

12.0 CHAPTER 12 – IMPLEMENTATION, MONITORING AND REVIEW

12.1 Chapter 12 - General

Objection

352/10 Mr T F Q Hedley Whiteparish Preservation Group

Summary of Objection

- 12.1.1 The County should inspect all sites on day one of commencement of operation of a development to ensure that operators are meeting all EU Directives and BPEO.

Inspector’s Reasoning and Conclusions

- 12.1.2 This is essentially a matter relating to the day to day operation of the WPAs’ Development Control sections and the Environment Agency. Chapter 11 of the Plan makes it clear that the WPAs will ensure that waste management development is carefully monitored and carried out in accordance with the requirements of the valid planning permission, including any relevant conditions and agreements. I do not consider that it is necessary, or in the interests of efficient monitoring, for the Plan to indicate that an inspection will be carried out on a particular day.

RECOMMENDATION

- 12.1.3 I recommend that no modification be made to the Plan in response to this objection.

12.2 Table 12.1

Objections

59/12	Ms J Ripley
215/6-8	Mrs C G Carver Devizes and Marlborough Friends of the Earth
220/4	Mr R A W Guest - Friends of Dauntsey Vale
235/1-2	Ms M Willmot Salisbury Friends of the Earth
247/9-18	Mrs A Boakes Whiteparish Parish Council
349/12	Mr M Oliver Viridor Waste Management
368/12	Mrs J Heselwood
699/P1	Mr J Jackson

Summary of Objections

- 12.2.1
- (a) The Pre Inquiry Changes do not comply with the national integrated transport policy as set out by the Deputy Prime Minister on 20th July 1998.
 - (b) The list of Indicators should include the percentages of the population served by kerbside collection firstly for dry recyclables and secondly for garden waste; the percentage of population with no kerbside collection but within 1km of a recycling centre; the number of farms composting municipal waste; and the percentage of towns with HRCs.
 - (c) The targets should focus on reconciling anticipated waste arisings with waste management capacity on an annual and plan period basis.
 - (d) Target 2 is a meaningless numeric measure. It could be met, for instance, by one very serious deviation from the Plan and 99 minor schemes permitted which were compliant.

Objection Coding

XXX/XX A N Other = Respondent No./Objection No. Name

RX = objection to Revised Deposit Draft

W = Withdrawn

CW = Conditional Withdrawal

- 12.1 -

- (e) Target 3 is a poor target open to abuse. Poor metrics frequently distort performance.
- (f) Indicator 4 should have a 100% target. No proposals should be approved that do not maximise recycling / composting.
- (g) Target 5 is unambitious, unless significant population increase in the Plan area is envisaged.
- (h) Indicator no.7 is unambitious in its targets for recycling and composting of household waste. The Government’s targets for recovery should be met by recycling and composting and exclude energy recovery.
- (i) Target 9 should be zero if target 8 is zero.
- (j) Indicator 9 should refer to the control of lorry numbers visiting sites to limit waste imports.
- (k) Target 11 seems to be incorrect. The main target should be to develop such facilities within Preferred Areas defined in chapter 5.
- (l) Target 12 is a cop-out, much as policy 7. More serious consideration should be given to reduction of the reliance on road transportation.
- (m) Targets 17, 19 and 20 are vacuous. If the WPA permits a development, it will presumably be acceptable by definition.
- (n) Target 18 should be strengthened by the addition of 'or modified' after the word 'blocked'.

