The total figure is well below the original Regional Waste Forecast for both 2015/16 and 2020/21, while the landfill diversion percentages are significantly higher than forecast.

Conclusion: It is, therefore, reasonable to conclude that the rate of growth of waste production is within the range that we have planned for.

W 2. Is waste treatment capacity keeping pace with production?

YES

Underlying Questions:

Have interim targets been met as set out in Policy 2.2?

Yes. During 2020 - 21, application records show that 104,150 tpa of new waste treatment capacity was permitted within the Plan area (all within Staffordshire). The figure for additional capacity will be a little smaller, as each application replaced or modified existing capacity. The table below shows how the changes are broken down by category and by site.

The application at Four Ashes involved the change of use from a clinical waste facility to a refuse-derived fuel facility. The

throughput increased from 15,000 to 104,000 tonnes per annum, and the clinical waste treatment capacity was transferred to a new facility permitted in the previous year. As no additional capacity was recorded when the replacement site was permitted, no deduction needs to be made this year as the original site closes.

The variation of the permission at Blythe View Farm does involve a reduction in annual throughput from 500 to 150 tonnes, but this is partially compensated for by permitting the operation to continue for a further 3 years. In any case, this facility never provided a route for the management of significant quantities of waste.

The Waste Local Plan set a series of targets for additional capacity for Recycling, Organic Treatment, and Residual Treatment required to support a movement of waste up the treatment hierarchy.

Adding the new capacity to the existing totals, we can see that all of the targets to 2020/21 have been met, together with 2025/26 targets for Organic and Residual Treatment.

Have we avoided any net loss of waste management capacity, particularly towards the upper part of the hierarchy?

Data for losses in waste treatment capacity are less reliable as the planning authority may not be informed when a site reduces capacity or ceases to operate. The latest figures have been produced by adding newly permitted treatment capacity to the previous totals.

The original figures come from work carried out during the [review of the Waste Local Plan](#), in which Environment Agency returns were matched against planning permissions. They include all losses from May 2012 to March 2018.

While there appears to have been an overall increase in treatment capacity of just under 128,500 tpa since the plan was adopted, but this has not been shared equally across treatment categories. The losses have been greatest for waste transfer stations, while recycling, and particularly aggregate recycling sites have seen an expansion of capacity, though in the case of recycling, this has been accompanied by a large drop in the number of operational sites.

The changes for the reporting period are dominated by the opening of a single, large refuse derived fuel plant. This has been categorised as Residual Treatment for the purposes of the statistics as is difficult to assess how much this will contribute to a gradual movement towards treatment higher up the waste hierarchy. Much will depend on the fate of the fuel produced.

Data Source: Applications Register;**Data Table: New waste treatment capacity (tpa) added during 2020 – 21**

Application Ref.	Recycling	Organic Treatment	Residual Treatment	Transfer Station	Aggregate Recycling	Landfill
SM.19/03/1140 W				0		
S.20/04/4124 W						0
S.20/02/4120 W	150					
SS.20/05/614 W			104,000			
ES.20/04/512 W	0					
Totals	150		104000			

Total overall: 104,150

Data Table: Progress against targets for additional waste treatment capacity (2020-21 figures)

	Recycling (tonnes per annum)	Organic Treatment	Residual Treatment	Transfer Station	Aggregate Recycling
Staffordshire	1,204,709	513,500	609,000	909,000	882,000
Stoke-on-Trent	399,561	40,000	335,566	336,367	536,599
Total	1,604,270	553,500	944,566	1,245,750	1,418,599
Interim Target (Target year 2010/11)	952,620 Achieved	272,970 Achieved	451,410 Achieved		
Interim Target (Target year 2015/16)	1,370,913 Achieved	382,977 Achieved	620,160 Achieved		
Interim Target (Target year 2020/21)	1,792,659 Not Achieved	478,641 Achieved	744,700 Achieved		
Interim Target (Target year 2025/26)	1,800,919	484,381 Achieved	758,700 Achieved		

Data Table: Changes in overall waste management capacity since adoption of the Waste Local Plan

	Recycling	Organic Treatment	Residual Treatment	Transfer Stations	Aggregate Recycling	Total
Staffordshire						
May 2012	62	13	11	74	22	182
	888,970	522,595	544,843	1,332,730	708,401	3,997,539
March 2021	46	14	4	50	27	141
	1,204,709	513,500	609,000	909,383	882,000	4,118,592
Change (No.)	-16	1	-7	-24	5	-41
Capacity (T)	315,739	-9,095	64,157	-423,347	173,599	121,053

Stoke-on-Trent						
May 2012	24	1	4	28	5	62
	523,193	39,784	335,952	429,761	312,039	1,640,729
March 2020	17	1	3	22	9	52
	399,561	40,000	335,566	336,367	536,599	1,648,093
Change (No.)	-7	0	-1	-6	4	-10
Capacity (T)	-123,632	216	-386	-93,394	224,560	7,364

