

25th September, 2009

Suffolk County Council,
Minerals and Waste Policy Team,
Endeavour House,
8 Russell Road,
Ipswich,
Suffolk, IP1 2BX

Attention of Mr G. Gunby

Dear Sirs,

Waste Core Strategy (Final Consultation) 2009

Thank you for including the Society in the above consultation, now in its final stage, to contribute to the County Council's draft waste planning policies before a final version of the document is drawn up for submission to the Secretary of State. We understand that comments made by us and others at that stage will be submitted alongside the document for consideration as part of the Examination in Public.

The Society submits **in bold** the following comments for consideration on some parts of the document.

Before proceeding to the main policy sections we would single out **two** points which, in the Society's view, influence the document to the detriment of the environment.

Point 1.

1.24 Example: Western Suffolk Draft Community Strategy 2006 – 2016
..... The key priority relevant to the Waste Core Strategy is as follows: - *to protect our natural and built environment and local biodiversity and ensure sustainable development.*

The word 'protect' is key. This document has used 'minimise the effect of' which is not the same a full protection, it is merely a 'mitigating measure'. There will be a need, in some sensitive cases, for total

protection. This point runs throughout the document and the above example shows that should not be lost.

Point 2.

1.35 Example: Suffolk Community Strategy 2008 – 2028

The Suffolk Community Strategy embraces four fundamental themes. The Waste Core Strategy has relevance to two of these namely: *A prosperous and vibrant economy. 'The Greenest County'*.

Whilst both these aspirations are commendable, they typify the problems which arise from trying to serve both the economy and the natural environment. It is difficult within the recently changed planning guidance to deliver policy that is green, sustainable and gives appropriate protection for the natural environment when these are pitted against strong economic considerations. The economy, backed as it usually is by industry, has the stronger hand, and other policies are often given lesser weight with the result that environmental concerns are subordinated.

There is emphasis in the sustainability appraisals on the economic benefit being a 'positive factor', which it is, but when set against harm to the environment it gives a 'neutral' instead of a 'negative' outcome. The first cancels out the second. This matrix skews the outcome and tips the scales in favour of development, sometimes having a negative impact on the countryside.

Chapter 4. Waste Management Requirements

4.5 Policy WM3 for the East of England Plan requires each Waste Planning Authority to cater for a proportion of imported waste, which is London's waste. ... landfill only practicable option.

London waste (ie: municipal solid waste, commercial & industrial waste and London waste), we understand, is about 12 per cent at present. (We are not sure if this includes construction and demolition waste, and any building waste as a result of the 2012 Olympics.) Post 2015 provides only for handling treated waste "for which landfill is the only practicable option". As landfill is nearly at an end it is not clear how the County intends to dispose of it. Land-raise is not favoured because of environmental considerations and the Society would not support it, and incineration plants are unsustainable, creating one-third more CO2

than gas-fired power stations. By what method will Policy WCS1 manage this waste? Although it is unclear it appears it would go to incineration?

Chapter 6. Specific Sites identified for Strategic Residual Waste Treatment Facilities by SCC

Most of these sites have some draw-backs for various reasons and whilst the Society appreciates that waste is a practical problem, and needs to be correctly dealt with, it will not be without loss to the environment because it is often an unsustainable process. Industry, construction and the public need encouragement to reduce waste, and county and district councils need to provide a consistent approach to providing kerbside collection for all categories of household waste which cannot be disposed of at source through composting, etc. Kerbside collection is more sustainable as it lessens the need for people to drive to disposal sites, and it also discourages fly-tipping in the countryside. It is apparent that people will not pay a commercial rate for contractors to take away unwanted furniture and white goods.

The Society has had its attention drawn to several sites with specific problems but it would reiterate the cases of Shepherds Grove, Stanton and Masons Quarry, Great Blakenham. In connection with the former complaints have been received regarding the disposal of waste not suitable for that outlet and being left abandoned on footpaths around the site causing nuisance. So there is a sorting problem at this site which needs urgent attention. In the case of Masons Quarry there are still outstanding matters regarding the protection of wildlife species, and in particular the Great Crested Newts, which we understand cannot easily be re-established elsewhere. It would seem late in the day for a protected amphibian, to be discussing its continuance at the planning application stage, when its fate is likely to have been sealed.

Chapter 7. Specific Sites identified for Non Hazardous Landfill Site W7: Layham Landfill Site

The Society supports fully the general concern at this site over increased environmental and highway impacts caused by any change in the category of waste permitted at this location being situated close to the Dedham Vale AONB boundary and surrounded by special landscape areas. A planning condition prevents the disposal of dedicated

household waste here. It is an attractive, rural and mainly tranquil area, and any change which increases the use of this site, not at present allowed under the existing planning permission, should not be permitted. Its situation close to a nationally important designated area should safeguard this area's future.

