

Summary from Consultation responses for Joint Waste DPD

Waste Hierarchy

- Agreement that landfill must be reduced and that waste minimisation, re-use and recycling should be maximised

Waste Data

- Agree DPD should use most up-to-date data provided it is based on a realistic assessment of waste arisings, including realistic waste growth projections. General support that the RSS data should be updated where new information available. But also concern expressed that data in the JRWMS undermines the waste hierarchy as insufficient priority being given to recycling.
- The DPD should not consider the up to date information and forecasts to be fixed, but should also improve on these wherever possible.
- Concern that the role of construction/demolition waste is being underplayed as not important (e.g. there are no targets in Table 3 of Technical Document). 80% construction material still comes from natural sources, not from recycling/reuse as stated in the Document.
- Query basis and accuracy of figures used in Technical Document e.g. North Somerset's waste figures for 1995/6 – 2005/6 have been the subject of investigation. Also if RSS figures are on the high side for municipal waste, is this not the case for the other waste streams as well, leading to danger of over provision of waste facilities?
- Concern about challenging targets for diverting waste from landfill to recovery and whether this can be realistically achieved. What contingency plans will there be to deal with the waste if this is not achieved?
- General agreement that data on non-municipal waste poor, but also strong support that the commercial/industrial sector must be more proactive in taking responsibility for its waste and managing it in a more environmentally and socially acceptable way, and that there should be more pressure from central and local government to this effect.
- View that commercial and industrial data is an under estimate – but recognise difficulty in trying to get more accurate information with commercial sensitivity issues. Waste data way down the list of priorities for small and medium enterprises. Need a better steer from Environment Agency.
- Query how the findings from the baseline Capacity Study will be taken into account in the continued preparation of this document. How can the statement that there are no capacity gap issues with regard to inert and hazardous waste be made in advance of this Study?

Dealing with waste generated in the WoE

- Consistent theme running through responses that waste facilities should be local to where the waste originates. The two strands of this argument are producer responsibility and climate change:
 1. that we should take responsibility for the waste which we produce (i.e. produced within the West of England); and

2. to cut down on road transport and thereby reduce greenhouse gas emissions, traffic congestion and pollution.

Strong view that dealing with our own waste would encourage greater recycling. Also some respondents want to see waste transported by rail and/or water. A view also that waste should be managed within UA where it arises (i.e, no cross boundary movement between UAs within the WoE)

- Some recognition and acceptance, although also disagreement, that exceptions to the above might be appropriate:
 1. for hazardous waste;
 2. where facility close to WoE boundary and there may be a facility closer across the boundary, and consequent reduced haulage distances;
 3. where economically viable to export;
 4. waste doesn't respect administrative boundaries so DPD can only attempt to influence or even out the movement of waste;
 5. processing facilities and markets for recyclables rely on national and international distribution, so some cross boundary movements necessary
- Insufficient information to indicate where existing waste facilities are or how self-sufficiency in waste management is going to be achieved, particularly how the currently exported waste is going to be dealt with within the WoE.
- Need to take account of carbon footprinting in the strategy and planning of waste management facilities .
- Support for dealing with our own waste provided we benefit from the electricity generated.
- It is not clear whether export of waste is a particular problem in the West of England. What evidence is there? How much is exported? What are the links with other local authorities to whom the exported waste is going? What is the current engagement with waste authorities and companies in other regions to address this, and how does this relate to wider transportation plans and strategies?
- It would help if it was stated where reprocessing plants are and where material is being exported to. This could be illustrated on a key diagram.

Importing waste into the WoE

- Mixed views as to whether the WoE should import waste for treatment. Some support in the following circumstances:
 1. this would reciprocate those authorities who currently accept our waste;
 2. where economies of scale could be achieved;
 3. where it would be cost effective and therefore of less cost to WoE residents;
 4. where there would be benefits to WoE residents (eg electricity generation)
 5. where our facilities would be the most local ones and where adjoining areas are rural and therefore unable to justify a facility.
- General view that facilities should be designed to meet WoE's requirements only but if there was spare capacity then importing waste may be OK, but concern about consequent impact on road transportation. Some considered importing waste only acceptable if rail or water transport used and concern was also expressed about the size of the carbon footprint with importing waste.
- Given current level of waste exportation to other areas, is it realistic to expect that all of the WoE's waste will be dealt with within the WoE and that there should be a policy approach preventing waste being imported for treatment? If so, this should be reflected in the Vision.