Combined						
May 2012	86	14	15	102	27	244
	1,412,163	562,379	880,795	1,762,491	1,020,440	5,638,268
March 2020	63	15	7	72	36	193
	1,604,270	553,500	944,566	1,245,750	1,418,599	5,766,685
Change (No.)	-23	1	-9	-30	9	-52
Capacity (T)	192,107	-8,879	63,771	-516,741	398,159	128,417

Discussion: The number of waste related planning applications during the reporting period was small, and not all planning applications relating to waste treatment facilities lead to an increase in treatment capacity, or an increase in the number of operational sites. However, data from planning applications does show that there was an overall increase in treatment capacity.

The Waste Local Plan set a series of targets for additional capacity for Recycling, Organic Treatment, and Residual Treatment to support a movement of waste up the treatment hierarchy. All of these have already been met on time or ahead of time, with the exception of the 2020/21, and 2025/26 targets for recycling capacity which are yet to be achieved.

Conclusion: It is, therefore, reasonable to conclude that waste treatment capacity is keeping pace with production

W 3. Are we maintaining net self-sufficiency for waste management?

YES

Underlying Questions:

What proportion of our waste is treated within the Plan area, and what proportion is exported for treatment elsewhere?

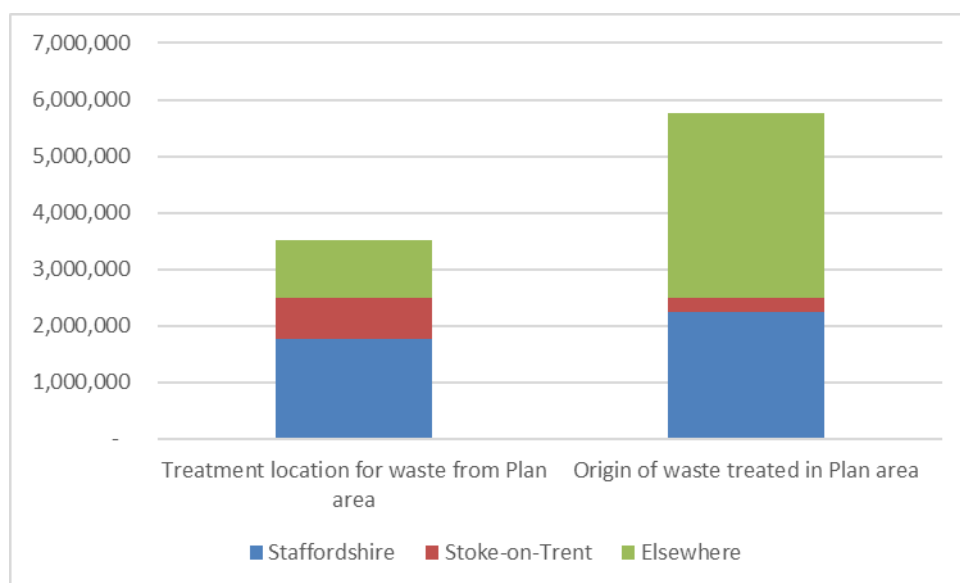
Of the 3,502,003 tonnes of waste which originated within the Plan area (as described in W1), 2,499,041 tonnes (71%) was also treated here (1,764,664 tonnes (50%) in Staffordshire, and 734,377 tonnes (21%) in Stoke-on-Trent), with 1,002,962 tonnes (29%) of waste transported beyond the Plan area for treatment or disposal.

Over the same period, 3,255,705 tonnes of waste was brought into the Plan area from beyond its boundary, bringing the total treated within the Plan area to 5,754,746 tonnes (4,479,894 tonnes (78%) in Staffordshire and 1,430,512 tonnes (25%) in Stoke-on-Trent).

Data Source: Environment Agency Waste Data Interrogator (2020)

Data Table: Destination and origin of waste within the Plan area

	Staffordshire	Stoke-on-Trent	Elsewhere
Treatment location for waste from Plan area (T)	1,764,664	734,377	1,002,962
Origin of waste treated in Plan area (T)	2,231,255	267,786	3,255,705



Discussion: While not all of the waste arising within the Plan area is treated within the Plan area, the amount of waste exported for treatment elsewhere is much smaller than the amount of waste imported for treatment. We are, therefore, treating an amount of waste which is equivalent to 230% of the amount generated in the Plan area.

Conclusion: It is, therefore, reasonable to conclude that we are maintaining net self-sufficiency for waste management within the Plan area

W 4. Are the location policies for waste sites working?

YES

Underlying Questions:

Are new approvals in line with locational criteria?

