



Local Development Plan 2021 > 2036

Cardiff Council - May 2026

Cardiff Replacement LDP Examination

Hearing Session 13
Minerals and Waste

HS13.01 Council Statement in
Response to Inspectors Questions
in ID08m



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Cardiff Council
Replacement Local Development Plan
Examination

Hearing Session 13 – 14.00-17.00, 30 June 2026

Virtual

Minerals and Waste

Issue - Does the LDP make adequate provision for minerals and waste?

1. Opening and introductions

2. Minerals

Assessment of Mineral Need

2.1 What evidence has the Council relied upon to identify the need for aggregates and other minerals over the plan period, and how up to date is that evidence?

Response:

The Council confirm that the level of need for aggregates and other minerals was calculated using evidence found in the second review of the South Wales Aggregates Working Party (SWRAWP) Regional Technical Statement (RTS 2nd Review, 2020) (RLDP55). The RTS 2nd Review provides specific recommendations to the constituent LPAs regarding the quantities of aggregate which will need to be supplied from each area and the nature and size of any allocation which need to be made within LDPs. The recommendations are based upon an annualised apportionment figure based over 25 years for crushed rock (LDP plan period plus ten years) and 22 years for sand and gravel (LDP plan period plus seven years). The RTS 2nd Review identified that Cardiff needs to make provision for 1.411 million tonnes of crushed rock aggregates per annum. It identified a nil apportionment of land-won sand and gravel. A subsequent Position Statement for the region produced in 2022 states that allocations of 7.475mt of hard rock are required in Cardiff.

The SWRAWP are currently undertaking a third review of the RTS, but it is unlikely to be finalised and published before the Examination takes place. Until such time as the third review is published then reliance will continue to be placed on the 2nd Review and subsequent Position Statement as the most up to date evidence of need in the region.

The SWRAWP also publish an annual report based on the findings of an annual survey of aggregate sales information. The Deposit Replacement LDP was based upon the

SWRAWP Annual Report 2022 published in September 2024, as this was the most up to date evidence available at that point in time. The most recent annual report is Annual Report for 2024, published in January 2026. The difference between the landbank based on the highest average of the previous annual 3 year and 10 year average sales. The landbank calculations differ as follows:

	3 year annual average sales (million tonnes)	10 year annual average sales (million tonnes)	Landbank in years based on highest average
Annual Report 2022	2.22	2.20	24
Annual Report 2023	2.11	2.22	24
Annual Report 2024	2.01	2.23	25

The Council do not consider that the difference between the landbank calculations shown in the Annual Reports is significant enough to require any alterations to the mineral's strategy of the Plan.

2.2 Has the Council followed recognised methodologies and the latest regional apportionment when establishing its mineral need, and how is this reflected in the Plan's strategy?

Response:

Yes, the Council confirm that the methodology for assessing Cardiff's mineral need was based on the regional apportionment exercise undertaken by the South Wales Regional Aggregates Working Party. The SWRAWP Regional Technical Statement 2nd Review sets out the regional apportionment required to be supplied by each of the constituent local authorities. The Second Review was followed by a Position Statement for the sub-region which gave an updated apportionment for Cardiff of 7.475mt.

This is reflected in the Plan's Strategy in the following ways:

- The need to safeguard known mineral resources and make provision for sufficient mineral reserves to meet the agreed apportionment of mineral reserves for the region is identified as a Key Issue (Paragraph 3.9);
- Objective 10 of the Plan states that the Plan will ensure natural resources are protected including mineral and sand and gravel resources and reserves;
- Strategic Policy SP11 'Maintaining a Supply of Minerals' provides a commitment that Cardiff will maintain a steady and adequate supply of minerals and contribute to regional aggregate supplies;
- Policies MW1 to MW7 provide a framework by which mineral resources and reserves will be adequately protected, provides guidance on how any applications

for mineral working would be determined, and the preferred order of mineral resource release, should this prove necessary to fulfil regional apportionment requirements.

2.3 What evidence demonstrates that the Plan will deliver its requirement of 7.475 million tonnes of crushed rock by 2041?

