

GLOUCESTERSHIRE WASTE CORE STRATEGY EXAMINATION

Inspector's Issue 2: Whether the Statistical Basis for the Core Strategy (CS) is Robust and Justifies the Vision and the Strategic Objectives

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January 2012

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Summary of Cory's Position

- The evidence base is unsound and overestimates the tonnages of waste planned for in the CS;
- The evidence base is inconsistent with waste targets set out in national, regional and local policies; and
- The Vision, Key Driver 5, Key Issue 10, Strategic Objectives 2 and 3 and Policy WCS4 of the CS do not follow and / or are not justified by the evidence base.

Introduction

Cory has consistently made detailed submissions regarding the unsoundness of the evidence base to the County Council (CC) including:

1. The representations made by Cory to CD1.1 in February 2011 (see CD1.14);
2. The requested response to the CC following a meeting held with the CC in March 2011 (see **Appendix 1**); and
3. The representations on the focussed changes made in August 2011 (see CD1.15).

In addition to these representations, Cory sets out below why it still considers the evidence base to be unsound and the changes sought to the plan that would make it sound in response to the questions posed by the Inspector.

Question 1: Statistical base: Municipal Solid Waste (MSW)

Table 3I of CD10.4 summarises the CC's position in terms of MSW. Cory does not consider the data contained in this table to be robust.

Q 2.1 - Cory contend that the CS overestimates the level of MSW arisings throughout the Plan period and provides no justification for the waste growth levels. Specific aspects of Table 3I that are considered not to be robust are:

1. The arisings estimate is stated to be calculated from a 2006/07 baseline level which is considered out of date;
2. Recent data from the CC (see **Appendix 2**) indicates that the levels of MSW arisings for 2010/11 and 2011/12 are already being overestimated in Table 3I. Any errors in the estimate of current MSW arisings are compounded in Table 3I throughout the rest of the Plan period. A recalculation of MSW arisings based on current levels is provided in **Appendix 3** to illustrate this point.
3. The underlying assumptions behind the CC's estimate of growth in MSW arisings are not justified or explained in the CS. They also predict growing levels of arisings for every year from 2010/11, which is inconsistent with current predictions by the CC which suggest a fall in the arisings level from 2010/11 to 2011/12 (see **Appendix 2**).

In order to make the CS sound the evidence base needs to be updated to reflect current levels of waste arisings and waste growth. Justification is also required to be provided regarding future waste growth forecasts.

Q 2.2 – No comment.

Q 2.3 - The levels of recycling and composting set out in the CS help to determine the number and capacity of recycling and composting facilities required as well as the levels of residual waste and the associated capacity of residual treatment and disposal facilities required.

In order to be considered sound the CS must have regard to the targets stated in the CS i.e. 60% recycling and composting by 2019/20 and 70% by 2030. The CS fails to do this in the evidence base, i.e. Table 3I of CD10.4, and in consequence the CS overestimates the capacity requirements of residual treatment and disposal facilities.

Specific aspects of Table 3I of CD10.4 in terms of residual MSW levels that are considered unsound are:

1. The current residual MSW levels are overestimated in Table 3I and are inconsistent with current data as set out in Table 3-5 in **Appendix 2**. **Appendix 4** provides residual MSW input levels to Cory landfills, which confirms the County's current residual MSW levels as set out in **Appendix 2**. Any errors in the estimate of current levels of residual MSW are compounded in Table 3I throughout the rest of the Plan period.
2. The residual MSW projections in the CS are inconsistent with other published projections by the CC. The latest projection is attached as **Appendix 5** and clearly illustrates residual MSW levels consistently well below the 150,000 tpa level indicated throughout the CS (Key Driver 5, Objective 3 and Policy WCS4 of CD1.1). Even this current projection overestimates current levels of residual MSW with the graph indicating residual MSW levels well above the figures provided in Table 3-5 of **Appendix 2**.
3. Table 3I in predicting residual MSW levels is unjustified as it does not have regard to the 60% and 70% recycling and composting targets.
4. Table 3I in predicting residual MSW levels requiring landfill incorrectly adds to the predicted residual MSW levels an allowance for LATS. The level of residual MSW requiring treatment and / or disposal is simply the level of MSW remaining following recycling and composting.

Appendix 3 recalculates the level of residual MSW on the basis of current levels and the application of the CC's targets for recycling and composting applied to revised MSW arising estimates. This illustrates the level by which the CS overestimates residual MSW requiring treatment and / or disposal.

Over the Plan period 2010/11 to 2027/28 these overestimates are compounded which has significant impacts on the capacity of facilities required to be planned for by the CS. For example, the CS states that the disposal requirements for residual MSW for the Plan period 2010/11 to 2027/28 ranges between 2.7 and 3.7 million tonnes (Table 11b of CD10.4). Whereas the projections set out in **Appendix 3** suggests a level of 2.3 million tonnes would be more appropriate.

In order to make the CS sound the evidence base needs to be updated to reflect current levels of residual waste and the projected attainment of stated recycling and composting targets. The capacity of treatment facilities and the level of disposal requirements planned within the CS needs to reflect these revised projections.

In terms of disposal requirements regard should only be given to the levels of MSW remaining after recycling, composting and recovery.