Need for Waste Facilities

- General consensus that more waste facilities needed within WoE . Mixed views on the capacity gap figures - some consider that they don't reflect current trends in waste reduction/recycling in the food and retail industries – others consider that they are too low given that waste is forecast to increase and are also inflexible to adapt to future changes.
- General view that recycling/composting requirements are too low and reflect the unambitious targets in the JRWMWS and, conversely, that the recovery requirements are too high .

Size of Waste Facilities

- Recognition that need a range of different types of facilities .
- Overwhelming support for facilities that are small and local. Predominantly this is in support of the stance on minimising transport, but other reasons cited include:
 1. greater flexibility to adapt to changes ;
 2. so residents can use them – this relates specifically to recycling ;
 3. greater opportunities for benefits from facilities to be felt by local communities (e.g. jobs, free compost, energy & heat) ;
 4. less risk than with large scale ;
 5. spreads the impact ;
 6. easier to get planning permission ;
 7. greater health and financial risks in procuring larger facilities ; and
 8. larger facilities may mitigate against waste minimisation and recycling .
- Some concern about implementation, but differing views as to whether less larger facilities or more smaller facilities would achieve swifter delivery of facilities and easier passage through planning process .
- A view that due to sensitivity of waste traffic in residential areas, a few larger sites located in industrial areas is favoured. But concern also expressed about intensifying industrial development at Avonmouth, unless this was the most suitable location .
- Also a view that a mix of sites would be best, particularly given the geographical spread of the population – this also maximises flexibility and makes new entries to the market possible.
- Lose economies of scale with smaller facilities .
- Any facility should be innovative and iconic. It should use best available design, be energy efficient, use recycled materials and include ecological sound aspects.
- Some support for concentrating waste facilities to achieve economies of scale.
- What is the justification for choosing two lots of 30,000 tonnes capacity for composting rather than four of 15,000 tonnes capacity?
- Query whether there is scope, as is suggested, to extend existing recycling and composting initiatives and, if so, where and how?
- Site size should be linked to transportation method – i.e. for large facility use rail, for smaller facilities use road .

Dual use Facilities

- Mixed views about commercial and industrial waste being dealt with jointly with municipal – a general view that industry should have to manage its own waste within WoE but also a view that joint facilities could have economic benefits. Some support where it would not cost taxpayers or be used to justify larger scale facilities.
- Benefits to integrating the two waste streams in terms of sustainability of facilities and the lessening of transport impacts .
- Facilities should be provided in a three phase model; the first generation of facilities would deal solely with MSW, the second generation would deal with C&I waste and the third generation would provide a combination of facilities to deal with both MSW and C&I waste.
- According to DEFRA statistics 42.2% of commercial and industrial waste being reused and recycled. Concern that dual use will undermine the work being done by businesses to reduce, reuse and recycle their waste.

Delivering facilities

- Industry view that economic factors are the principle driver with the major financial risk factors associated with site planning being the accuracy, or rather the inaccuracy, with regards to the predicted tonnages of wastes, the unproven status of some of the technology options, who would be in control of the waste stream and the length of contracts, with longer contracts being preferred. A higher degree of certainty surrounding these issues would enable a lessening of financial risk to lenders and a greater degree of deliverability for technology providers.

Waste facilities to include in DPD

- Concern that individual UAs may not provide their contribution of smaller sites, so DPD must include clear strategy for provision and clarify where the provision of these facilities will be documented. Suggestion that the individual planning documents of the UAs must be prepared in tandem with the Joint Waste DPD .
- Some consider that the DPD should include all waste facilities – to not do so will introduce confusion, conflict and delay into the planning and delivery process. Also concern that there will be little integration between the network of large and small facilities. Smaller facilities may have strategic significance individually or collectively.
- Household waste recycling centres should be included in DPD to help build a comprehensive network across the WoE.
- Query justification and logic for DPD only providing for 30,000+ tonnes facilities for recycling and composting. The difference between a 29,000 tonnes and 31,000 tonnes facility is minimal.
- Strong support for combined heat and power, with location close to users .
- Only exclude recycling and composting facilities below 10,100 tonnes .
- 'Mechanical, Biological and Thermal treatment' facilities is imprecise and could include recycling and composting facilities. It would give more clarity if the description were 'All Residual Waste treatment facilities regardless of capacity' .
- Support for phasing of facilities .
- DPD should include C&D waste together with waste minimisation and on and off-site re-use policies .