Response:

The Council confirm that since the publication of the Position Statement requiring Cardiff to provide an apportionment of 7.475mt of crushed rock the following planning applications have been approved:

Application no.	12/09/23	Taffs Well Quarry	4mt
20/02351/MJR			
Application no.	02/05/25	Taffs Well Quarry	3mt
24/00306/VAR			

As an additional 7mt of reserves already benefit from planning permission and the Plan identifies a Preferred Area for mineral working adjacent Ton Mawr Quarry, it is considered that the Plan provides sufficient evidence to demonstrate it will meet this requirement.

2.4 When is the next regional apportionment exercise expected to be undertaken, and how would the Plan respond to any future changes in apportionment requirements should they arise?

Response:

The Council note that Minerals Technical Advice Note 1 requires the preparation of Regional Technical Statements for the areas covered by Regional Aggregates Working Parties. The first SWRAWP Regional Technical Statement was published in 2008 and is required by MTAN1 to be reviewed every five years. The First and Second Reviews were published in 2014 and 2020 respectively. The Third Review of the RTS began in January 2026 and is currently in progress. An Interim Report detailing work undertaken in Stage 1 of the review was published in March 2026.

Should the Third Review conclude that a larger apportionment is required to be provided by Cardiff, this need would be directed towards the Preferred Area of Known Resource identified at Ton Mawr Quarry in Policy MW1. Any additional requirement would be assessed against Policy MW2 'Preferred Order of Mineral Resource Release'. It is noted that Policy MW7 safeguards areas of limestone resources should their use be required in the future.

Provision for Mineral Supply

2.5 Does the Plan, taken as a whole, make provision for a steady and adequate supply of minerals throughout the plan period?

Response:

Yes, the Council confirm that the Plan encourages a sustainable supply of minerals across the Plan period. It makes provision for a steady and adequate supply of minerals in the following ways:

- Strategic Policy SP11 commits to providing a steady and adequate supply of minerals and contribution to regional aggregates supplies by supporting the efficient use of minerals, protecting mineral reserves and resources, maintaining landbanks, and safeguarding minerals and minerals infrastructure such as sand wharves;
- Policy MW1 provides protection for existing mineral reserves and resources from incompatible forms of development which could cause sterilisation and prevent future working;
- The Plan provides a framework for assessing future planning applications for future mineral working. Policy MW1 sets out a Preferred Area of known resource suitable for the future working of limestone at Ton Mawr Quarry. Policy MW2 provides a preferred order of mineral resource release which sets out a sequential test approach to be used to guide the future release of mineral resources should this prove necessary;
- The Plan provides protection for mineral reserves and resources against incompatible development which could cause sterilisation. Policy MW4 sets out the policy by which the buffer zones shown on the Proposals Map will be protected from incompatible development;
- Policy MW6 provides protection for the sand wharves identified on the Proposals Map so that their ability to land marine dredged sand and gravel is safeguarded. It encourages new facilities for the landing of marine dredged sand and gravel within the existing wharves. This will ensure the continuity of supply;
- Policy MW7 safeguards the sand and gravel, limestone and high specification aggregates resources shown on the Proposals Map against development which would permanently sterilise them. This will ensure that these resources will be available should it prove necessary to work them in the future to provide an adequate supply of minerals.

2.6 Has the planning permission to deepen Taffs Well Quarry been considered in assessing supply and landbanks?

Response:

The Council confirm that the application to deepen Taffs Well Quarry was granted planning permission in May 2025. As it was granted permission after the date of the Deposit Plan in January 2025, it was not specifically taken into account in the calculating of supply and landbanks and was not reflected in the Minerals Background Paper. Figures were based on the most up to date evidence available at that time – the 2nd Review of the SWRAWP Regional Technical Statement (2020), the Position Statement for the sub-region produced in 2022 and the Annual Report 2024. The Position Statement for the sub-region stated that an additional 7.475mt of hard rock should be provided by Cardiff. This is largely accounted for by the granting of two permissions at Taffs Well Quarry which together amount to 7mt. Revised figures will be provided in the update to the Minerals Background Paper.

2.7 Have any other applications for mineral working been submitted or determined within Cardiff and/or the Cardiff city sub-region since publication of the Deposit LDP, and if so, what implications do they have for the Plan's assumptions, Policy SP11, and the wider suite of minerals policies?