Question 2: Statistical base: Commercial and Industrial (C&I)

Q 2.4 – Cory considers that the CS should have regard to DEFRA's survey results. These provide a more up to date source of information than that contained in the CS and should as a minimum be used to help validate the data and assumptions contained in the evidence base.

On the basis that significant differences exist between the C&I managed figures as set out in Table 4c of CD10.4 and Table N4 of the DEFRA report (see **Appendix 6**) i.e. a difference of 200,000 tpa regarding the levels of residual waste landfilled, updated assessments are necessary to make the evidence base sound.

In order for the evidence base to match the Vision in the CS with respect to the capacity of facilities being provided to meet Gloucestershire needs the evidence base should consider the County's arisings, arising growth projections, attainment of national, regional and local waste targets and the capacity of existing and consented facilities, in order to derive future capacity needs in relation to all stages of the waste hierarchy. On the basis of DEFRA's survey data there would appear to be a minimum of 325,000 tonnes of these C&I waste arisings being reused, recycled, recovered and treated (see **Appendix 6**).

Q 2.5 – It is currently unclear from Section 10 of CD10.4 as to the level of wastes both exported from, as well as imported into, Gloucestershire. **Appendix 7**, which was in part prepared by the CC, suggests that residual wastes are imported into Gloucestershire, although the level of these imports is unclear from Section 10 of CD10.4. A number of the facilities identified in Table 10f of CD10.4 have recently been permitted, which in turn may also have a bearing on future waste imports to the County. With respect to movements of C&I wastes an update to Section 10 of CD10.4 is proposed to improve the robustness of the evidence base.

Q 2.6 – Cory contend that use should be made of a reducing waste growth forecast with regard to residual C&I wastes. The approach of adopting a 0% growth rate is not fully justified in the CS and does not conform to the approaches adopted by other adjoining Waste Planning Authorities (WPAs).

Q 2.7 – Cory believe it is inaccurate for the CS to include both recycling and recovery within the definition of 'recovery' for the C&I waste stream. This approach is contrary to that adopted in the CS in relation to MSW and is contrary to the waste hierarchy. In order to make the evidence base to the CS sound the CC need to split out the targets for recycling and recovery. These separated targets should then be clearly defined in Strategic Objectives 2 and 3 and refined in Policy WCS4. This approach will assist the CS to plan for the required facilities.

Focussed Change 9 (CD1.3) suggests a need to deliver by 2020 C&I recycling facilities with a capacity of 96-116,000 tpa, and C&I recovery facilities with a capacity of 47-77,000 tpa.

Question 3: Statistical base: Hazardous wastes

Q 2.8 – No comment.

Question 4: Statistical base: Landfill

Q 2.9 – Cory asserts that the estimates of life of the non-hazardous landfills in the CS are inaccurate and unsound with the evidence base to the CS significantly overestimating the inputs to landfill over the Plan period. The estimated inputs do not have full regard to recycling and recovery targets or the impacts of economic drivers such as the landfill tax. The estimates are also significantly at odds with the evidence relating to predicted landfill inputs associated with adjoining WPAs.

Q 2.10 – As set out in the Landfill Position statement Cory can confirm that the assessments of remaining void and Cory's predicted assessment of life at the Wingmoor Farm West landfill is not impacted by any potential built development on the front part of the Wingmoor Farm West landfill site.

Question 5: Statistical base: Construction and Demolition (C&D) Wastes

Q 2.11 – Cory's position is that the assumption of a constant level of residual C&D waste requiring disposal to landfill makes the evidence base to the CS unsound. This approach does not conform to the assumptions adopted by other adjoining WPAs. This approach is also inconsistent with recycling and recovery and landfill diversion targets set out within national policies and the CS (Strategic Objective 2 and Policy WCS3). On account of these assumptions the CS overestimates the inputs to, and therefore the capacity needs for, non-hazardous landfill during the Plan period.

Question 6: The Vision and Strategic Objectives

Q 2.12 – No comment.

Q 2.13 – No comment.

Q 2.14 – No comment.

Q 2.15 – The CC's reasoning provided in both CD1.3 FC10 and CD1.14 60/11 indicates an aim to provide for self-sufficiency in waste management capacity.

Q 2.16 – The C&I recovery requirement in Objective 3 and Policy WCS4 should not include recycling capacity requirements and to be consistent with the Vision of the CS should be related to the County's requirements.

The County's requirements for C&I recovery capacity as set out in Focussed Change 9 (CD1.3) would appear to be between 47-77,000 tpa by 2020.

Q 2.17 – No comment.

Q 2.18 – No comment.

APPENDIX 1

APPENDIX 1: Cory Representation to the County Council in March 2011**Publication Waste Core Strategy****Waste Data - Further response from Cory Environmental (Gloucestershire) Limited****Introduction**

Further to the meeting held on 23 March 2011 Cory Environmental (Gloucestershire) Limited ('Cory') was requested to provide additional information to the County Council in relation to the Waste Data used to underpin the Waste Core Strategy (WCS) – Publication Version December 2010. The information below is provided in addition to the earlier representations made on the WCS by Cory.