Inspector’s Reasoning and Conclusions

- 12.2.2 The Pre-Inquiry Changes placed on deposit by the WPAs include a proposal to amend Table 12.1 by inserting cross references to related indicators used by the South West Regional Assembly. The proposed change also seeks to correct an error in the Plan printing process in relation to Target 4, which should have read 100%. I agree that all proposals should seek to maximise recycling and composting, subject to the proviso that waste minimisation schemes may not include recycling, not least because it lies further down the waste hierarchy. In the interests of accuracy and the understanding of the Plan, I shall recommend that the proposed change be incorporated into the Plan.
- 12.2.3 A number of additional indicators are suggested by objectors for inclusion in Table 12.1. These include the percentages of the population served by kerbside collection for dry recyclables and garden waste, the percentage of farms composting municipal waste and the percentage of towns with HRCs. It is also suggested that a target could be set for the percentage of population with no kerbside collection but within 1km of a recycling centre. There is no doubt that such factors will be of significance in determining how much waste will be diverted from landfill and it is appropriate that efforts are made to encourage such measures. However, the extent to which kerbside recycling and the other identified measures will be introduced is a matter for the MWMSs rather than the Waste Local Plan. The Plan provides the broad framework for land use planning of waste management of which the MWMSs must take account. It should not seek to define detailed strategies and I therefore conclude that the additional targets should not be incorporated into Table 12.1.
- 12.2.4 With regard to the reconciling of anticipated waste arisings with waste management capacity, I agree with the WPAs that the combination of the various targets will enable this to be done.
- 12.2.5 Some objectors are concerned that the targets in Table 12.1 seem weak. It is submitted, for instance, that Target 2 is a meaningless numeric measure that would be met in a situation

where a WPA allowed a very serious deviation from the Plan whilst permitting 99 minor proposals that were compliant. I agree that statistics and targets can be misinterpreted and misleading, and the achievement of a particular target does not necessarily mean that the overall objective of that target has been properly met. Targets, and the statistics they generate, must be put into context, meaningfully evaluated and reviewed, and not given inappropriate weight. However, targets can also provide helpful guidance, draw attention to problems and, if properly evaluated, assist in reviews and the formulation of improvements to a system.

- 12.2.6 Strictly, the objector is incorrect in the scenario suggested for Target 2 as the requirement is a figure of less than 1%, not 1%. More importantly, it seems to me that an assessment of the number of advertised departures that are permitted would provide useful information on the appropriateness and practicality of the Plan’s provisions and policies. As indicated above the statistics would need to be properly analysed, but I do not agree that they would be meaningless. Moreover, as the WPAs, point out, they form part of national performance indicators and must be collected by the WPAs. Accordingly, I do not consider that the target should be modified.
- 12.2.7 Similarly, Target 3 is a national performance indicator, which in my opinion, could provide helpful comparative data to assist the WPAs when assessing its decision making performance. The results of the target would need to be carefully evaluated, but I do not agree that it would be open to abuse in a responsibly run authority.
- 12.2.8 I agree that Target 5 appears on the surface to be unambitious. However, municipal waste arisings are increasing significantly and the population (and certainly the number of households) in the Plan area are expected to increase during the Plan period. It is therefore not unreasonable that the WPAs should set a target of slowing this growth before reversing it. Targets should be challenging, but at the same time they should be realistic. Target 5 effectively requires continual improvement on the issue of waste arisings. This is not unambitious and will require continuous effort to maintain the required results. Although I would prefer to see specific percentage figures in relation to this target, I appreciate that the lack of precise data and the step changes that are anticipated to take place in the management of waste during the Plan period make it difficult if not impossible to be more precise.
- 12.2.9 Objectors argue that Indicator No. 7 is unambitious in its targets for recycling and composting of household waste. It is pointed out that some authorities already exceed the recycling targets set out. Moreover, it is submitted that the Government’s targets for recovery should be met by recycling and composting and not by energy from waste. I deal with the issue of recycling and composting targets at section 3.22 of this report and note that recycling targets for the Plan area have been set by the Government. I agree with the WPAs that it is the role of the MWMSs and the bodies that prepare those documents to consider whether these targets can be improved upon. Bearing in mind that targets should be realistic as well as challenging, I conclude at paragraph 3.22.7 that the targets should not be modified. The recovery targets should not be restricted solely to recycling and composting. I am mindful, however, that the recycling target for Wiltshire has now been set at 33% rather than the 30% indicated in Table 12.1. This should be amended, not least to ensure that the figure is consistent with that set out in Table 3.6 of the Plan.

