

POLICY STATEMENT

WASTE PLANNING AND MANAGEMENT

Summary of policy position

We will insist that proposals for new facilities are based on realistic assumptions on the key drivers for waste arisings rather than simple projections from past trends.

We believe that the risks to the environment of over-providing capacity are greater than ultimately ending up with a short term greater amount of waste going to landfill.

It must be demonstrated that the potential for minimizing waste generation and maximising reuse/recycling has been fully taken into account in setting targets and in arriving at the capacity for new recovery facilities.

Major facilities should be located close to the major population centres in the Vale leaving scope for smaller scale facilities to service the more dispersed centres of Cirencester and in the Forest of Dean.

We are technology neutral. However the choice of technology must result in facilities of a scale and traffic generation which would work well with the landscape and road system for the site in question. We will oppose facilities which do not and whose effects cannot be mitigated.

In respect of C&D waste, we support initiatives to increase the proportion of waste processed on site to inert hard core for other construction uses.

Context

There are five major waste streams in Gloucestershire:

- Municipal Solid Waste (MSW) amounting to some 295,000 t.p.a. This is largely household waste collected from the kerbside by district councils (using commercial contractors) or delivered by individuals to Household Recycling Centres (HRCs) and then disposed of by the County Council (using commercial facilities). A lot is known about this waste.

- Commercial and Industrial Waste (C&I) collected from commercial premises and factories by private waste contractors under contractual arrangements with the generator of the waste and then disposed of to commercial facilities. Because this waste is often transported across county borders for treatment, there are no reliable figures for the amount of this waste arising in Gloucestershire. The most reliable figure is the amount of this waste being processed in the county - 375,000 t.p.a. Some studies have indicated that the amount arising might be only 250,000 t.p.a and the rest is imported waste. This is disputed both by the County Council and the waste industry. It is known that the composition of C&I waste at source is similar to MSW.
- Construction and Demolition Waste. This largely inert waste is handled by the waste industry and the amount managed is about 295,000 t.p.a.
- Metals from a variety of sources amounting to about 130,000 t.p.a. This a largely segregated stream of waste handled through specialized, often quite small, facilities.
- Hazardous Waste which is or contains materials which make it harmful to health or the environment; obvious examples are oil and asbestos. This waste stream amounts to 90,000 t.p.a. being both arisings in Gloucestershire and waste imported from neighbouring counties. It is handled through one specialized dedicated commercial facility at Wingmoor Farm.

This policy is mainly concerned with MSW and C&I waste.

Up to 2006 MSW in Gloucestershire grew year on year reflecting increasing numbers of households and rising prosperity. Projections of these past trends showed MSW growing by 1.6% p.a until 2020. However since 2006 the amount of MSW has declined year on year even though the number of households has continued to increase. This means people are producing less waste. Some of this is due to changes in the way waste is collected, e.g. fortnightly non-recyclable waste collection, and some is due to the economic downturn. However there is also evidence of changing habits. Forecasting future arisings is subject to great uncertainty as it depends on the extent to which initiatives to reduce waste continue, the rate of growth of households, the fact that the population is getting older and how quickly we have economic recovery and rising consumer expenditure. It is possible that there will be no further growth in arisings up to 2020.

C&I waste managed in the county has varied over time and this may be a reflection of capacity and the commercial economics of moving waste to alternative facilities. Forecasting future amounts is very difficult. The best assumption is that there will be no growth in the total amount managed for the foreseeable future.

Strategic Framework

There are three key strategies which form the basis for considering waste management.

a) The Waste Hierarchy

This sets an order of environmental preference for the disposal of waste, viz:

- Prevention. The most environmentally effective solution is to reduce the generation of waste including the re-use of products. Much progress has been made by producers and consumers to minimize waste, for instance in reducing packaging and throwing less away. The overall objective is to de-couple waste generation from economic growth.
- Preparing for re-use. Products that have become waste can be checked, cleaned or repaired so that they can be reused.
- Recycling. Waste materials can be reprocessed into products, materials or substances including compost. Considerable progress has been made in Gloucestershire with 42% of MSW but only 17% of managed C&I being re-used/recycled. It is estimated that some 80% of MSW or C&I waste is reusable or recyclable so there is some potential for much higher recycling rates.
- Other Recovery. Waste can serve a useful purpose by replacing other materials that would otherwise have been used, including using waste to generate energy. Gloucestershire has currently no facilities for other recovery of residual MSW or C&I waste though there is planning approval for a 30,000 t.p.a gasification plant at the Moreton Valence site. There are a number of different technologies and these are set out in full in publications by Defra; technology is developing all the time.
- Disposal. This is the least desirable solution where none of the above options is appropriate. The commonest form of disposal in Gloucestershire is to landfill with some 57% of MSW and 83% of C&I waste currently going to landfill. There are growing financial penalties (Landfill Tax) for disposal to landfill. Given the potential to divert waste from landfill it is estimated that there will be no need for further landfill capacity over the next 15years.