Response:

The Council confirm that since the publication of the Deposit Plan in January 2025, the following applications have been approved within Cardiff:

24/00306/VAR	Taffs Well Quarry	Variation of Conditions 1 and 6 (Proposed Deepening of Quarry) of 20/02351/MJR to amend the approved plans as follows: 1) to include two further phases of development, Phases 22 and 23 with respective drawings provided 2) to allow quarrying lower than the current permitted depth of 30metres Above Ordnance Datum.	Additional 3mt
22/03047/VAR	Ton Mawr Quarry	Variation of Condition 3 of 01/01485/W to extend the time period of the permission until 31st December 2042	No change in reserves

23/02169/DOC	Creigiau Quarry	Discharge of Condition 12 (Improved Access Details) of 15/01953/MJR	No change in reserves
26/00399/DOC	Creigiau Quarry	Discharge of Condition 34 (Borehole Details) of 15/01953/MJR	No change in reserves

The Cardiff City sub-region consists of Cardiff, Caerphilly, the Vale of Glamorgan, Rhondda Cynon Taf, Bridgend and Merthyr Tydfil. The SWRAWP Annual Report 2024 lists mineral applications of note within Wales. Information extracted from Table 11 'Monitoring of Planning Applications' below shows applications made to local authorities within the sub-region.

11. MONITORING OF PLANNING APPLICATIONS								
Planning Applications and Decisions up to 2024								
Planning Reference	Planning Authority	Site Name	Type	Mineral	Reserve	Date Submitted	Decision	Date
20/0702/FUL	Caerphilly	Bryn Quarry (Gelliargwellt Uchaf Farm), Gelligaer (Caerphilly)	Ext	Sandstone	2.6Mt	24.08.20	Refused (Appeal Lodged)	
24/0525/FUL	Caerphilly	Bryn Quarry (Gelliargwellt Uchaf Farm), Gelligaer (Caerphilly)	Ext	Sandstone	6.1Mt	12.07.2024	Recommended to approve at committee – awaiting decision to be issued	
20/02351/MJR	Cardiff	Taffs Well Quarry	Ext	Limestone	4 Mt	15.11.20	Approved	12.9.2023
22/03047/VAR	Cardiff	Tonmawr	EoT (20 years)	Limestone	Nil	21.12.22	Awaiting decision	
24/00306/VAR	Cardiff	Taffs Well	S73 (deepening quarry)	Limestone	3 Mt	9.2.2024	Awaiting decision	
15/0666/10	Rhondda Cynnon Taf	Craig yr Hesg, Pontypridd,	Ext	Sandstone	10 Mt	15.05.15	Refused (Appeal Allowed)	11.10.22
21/0720/15	Rhondda Cynnon Taf	Craig yr Hesg, Pontypridd, (Rhondda Cynon Taf)	EoT (6 years)	Sandstone	Nil	17.05.21	Refused (Appeal Allowed)	11.10.22

The table includes minerals applications up to 2024. The most significant of these being the application in Rhondda Cynon Taf for a 10mt extension to Craig yr Hesg Quarry. Since the Annual Report 2024, no additional significant applications have been determined within the sub-region. Applications received and determined within the sub-region are mostly variations of conditions, applications for extensions of time or other operational amendments which have no impact upon the quantity of reserves permitted within the region.

As no applications which have a significant impact upon regional reserves and landbanks have been submitted since the last Annual Report was published, it is not considered that there would be an impact upon the mineral's strategy of the Deposit Plan.

2.8 Does the Plan demonstrate sufficient flexibility to respond to any future shortfall in mineral supply; and should the Plan make provision to assist in meeting any potential future apportionment shortfall in the sub-region?

Response:

The Council will continue to be a member of the South Wales Regional Aggregates Working Party and the Cardiff City sub-region. The third review of the Regional Technical Statement is currently being progressed. It is acknowledged that, once finalised, the third review will establish whether Cardiff should provide any additional apportionment.