Waste Data**Summary of Cory Representations**

- The explicit reference in the WCS to between 10-13 years life at the non-hazardous landfill sites in Gloucestershire is considered inaccurate and therefore unsound. This is due to a combination of the following factors:
 - Underestimation of available landfill void
 - Overestimation of residual MSW to landfill over Plan period
 - Overestimation of residual C&I to landfill over Plan period
 - Overestimation of residual C&D to landfill over Plan period
- Changes as a result of the above would impact other aspects of the WCS including for example stated Key Issues and Key Drivers

Landfill Void

The available void at the two Cory non-hazardous landfill sites in the County (Hempsted and Wingmoor Farm West) was 3,205,000 m³ as at 31 December 2009. The estimate of landfill life set out in the WCS needs to be recalculated to have regard to this entire void being available at 31 December 2009 as opposed to 31 March 2009.

Residual Waste Inputs to Landfill over the Plan Period

Further to both the written representations submitted by Cory and the discussions held in our meeting on 23 March 2011 Cory provide, as requested, a high level summary of the factors that contribute to the lack of credibility and robustness in the evidence base. As requested more specific reasons relevant to the individual waste streams are provided under the relevant sections below.

APPENDIX 1: Cory Representation to the County Council in March 2011**Summary of Key Factors**

- Use of 2008 data is not 'fit for purpose' – use should be made of the most recently available data, as set out in the Companion Guide to PPS 10, especially considering the more recent data shows a significant difference from the 2008 dataset
- Assumed input levels to landfill need to have regard to commercial and legislative drivers, as set out in the Companion Guide to PPS 10, and assuming a constant level of inputs runs counter to this
- Assumed input levels to landfill need to relate to future residual waste volumes having regard to the attainment of both national and local recycling and recovery targets for the different waste streams
- Assumed input levels need to have regard to and be consistent with other policies and statements within the WCS
- Approach to the evidence base varies from the approach adopted by other Waste Planning Authorities, including an adjoining authority that has recently had its WCS declared 'sound' by an Inspector.

MSW Inputs

As stated in the Companion Guide to PPS 10 forecasts of this waste stream should be provided by the WDA. The guide also states that these projections can be updated annually as data becomes available. For example, the West of England Partnership's Joint Waste Core Strategy which has recently been found 'sound' had regard to 2009/10 MSW data. In order for the evidence base to be considered robust the WDA forecasts must use the most up to date information and be in accordance with other published WDA projections.

Additional comments on this waste stream are as follows:

- Both sets of assumptions used by the County Council in the WCS to determine residual MSW inputs to landfill are considered unsound.
- Dataset 1 assumptions use WDA projections. However, the projections used are taken from a baseline tonnage for 2006/7 which is out of date. This creates inaccuracies in the projections, for example there is some 40,000 tpa difference between the stated projected level in 2008/09 and the actual inputs. Furthermore, the WDA projections used in the WCS show a higher level of MSW inputs to landfill and do not reflect more recent WDA projections on residual MSW. Two separate and more recent WDA projections have been publicised. These being in December 2010 in the form of a Waste Flow Model put on the Council's website as well as projections presented in the Council's cabinet paper dated 16 March 2011.
- Dataset 2 assumptions use a constant input level. This approach is considered unsound since it has no regard to achieving national and local recycling targets and is inconsistent with other sections of the WCS.
- Recent public discussions by the County Council both at Cabinet and at Full Council meetings in March 2011 made explicit reference

APPENDIX 1: Cory Representation to the County Council in March 2011

to a County recycling rate of 70% by 2030. This target needs to be reflected in the WCS as well as in any projections of residual MSW.

- The Council's minutes from our meeting dated 23 March 2011 (comments on which will be forwarded separately) suggests that the phrase 'zero growth' used in the WCS refers to zero growth in waste arisings. The note suggests that as this is an aspiration it does not conflict with the proposed forecasted growth in MSW arisings post 2020. The soundness of this approach is questioned.

C&I Inputs

The two sets of assumptions used by the County Council in the WCS to determine residual C&I inputs to landfill are different to a level of 168,000 tpa, which remains constant during the Plan period. Dataset 1 projections are over 140% higher per annum than the projections used in Dataset 2. This results in a difference in the need for landfill capacity (for C&I wastes alone) between the period 2010/11 to 2027/28 of over 3,000,000 m³. This margin of difference in the projections undermines the evidence base and is one reason why the evidence base is considered unsound.

In order for the evidence base to be considered robust any projections must use the most up to date information (2008/09 or later if available) as the baseline level. Further support to the use of the 2008/09 data is provided by:

- The Companion Guide to PPS 10 that states that use of updated information should be taken into consideration at the point at which the results of surveys become available
- DEFRA's C&I waste survey 2009 that was published in December 2010. This study provides an estimate of C&I inputs to landfill in Gloucestershire in 2009 of 114,000 tpa – an input level only 4,000 tonnes different to the 2008/09 level set out in the WCS yet some 172,000 tonnes different from the 2008 levels.