Largely. Planning applications data show that, of the five approvals during the reporting period that had the potential to add new waste treatment capacity, four related to sites with existing waste-related permissions.

Two related to existing waste management facilities located on industrial estates, in line with Policy 2.3; one related to a small-scale, on-farm operation, where location was justified by a local

need for the product: and one simply allowed more time to complete an agricultural improvement approved under Policy 1.4.

The only completely new site was a temporary operation proposed to process a large amount of illegally tipped waste. The rural site was not in line with the general location criteria, but was justified as an exception to minimise the need to transport the waste.

How many new approvals were granted under exceptions criteria?

During this reporting period, no applications were approved under the exemption criteria contained within Policy 3.

Data Source: Application Register and application details

Data Table: Waste applications determined between 1 April 2020 and 31 March 2021

Overall, 5 applications had the potential to add new treatment capacity (taken as a broad interpretation of “new waste sites”)

App. No.	Location	Description	Date granted	In line with locational criteria?	Additional capacity added
SM.19/03/1140 W	Rowley Gate Farm, Devils Lane, Longsdon	Application for temporary Waste Recycling Facility to process previously fly-tip	06-May-20	Special case. Temporary operation near illegally tipped waste.	0
S.20/04/4124 W	Land to the south of Cotes Lane, Swynnerton	To vary condition 3 to extend duration by 12 months - permission S.18/04/4124 W	17-Jul-20	Yes, Existing Site, approved in line with policy 1.4. More time to complete.	0
S.20/02/4120 W	Blythe View Farm, Grindley Lane, Grindley	Application not to comply with (to vary) Conditions 3, 4, 5, 6, 8	08-Sep-20	Yes, Existing Site. Reduced scale.	150
SS.20/05/614 W	Veolia Environmental Services Limited, Station Road, Four Ashes	Change of use from a Clinical Waste Facility to a Refuse Derived Fuel Facility	06-Nov-20	Yes, Existing Site. In line with criteria. Change of Use.	104,000
ES.20/04/512 W	Willshee's Waste & Recycling Ltd, Glensyl Way, Burton on Trent	Application not to comply with (to vary) condition 11 of planning permission ES.	06-Nov-20	Yes, Existing Site. In line with criteria. Extended hours.	0

Discussion: Two of the five planning permissions which had the potential to add new treatment capacity were on industrial sites, in line with locational policies, and two related to sites with existing waste-related permissions. The remaining site was not in line with the criteria, but its location was justified as it was to be a temporary, development to process illegally deposited waste.

Conclusion: Overall, it is reasonable to conclude that the location policies for waste sites are working.

W 5. Are we doing all we can to safeguard existing waste treatment sites?

YES

Underlying Questions:

Have we avoided the sterilisation of waste treatment sites contrary to the requirements of policy?

Yes. We were consulted by District/ Borough Councils on 2 applications which had the potential to impact on existing waste management facilities. These were examined, but neither raised safeguarding concerns, so no objections were made

Data Source: Applications Register. WCA Applications determined 1 April 2020 to 31 March 2021

Discussion:

The County Council was consulted on 2 District/ Borough Council applications which might have impacted on waste management facilities. In both cases, it was concluded that there would be no adverse impacts.

We continue to receive many fewer waste consultation area (WCA) consultations than mineral safeguarding area (MSA) consultations. As discussed in previous reports, this may reflect the large geographical extent of the Mineral Safeguarding Areas in comparison to the relatively small areas where waste management facilities might be affected, and also the relative difficulty for local planning authorities to identify where WCA consultations would be appropriate.

All LPAs have been provided with GIS layers providing the locations of all waste sites that might require safeguarding.

Conclusion: Overall, it is reasonable to conclude that we are doing all we can to safeguard existing waste treatment sites.

W 6. Are we doing all we can to reduce the impacts of waste treatment facilities on the environment?

YES

Underlying Questions:

What proportion of new permissions require specific environmental improvements to be achieved?

100%. Once again, all new waste planning permissions include some form of environmental improvement.

Were any new permissions approved where adverse impacts (as defined in Policy 4.2) were anticipated, but judged to be outweighed by material planning benefits?

No. No such approvals were granted

How many approved were granted requiring phased improvement of existing waste management facilities?

None. No such approvals were granted

Were all newly permitted facilities enclosed?

No. Two of the five approvals involve open-air operations, though both were very small in scale. One involved shredding very small quantities of wood for animal bedding, while the other allowed extra time to complete a small infilling operation for agricultural improvement. Both will be completed within 2 years

The remaining permissions all require any waste handling operations to take place within a building, with measures to ensure that noise, dust and odour etc. are properly contained.

What proportion of new facilities were exempted from requirement for enclosure?

40%. One of the approvals related to an agricultural infill, using inert waste, so enclosure would not have been applicable. It could also be argued that enclosure was not practical for the small-scale wood shredding operation as the measures required to ensure a safe working environment could not be justified.