Should a shortfall in the mineral supply be identified within the Plan period, the Plan identifies the following which could contribute towards meeting the additional need:

- Preferred area of known resource suitable for the future working of limestone at Ton Mawr Quarry;
- Guidance on the preferred order of mineral resource release in policy MW2. The extension or deepening of existing sites will be favoured before the release of new sites, with deepening preferred to lateral extension. Criteria ii. of the policy states that one of the factors in considering applications for new mineral working would be whether the addition of new reserves preserves the productive capacity of Cardiff to meet its sub regional apportionment commitments;
- Protection of existing reserves and resources by identifying them on the Proposals Map and proposing buffer zones around them to protect them from incompatible development;
- Identification and protection of sand and gravel, limestone and high specification aggregate (HSA) resources under policy MW7. This will ensure that these resources would be available for future working should a need be identified.

2.9 Is it necessary for the Plan to identify further allocations, preferred areas or areas of search to ensure it provides a robust framework for meeting current or future requirements, including those in the wider sub-region?

Response:

The Council do not consider it is necessary to identify any further allocations, preferred areas or areas of search prior to the finalisation of the Third Review of the Regional Technical Statement. As outlined above, it is considered that the Plan is sufficiently flexible to respond to any shortfall in mineral supply which may be identified in the future and that it provides a robust framework for meeting current or future need.

Should regional collaboration identify the need for additional reserves in Cardiff, proposals would be directed towards the preferred area at Ton Mawr, and then the extension or deepening of existing sites, with deepening preferred to lateral extension. There are then the areas of safeguarded resource identified under policy MW7. It is considered that this provides a sufficiently robust framework which will meet the demand for any additional reserves to be released, should this prove necessary to support Cardiff's contribution to the region.

Safeguarding of Mineral Resources and Infrastructure

2.10 Are mineral safeguarding areas and buffer zones appropriately defined and justified by the evidence base; and will such areas provide proportionate and effective protection against the sterilisation of mineral resources?

Response:

The Council note that the designation of mineral safeguarding areas is supported by PPW in order to safeguard and protect access to mineral resources which society may require in the future. Areas to be safeguarded are shown on the Proposals Map and given protection by policy MW7. This states that development that would permanently sterilise the mineral resources will not be permitted unless a number of criteria can be met. The criteria allow for development where the applicant can demonstrate the mineral is no longer of resource value, that the mineral can be extracted prior to the incompatible development, that the incompatible development is of a temporary nature or that there is an overriding need for the incompatible development which overrides the need for the incompatible development which overrides the need for the resource. Policy MW7 does, therefore, allow for a degree of flexibility provided that the criteria can be met. It is considered that the mineral safeguarding areas are supported by national guidance and that they will provide proportionate and effective protection against sterilisation so that they can be maintained for use, should the need arise in the future.

Paragraph 71 of MTAN1 states that the minimum distance for buffer zones around hard rock quarries should be 200m. The Proposals Map shows a buffer zone of 200m around mineral reserves and resources. Within these areas no mineral working, housing or other sensitive development will be permitted. It is considered that the buffer zones are appropriately defined in line with national guidance. The buffer zones are justified as they provide an area of protection which prevents the encroachment of incompatible development which could cause sterilisation of the mineral. The buffer zones also reduce the environmental impact of mineral working by providing a separation distance between sensitive development and mineral working.

The Council consider that the mineral safeguarding areas and buffer zones are appropriately defined and justified by the evidence base. They will provide proportionate and effective protection against the sterilisation of mineral resources.

2.11 Is the Council satisfied that sufficient measures are available to prevent mineral operations at the sites identified by Policy MW3?

Response:

The Council note that Policy MW3 identifies three sites where mineral working is no longer considered appropriate:

- Cefn Garw Quarry;
- Highland Park Brickworks Ely; and
- West End Brickworks, Ely.

At these sites, where necessary, measures to prevent further mineral working and secure restoration will be sought at the earliest opportunity. The three identified sites have not been worked for many years and effectively been abandoned for mineral purposes. Although planning permissions for mineral extraction still exist at these sites, in environmental terms they are unsuitable for mineral working and have largely re-vegetated, with parts of the brickworks being put to permanent alternative uses. At present there is no need for the mineral reserves at the sites, no demand for the sites to re-open, nor any indication that an operator intends to recommence working at any of the three sites. There is no reliance on the reserves within the sites in terms of the provision of an adequate landbank of minerals. Should it prove necessary, prohibition orders could be used under this policy to prevent any future working at these sites.