In terms of projections of residual C&I inputs to landfill the WCS proposes only a single scenario of 0% growth. In light of the WCS's reference to there being a greater difficulty in projecting residual C&I levels the use of more than one scenario is proposed. Having regard to the approach taken by other Local Planning Authorities in adjoining areas in projecting residual C&I levels an alternative scenario to project would be one that assumes a falling level of residual C&I wastes over the Plan period. Examples of where adjoining Local Planning Authorities have adopted projections of falling levels of C&I residual wastes include:

- The West of England Partnership - the supporting information that accompanied the West of England Partnership's Joint Waste Core Strategy, which has recently been found to be 'sound' by an Inspector. In Table 7 of 'Topic Paper: West of England approach to identifying future capacity requirements for the Joint Waste Core Strategy' the level of C&I inputs to landfill is shown to reduce from some 396,000 tpa in 2010/11 to some 156,000 tpa by 2020/21.
- Oxfordshire – the Inspectors report on a recent planning appeal decision (APP/U3100/A/09/2119454) for a waste facility sets out

APPENDIX 1: Cory Representation to the County Council in March 2011

the agreed position on the levels of Oxfordshire's residual waste by waste type. Table A2 on page 11 of the Inspector's report shows the level of residual C&I wastes falling from some 296,900 tpa in 2010 to some 228,300 tpa by 2025.

Any projections of residual C&I inputs to landfill also needs to have regard to the following:

- The Companion Guide to PPS 10 which states the need for regard to be given to commercial and legislative drivers such as the landfill tax
- Other policies and statements within the WCS – Strategic Objective 3 of the WCS for example identifies an annual level of C&I waste to be diverted from landfill during the Plan period and any projections of C&I inputs to landfill needs to have regard to this target
- National recycling and recovery targets – these include the target set out in the Waste Strategy for England 2007 to reduce the level of C&I waste which is landfilled by 2010 to 80% of 2004 levels. The need assessment that accompanied the West of England Partnership's Joint Waste Core Strategy also states in paragraph 4.4 of the [previously referenced] Topic Paper that regard needs to be given to the diversion of C&I waste from landfill. Although it recognises that there are no national composting / recycling targets for C&I wastes regard could be given to applying the same recycling and composting targets for MSW to C&I wastes. This approach could provide an alternative projection scenario to Dataset 2 used in the WCS, which applies a 0% growth rate to the 2008/09 input levels.

In terms of overall projections of non hazardous (MSW and C&I) inputs to landfill it is worth noting the projections adopted by the West of England Partnership in their Joint Waste Core Strategy which has recently been found to be 'sound'. Table 6.4 of the proposed adopted version of the Joint Waste Core Strategy shows a falling level of non-hazardous (MSW and C&I) waste requiring landfill from some 696,000 tpa in 2010/11 to some 276,000 tpa in 2020/21. On the basis that the West of England Partnership area adjoins Gloucestershire and that this evidence base has recently been found by an Inspector to be 'sound' regard should be given to the projections used by the West of England Partnership. For example it is considered unsound for the County's WCS to assume a non-hazardous landfill requirement in 2020/21 of between 445,000t (Dataset 1) and 324,000t (Dataset 2) whilst the approved estimate for the whole of the West of England Partnership area in 2020/21 is 276,000 tonnes.

C&D Inputs

The two sets of assumptions used by the County Council in the WCS to determine residual C&D inputs to landfill are formed on the basis of a constant level of inputs from a baseline level of either 2008 or 2008/09. This approach is considered unsound.

APPENDIX 1: Cory Representation to the County Council in March 2011

In terms of projections of residual C&D inputs to landfill the WCS proposes only a single scenario of 0% growth. In light of national and local targets to divert C&D waste from landfill together with the evidence from adjoining authority areas that project a falling level of residual C&D wastes over the Plan period the use of alternative scenario(s) is proposed.

In order for the evidence base to be considered robust any projections need to have regard to the following:

- National recycling and recovery targets – these include the target set out in the Waste Strategy for England 2007 to halve the level of C&D waste which is landfilled by 2012. Furthermore, the need assessment that accompanied the West of England Partnership's Joint Waste Core Strategy states in paragraph 4.5 of the [previously referenced] Topic Paper that a total of 85% of C&D arisings should be diverted from landfill.
- Local recycling and recovery targets – these include the targets set out in Strategic Objective 2 and Core Policy WCS3 of the WCS to divert 85,000 tpa of C&D wastes from landfill.

In terms of overall projections of inert (C&D) inputs to landfill it is worth noting the projections adopted by the West of England Partnership. Table 6.5 of the proposed adopted version of the Joint Waste Core Strategy shows a falling level of inert (C&D) waste requiring landfill from some 679,000 tpa in 2010/11 to some 457,000 tpa in 2020/21. On the basis that the West of England Partnership area adjoins Gloucestershire and that this evidence base has recently been found by an Inspector to be 'sound' regard should be given to the projections used by the West of England Partnership.

Conclusions

Cory maintains that the estimate of 10-13 years life at the non-hazardous landfill sites in Gloucestershire is inaccurate and unsound having regard to a combination of the following:

- The additional 9 months void at the two Cory landfills
- The most up to date WDA projections of residual MSW
- The attainment of set national and local recycling and recovery targets for MSW, C&I and C&D
- Current and potentially falling levels of C&I inputs to landfill
- Reducing C&D inputs to landfill

Cory project, as set out in our response dated 22 December 2010 to the County's Strategic Waste Review, an excess of 20 years operational life at Cory's non-hazardous landfills in Gloucestershire.

