



The countryside charity  
Gloucestershire

## POSITION STATEMENT

### WASTE PLANNING AND MANAGEMENT

#### Summary

*We opposed the construction of the waste incinerator at Javelin Park on the grounds it was oversized for Gloucestershire's needs which were overstated in the case, those needs could be better met from smaller more local facilities and the sheer scale and mass of the facility would be visually damaging to the local countryside and to views towards and from the Cotswold escarpment. We did not object to the technology per se but noted that other technologies might be a better option for the site. Despite our and others opposition, the facility was approved on appeal and is now under construction. As a result we do not think there is any further need for recovery facilities in Gloucestershire and we will be opposed to planning applications for such facilities for household waste.*

*There may be a case for some limited facilities for processing commercial waste. Before new recovery facilities are considered it must be demonstrated that the potential for minimizing waste generation and maximising reuse/recycling has been fully taken into account in assessing need and that Javelin Park is fully utilised with waste from Gloucestershire.*

*We are concerned that the existence of Javelin Park may weaken local authority commitment to recycling. We will monitor recycling trends and lobby for improvement if we think this is warranted.*

*Apart from recovery facilities, the Gloucestershire Waste Core Strategy envisages a need for further gathering/sorting, composting and recycling facilities. These facilities should be located close to the major population centres in the Vale leaving scope for smaller scale facilities to service the more dispersed centres of Cirencester and in the Forest of Dean.*

*We are technology neutral. However the choice of technology must result in facilities of a scale and traffic generation which would work well with the landscape and road system for the site in question. We will oppose facilities which do not and whose effects cannot be mitigated.*

*In respect of Construction and Demolition waste, we support initiatives to increase the proportion of waste processed on site to inert hard core for other construction uses.*

## Context

There are five major waste streams in Gloucestershire:

- Municipal Solid Waste (MSW) amounting to some 282,000 tons per annum (tpa). This is largely household waste collected from the kerbside by district councils (using commercial contractors) or delivered by individuals to Household Recycling Centres (HRCs) and then disposed of by the County Council (using commercial facilities). A lot is known about this waste.
- Commercial and Industrial Waste (C&I) collected from commercial premises and factories by private waste contractors under contractual arrangements with the generator of the waste and then disposed of to commercial facilities. Because this waste is often transported across county borders for treatment, there are no reliable figures for the amount of this waste arising in Gloucestershire. The most reliable figure is the amount of this waste being processed in the county - 375,000 tpa. Some studies have indicated that the amount arising might be only 250,000 tpa and the rest is imported waste. This is disputed both by the County Council and the waste industry. It is known that the composition of C&I waste at source is similar to MSW.
- Construction and Demolition Waste. This largely inert waste is handled by the waste industry and the amount managed is about 295,000 tpa.
- Metals from a variety of sources amounting to about 130,000 tpa. This a largely segregated stream of waste handled through specialized, often quite small, facilities.
- Hazardous Waste which is or contains materials which make it harmful to health or the environment; obvious examples are oil and asbestos. This waste stream amounts to 90,000 tpa being both arising in Gloucestershire and waste imported from neighbouring counties. It is handled through one specialized dedicated commercial facility at Wingmoor Farm.

This statement is mainly concerned with MSW and C&I waste.

Up to 2006 MSW in Gloucestershire grew year on year reflecting increasing numbers of households and rising prosperity. Projections of these past trends showed MSW growing by 1.6% per annum until 2020. However since 2006 the amount of MSW declined year on year until 2014 even though the number of households had continued to increase. This meant that people were producing less waste. Some of this was probably due to changes in the way waste was collected, e.g. fortnightly non-recyclable waste collection, and some was due to the economic downturn. There is also evidence of changing habits. However since 2014 MSW has increased again though it is too early to know whether this is a trend or just a blip. Forecasting future arisings is subject to great uncertainty as it depends on the extent to which initiatives to reduce waste continue, the rate of growth of households, the fact that the population is getting older and how the economy will perform and translate into rising consumer expenditure. It is possible that there will be no further growth in arisings up to 2020.

C&I waste managed in the county has varied over time and this may be a reflection of capacity and the commercial economics of moving waste to alternative facilities. Forecasting future amounts is very difficult. The best assumption is that there will be no growth in the total amount managed for the foreseeable future.

## Strategic Framework

There are three key strategies which form the basis for considering waste management.

### a) The Waste Hierarchy

This sets an order of environmental preference for the disposal of waste, viz:

- Prevention. The most environmentally effective solution is to reduce the generation of waste including the re-use of products. Much progress has been made by producers and consumers to minimize waste, for instance in reducing packaging and throwing less away. The overall objective is to de-couple waste generation from economic growth.
- Preparing for re-use. Products that have become waste can be checked, cleaned or repaired so that they can be reused.
- Recycling. Waste materials can be reprocessed into products, materials or substances including compost. Considerable progress has been made in Gloucestershire with 48% of MSW but only 17% of managed C&I being re-used/recycled. It is estimated that some 80% of MSW or C&I waste is reusable or recyclable so there is some potential for much higher recycling rates. The Gloucestershire County Council target is 60% by 2020.
- Other Recovery. Waste can serve a useful purpose by replacing other materials that would otherwise have been used, including using waste to generate energy. Gloucestershire will soon have 193,000 tpa of capacity at Javelin Park for other recovery of residual MSW or C&I waste. There is also planning approval for a 30,000 tpa gasification plant at the Moreton Valence site. There are a number of different technologies and these are set out in full in publications by Defra; technology is developing all the time.
- Disposal. This is the least desirable solution where none of the above options is appropriate. The commonest form of disposal in Gloucestershire is to landfill with some 52% of MSW and 83% of C&I waste currently going to landfill. There are growing financial penalties (Landfill Tax) for disposal to landfill. Given the potential to divert waste from landfill it is estimated that there will be no need for further landfill capacity over the next 15years.