Environmental Protection, Restoration and Amenity

2.12 How do the Plan's minerals policies ensure that environmental effects and impacts on local communities, such as noise, dust, traffic and landscape harm, are fully assessed and appropriately controlled?

Response:

The Council note that many of the potential environmental impacts from mineral working are restricted by national legislation and guidance. All sites that are currently working operate under modern environmental controls and are subject to planning conditions which restrict any potential detrimental effects upon local communities.

Policy MW2 indicates the preferred order of mineral resource release and, with the exception of a lateral extension at Ton Mawr Quarry, directs mineral working towards the extension or deepening of existing mineral working. It is, therefore, likely that should any applications be submitted within the Plan period they would be at existing active sites. Any applications for the release of additional reserves or other mineral working at existing sites would be subject to similar conditions to those imposed upon current working which prevent adverse environmental impacts and restrict the impact upon local communities. Furthermore, the life of any additional reserves released will be restricted to enable new technologies and updated environmental expectations to be reflected in working practices in the future. Buffer zones would continue to provide a separation distance between residential uses and mineral working to further reduce the likelihood of detrimental environmental impacts.

2.13 What actions will the Council take to ensure that approved restoration schemes are implemented in practice and that sufficient funding is available to complete them?

Response:

The Council notes that Policy MW5 states that planning permission will only be given for mineral working and associated plant and buildings where they are accompanied by firm proposals for the reinstatement of the site to a condition fit for an appropriate after-use, supported by adequate after-care proposals. Applications for the review of existing controls will also be expected to be accompanied by appropriate reinstatement and after-care proposals.

Mineral operators will be expected to agree the broad aims of the restoration scheme at the outset of the process and then keep the restoration aims under review at regular intervals throughout the working life of the site. Plans for the appropriate restoration of mineral sites will be secured by conditions on the planning permission and s106 agreements where necessary. These can ensure that sufficient funding remains available for restoration.

2.14 How appropriate is housing allocation H2.4, having regard to its proximity to an operational wharf with potential for noise, dust, HGV movements and unsociable working hours?

Response:

The Council propose that this site is withdrawn from the Plan due to representations made by Associated British Ports (ABP), Breedon Trading Limited and the Mineral Products Association (MPA). Statements of Common Ground have been agreed between the Council and these parties to this effect. These changes to the Plan will form part of the forthcoming Matters Arising Changes consultation.

3. Waste

Waste Arisings and Capacity Requirements

3.1 What methodology has been used to forecast waste arisings over the plan period, and is it robust and proportionate?

Response:

The Council note that as part of 'Towards Zero Waste' the CIM Sector Plans forecast likely waste arisings and requirements, as well as any shortfalls in waste management provision. The forecasts are based on the requirements of the region rather than being expressed at individual local authority level. The Sector Plans are based on providing capacity for the management of waste arisings in terms of tonnage, rather than land-take based requirements. Regional monitoring based on the requirements of TAN 21 is used to monitor waste arisings, assess the capacity of the region and identify gaps in provision. The Council will continue to work collaboratively with the South East Wales region to monitor waste arisings and respond to any identified capacity requirements. It will respond to any need identified during the Plan period and continue to support and enable an integrated and adequate network of waste management facilities within Cardiff and across the region.

The Wales (Waste) measure 2010 established statutory targets for local authorities for the percentage of municipal waste recycled, prepared for re-use and composted. The statutory target is to achieve a recycling performance of 70% from 2024/2025 onwards. The Council's last published Annual Wellbeing Report 2024/2025 stated that the year-end recycling performance was 64.01%. The Council is currently in the process of preparing a replacement recycling strategy for 2026-2030. The Cardiff Council Corporate Plan states that the Council will continue to work with Welsh Government, WRAP and the WLGA to achieve improvements in collecting and processing recycling. The aim is that the percentage of municipal waste collected and prepared for reuse and/or recycled will be 70%.