APPENDIX 2

Gloucestershire Joint Waste Committee

Business Plan 2012 – 2015
Draft



3.2.5.2 Outcome 1: Waste Minimisation

GCCs waste minimisation objective is expressed through total waste arisings and total residual waste arisings. Figure 3-4 and Figure 3-5 show the budget for these two performance indicators for 2011/12 against 2010/11 figures.

Figure 3-4: Total Household Waste Arisings (Tonnes)

District	2010/11 (Fcast)	11/12 Base Budget
Cheltenham Borough Council	47,680	46,615
Cotswold District Council	35,259	37,319
Forest of Dean District Council	33,605	34,144
Gloucester City Council	45,436	43,958
Stroud District Council	35,520	35,619
Tewkesbury Borough Council	30,729	29,370
HRC Waste Arisings	43,656	43,272
OVERALL ARISINGS	271,884	270,297

Figure 3-5: Total Household Residual Waste Arisings (Tonnes)

District	2010/11 (Fcast)	11/12 Base Budget Outturn
Cheltenham Borough Council	31,154	24,852
Cotswold District Council	13,958	14,264
Forest of Dean District Council	20,448	20,570
Gloucester City Council	24,715	23,276
Stroud District Council	26,786	26,017
Tewkesbury Borough Council	14,248	14,192
HRC Waste Arisings	14,601	14,880
OVERALL ARISINGS	145,911	138,051
Average cost to dispose of 1 tonne residual waste	£80.10	£90.13

APPENDIX 3

Appendix 3: Recalculation of Table 3i from CD10.4 Based on Current MSW Arisings and Residual Waste Levels

Year	Total Household Waste Arisings	Potential C&I Arisings within MSW	Total MSW	Waste Growth % Increase	Compost / AD	Recycling	% Compost and Recycling	Residual after Composting and Recycling	9
2009/10			293,815			49,244	75,548	42.47	169,023
2010/11	271,884	9,476	281,360					48.14	145,911
2011/12	270,297	9,421	279,718					50.65	138,051
2012/13	274,649	9,572	284,221	1.61				51.00	139,268
2013/14	279,058	9,727	288,826	1.62				52.00	138,636
2014/15	283,610	9,885	293,495	1.62				53.00	137,943
2015/16	288,196	10,045	298,241	1.62				54.00	137,191
2016/17	292,858	10,207	303,065	1.62				55.00	136,379
2017/18	297,596	10,372	307,969	1.62				56.00	135,506
2018/19	302,414	10,540	312,954	1.62				58.00	131,440
2019/20	307,311	10,711	318,021	1.62				60.00	127,209
2020/21	309,792	10,797	320,590	0.81				61.00	125,030
2021/22	312,271	10,884	323,155	0.80				62.00	122,799
2022/23	314,751	10,970	325,721	0.79				63.00	120,517
2023/24	317,230	11,056	328,287	0.79				64.00	118,183
2024/25	319,710	11,143	330,853	0.78				65.00	115,799
2025/26	322,190	11,229	333,419	0.78				66.00	113,363
2026/27	324,669	11,316	335,985	0.77				67.00	110,875
2027/28	327,149	11,402	338,551	0.76				68.00	108,336

WCS MSW arisings 2010/11 - 2027/28 in Table 3i in CD10.4	5,946,238	WCS residual MSW arisings 2010/11 - 2027/28 in Table 3i in CD10.4	2,686,993
Recalculated MSW arisings 2010/11 - 2027/28	5,604,429	Recalculated residual MSW 2010/11 - 2027/28	2,302,436
Difference	341,809	Difference	384,557

Notes:
Column 2: Totals includes District Council and HRC arisings. Figures for 2010/11 and 2011/12 from Table 3-4 of the Gloucestershire Joint Waste Committee Draft Business Plan 2012-2015 (Appendix 2). Figures for the remainder of the Plan period based on waste growth levels in Column 5.

Column 3: Commercial and Industrial Arisings Collected by the District Councils. Figures calculated on the basis of 3.5% of Column 1 - this being the level of this waste collected by District Councils as set out on page 7 of the JMWMS

Column 4: Total of Columns 2 and 3

Column 5: CC's projected waste growth levels as set out in Table 3i of CD10.4

Column 6: Level of Compost / AD as provided in Figure 3a of CD10.4

Column 7: Level of Recycling as provided in Figure 3a of CD10.5

Column 8: Percentage of Total MSW being composted / AD and recycled. 2009/10 figure is calculated from actual arisings and residual waste levels. 2010/11 and 2011/12 levels are based on Column 9 divided by Column 4. Remainder of figures have been set based on the targets levels in the CS of 60% by 2019/20 and 70% by 2030.

Column 9: Level of Residual MSW. 2009/10 figure is from Figure 3a of CD10.4. 2010/11 and 2011/12 levels are from Table 3-5 of the Gloucestershire Joint Waste Committee Draft Business Plan 2012-2015 (Appendix 2). Remainder of figures are based on the level of the total MSW remaining following attainment of the targets set out in Column 8.

