

## Wiltshire County Council Waste Core Strategy Examination ~ Response by Ps and Qs

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**Comments from:** Ps and Qs, Purton  
Ps and Qs is a citizen sustainability group established since 1994  
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We fully support the comments made by CPRE and wish to emphasise the following:

- The conditional use of "acceptable" and "where appropriate" is unhelpful as this can be interpreted for any purpose. It is the case that all development now must be sustainable (WDC 1) and this would then align with the draft Regional Spatial Strategy
- Greater clarity is required so that it is unequivocal that impacts will be controlled so they do not have an adverse effect on properties, settlements and surrounding land uses (4.2)
- Due to existing and likely future food shortages all good agricultural land should be protected and not unnecessarily squandered (4.11)
- There should be no development in flood risk areas (4.14)
- Specific distances from settlements should be cited. In the past errors were made (e.g. at Purton)
- It is essential that the number of vehicles coming to a landfill site per day will be limited to 30 this number shall not be averaged out over the year. (5.2)
- Extensions to landfill sites should not be allowed as inevitably the planning conditions extant at the time of permission are then ignored. For instance, at Purton the original landfill was permitted on the basis of a defined life after which traffic would cease to disturb nearby residents. Two extensions and thirty years later residents are still inconvenienced (7.6)

SUPPLEMENT following the issue of various Position Statements by the joint Councils

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### Position Statement MM 4

*12 The forecasts of household waste generation have been questioned (by Parish Council and by individuals), the suggestion being that they have been over-estimated. Can the Councils explain, for the benefit of this Examination, the statistical basis for the forecasts of necessary provision and apportionment to the County (which appear to have been accepted at RSS Examination as being adequately founded).*

For Wiltshire, the forecasts for municipal waste arisings were developed by the County's Waste Management Team in 2006 and are based on recorded and projected trend data. In recent years, municipal waste arisings have shown negative growth. This is due in part to the introduction of new initiatives such as green bin and black box recycling. This situation will be monitored through the Annual Monitoring Report and will indicate if there are any significant changes to the projected waste growth per annum and if a review of the documents is required. The long term trend indicates that municipal waste arisings will continue to grow at a rate in the region of 1% - 2%

**Ps and Qs** Given the negative growth in recent years due in part to "green" initiatives and these initiatives will increase, we believe that the statement "*The long term trend indicates that municipal waste arisings will continue to grow at a rate in the region of 1% - 2%*" is misleading, at best, ~ a cynical attempt to justify increased landfill capacity.

15 *To what extent does the level of proposed provision in the north-east already reflect the proposals for growth in that area? Has the need for provision in the north-east been under-estimated?*

Swindon Borough has seen consistent and uniform growth in waste arisings in tandem with the continued expansion of Swindon; existing strategic waste sites are currently meeting this need. The Councils recognise the need in the longer term for the provision of additional waste treatment facilities and to this end are working towards delivering a solution using DBERR's Forward Commitment Procurement process.

**Ps and Qs** The statement: "...existing strategic waste sites are currently meeting this need." This bland statement is misleading ~ it does not reveal that at least one current strategic site in the area is being developed through planning subterfuge and by default. For instance in Purton, permission in the 1970s was granted a permit to fill an excavated brickworks with a defined lifetime and on the basis of local need in Wiltshire. The brickworks space was filled ahead of time, not by Wiltshire waste but from afar. Two extensions later, the planners still maintain that the landfill is needed for Wiltshire waste. This is true but the operators take a disproportionate amount of waste from the surrounding counties and as far away as Devon (Plymouth to be precise) and then keep asking for more space. This isn't strategic planning; it is superficial planning and a nonsense and certainly not in keeping with DBERR's Forward Commitment Procurement process when taking the government's own sustainability principles into account

16 *What is the response of the Councils to the industry representation that experience shows it is extremely difficult to obtain sites in industrial areas, and that failing to identify sites will lead to a shortfall?*

**Ps and Qs** does not believe the difficulty of finding and developing sites within industrial areas ~ it is simply cheaper to use greenfield sites. It **may** be more difficult than greenfield sites but it is not more difficult *per se*.

