

# Response ID ANON-MBC2-PQ2S-A

Submitted to **National Planning Framework: Position Statement**

Submitted on **2021-02-19 09:56:51**

## Questions

### 1 Do you agree with our current thinking on planning for net-zero emissions?

#### Please give us your views:

The Resource Management Association Scotland (RMAS) is a not-for-profit and non-political trade association representing micro, small and medium sized companies in the resource management sector in Scotland.

The RMAS welcomes the opportunity of contributing the Scottish Government National Planning Framework: Position Statement Consultation.

The Position Statement sets out the main issues that were raised during our early engagement; our emerging thinking on spatial priorities; and the potential changes to national planning policies that we are considering.

RMAS believes that delivering the goal of a Net Zero economy for Scotland by 2045 or earlier is essential in tackling the Climate Crisis, delivering a fairer society and providing a future prosperity for generations to come which is better and provides for greater wellbeing of all.

The resource and waste sector has an especially important role to play in that transition. It has already moved a huge distance in a short space of time and moved Scotland away from a landfilling nation to one which leads the way on capturing valuable resources in the form of energy or secondary resources, extended the life of goods through reuse schemes and engaging with households and business to ensure they have circular economic thinking embedded into their day-to-day thinking.

The sector also has a key role to play in public health and maintaining our beautiful environment. During the COVID-19 pandemic, waste and recycling were essential services protecting people's health but also controlling the flow of waste and ensuring it was managed safely, effectively and without risk to human health. These waste streams covered household waste, business waste, commercial and industrial wastes but also healthcare and hazardous clinical which was both contagious and non-contagious. It is a sector which reflects the health and wellbeing of our economy and society by measuring the output of our activity and the quality of our efforts to capture resources prior to them becoming waste and ensuring they are treated and disposed of correctly. We witnessed a rise in fly-tipping and illegal activity which shows how quickly ruthless and criminal operators can seek to exploit an opportunity and with little or no concern for the value of the environment or the health and wellbeing of others.

The resource and waste sector have an essentially critical relationship which is frequently marred by a negative perception of resource management as a societal and environmental service. It often only ever meets when decisions meet at a local political planning process decision or in the build up to a planning application decision. It is critical that the two professions work and collaborate more closely both on planning policies but even more importantly on strategic infrastructure and service issues. There will always be a need for waste treatment of some kind noting shifting priorities driven by an evolving waste hierarchy. It is also essential that the sector provides world class residual treatment infrastructure which is robust, reliable and fully exploits the benefits of heat and power, district heating systems and developments which can benefit other industrial sectors including food production or manufacturing.

Energy from waste treatment plants should not be viewed as a negative development if they are state of the art in their design, planned and developed at the right scale and located in the appropriate locations. The current disconnect between local planning processes and our ability to deliver networks of nationally integrated key service infrastructure such as residual treatment facilities and the way the procurement system operates has resulted in the development of residual treatment systems driven purely by commercial interests, with inbuilt carbon costs that will be difficult to overcome in the short term. We need a much more integrated strategic approach going forward that builds facilities at the appropriate scale, in the right places that can deliver efficient renewable energy and heat and power to local housing or commercial and industrial developments. These might include advanced crop production, manufacturing, public infrastructures and commercial sites.

The sector can also provide great support to local business and commercial sectors by advising on circular thinking and in particular enabling indigenous recycling capacity by delivering services which support this. This sector has contact with every house, every business and every community development in the country.

The sector recognises and is committed to delivering a decarbonised industry to support net zero but there is also a need for the sector to be supported to get there. Areas of greater impact such as housing, transport, land use, agriculture, commercial and building and construction all overlap with resources and waste. Net zero and efficient resource management would be better supported by a more nationally and strategically integrated approach to infrastructure development.

The NPF is the logical framework for this but to date it has largely failed to provide this.

For the waste and resource sector fleet to transfer to zero emissions we need investment in infrastructure, new technologies and availability of knowledge and support from the planning system to help deliver the change.

If older buildings are to be redeveloped then the sector will end up supporting the clean-up of brown field sites, removing old construction wastes and advising and delivering insight into new building and construction materials and techniques. This again requires close collaboration and respect between professions.

The planning process itself is expensive and long winded. The sector recognises the need for control and democratic process but the system must be speeded up, especially in light of the global pandemic, or we will simply run out of time to deliver the scale and level of change needed to deliver Net Zero.

We believe there is a role for a strategic planning group comprised of multidisciplinary experts to evolve Scotland's resource management infrastructure system, This should develop a forward strategic infrastructure plan that can support the transition over time to a lower carbon more cost-effective resource management system in Scotland.

## 2 Do you agree with our current thinking on planning for resilient communities?

### Please give us your views:

RMAS broadly agrees with the concept of resilient neighbourhoods and communities. It is also good to set the goal of a 20-minute rule and the sector supports this with the provision of kerbside collections for recycling and food waste as well as comprehensive coverage of service offerings for commercial, industrial and other sectors. There is a need for planning to further support integration of bring sites at a higher density into communities either in the form of deposit return take back points, community drop off points or a higher provision of household waste recycling centres.

Communities can be relatively negative about the proposed development of even small resource, recycling and disposal points. The planning profession and local and national politicians must recognise that for resource efficiency to become truly embedded in the nations psyche, it requires provision of infrastructure to become part of our daily lives and community landscape.