APPENDIX 4

Appendix 4: Levels of MSW to Cory landfills in 2010/11 and 2011/12

	2010/11	2011/12 (6 months)	2011/12 (12 months)
Waste Type			
MSW - General	147,387	69,630	139,260
MSW - N Somerset	49,121	16,145	32,289
MSW - Total	196,508	85,775	171,549

Note:

Cory landfills (Hempsted and Wingmoor Farm West) currently accept all the CC's residual MSW

The CC's MSW is included within the MSW - General line

Figures for 2010/11 and 2011/12 (6 months) are based on actual inputs

Figures for 2011/12 (12 months) comprise a simple doubling of the 2011/12 (6 months) figures

APPENDIX 5

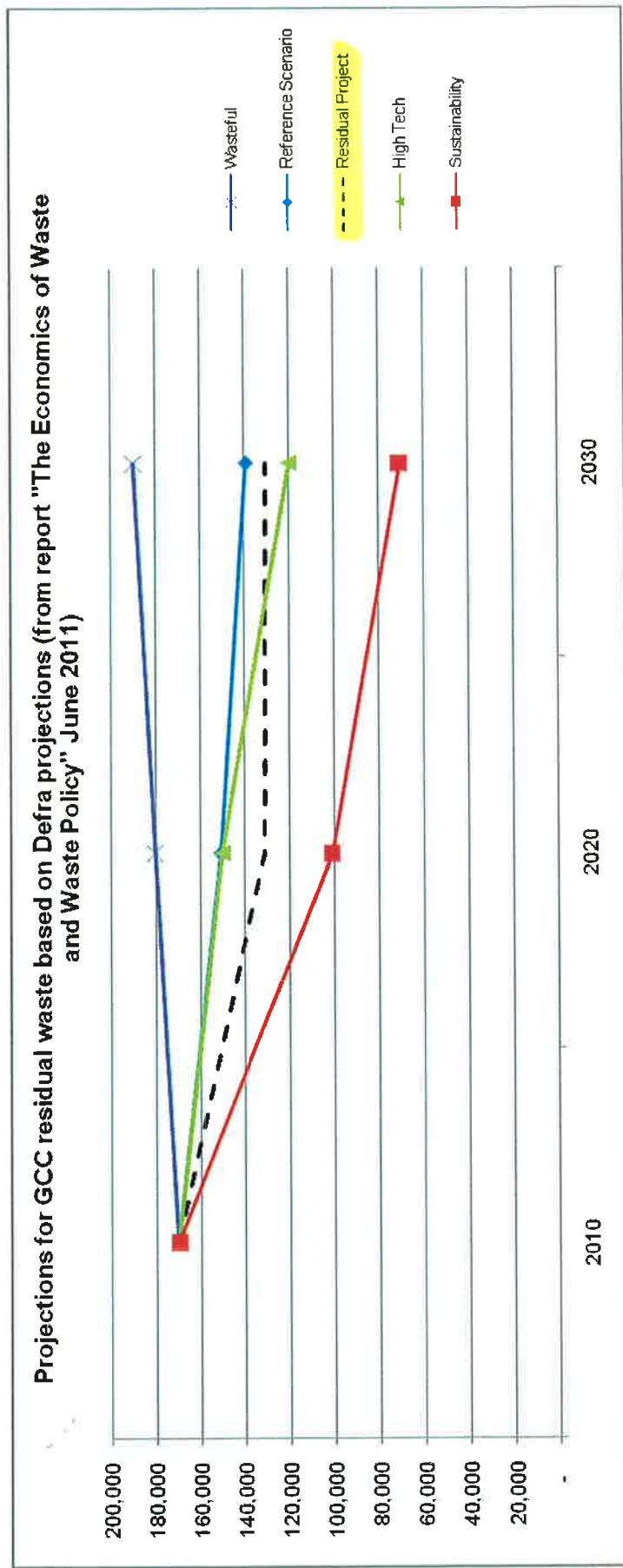
Agenda Item 2

Residual Waste Project – Selection of Preferred Bidder

Cabinet Date	14 th December 2011
Finance and Change	Councillor Ray Theodoulou
Key Decision	Yes
Background Documents	To approve the business case for Residual Waste Procurement, 23 rd April 2008. Residual Waste Contract – Competitive Dialogue Evaluation Framework, 19 th November 2008. Residual Waste Project – Selection of Bidders to be Invited to submit Detailed Solutions, 16 th December 2009. Residual Waste Project – Strategic Re-appraisal, 16 th March 2011.
Main Consultees	Waste Project Board, Environment Scrutiny Committee, Gloucestershire Waste Partnership and stakeholders including Gloucestershire residents through the consultation exercise in summer 2008.
Planned Dates	Contract award in summer 2012
Divisional Councillor	All
Officer	Jo Walker, Director Strategic Finance (01452 427492; joanna.walker@gloucestershire.gov.uk) Ian Mawdsley, Residual Waste Project Lead (01452 425835; ian.mawdsley@gloucestershire.gov.uk)

Purpose of Report	To select a preferred bidder for the Residual Waste Project.
Key Recommendations	<p>(a) endorse the selection of the preferred bidder subject to satisfactory agreement of the letter of appointment;</p> <p>(b) authorise the Director Strategic Finance following consultation with the Cabinet Member for Finance and Change to agree the preferred bidder letter of appointment; and</p> <p>(c) subject to (a) authorise the Director Strategic Finance to continue with the clarification and confirmation of commitments required to finalise the contract with the preferred bidder, develop final documentation, and report back to Cabinet to seek authority for contract award.</p>
Resource Implications	Resource implications remain within the resources and affordability approved by Cabinet on 23 rd April 2008. There is an increased cost risk in the event the project does not proceed.