17 *It is recognised that the Core Strategy does not promote any one form of waste management above another: but, allowing for that, and given that the Core Strategy is the policy document in which the 'difficult' decisions are to be taken, should the Core Strategy not grasp a little more firmly the 'nettle' of energy from waste facilities?*

**Ps and Qs** believe that greater emphasis should be placed on energy from waste. To simply place waste in the ground is 1970s thinking ~ appropriate for its time but naive for today's context.

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### **Position Statement MM5**

18 *Does easy access to the motorway assist in reducing the overall impact of transport, or does it simply encourage the import of waste from elsewhere? How might the latter be reduced in the interests of the former?*

**Ps and Qs** When the Councils state that: "As to whether access to the motorway increases the importation of waste, the Councils are not in a position to comment at this stage." This is a nonsense and deliberately misleading. Everyone knows that the M4 facilitates import of waste from all counties abutting the M4 from far away as Devon and South Wales.

19 *What appears to be a high proportion of waste managed within the County is imported from neighbouring authority areas. To what extent does this situation represent the management of waste at the point nearest to its source? What scope might there be for reducing the importation of waste? Would this be desirable as an object of Core Strategy policy? If so, how might it be incorporated explicitly into the Core Strategy?*

**Ps and Qs** When the Councils state that: "The Councils consider that this is highly likely to decrease for a number of reasons." This is another nonsense and again deliberately misleading. The latest extension for Purton, for instance was argued upon an increase.

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**Position Statement MM7**

22 *The proposals for dealing with this category of waste is unclear, and the whole section on Core Strategy p 7 is vague. What is the source of the Core Strategy statement that ‘there is limited data available to enable accurate forecasting of the amount of future waste that is likely to arise?’*

**Ps and Qs** We find it remarkable that given the importance of this waste that data have not been collected and when taken into conjunction with...

23 *Further explanation is required, to support the implicit contention that the Core Strategy provisions are adequate to deal with this category of waste: in particular, to justify the statement that the Council’s approach to providing sufficient capacity over the next 20 years will be to identify sites through the Waste Site Allocations DPD. The Core Strategy text at 2.21 appears to suggest that the Strategic Sites proposed in the Core Strategy would not be available to deal with commercial/industrial waste. Are further Strategic Sites necessary to deal with Industrial and Commercial waste? If so, should these not be flagged up at Core Strategy stage? Does the Core Strategy underestimate the level of overall provision required for waste management?*

....we believe that the Councils’ response is wholly inaccurate and leads to a flawed Core Strategy.

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**Position Statement MM8**

26. *Representations argue that there is no need for a waste audit policy, as EIA requirements would be sufficient to cover this aspect. CS paragraph 5.24 accepts that where development proposals fall within the scope of the EIA Regulations some of the provisions of the waste audit process will be covered by... the Environmental Statement. Please explain how Policy WCS6 would improve upon current provisions and/or extend their scope to achieve more comprehensive waste minimisation and separation for re-use/recovery/recycling.*

**Ps and Qs** Originally, the Councils’ did not have waste audits with any rigour in their documents. During the consultations Ps and Qs demonstrated that this was a flaw because any practitioner of EIAs will know that to rely on the simple statements of audit in an EIA would be insufficient. The Councils re-worked their documentation accordingly and they were right to do so.

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**Position Statement MM11**

34. *Why are there no targets related to Policy WCS1?*

**Ps and Qs** In any sector, there is a very simple reason why targets are not favoured... This is well-known and in this instance it is to allow the Councils to work closely with the waste site operators as required. Targets would constrain the relationship.

35. *CS paragraph 6.6 appears to suggest that it is the intention of the CS to reduce both imports and exports of waste. Policy WCS1 does not appear to go as far as this. The Monitoring Indicators table at CS p33 does not include a target for the percentage of waste imported and exported for management. What exactly is the policy position of the Core Strategy on import/export, and how could it be made clearer? [overlap with MM5].*

**Ps and Qs** The Councils statement that: “There is no target for the percentage of waste imports and exports as this is not within the Councils control.” ...is not true as it could be integrated into the contracts with the waste industry and commercial operators. They choose not to.