Landfill/Landraise

- Mixed views on issue of landfill and landraise. Some support for landfill only where extending existing sites, but some support for landraise even in the Green Belt.
- Mixed views also on exporting waste to landfill. Some support for continuing to export and with the WoE providing more recovery facilities in reciprocation.
- Need greater clarity and evidence to support strategy for landfill .

Site Selection Methodology

General comments

- Some concern that the various criteria are too onerous and therefore it's unlikely that sites can be found, whereas others consider the criteria insufficient.
- Question whether the criteria are appropriate for all facilities .
- A view that waste facilities would be acceptable if visually unobtrusive and small in scale .
- Also a view that the criteria are appropriate for landfill not for sophisticated waste treatment facility .

List A

- Shouldn't exclude whole of Bath just because it is a world heritage site .
- Include UK BAP priority habitats in List A.
- Shouldn't necessarily exclude existing land use allocations .

List B

- List B should be treated in same way as List A – i.e. as factors that will not may rule out waste sites .
- There shouldn't be any development on Green Belt or Greenfield sites – move these to List A. But also a view that Green Belt wasn't a negative factor .
- Move the various heritage and nature conservation designations, Forest of Avon, floodplains and major/minor aquifers to List A .
- Include proximity to sensitive uses (schools, hospitals, houses) to List B.
- Add parks/public places, community facilities and allotments to List B.
- A number of criteria for specific site assessment were suggested should be added to List B (e.g. odour, air quality) .
- Add Grade II listed buildings to List B .

List C

- Strong support for locating on brownfield land and other derelict sites.
- Mixed views about locating on industrial sites and waste management sites. Some former industrial or former waste management sites could be suitable for certain types of waste management facility and others not. Need to take account of PPS10 concern over cumulative impact.
- Differing views about expanding industrial or waste sites. While there was some support for expansion in preference to new facilities, others considered that such expansion must be assessed on an individual basis and would depend on local impacts and potential benefits. Also views expressed that site expansion should be limited to encourage waste reduction .

- Disagreement over locating in urban areas. Some consider urban areas should be excluded to keep facilities away from people, particularly children, because of the potential impacts. Others consider urban areas may be acceptable depending upon the size and type of facility.
- A view expressed that waste sites shouldn't be developed in deprived areas as they have enough to contend with .
- Edge of urban areas generally supported .
- Strong support for locating facilities where there are opportunities for combined heat and power, either in residential development or large facility such as hospital, industrial development, university etc. Include in List C .
- Proximity to end users and waste supply chains considered to be important criteria for site selection.
- Need to assess transport according to overall environmental impact not just physical distance from road network .
- Minimise distance from waste arising to waste facility .
- Support for rail linked sites but also recognition that locations close to railways and waterways are not important if having small local facilities. Possibly consider rail transport of waste on minor routes e.g. Portishead/Severn Beach and Tytherington lines.
- Other suggested general locations:
 - (1) Redundant farms remote from habitation;
 - (2) Old airfields and military/MOD sites ;
 - (3) Quarries, but not those in AONBs, with nature conservation interests, or near housing ;
 - (4) Old underground mines ;
 - (5) Derelict industrial land and other derelict sites, including railway land ; and
 - (6) Coastal and low lying areas near rivers, where waste could be used in flood defences or to raise land levels .

Other individual suggestions included battlefields and waste ships in the Bristol Channel.

