South West England
draft waste strategy

How to respond to the consultation draft
Background

The South West Regional Assembly (SWRA) produced its draft regional waste management strategy (RWMS) in March 2004. The RWMS is an overarching document that will frame what action is taken to manage waste and resources in the region for the next five years at least.

Once the Assembly has consulted on the Strategy it will be re-written in light of the comments that people send in and then will go to the Government before it is finally adopted into Regional Spatial Strategy. This will be a statutory document setting out policies that all local authorities and other organisations in the region should implement.

Friends of the Earth has major concerns about the draft Strategy that the Assembly has put out for consultation. The policies in it have been derived from a computer model that has serious flaws. Therefore we would like as many individuals as possible to respond to the draft, letting the Assembly know that the strategy does not go far enough to encourage waste minimisation and recycling.

We have produced this briefing as a guide for your response, but feel free to include information from your own knowledge and experiences. This briefing gives you a summary of what the RWMS says and then some key points that you could use if you only have time to make a short response. We also give some more detailed information on the policies that you could use if you have time to include them in a longer response.

If you want to read it for yourself, the draft RWMS can be found on the Internet at http://www.southwest-ra.gov.uk/swra/ourwork/consultationregister/current.shtml or you can ask for a copy from the Regional Assembly on 01823 270101.

There is an online consultation form on the web site above, or you can use the information in this briefing to write a letter. You can submit your comments by e-mail to Craig Frost craig.frost@southwest-ra.gov.uk or write to Craig Frost, South West Regional Assembly, Dennett House, 11 Middle Street, Taunton, Somerset TA1 1SH.

The consultation ends on Friday 21st May 2004

What the draft strategy says

The South West Regional Assembly has produced the regional waste strategy based (it says) on the Region’s Vision for waste, which was agreed in 2002. The Vision said:

The South West Region will become a minimum waste producer by 2030, with business and households maximising opportunities for reuse and recycling.

The aims of the Strategy itself is to:

Ensure that by the year 2020 over 45 per cent of waste is recycled and reused and less than 20 per cent of waste produced in the region will be landfilled.

However, the policies put forward in the regional waste strategy do not match up with the proposed vision that was agreed.
Waste Minimisation
The Assembly has not put forward any policy on waste minimisation for the region even though it says that the first thing that the people in the region and organisations need to do is reduce the amount of waste produced. The Assembly has assumed that Municipal Solid Waste will grow at 1.6 per cent a year until 2020 but has set no target to reduce this growth over the strategy period.

Recycling and composting
The Assembly has set a minimum target of recycling municipal waste segregated at source of 45 per cent by 2020. Friends of the Earth does not think that this is an ambitious target – especially as other regions are adopting targets that are higher than this.

Recovery
The Strategy includes a policy to recover value of 55 per cent of municipal waste – either by mechanical biological treatment or “thermal treatment” or a combination of the two by 2020. The Assembly has not ruled out the possibility that mass-burn large incinerators could be built in the region. When the data behind the Strategy – in the Consultant’s report - are looked at, they show that this policy could mean up to 22 incinerators in the region by 2020.

Friends of the Earth’s suggested response
Please write as full a response as you can, including details from your own experience and knowledge, using the information below. If you can only spend 10 minutes responding, then include these key points as these are the main messages that we want to get over to the Assembly.

The key points are that the strategy should:

- Exceed the Government’s statutory recycling targets by adopting a target of 50% recycling and composting by 2010 and 75% by 2015.
- Adopt the aspiration for zero waste and put in place policies that aim to achieve it.
- Rule out mass-burn incineration as a waste management option in the strategy.
- Set clear waste minimisation targets for municipal waste. The Assembly should set a target for reducing the growth of all waste to 0% by 2010 and reduce total waste volumes by 5 per cent by 2020.
- Invest in green, clean technologies for dealing with the waste that is left after intensive waste minimisation, reuse and recycling schemes are up and running.

If you have a bit more time you could include the following more detailed comments:

Support these policies:

P1.1 The Regional Assembly and partners should lobby government for an effective long term national awareness campaign.

P1.2 Raising awareness in schools (i) All waste disposal authorities, working in partnership with collection authorities, education services and schools should have initiatives in place to promote waste minimisation and recycling in schools
(ii) A regional network of organisations promoting sustainable waste management in schools
should be established to share best practice and experience to maximise use of resources.

**P1.3 Local awareness campaigns should be in place and authorities should make commitments to ensure their long term funding.** However the Assembly should set a timetable for this last policy, stating that local awareness campaigns should be in place by 2006.