Residual Waste Projections



Wasteful	Unlimited Wastefulness characterised by a lack of action and an increasing waste intensity. (Overall intensity and arisings increase strongly due to an early period of economic stagnation)
<i>Reference scenario</i>	Business-as-usual. (The scenario assumes current trends to continue).
Residual Project	GCC's residual waste forecast (high recycling rates reaching 70% by 2030)
High tech	High-Tech/Large-Scale Solutions where technology is the key to dealing with waste issues. (High tech approaches are regarded as the key to solving waste and resource problems, rather than a shift in behaviours).
Sustainability	Sustainability Turn driven by societal decision and behaviour change to go green. (The entire nation (society, industry and politics) opts for deep green).

APPENDIX 6

Table N 4: South West results by WPA and Waste Management Method (tonnes), 2009

WPA	Landfill	Land recovery	Thermal treatment (energy recovery)	Thermal treatment	Transfer station	Non-thermal treatment			Recycling	Composting	Reuse	Unknown	Total
						1,936	5,074	49,322					
Bath & NE Somerset	29,513	359	366	2,191	5,074	1,936	49,322	2,047	2,361	5,654	98,823		
Bournemouth	24,539	68	359	2,535	4,429	1,392	36,075	740	1,068	5,026	5,026	76,232	
Bristol, city of	90,309	7,160	10,176	9,630	14,144	11,147	133,386	4,830	7,512	15,767	304,059		
Cornwall	84,727	6,627	5,082	16,793	14,640	18,713	172,666	12,466	11,926	20,676	364,315		
Devon	116,248	17,403	5,031	15,579	24,388	21,553	218,338	9,390	18,071	27,508	473,509		
Dorset	59,504	9,649	2,402	8,285	12,209	16,987	113,289	1,667	8,790	108,917	341,698		
Gloucestershire	114,203	26,864	6,973	9,503	22,573	54,851	209,976	4,969	12,303	63,974	526,188		
Isles of Scilly	379	0	3	25	89	10	683	7	5	118	1,320		
North Somerset	29,529	5,388	2,284	4,189	5,239	5,991	59,461	2,221	3,158	5,969	123,430		
Plymouth	48,998	1,641	1,772	4,254	6,916	4,309	72,616	6,801	3,259	7,108	157,672		
Poole	25,881	1,127	514	2,290	5,566	2,804	85,279	3,583	2,969	5,646	135,659		
Somerset	122,291	49,942	11,229	10,818	19,976	21,101	193,836	6,993	12,350	40,062	488,596		
South Gloucestershire	53,784	2,767	934	7,596	7,831	14,091	102,737	2,116	3,057	13,741	208,654		
Swindon	37,336	1,049	1,123	7,137	6,423	6,967	89,035	3,374	3,153	9,089	164,687		
Torbay	19,402	2,253	1,121	3,415	2,751	3,763	28,266	2,218	1,496	3,958	68,642		
Wiltshire	77,578	6,418	5,432	11,102	12,929	11,300	131,112	3,716	7,508	19,987	287,084		
Total	934,218	138,715	54,803	115,340	165,177	196,915	1,696,077	67,139	98,985	353,200	3,820,568		

Notes:

Table produced from results of the Survey of Commercial & Industrial Waste Arisings 2010, more detail is available online at:
<http://www.defra.gov.uk/evidence/statistics/environment/waste/wrindustry.htm>

Appendix 6: Table N4 of DEFRA Survey Split into the Waste Hierarchy

Row No.	Waste Category	2009 (t)
1	Re-use	12,303
2	Composting / Recycling	214,945
3	Recovery & Treatment	98,191
4	Landfill	114,203
5	Transfer Station	22,573
6	Unknown	63,974
	TOTAL	526,189

Notes:

- Row 1 = Re-use column in Table N4
- Row 2 = Composting and Recycling columns in Table N4
- Row 3 = Land recovery, Thermal and Non-thermal treatment columns in Table N4
- Row 4 = Landfill column in Table N4
- Row 5 = Transfer Station column in Table N4
- Row 6 = Unknown column in Table N4

APPENDIX 7

22nd October 2010

West of England Joint Waste Core Strategy

Statement of Common Ground

Between

The Partnership Authorities comprising, Bath and North East Somerset, Bristol City, North Somerset, and South Gloucestershire Councils.

and

Gloucestershire County Council.

1. Introduction.

1.1 This statement of common ground relates to the representations made by Gloucestershire County Council to the pre-submission (publication) draft of the West of England Joint Waste Core Strategy (JWCS).

1.2 The Partnership Authorities responded to the representation from Gloucestershire County Council and further discussions took place on 1st September 2010.