WRAP modelling has shown that the target of 70% is achievable by improving systems and collections, such as:

- Reducing the proportion of recyclable material being presented as residual waste through existing services;
- Changes to recycling services and increasing segregated recycling collections;
- Targeted interventions within areas of high-density housing and flats;
- Year-round garden waste collection;
- Increasing Absorbent Hygiene Product collections;
- Dedicated soft plastic collection.

It is considered that the planned improvements to the Council's waste performance will increase the quantity of waste arisings which are diverted from residual waste streams and see an increase in arisings in terms high quality reuse, recycling and recovery.

In land use terms, the waste policies of the Plan aim to ensure that waste arisings produced within the County are managed in an environmentally acceptable and sustainable manner. Currently, improvements to the Council's waste performance are largely based upon improving education and behaviour, as well as improvements and alterations to the frequency of existing services. The facilities for the management of existing arisings and the potential increase in waste streams already exist as part of the Council's current waste management service. At present, there is no identified land-based requirement which is required within the Plan period in order to fulfil the ambition to meet the statutory 70% target. Should progress towards the 70% target necessitate the provision of additional waste management facilities within the County, these will be supported in land use policy terms.

3.2 Does the Plan identify any shortfall in waste management capacity, and how does the Council propose to address this?

Response:

The Council confirm that the Plan does not identify any shortfall in waste management capacity. Neither the regional waste monitoring carried out to supplement TAN 21 'Waste', nor the Municipal Sector Plan identified any shortfall in waste management capacity specifically in Cardiff. The Council's Recycling Strategy does not identify any shortfall in facilities for dealing with municipal waste.

Cardiff is a member of Prosiect Gwyrdd which delivered the regional energy from waste plant, as well as part of the Cardiff Organic Treatment Project which delivered

an anaerobic digestion plant to deal with arisings from Cardiff and the Vale of Glamorgan. Cardiff Council has an integrated network of waste management facilities:

- Energy Recovery facility;
- Materials Reclamation Facility;
- Anaerobic digestion plant;
- Composting windrow facility;
- Household Recycling Centres;
- Reuse facility at Lamby Way;
- Network of smaller bring sites and recycling infrastructure at Hubs.

There are also a range of waste facilities run by private operators such as waste recycling facilities, waste transfer stations, small scale hazardous waste transfer stations, scrap yards, metals recycling facilities, clinical waste disposal facilities etc.

At this point in time there is no identified shortfall in waste management capacity in Cardiff. There are no ongoing regional waste procurement processes at present and no outstanding need in the region. Should any shortfall for existing waste streams be identified during the Plan period, or any additional new waste streams emerge for which there is not sufficient capacity within existing plant, policy MW8 will provide guidance on the criteria by which proposals would be assessed.

Adequacy and Deliverability of Waste Sites

3.3 Given the anticipated planning applications for additional waste management facilities, including for treatment and recovery, waste transfer, and energy from waste, should the Plan identify specific sites to meet these and other potential activities?

Response:

The Council confirm that the Sector Plans and regional waste monitoring produced under TAN21 did not identify any significant shortfall in waste management capacity, or a need for any type of waste facility or technology to be located within Cardiff in order to manage a specific waste stream. No specific locational or technological requirement has been identified at present, either by the Council itself or through regional monitoring or collaboration exercises. Should regional collaboration identify the need for a regional waste facility in the future, there is no guarantee that such a facility would need to be located within Cardiff, rather than any other available sites within the region. There are no current planning applications or extant planning permissions for significant waste facilities within Cardiff. Therefore, it is not considered necessary to identify and allocate specific sites for waste purposes within the Plan, as future needs or likely locational and technological requirements are not yet known.

The principal aim of national waste management guidance is the move to a circular economy where resources are kept in use and waste production is reduced. As technology advances with time, it is likely that additional, or replacement, waste facilities will be required. These facilities could manage new and emergent waste streams, or more effectively deal with existing waste arisings. It is not considered prudent to identify and allocate specific sites for waste management purposes at this stage, given that the locational and technological requirements of any waste facilities which may be required in the future are currently not known. Factors such as site size, operating conditions, environmental sensitivity or the need for proximity to users or other installations are not yet known.