All waste disposal authorities are required to ensure that waste is moved up the hierarchy and that the potential is fully exploited (if economically reasonable) before the next step down the hierarchy is brought into play. For Gloucestershire the major issue is drastically reducing the amount of material going to landfill.

b) The Proximity Principle

Waste collection and disposal requires movement in large vehicles with possible adverse effects in terms of exhaust emissions and traffic, particularly on minor roads. Waste facilities should therefore be located as close as possible to the source of the material but recognizing the benefits of economies of scale.

c) Duty to Co-operate

The Planning and Compulsory Purchase Act 2004 has been amended with an additional section (33A) placing a duty on planning authorities to cooperate in relation to sustainable development. The requirement is repeated in paragraph 178 of the National planning Policy Framework (NPPF) which emphasizes the need to cooperate in relation to strategic priorities which include waste. Planning authorities therefore have a duty to co-operate to actively explore opportunities for cross county border solutions. In the case of waste the obvious benefits may be application of the proximity principal and sharing of waste processing facilities. The commercial sector operates without regard to county boundaries optimizing their operations across geography. The duty to co-operate therefore principally applies to the management of MSW.

CPRE Gloucestershire Policy

Against the above situation and framework CPRE Gloucestershire Policy is:

- a) To recognize that there is great uncertainty over forecasting future waste arisings. This means that we will insist that all plans or proposals for new facilities are based on realistic assumptions on the key drivers rather than simple projections from past trends, that resultant forecasts are set within a range of scenarios for these key variables, and that the robustness of proposals is tested against this range.
- b) We believe that the risks to the environment of over-providing capacity are greater than ultimately ending up with a short term greater amount of waste going to landfill, because the economic incentive to fully use capacity will either divert material from recycling or suck in material from further away. On the other hand if there is not enough capacity in Gloucestershire it is very likely that there will be opportunities to use capacity in neighbouring counties until longer term solutions can be arranged.
- c) We support the principle of the waste hierarchy and will wish to be convinced that the potential for minimizing generation and maximising reuse/recycling has been fully taken into account in setting targets and in arriving at the capacity for new recovery facilities. We believe that

Gloucestershire should set a target of being a UK exemplar of best practice on recycling rates. The target should be not less than 70% by 2020.

- d) The proximity principle should apply. We support the idea that the major facilities should be in the Vale because that is where the major population centres are and we would expect the capacity of such facilities to be appropriate to waste generated in Gloucestershire. Equally, we would expect the county to have explored smaller scale facilities to service the more dispersed centres of Cirencester and in the Forest of Dean in particular in cooperation with the neighbouring areas of other counties. At an even smaller scale we will campaign for waste management facilities to be integrated into any new housing development of over 100 dwellings or small business parks preferably with district combined heat and power (CHP) generation.
- e) We are technology neutral in that we do not espouse a particular waste management technology over any other. However we would expect the choice of technology and scale of facility to have been tested against what would be best in landscape and traffic terms for the site in question. This will mean choosing a solution which gives the best trade off between economics of waste management and protecting our environmental assets. We will oppose facilities which are out of scale to their environment and whose visual effects can not be mitigated. We expect views to and from the AONBs to be protected.
- f) We are not opposed in principle to incineration and other combustion processes with power generation and CHP. We note that the calculations on the relative benefits of different technologies on greenhouse gas emissions are complex and need to be weighed with the relative benefits in terms of renewable energy. We do not have the expertise to evaluate these calculations independently nor of the complex issues of health risks (if any) from emissions from incinerators.
- g) In respect of C&D waste we support initiatives to increase the proportion of waste processed on site to inert hard core for other construction uses. Unless the same vehicles are used both to remove quarried material and to bring in C&D waste, we will oppose the transport of C&D waste to quarries either for infill or reprocessing as to do so would add to HGV traffic on country roads.
- h) When any of the licences to operate come up for renewal, we will campaign to ensure that conditions of renewal include adequate screening of the site, the strictest protection from malodours/ fumes and noise and most importantly an upgrading of the local roads to ensure they are safe for the level of heavy goods vehicle traffic; this does of course need to be sensitive to landscape and the character of the area.

- i) In all cases of major new facilities we would expect the application of Best Available Technology, an inspection and report by the Environment Agency and an implementation plan of their recommendations. This should include hydrology and effects on watercourses and flood plains.

Revised August 2012

CPRE Gloucestershire Policy Statements are regularly reviewed and updated as necessary. They should be read as a set