When redeveloping older buildings, neighbourhoods and also when specifying requirements for new developments, planning professionals and politicians must push for adequate provision of recycling infrastructure, space suitable for taking appropriate "binscapes" and street furniture and embrace new design and technology that supports this.

At a basic level, the sector would respectfully suggest that, adequate litter bin provision is put in place alongside the appropriate contact requirements to ensure they are serviced regularly and not just in city centres. Street cleansing and maintenance plans, alongside road and ground maintenance operational plans should be required and monitored to ensure that neighbourhoods are kept clean, gulley wastes removed, and regular maintenance keeps all communities and neighbourhoods to a world class level of cleanliness. If a community feels that the local authorities and politicians care for their wellbeing then it will instil a feeling of civic pride and respect for their local community.

Some wastes cannot at present be managed within 20 minutes of a neighbourhood or community. Much of the waste can be minimised or even avoided but some materials like clinical waste or unavoidable food waste must travel further to be treated. It also makes sense to manage and treat the waste at this larger scale in more regional strategically important locations and often this makes both environmental and economic sense. It is important to ensure facilities are located and built in the right place and to the correct scale where they can deliver the most benefit to the local community and Scotland as a whole. Where possible opportunities to back haul, bulk up and move materials effectively and efficiently.

Procurement and planning both need to be reviewed and looked at in order to ensure that all materials are treated in Scotland and that the process supports local business and service providers as long as they can prove appropriate securities are in place and the right controls have been planned for to ensure service delivery.

Use of the waste hierarchy and circular thinking will, were possible deal with materials closer to home but, there is a need for some larger infrastructure to be strategically located and for it to be planned and developed in an integrated way to bring the greatest benefit to the Scottish economy and environment.

## 3 Do you agree with our current thinking on planning for a wellbeing economy?

### Please give us your views:

There is support for the current thinking on planning for a wellbeing economy. RMAS is delighted that there is recognition of the need for the planning system to support delivery of the biodegradable landfill ban as well as the more ambitious goal of Net Zero. There must be a role for energy from waste (EfW) and the plan highlights this:

"Planning should enable energy from waste infrastructure, with a growing need arising from the forthcoming ban on landfilling of biodegradable municipal waste. "

All forecast and [projections show that there will be a need to manage some waste via EfW. The implications of restricting the development of EfW in Scotland will mean waste travelling by road, rail and sea to England and further afield. Presently all clinical waste is being sent to Wales for treatment. Surely Scotland should manage its own wastes within its own borders if it truly believes in well-being. EfW has provided a much-needed route for disposal of carcasses during mad cows' diseases cull and foot and mouth and well as dealing with healthcare wastes. Even taking this absolute need for emergency and public health treatment capacity aside, there is an opportunity to develop EfW with district heating in such a way that low-cost renewable energy and valuable free heat can be delivered to local communities if the development of the plant is thought about in such a way to provide this holistic long-term view.

The sector has provided services in terms of cleaning up derelict and brown field sites, decontaminating land and providing high quality recycled aggregates to redevelop and revalue old industrial areas of Scotland. The sector has brought jobs to areas of high unemployment and is passionate about reskilling workforce and providing them with a career opportunity in a dynamic and fast-moving sector. This includes work focused on building and construction, offshore decommissioning, circular routes for food and drink sector and many others.

In a similar way to that which waste professional are being ask to think of the whole systems approach to managing our resources and emissions, professionals in planning and procurement need to think of the sector as part of the solution and involve them at early stages in processes not simply as the end destination and last option.

## 4 Do you agree with our current thinking on planning for better, greener places?

### Please give us your views:

No comment

## 5 Do you have further suggestions on how we can deliver our strategy?

### Please give us your views:

A more conversive, cross sectoral and experiential approach is needed across the board to develop and deliver the strategy. The key immediate challenge we face is tackling climate change. The Net Zero challenge, given the historic processes used to date to develop key infrastructure will mean much of the work is tokenistic, in spite of a positive and well intentioned policy framework. A longer term, transition based approach is needed supported by cross sectoral

non-compartmentalised partnerships to support delivery.

**6 Do you have any comments on the Integrated Impact Assessment Update Report, published alongside this position statement?**

**Please give us your views:**

No comments

**7 Do you have any other comments on the content of the Position Statement?**

**Please give us your views:**

No comments

**About you**

**What is your name?**

**Name:**

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**Are you responding as an individual or an organisation?**

Organisation

**What is your organisation?**

**Organisation:**

SRMA (Scotland) Limited trading as the Resource Management Association Scotland (RMAS)

**The Scottish Government would like your permission to publish your consultation response. Please indicate your publishing preference:**

Publish response only (without name)

**We will share your response internally with other Scottish Government policy teams who may be addressing the issues you discuss. They may wish to contact you again in the future, but we require your permission to do so. Are you content for Scottish Government to contact you again in relation to this consultation exercise?**

Yes

**I confirm that I have read the privacy policy and consent to the data I provide being used as set out in the policy.**

I consent

**Evaluation**

**Please help us improve our consultations by answering the questions below. (Responses to the evaluation will not be published.)**

**Matrix 1 - How satisfied were you with this consultation?:**

Very satisfied

**Please enter comments here.:**

**Matrix 1 - How would you rate your satisfaction with using this platform (Citizen Space) to respond to this consultation?:**

Very satisfied

**Please enter comments here.:**