If sites were to be allocated specifically for waste management purposes, the sites may remain unused if they prove unsuitable for emergent waste streams, or are not appropriate in terms of scale or nature to meet the locational or technological standards required of specific waste management facilities.

3.4 Given that some waste uses may fall within the B Use Class and be appropriately located on employment land, what implications does this have for the Plan's ability to maintain a sufficient supply of land for non-waste industrial and warehousing uses, particularly in light of identified shortfalls, and how is this managed through the Plan's strategy and policies?

Response:

The Council confirm that no need for a regional scale waste facility, or other waste facility with a significant capacity, has been identified by regional monitoring. No significant shortfall in provision for handling municipal waste streams has been highlighted by the Council's own waste management strategy. Given this, is it anticipated that proposals for waste facilities which come forward during the Plan period would predominantly be smaller in scale and fall within 'B' use classes. These facilities would have locational requirements and operating conditions similar to other uses typically found within existing industrial and warehousing areas.

With the move to a more circular economy, it is likely that increasingly 'waste' uses will consist of industrial processes and recovery and reworking of existing materials, which will be no different from any other industrial use typically directed towards business and industrial areas. Waste uses falling within 'B' use classes would be acceptable in land use terms in general industrial areas and, as they would be classed as employment uses, would have no detrimental impact upon the employment landbank.

TAN 21 (paragraph 3.21) states that Employment Land Supply Surveys will not be expected to specifically quantify the amount of separate future provision likely to be

needed for waste facilities, but that LDPs should indicate where suitable and appropriate sites exist for the provision of waste management facilities. The policy provides a degree of certainty by directing waste facilities towards existing industrial land.

Given the existing waste framework within Cardiff and the range of waste streams which are already sufficiently dealt with within the County, it is not considered that future waste proposals are likely to require a significant quantity of additional land, so would not have a significant detrimental impact upon the employment landbank.

Policy Clarity and Flexibility

3.5 Do policies SP23 and MW8, taken together, support the provision of a wide-ranging and diverse waste infrastructure that meets identified needs?

Response:

The Council confirm that Policies SP23 and MW8 support the provision of a wide-ranging and diverse waste infrastructure which will meet identified needs. The provision of additional waste facilities is supported, where it is proven that there is a demonstrable need or where the proposed use would move the management of waste further up the waste hierarchy.

Should regional monitoring identify the need for additional waste facilities and regional collaboration determine that the additional facilities would be most appropriately located within Cardiff, the policies would be sufficient to assess the proposal in land use terms. Cardiff remains committed to working with the region to monitor waste arisings, identify gaps in provision and ensure that waste arisings are managed as high up the waste hierarchy as possible.

The shift to a more circular economy will mean that waste is managed higher up the waste hierarchy and treated more as a potential resource. It is anticipated that applications for smaller-scale waste management facilities, or new solutions for emergent waste streams, may arise during the plan period. Facilities for the handling, treatment and transfer of waste will be generally encouraged towards existing B2 industrial land.

It is considered that the policies, when taken together, enable the assessment of applications for waste management facilities that the Council is likely to receive during the plan period.

3.6 Are the criteria-based approaches in policy MW8 sufficiently clear and robust, including how the criteria are intended to be applied in decision-making?

Response:

The Council confirm that Policy MW8 provides a criteria based policy for the assessment of a range of waste management applications which may be submitted during the Plan period. The need for the proposed use would be assessed against regional monitoring and considerations of whether there is a shortfall in provision in terms of capacity, location or technology. Waste proposals which are not necessarily regional in scale will also be supported where they would allow waste to be managed higher up the waste hierarchy. The policy also contains various criteria which would ensure that the potential environmental impacts and impacts on human health and neighbouring occupiers would not be unacceptable. Proposals should also contain acceptable plans for restoration, aftercare and after-use, where appropriate. The final criteria ensures that all waste proposals should be accompanied by a Waste Planning Assessment which would contain sufficient information to enable planning officers to adequately assess the proposal and its likely impacts.

The Council consider that the criteria based approach provides a sufficiently clear and robust policy to allow officers to assess and determine applications for waste management facilities. It will provide guidance to applicants to assist them in understanding how applications are likely to be determined, and the information required to be submitted as part of an application.

4. Action Points