**P1.4 The Regional Assembly, working in partnership with other key players, will gather good practice and look at the benefits of undertaking a region-wide awareness campaign starting in 2005-06, linking in with national and local campaigns with a view to promoting best practice.**

**P7.7 Waste development plans should make provision for facilities to maximise the recycling of construction and demolition waste. The use of recycled construction and demolition waste should be encouraged to reduce the need for primary aggregates.**

**P7.9 Local planning authorities should ensure provision is made for space to allow for the separation and collection of waste, consistent with the type of development in question, whether a housing development, employment, retail, leisure or mixed use.**

**P8.1 Design of new housing layouts should make provision for kerbside collection or community facilities for the collection of recyclables and compostable waste. New dwellings should incorporate segregated storage for recyclables.**

**These policies should be changed or added:**

**P3.1 Remade Southwest and Remade Kernow should develop a single “Recycled Procurement Code and Guide” for the region and will encourage its adoption by public and private sector organisations.**

Although we agree that this should be done, we would like to see a policy included in the strategy that states that the Assembly, the Regional Development Agency and the local authorities in the region will adopt a green procurement code. They should purchase recycled goods and where possible close the loop on resource use. They could do this, for example, by signing up to a scheme such as the one run by BioRegional Development Group where organisations’ paper is collected for recycling and then they can buy back the recycled product at a lower than market price.

There is no policy in the strategy on waste minimisation. This is a huge hole in the strategy. The South West Vision for waste said that the region should become “a minimum waste region by 2030....” Therefore if the Regional Waste Strategy is truly following the Vision it should include a policy that sets a target for both minimising the growth in waste in the region and also for reducing absolute volumes of waste. Friends of the Earth would like to see the following policy added:

**The Assembly will promote action to reduce the growth of all waste to 0% by 2010 and reduce total waste volumes by 5 per cent by 2020. This will be achieved by:**

- ensuring a waste reduction target is adopted in all regional and local strategies;
- identifying and disseminating examples of good practice encouraging public sector organisations and businesses to implement waste minimisation programmes
P7.1 Waste collection and disposal authorities should ensure that by 2020 a minimum of 45% of municipal waste is segregated at source for recycling or composting. Waste development plans should make provision for sufficient facilities for sorting or composting of this proportion of waste arisings.

The targets for recycling and composting of Municipal Solid Waste are too low. They should be 50% by 2010 and 75% by 2015. With the political will and the right resources, high rates of recycling are achievable by local authorities. Some are close to achieving 50% recycling rates, such as Daventry, 44%, and Lichfield reporting over 42%.

Research carried out for the Community Recycling Network (Maximising Recycling Rates: Tackling Residuals) found that over 60% recycling and composting could be achieved within the next 5-10 years by adopting current good practice from Europe. The Assembly’s limit of 45% by 2020 is therefore woefully unambitious. The East Midlands Regional Assembly has adopted an option for dealing with waste that will mean 60% of MSW is recycled or composted by 2015. If the South West is not to be left behind the Assembly should set a similarly ambitious target and prove that it has the will to tackle the issue of waste seriously and imaginatively.

POLICY P7.2 Waste disposal authorities should recover value from the remaining (ie up to 55%) municipal waste by mechanical, biological or thermal treatment or a combination of these processes by 2020. Waste development plans should make provision for sufficient facilities for treatment of this proportion of waste arisings.

Incineration should not be included as a waste management option in the strategy. Incineration of residual waste (even where energy is recovered) is a waste of natural resources, undermines recycling and composting, contributes to climate change and causes pollution from air emissions and toxic ash. The Assembly should be leading the way in promoting cleaner, greener ways of dealing with the waste that is left after intensive waste minimisation, reuse and recycling. This should include promotion of anaerobic digestion for separated organic wastes (AD) and mechanical-biological treatment (MBT) (with residuals to landfill).

Friends of the Earth would like to see the following policy included in the strategy:

Local Planning Authorities should include a presumption in Waste Local Plans against the development of waste to energy plants for mixed household waste and landfill capacity, except in the following exceptional circumstances:

- The authority has already reached a municipal waste recycling and composting target of 60 per cent.
- The proposed development is more than 2 km of human habitation
- The proposed development would have no impact on a watercourse or aquifer

A policy should be added to the section titled segregated collection systems about kerbside collections of recyclables. We would like to see the following policy added:

Waste Collection Authorities and waste management companies should provide a separate collection of recyclable and compostable materials to every household by 2006.
Small and medium sized businesses should also be encouraged to separate waste for collection.

**Consultation Events**

The Regional Assembly is running a series of half day consultation events on the draft Regional Waste Strategy. These events will be independently facilitated and have three objectives:

- Raising awareness of the content of the draft Regional Waste Strategy
- Equipping stakeholders with the information and understanding they will need to make a formal response to the consultation
- Identifying gaps in the coverage of the Strategy

The events will take place on the following days:

- Trowbridge 14th April 10am - 1pm
- Gloucester 16th April 1.30pm - 4.30pm
- Truro 21st April 10am - 1pm
- Dorchester 23rd April 10am - 1pm
- Exeter 29th April
- Taunton 5th May 1.30pm - 4.30pm
- Thornbury 7th May 10am - 1pm

The Assembly would welcome attendance at these events from a wide cross-section of people and representatives of businesses and organisations in the region. If you would like to attend one of the events please contact: **Lesa Hartland**

Tel: 01823 425202

E-mail: lesa.hartland@southwest-ra.gov.uk