1.3 This statement of common ground sets out the areas subsequently agreed by the Local Planning Authorities.

2. Background

2.1 A summary of the representation from Gloucestershire County Council is provided below:

2.2 General approach

2.2.1 Gloucestershire County Council supports the proposals to ensure recovery and recycling targets and that the JWCS acknowledges that there will still be a role for new disposal capacity over the plan period. However, it is not clear as to how this landfill provision will be made, Gloucestershire County Council contends that the policy for landfill provision is not clear and not particularly proactive. Therefore unsustainable practices of exporting waste for disposal could potentially continue as recognised at paragraph 6.10.4 of the JWCS.

2.2.2 Gloucestershire County Council has stated that it is not clear how the landfill policy 8 will be implemented, in terms of prioritising brownfield land.

2.3 Identification of sites

2.3.1 Gloucestershire County Council suggested that the JWCS could identify sites/areas of search to be identified in a landfill DPD.

2.4 Hazardous waste

2.4.1 Gloucestershire County Council has suggested that the JWCS submission document is lacking a policy on hazardous waste, and seems to be reliant upon provision being made for hazardous waste elsewhere in the South West.

3. **Matters subsequently agreed.**

3.1 General approach

3.1.1 Both parties agree that the JWCS clearly sets out that there is a requirement for additional landfill capacity within the West of England to meet its own needs over the plan period to 2026.

3.1.2 The Partnership Authorities acknowledge that the practice of exportation of waste to disposal is not a sustainable option and are committed to meeting their own needs over the plan period (JWCS para 6.10.4).

3.1.3 Both parties recognise that whilst not a wholly acceptable approach, the practice of exportation of waste to Gloucestershire for disposal to landfill may continue to occur in the short term, until new provision is made in the West of England. It is understood that whilst Gloucestershire County Council is not as constrained by lack of capacity in the short term, both parties agree that the exportation of waste to landfill cannot be a long-term solution to dealing with the non-treatable residues of West of England's waste. The Topic Paper produced for the Inspector on "Future Capacity Requirements" contains phased requirements for landfill over the plan period. Both parties suggest this information is included in the schedule of changes to the JWCS, at the monitoring section, to ensure the provision of landfill is effectively monitored and managed.

3.1.4 Over the plan period as additional provision for landfill/landraise is made in the West of England, and with continued engagement and co-operation between the LPAs; it is expected that the practice of exportation will be avoided.

3.2 Identification of sites

3.2.1 The approach taken by the Partnership Authorities in the JWCS is a criteria based policy. Whilst this has not allocated sites, as preferred by Gloucestershire County Council, this approach is agreed by both parties to potentially identify areas of search for landfill by setting out those areas that are unsuitable because of environmental or policy constraints and considering the rest of the plan area as, in effect, a potential "area of search". If the intention by the Partnership is that these remaining areas are an 'area of search' Gloucestershire County Council recommends that the JWCS make this clear in the policy and text. The Partnership Authorities consider that the JWCS achieves the same aim by setting out broad locations and would agree that the proposed clarifications can be made.

3.2.2 The Partnership considers that, through a call for sites and extensive consultation, it has proactively sought suitable locations, as updated in the Landfill Review Paper May 2010. Gloucestershire County Council still has some concerns of whether enough investigation has occurred but both parties agree that there

should not be a time delay in the adoption of the JWCS. The Partnership considers that there is a clear mechanism identified in the JWCS for identification of landfill provision underpinned by robust monitoring that will identify if any necessary intervention is required (for example which may lead to a review of the JWCS, either in whole or part). Gloucestershire County Council does not agree on this or how the criteria within Policy and other concerns relating to Landfill are outlined in their additional written representation.

3.3 Hazardous waste

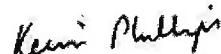
3.3.1 The Partnership Authorities have, in their changes to the submission document of the JWCS, clarified, at paragraph 6.10.11, that policy in the JWCS is appropriate to consider proposals for both hazardous and non hazardous waste. However, the evidence base did not highlight hazardous waste management as an issue for the plan area, with anticipated arisings remaining broadly constant across the plan period and comprising a relatively small amount of the waste arising in the West of England. The policy context for hazardous waste is also dealt with at national level and therefore the Partnership Authorities do not consider there to be any policy imperative to repeat policy in the JWCS. Acknowledgement is made in para 6.10.10 that policies 8 and 9 also apply to proposals for hazardous waste disposal facilities in the Plan area.

3.3.2. Gloucestershire Council still has some concerns as to whether the JWCS contains sufficient provision for treatment/recovery of hazardous wastes which may arise from the envisaged provision for waste recovery facilities such as those which may come forward under Policy 5 or as otherwise submitted (i.e. recent proposals for thermal/biomass energy generating plants in the Avonmouth/Severnside area). Gloucestershire County Council has some additional concerns which are outlined within their written representation.

4. Agreement

On behalf of Gloucestershire County Council:

Name: Kevin Phillips, Minerals and Waste Policy Manager



Signed:

Date: 22.10.10

On behalf of the Partnership Authorities of Bath and North East Somerset, Bristol City, North Somerset, and South Gloucestershire Councils:

Name: Ian Collinson Head of Planning, Housing & Infrastructure



Signed:

Date: 22.10.10.