How many approvals granted involved temporary planning permissions?

Three of the approvals involved a temporary planning permission. Two of these extended the lifetime of permitted, time-limited operations, and the third permitted a new, temporary waste treatment facility to process a large quantity of illegally deposited waste.

Data Source: Planning Applications Register and individual applications and permissions.

Data Table: New waste planning permissions granted 1 April 2020 to 31 March 2021.

App. No.	Location	Date granted	Includes environmental improvement?	Adverse impacts anticipated?	Phased improvements needed?	Enclosed?	Exempt from enclosure?	Temporary permission?
SM.19/03/1140 W	Rowley Gate Farm, Devils Lane, Longsdon	06-May-20	Yes	No	No	Yes	No	Yes
S.20/04/4124 W	Land to the south of Cotes Lane, Swynnerton	17-Jul-20	Yes	No	No	No	Yes	Yes
S.20/02/4120 W	Blythe View Farm, Grindley Lane, Grindley	08-Sep-20	Yes	No	No	No	Yes	Yes
SS.20/05/614 W	Veolia Environmental Services Limited, Station Road, Four Ashes	06-Nov-20	Yes	No	No	Yes	No	No
ES.20/04/512 W	Willshee's Waste & Recycling Ltd, Glensyl Way, Burton on Trent	06-Nov-20	Yes	No	Yes	Yes	No	No

Discussion: The impacts of waste treatment facilities on the environment are being well managed. Potential impacts are being controlled through conditions.

On one occasion, where an application involved extending operational hours at a well-established site, the opportunity has been to review environmental controls with a view to improvements across the whole site.

While two of the five permissions did involve outdoor operations, these were small in scale and enclosure would have been impractical, or simply not applicable. The remaining applications, which are much larger in throughput, all require enclosure.

The one completely new site that was permitted makes provision for all waste processing to take place in an enclosed environment, even though the permission is temporary. Conditions to ensure that operations cannot begin until the chosen building has been brought to a standard where enclosure can be effective. This suggests that the Waste Local Plan policies are supporting a move towards most waste management operations being carried out within buildings.

Conclusion: Overall, it is reasonable to conclude that we are doing all we can to reduce the impacts of waste treatment facilities on the environment.

W 7. Are we co-ordinating our work with other waste planning authorities across the region?

YES

Underlying Questions:

Have we continued to co-operate on regional issues with regard to current and future waste management capacity, and on future evidence base preparation?

Yes. The West Midlands Resource Technical Advisory Body was set up as a forum for discussion between Waste Management Authorities across the region to discuss such issues. Staffordshire County Council has been represented at all meetings of this group.

Data Source: Minutes of meetings of West Midlands Resource Technical Advisory Body.

Data Table: Attendance at WMRTAB Meetings.

Date of meeting	SCC Represented?
10 June 2021	Yes
8 December 2020	Yes
20 March 2020	Yes

Discussion: Meetings of the West Midlands Resource Technical Advisory Body provide a forum to discuss regional issues relating to waste management provision, and to ensure compliance with the Duty to Cooperate. Though the frequency of meetings has declined in recent years, and they have moved online in response to Covid, Staffordshire County Council has been represented at all meetings and has been fully involved in discussions.

Conclusion: It is, therefore, reasonable to conclude that we are co-ordinating our work with other waste planning authorities across the region.

W 8. Does the Waste Local Plan need to be revised?

NO

Underlying Questions:

Are the policies working as we intended?

Yes, analysis of applications during the reporting period has not raised any concerns that policies are failing to work as intended

How is the plan performing against targets?

Fine, as reported in 2 (above) plan targets are being met as planned, or ahead of schedule

Have there been any relevant changes to National Planning Policy?

No. The [Environment Act 2021](#) is expected to have an impact on the design of packaging to facilitate recycling, and also on the approach to collection and recycling of household waste. If these changes require different collection services, then these would need

to be addressed through the [Municipal Waste Management Strategy](#) which, in turn, would influence any review of the Waste Local Plan.

Have there been any changes to our Strategic Priorities?

No, there have been no changes to our Strategic Priorities since the Waste Local Plan was prepared.

Have there been any changes to local circumstances?

There is nothing to suggest that local circumstances are significantly different to when the Waste Local Plan was prepared.

Data Source: [First Review of the Waste Local Plan, December 2018.](#)

Discussion: A 5-year review of the Waste Local Plan was completed in December 2018 concluding that there was no need for a revision.

Since then, there have been no significant changes. The Plan policies are working as intended, Plan targets are being met on time or ahead of schedule, and there have been no significant changes to National Planning Policy, strategic priorities, or local circumstances.

Conclusion: It is, therefore, reasonable to conclude that the Waste Local Plan does not need to be revised.

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