Suggested Sites or areas which should be included in the Site Selection process

A. Quarries /Mines

- Existing quarries in South Glos – Chipping Sodbury, Wickwar, Cromhall area, Tytherington, Codrington
- Coombe Down mines
- Black Rock Quarry, Portishead (for clean subsoil landfill only)
- Fullers Earth, Odd Down

B. Industrial Areas

- Avonmouth (whole area, including the following specific sites - old incinerator, Former BZL site, Compact Power)
- Royal Portbury Docks
- Portishead Docks
- Portishead old Power Station

- Severnside (incl Crooks Marsh)
- Old paper factory/Industrial site on Avon Mill Lane
- Gas works site Weston Super Mare
- St Phillips Marsh
- Oldbury power station
- Industrial areas of Weston Super Mare
- Cement works, to provide the fuel for the works
- Bristol Airport
- Filton Airfield

C. Waste Sites

- Carsons Road Shortwood
- Northwick landfill site
- Landfill sites over 10 years old are stable
- Local waste sites eg allotments
- Bedminster Down, former landfill, South Liberty Lane

D. Derelict Sites

- Ex BT radio research laboratory, Long Lane, Backwell Hill, Bristol, BS48 3DE
- Weston Airfield

E. Railway Land

- Westerleigh Sidings
- Flax Bourton railway sidings

F. New Development

- Western Riverside, Bath
- Areas of new urban development, including urban extensions
- Within new hospital complex at Southmead

G. Elsewhere

- Along the Severn Estuary
- Yate
- Hutton Moor
- Alongside M32
- Cribbs Causeway
- Near Avon Ring Road
- Old Post Office Building, near Temple Meads
- Upwind of Council Offices (small scale facilities only)
- Brassmill Lane
- Bleadon Levels - adjacent to sewage treatment facility
- A370 WSM to Congresbury - Various landfills (land raising schemes)
- Land within view of supermarkets or manufacturing/ business centres to encourage people to buy wisely
- Areas in need of some regeneration e.g. Radstock/Midsomer Norton
- Former Wills Factory, Hartcliffe
- Keynsham

- Long Ashton
- Bath
- Bedminster Down
- Lorry park and land by Junction 18 M4, Tormarton
- Underground at Box Hill
- The Downs
- Ashton Court

Objectives for Site Assessment

(Many comments on this duplicated views expressed on the Site Selection Methodology, either to re-iterate their points or because it was not clear that these objectives are applied after sites have been subject to the selection process in Lists A-C. These comments have therefore been included in the relevant summaries above rather than in this section)

- Mixed views about the list, from it being comprehensive enough to not being an exhaustive or good enough list. Also query whether a list was needed as objectives used to assess a site will inevitably vary depending on site - the need is simply to avoid/minimise consequences of developing a particular site.
- Some considered there was an order to the list of criteria and expressed views on the order. Minimising impact on human health was seen by some as most important objective.
- There was also some concern over the severity of some objectives with a view that minimising impact was more realistic than avoidance/ prevention, but equally there was concern that 'minimise' was not strict enough. In particular preventing adverse visual impact was identified as too strict whereas minimising odour was too weak. In addition it was queried what control there would be to ensure impacts remained minimised.
- Specific comments on the listed objectives were:
 - Exclude impact on public footpaths and rights of way
 - Exclude protection of best and most versatile agricultural land
 - Avoiding loss of trees may not be a necessary objective if the opportunity for replacement tree planting on or near site
 - May be appropriate for some facilities to be accessed through residential areas, so that people can use them or they are near where waste collected
 - Some objectives characteristic of processes not sites
- Additional objectives for the list were:
 - Rail access should be available as well as highway access
 - CO² emissions from transporting waste need to be considered
 - Life cycle costs needed
 - Minimise interests on geological interests
 - Protect nature conservation interests – specific mention of ancient woodland and UK BAP priority habitats
 - Cost of moving generated power to the consumer
 - Minimise impact on sensitive properties
 - Avoid risk of pollution to water courses, aquifers, etc or of flooding
 - Consider cumulative impact and existing uses nearby
 - impacts on social/community facilities
 - impacts on historic environment
- Sites must be capable of meeting the objectives in the future even if they don't meet them all now

- Keep long term sustainability issues uppermost
- Sites must be user friendly
- Develop rather than remove interesting contours of land.
- Consider plus points of sites rather than negative objectives listed
- Need carbon footprint for each possible site
- Some contradictions and overlap between site objectives and positive locational factors in List C.
- Important that waste management facilities are located within central and highly accessible locations which do not encourage additional trips along the Strategic Road Network