All waste disposal authorities are required to ensure that waste is moved up the hierarchy and that the potential is fully exploited (if economically reasonable) before the next step down the hierarchy is brought into play. For Gloucestershire the major issue is drastically reducing the amount of material going to landfill.

### b) The Proximity Principle

Waste collection and disposal requires movement in large vehicles with possible adverse effects in terms of exhaust emissions and traffic, particularly on minor roads. Waste facilities should therefore be located as close as possible to the source of the material but recognizing the benefits of economies of scale.

### c) Duty to Co-operate

The Planning and Compulsory Purchase Act 2004 has been amended with an additional section (33A) placing a duty on planning authorities to co-operate in relation to sustainable development. The requirement is repeated in paragraph 178 of the National Planning Policy Framework (NPPF) which

emphasizes the need to co-operate in relation to strategic priorities which include waste. Planning authorities therefore have a duty to co-operate to actively explore opportunities for cross county border solutions. In the case of waste the obvious benefits may be application of the proximity principle and sharing of waste processing facilities. The commercial sector operates without regard to county boundaries optimizing their operations across geography. The duty to co-operate therefore principally applies to the management of MSW.

### **Gloucestershire County Council Waste Core Strategy**

In 2012 Gloucestershire County Council adopted a waste core strategy covering the period up to 2027. Over that period it is envisaged that capacity will be required for composting and recycling of 30,000 tpa to support a MSW recycling rate of 60% post 2020 and about 100,000 tpa for C&I improved recycling rates.

### **CPRE Gloucestershire Policy**

Against the above situation and framework CPRE Gloucestershire Policy is:

- a) To recognize that there is great uncertainty over forecasting future waste arisings. This means that we will insist that all plans or proposals for new facilities are based on realistic assumptions on the key drivers rather than simple projections from past trends, that resultant forecasts are set within a range of scenarios for these key variables, and that the robustness of proposals is tested against this range.
- b) While we opposed the Javelin Park waste incinerator it was approved on appeal and is now under construction. It will provide more capacity than is needed for Gloucestershire's residual MSW. We will therefore oppose applications for any further residual recovery plants until Javelin Park is fully loaded with waste from Gloucestershire.
- c) Because there is an economic incentive to fully use capacity, we are concerned that the future existence of over-capacity of recovery facilities in Gloucestershire and neighbouring counties will either divert material from recycling or suck in material from further away. We will monitor this and lobby appropriately.
- d) We support the principle of the waste hierarchy and will wish to be convinced that the potential for minimizing generation and maximising reuse/recycling has been fully taken into account in setting targets and in arriving at the capacity for new recovery facilities.
- e) We believe that Gloucestershire should set a target of being an exemplar of best practice on recycling rates. The target should be not less than 70% by 2020.
- f) The proximity principle should apply. We support the idea that the major facilities should be in the Vale because that is where the major population centres are and we would expect the capacity of such facilities to be appropriate to waste generated in Gloucestershire. Equally, we would expect the County Council to have explored smaller scale facilities to service the more dispersed centres of Cirencester and in the Forest of Dean in particular in co-operation with the neighbouring areas of adjacent counties. At an even smaller scale we will campaign for waste management facilities to be integrated into any new housing development of over 100 dwellings or small business parks preferably with district combined heat and power (CHP) generation.

g) We are technology neutral in that we do not espouse a particular waste management technology over any other. However, we would expect the choice of technology and scale of facility to have been tested against what would be best in landscape and traffic terms for the site in question. This will mean choosing a solution which gives the best trade off between economics of waste management and protecting our environmental assets. We will oppose facilities which are out of scale to their environment and whose visual effects cannot be mitigated. We expect views to and from the Cotswolds AONBs to be protected.

h) We are not opposed in principle to incineration and other combustion processes with power generation and Combined Heat and Power (CHP). We note that the calculations on the relative benefits of different technologies on greenhouse gas emissions are complex and need to be weighed with the relative benefits in terms of renewable energy. We do not have the expertise to evaluate these calculations independently nor of the complex issues of health risks (if any) from emissions from incinerators.

i) In respect of C&D waste, we support initiatives to increase the proportion of waste processed on site to inert hard core for other construction uses. Unless the same vehicles are used both to remove quarried material and to bring in C&D waste, we will oppose the transport of C&D waste to quarries either for infill or reprocessing as to do so would add to HGV traffic on country roads.

j) When any of the licences to operate come up for renewal, we will campaign to ensure that conditions of renewal include adequate screening of the site, the strictest protection from malodours/ fumes and noise and most importantly an upgrading of the local roads to ensure they are safe for the level of heavy goods vehicle traffic; this does of course need to be sensitive to landscape and the character of the area.

k) In all cases of major new facilities we would expect an inspection and report by the Environment Agency and an implementation plan of their recommendations. This should include hydrology and effects on watercourses and flood plains.

**Revised March 2017**

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**CPRE Gloucestershire Position Statements are regularly reviewed and updated as necessary. They should be read as a set**