



ENVIRONMENT AGENCY WALES RESPONSE TO 'OUR WASTE OUR CHALLENGE' – THE DRAFT N/SW/SE REGIONAL WASTE PLAN FIRST REVIEW

ADDITIONAL COMMENTS

Environment Agency Wales would like to make some additional comments on the Regional Waste Plan Reviews beyond the confines of the Survey questions. As the comments are largely common to all three plans, one response has been made.

There are a number of issues that we feel weaken these plans:

- Lack of focus on the waste hierarchy
- Hazardous Waste / Unmodelled Waste
- Land apportionment and over-provision
- Lack of clarity on definition of import/export
- Requirement for clarity when referencing fully the sources and date for which data is provided
- Queries relating to a South East table
- Lack of readability of parts of the North documents

We would also like to inform you of updated information that has become available since the plans were published, and may be worth referencing in the final plans. We understand that it may not be possible to amend the data published within the plans, as it has been used to form the basis for the consultation drafts, but making reference to new data will avoid confusion when the plans are read in the future.

Lack of focus on the waste hierarchy

There are references to the waste hierarchy in each of the documents, but more could have been done to highlight the regard that should, and was, given to this principle in the development of the plans.

Highest on the waste hierarchy is the need to reduce the quantity of waste that is produced. During the forecasting exercise, consideration was given to past trends and the effects of economic activity, but also to the effect of minimisation campaigns and waste reduction plans. It would be beneficial if this consideration of the hierarchy in the process could be made clear in the plans.

Reuse is another activity which is mentioned in the documents, but the plans themselves do not address it. As the forecasts include all waste arisings, wastes that could be reused have been modelled. It is reasonable to assume that reuse could be substituted for some of the front-end recycling. The types of facilities that would be needed for reconditioning such items could easily fall into the B2 industrial land. The plans should

ensure that within the guidance to local authorities it is made clear that sites for reuse activities are required. The smaller-scale, community based reuse schemes could be an ideal use for some of the sites with a small land area. This step could help to ensure that the reuse sector could flourish without experiencing problems in gaining planning permission.

Hazardous Waste / Unmodelled Waste

None of the consultation drafts adequately deal with the issue of hazardous waste. All make reference to hazardous and other unmodelled wastes which require specialist treatment or disposal, but no attempt has been made to determine what capacity is required to deal with this waste, where current provision exists and where future provision will be.

The change in definition of hazardous waste, and the lack of complete, reliable data on arisings and management of hazardous waste under its new definition, unfortunately coincided with the timescales for the development of these plans. However, the Hazardous Waste Supplement from the previous plan could have been included with any relevant updates. It could then have been proposed that a fully revised version could be included in the final plans to take account of the change in definition and new data. It is disappointing that no attempt has been made to include any substantial detail relating to hazardous waste management.

The absence of hazardous waste landfill void is mentioned in the consultation drafts, and the South East plan calls for a hazardous waste landfill to be developed in the region.

Land apportionment and over-provision

It was determined that the apportionment of land would be on the basis of waste arisings. Other forms of apportionment are not discussed in the plans. It could, for example, be argued that it makes sense in terms of economies of scale to develop super-facilities to deal with waste from a large geographical area. Alternatively, there may be significantly more suitable land in one authority area than in others and this may influence apportionment. An SEA approach from the outset could have influenced the way in which facilities were apportioned, and would have made.

The regions all determined to plan for an over-provision of land to allow for flexibility and choice for developers of facilities. The level of over-provision was not consistent between the three regions, and no discussion as to why that level was decided is included in the drafts.

Lack of clarity on the definition of import/export

All of the plans refer to the "import" and "export" of waste, while discussing movements of waste in and out of the regions. It is essential that a distinction is made between movements between the Welsh

regions, and into other parts of the UK, versus imports and exports out of the UK.

Waste is often transported between the regions of Wales, and out of Wales into other parts of the UK. In many instances this is carried out in order to make use of existing waste recovery or reprocessing facilities. Similarly, there are movements of waste into Wales from other parts of the UK. These movements are legitimate, and in some cases inevitable due to the nature of the waste management industry and the need for economies of scale.

Movements of waste beyond the UK borders fall under the Trans Frontier Shipments Regulations and the UK Waste Plan, which bans the export of waste for disposal. The export of waste for recycling and recovery operations is allowed under the UK plan.

Requirement for clarity when referencing sources and DATE for which data is provided

The authors of all three plans should take care when referencing data. As these plans are to stand for some time to come, they are likely to be read and referenced in the future when more updated information has become available. It is important therefore that all data is correctly referenced and dated.

Queries relating to a South East table

There is a table in Appendix F which is very confusing. It refers to a "developable area" and "area of maximum developable plot". The latter is sometimes larger than the former. Can it please be explained what the data in the columns mean. A simple "Total Area" and "Area that is available for development" would be helpful. The plan needs to identify sufficient land area, and this table does not make clear whether this has been achieved.

Lack of readability of parts of the North documents

Within the Technical Companion:

- Table F1 is incomplete, and Table F3 is too small to be readable.
- Maps L1 & L2 showing the areas of search are too small.
- Table N1 is not legible, and potentially contains some key information regarding locations where facilities may be developed. However, the summary in Table N2, which takes account of actual availability of plots within industrial estates, is helpful in terms of potential locations of future waste management facilities.

Information and data updates

There have been data releases since the production of the consultation drafts, and some additional data sets which will shortly be available. We believe that it would be of use to reference these in the final plans.

Below are the data sets that Environment Agency Wales can provide the Regional Waste Groups:

<u>Data set</u>	<u>Date available</u>
2006 Hazardous Waste Data	Now
2006 Commercial & Industrial Waste Arisings (estimate based on 2002/3 survey data re-grossed to 2006 ONS figures)	Now
2006 Agricultural Waste Arisings Data	Now
2006 Site Returns Data (showing management methods and movements of waste)	Completed – public release end Jan 06
Landfill Void as at 31 March 2007	Now
2006 Packaging Waste Data from accredited reprocessors (waste managed through facilities)	Now
2006 Construction & Demolition Waste Data	Completed – public release Jan/Feb 06
Numbers and capacity of waste management operations (PPC, WML & Exemptions)	Draft end Jan 06