



## Gloucestershire Waste Core Strategy Hearing

Written Statement for Session 2,  
Issue 2: Whether the statistical basis for the CS is robust and  
justifies the vision and the strategic objectives

Tuesday 31<sup>st</sup> January 2012

Statement by Land & Mineral Management Limited on behalf of  
Smiths (Gloucester) Ltd

Reference: Issue 2/767/Smiths

1. Smiths (Gloucester) Ltd is a local, independently owned business which is one of the main waste operators in Gloucestershire and handles all types of wastes including a substantial proportion of the Construction, Demolition and Excavation (CD&E) waste in the County.
2. Smiths, whilst acknowledging that a substantial amount of work has gone into the C&D figures in the CS, are concerned about the accuracy and robustness of the figures and that as a consequence the CS will not assist in providing adequate provision for the CD&E waste stream. Smiths have not been able to undertake a full breakdown and analysis of the CS figures and all the accompanying technical reports but make their comments from direct experience of dealing with the CD&E wastes in Gloucestershire. It is known that other operators in this field share their concerns.
3. Waste figures appear to be difficult to produce with any degree of accuracy particularly in the field of C&D wastes. Although the WDI is acknowledged as one of the best sources of waste data it does not collect:
  - Non-regulated facilities;
  - Facilities with exemptions from regulation;
  - Facilities with no requirement to report waste throughputs/capacityThese are typically are the routes for much of the C&D material and hence a large element of this waste stream is not accounted for.
4. Reviewing the documentation of the CS, Smiths has concerns about the dependability of the figures. The headline figures in the WCS represent 300,000tpa for C&D waste through 'licensed' sites with the majority of this to landfill.
5. Smiths alone in 2010 handled more than 300,000 tonnes of C&D waste. The majority of this was either recycled, recovered or was dealt with at sites exempt from holding an Environmental Permit. It is doubtful that any of this material is recorded on the WDI.



6. A further illustration of very concerning variations in figures for this waste stream can be seen by looking at the Capita Symonds report of 2007. For Gloucestershire the report refers to estimates of C&D waste in 2005 with approximately 100,000t going to landfill and 300,000tpa going to exempt sites for disposal, this compares with a figure of approximately 200,000tpa to landfill in figure 6b of the Gloucestershire trends 1999 to 2005.
7. The CS does acknowledge the difficulties in identifying figures but my client remains deeply concerned about the manner in which the unaccounted element is dealt with in exempt sites. The CS believes that there is over capacity for this waste stream, and states it is being proactive by providing for further capacity to help divert this material. Smiths disagrees with the comment on over capacity and considers this mistake has arisen because of an underestimation of quantities. Smiths in dealing with waste stream is having to take substantial quantities of this material out of the county.
8. Smith realise estimating capacity is difficult. To imply there is sufficient capacity leaves the underlying question as to why a large element of this is apparently underused and itself demonstrates it is a misleading assumption. This can be down to problems estimating the capacity; exempt operations with limits are often being 'banded' by the EA in round figures with quotes of 50,000t of material for storage and often this 'capacity' is simply not the reality on site due to other constraints. The technical paper on data refers to a theoretical over capacity which it then the council states that it does not believe there is over provision. This does seem to highlight a fundamental issue with the figures.
9. In addition to practicality of capacity issues there is the issue of the suitability of the nature of the C&D waste for treatment as much excavation material has severe limitations as to its usage.



10. The CS largely believes the exemption situation will address itself, noting exempt operations often as short term operations being difficult to plan for. As this represents a large proportion of the C&D waste stream Smiths deals with they consider this is not a satisfactory basis for forward planning.
11. Looking at some of the figures on exemption capacity many sites are finished or scheduled to finish in the near future. This notwithstanding sustainability issues of the location of the arising of the material and its use in exempt sites, arisings in the centre of the county and the majority of the exempt sites remotely located in the Cotswolds.
12. Looking at the exemption lists Smiths queries the accuracy given that the list includes a Smith's site which had its exemption removed in Spring 2007.
13. Furthermore the core strategy makes no reference or allowance for the diminishing number of sites which will operate under exemptions as they are being phased out. As fewer exempt sites exist, both to manage the long term deposit of materials either for restoration (para9) or for creating of screening bunds etc (para 19) , and also exempt sites which treat and recycle inert wastes (para 13), the CD&E waste will be directed toward the small number of permitted sites across the County
14. Notwithstanding issues of access to information, with the foregoing comments clearly it is not possible for Smiths supply alternative figures. However they do feel that the position is not one of over capacity for this waste stream and this should be reflected in the text in the CS with appropriate qualifications/caveats, particularly so with a requirement only for only an additional 85,000t (top figure) diversion from landfill which is not an accurate reflection of the true requirements of capacity for the C&D waste stream. Smiths consider that provision of 'over capacity' would not have a damaging effect as it will only come on stream when required by the market and with the current market conditions Smiths maintain that this would be a sensible position to be



in. However with under provision there will be an adverse impact with material being unnecessarily landfill which in turn occupies void space designated for other wastes. Additionally under capacity does drive waste towards situations of fly tipping on illegal sites.