Vision and Aims for Joint Waste DPD

- Support for the vision but main concern was that there wasn't enough emphasis on reducing, recycling and reuse – strategy shouldn't be focused solely on providing facilities for waste
- The vision is more of a statement of process, and should reflect actual outcomes based on realistic aspirations for the local communities: "By working together and in consultation with local residents and other stakeholders, B&NES, Bristol, North Somerset and South Gloucestershire unitary authorities will deliver a range of joint and individual facilities for the treatment of residual waste to meet identified needs by 2026". The vision would benefit from more of a place/location focus and should refer to delivery of actual outcomes rather than process.
- Suggest alternative vision that looks first at reducing, reusing and recycling, and then looks at the remaining waste being treated at small, localised plants using the least amount of energy and causing the least amount of pollution.
- Aiming for zero waste means that facilities must be small and short term so that some can be decommissioned or changed as waste reduces or its composition changes.
- Need to recognise the importance of climate change and the need to reduce greenhouse gas emissions
- Push commercial sector to stop packaging and printing excess.
- more emphasis should be placed on encouraging greater recycling in the community, recycling a greater range of waste and waste minimisation in existing development.
- Concern that 5th Aim could be industry driven, rather than driven by environment and sustainability.
- The final aim should be stronger and include "seeking benefits to the environment wherever possible".
- A view that the Vision needs to recognise cross-boundary movements of waste i.e "net" self-sufficiency rather than an absolute one, but also a view that Vision should be reworded to require sufficient capacity from facilities to enable self sufficiency for the WoE.
- Meaning of "consistent with the Waste Hierarchy Principle" is not clear. PPS10 requires all planning authorities to have as one of their objectives:

"help deliver sustainable development through driving waste management up the waste hierarchy, addressing waste as a resource and looking to disposal as the last option, but one which must be adequately catered for;"

- The aim should perhaps be to minimise the expenditure in managing waste by environmentally acceptable methods.
- The zero waste aim is unrealistic
- 2nd Aim should include requirement for landfill as this will still be needed, but can only be achieved with right mix of waste
- Waste minimisation aim should apply to all and not just to new development
- Vision should relate to environmental, social and economic impacts as well as needs
- Include requirement for proposals to not increase the need to travel
- It would be helpful if there were an overarching vision and objectives for the DPD and JRWMWS, with clear targets so that implementation and monitoring of the outcomes achieved can be easily undertaken

Relationship to other strategies

- Highlight the key waste related vision / aim / objectives from the Community Strategies and develop these within the vision and aims of the DPD.
- Are there any transport scheme proposals in the Local Transport Plans which could assist in minimising the transportation of waste or provide alternatives to road use
- Are there planning proposals which are likely to result in large scale development that will have major waste implications?
- The waste strategies and plans are not in line with community strategies. Bristol's community strategy states:

"The Bristol Partnership is working to reduce the ecological footprint of the city, focussing effort on minimising greenhouse gas emissions, reducing waste and achieving a sustainable transport system" A key objective is "tackle the causes of climate change (and reduce CO2 emissions and waste)".

- The waste strategies and plans are not in line with the Vision of the West of England Partnership: "The Vision of the West of England sees Quality of Life as critical to success by 2026 at which time:

"A carbon neutral sub regional economy has reduced household, transport and commercial energy consumption, increased renewable energy generation and adapted to climate change and rising sea levels. The sub region is resource efficient with waste production minimised and waste managed using sustainable approaches. The diversity of wildlife has be retained, enhanced and restored."

The Delivery Point includes: "Develop an effective and co-ordinated approach to waste minimisation and sustainable waste management."

Other Points for Preferred Options document

- Maps and "key diagram" style graphics should be used in the next consultation document to illustrate the spatial dimensions of the strategy.
- Need to cross-reference to actual evidence bases on which the document's assumptions and recommendations have been based.
- Need to make clear the status of RPG10, as part of the Development Plan, and how it relates to the Core Strategies of each of the four Authorities.
- Need to include a real sense of place and distinctiveness.
- Need to indicate where change is actually going to take place. Existing and possible locations of future strategic facilities should be shown on a map, along with

reference to anticipated growth areas and capacity of waste facilities and likely broad locations, supported by key diagrams and other visual aids

- Ensure issues actually read as "issues" (e.g. 3 and 4).
- Include proposed arrangements for implementation, monitoring and review, and invite comments on them.