



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

SUMMARY

We are disappointed that our previous comments on the approach to the Strategic Environmental Assessment (SEA) of the Regional Waste Plan (RWP) review have not been addressed. We remain concerned that the two separate SEAs fail to consider some of the possible Region-wide effects. We recommend that further work is undertaken to integrate the findings of the SEAs – to ensure that the environmental effects of the RWP review are fully assessed and to satisfy the requirements of 'The Environmental Assessment of Plans and Programmes (Wales) Regulations 2004' (The SEA Regulations).

INTRODUCTION

This response includes our views on the approach to the Strategic Environmental Assessment (SEA), provided in our role as a consultation body identified in the SEA Regulations.

MAIN RESPONSE

SEA ENVIRONMENTAL REPORTS

We consider the N/SW/SE RWP review to be an important opportunity to provide a robust defensible framework for waste planning - particularly as it makes a series of recommendations/ decisions that may be material considerations for local authorities to consider in their Local Development Plan process.

SEA is a key policy-aiding tool to achieve this objective and we believe that it should identify the key strategic effects of each of these recommendations/ decisions.

We are therefore disappointed that some of our key issues over the approach to SEA (as outlined in our letter of 15 June 2007) have not been addressed. In particular, we remain concerned that some region-wide strategic effects have not been covered by the assessment; these issues are outlined below.

Apportionment of waste management capacity/number of facilities to each local authority

One of the key outputs of the RWP review is the apportionment of waste management capacity and indicative numbers of facilities to each local authority. However, there has been no assessment of the environmental

effects of this element of the RWP. We recommend that further work is undertaken to address this.

Identifying the full range of effects at the Regional scale

The SEA Regulations expect Environment Reports to include information on: "... the likely significant effects on the environment, including short, medium and long-term effects, permanent and temporary effects, positive and negative effects, and secondary, cumulative and synergistic effects.."

We are concerned that there is the potential for region-wide (or inter-regional) environmental effects – particularly cumulative and synergistic effects – that have not been assessed by the two separate SEAs. We do not believe that these effects will be identified through the Sustainability Appraisal of the Local Development Plans of constituent local authorities, because they are at a smaller spatial scale. We recommend that further work is undertaken to identify and evaluate the full range of effects listed in the SEA Regulations.

The overall extent and distribution of identified Areas of Search/ available land for new waste facilities

The Areas of Search study provides a good evidence base for starting to identify possible constraints/opportunities when searching for possible sites. We fully understand and support the premise that the allocation and siting of individual facilities is a matter for each local authority to address through formal planning processes.

However, we are concerned that the Areas of Search study does not include an analysis of the overall extent and distribution of these constraints. We recommend that further work is undertaken to analyse how this extent and distribution is likely to influence the distribution of facilities at a regional level. For example - if the extent and distribution of first Areas of Search over the region were found to be small and restricted to localised areas, this may lead to a general conclusion that facilities are more likely to have to be situated in areas with some or significant constraints.