Chapter 8. Development Management Policies
Non-hazardous landfill

8.8 The need to protect major aquifers and sources of water abstraction is a major constraint on identifying sites that are suitable for non-hazardous landfill in Suffolk.

Most of Suffolk overlies a major aquifer that provides most of the drinking water for the County. In view of the importance to protect future water supplies where landfill or landraise is identified, and particularly with reference to Appendix 11 and the Environment Agency's comments, it would seem appropriate to include wording in Policy WCS7 which sets out *protection for vulnerable aquifers, and does not impact or create harm to the environment.*

At Policy WCS8 Residual Waste Treatment facilities with a capacity of less than 100,000 tonnes annual throughput

As residual waste is waste that is not recycled or composted, and has traditionally been buried in the ground at landfill sites do we assume that this waste is identified for incineration plants?

Whilst it is stated that the recovery of energy will be 'encouraged' from incineration it is also understood that incineration plants generating large amounts of carbon dioxide and other emissions such as nitrogen oxide, sulphur dioxide and ash is not good for climate concerns. This policy needs to be clearly explained – for example how will *encouragement* for the recovery of energy be carried out?

Incineration is a quick fix, will burn practically anything, but also has potential energy recovering benefits. However, it is not a sustainable way forward, so it is not a beneficial policy unless there are guarantees that a sustained energy source will become a reality without harm to the environment, and that the life of incineration will be short until more

sustainable disposal methods are established. The Society supports a waste policy governed by a hierarchy which places in order of priority *waste minimization, re-use and recycling, and lastly disposal by incineration and landfill.*

There is also a danger that material will be needed to feed an incineration plant 24/7, to make it a profitable investment, and this in turn may encourage other types of waste to be fed into it that might otherwise have gone to a more sustainable disposal route, or the importation of waste from other areas with resulting lorry miles.

At Policy WCS9 Waste Transfer Station, Materials Recycling Facilities etc.

This policy would be more clearly understood if it made it plain as to whether it is talking about *new buildings/plant* on sites (a) – (e) when it talks about ‘facilities’. This also applies at Policy WCS3 and in other parts of the consultation document, ‘facilities’ needs to be qualified in all areas of the Consultation, to make it plain as to whether or not a suitable building already exists on the site.

Composting Facilities

According to the Environment Agency, if households, where appropriate and possible, composted their own kitchen vegetable and green waste, the quantity of household waste could be dramatically reduced without significant harm to the environment. Furthermore there is scope for local and small scale composting facilities to take waste from those households without gardens, and it is widely recognised that these facilities can reduce transport significantly. Community projects of this kind are currently not supported or encouraged. Whilst a point of detail, do the public need to be made aware of this when collections are made from householders?

Policy WCS13 Anaerobic Digestion

It is understood that anaerobic digesters decompose material (food and garden waste) more quickly than landfill and the gas emitted can be used to produce local heat and light. If it is appropriate, in planning terms, to a farm complex for example, to have a digester as part of its enterprise which can also give back energy to the site and surrounding

buildings, so much the better. The strategy to seek to encourage anaerobic digestion in appropriate locations is welcomed but the policy will need to ensure that it is not used to encourage material being carried through the countryside to enable it to operate at full capacity (we understand that AD needs a constant flow of waste to work efficiently) at the expense of other environmental considerations. As the end product can be used (mixed with other compost) for fertiliser for the land this would appear a sustainable disposal route, if well sited.

Agricultural land should not be used to ‘feed’ an anaerobic digester in order to keep it going, when the land is vital for feeding the nation.

Policy WCS14 Recycling or transfer of inert and construction, demolition and excavation waste

As you state at 8.24 a considerable amount of waste generated in the County originates from construction, demolition and excavation activities. Government policy needs to reflect *sustainable building* through the re-use and adaptation of older buildings first before automatically requiring new build, where possible, and this in turn should filter down to reduce demolition waste. However, the new draft PPS15 does not appear to support this. Significant reductions in end of building life waste can be effected by careful choice of materials, and whilst this is currently a specialised area, tax incentives and better education would provide significant cost benefits in the longer term. Greater emphasis needs to be placed on this issue at planning application stage. In 2002/03 the UK produced around 330 million tonnes of waste and the vast majority of this was construction and demolition waste, most of which went to landfill.

Encouragement should be given to local authorities to ensure that policies are included in their local development plans for new housing, commercial and other developments, to include recycling facilities through the use of planning conditions.

At the end of this Policy it refers to construction disposal within ‘purpose-designed facilities’ – what does this mean – is it referring to incineration plant? If so, how many incineration plants does the Authority consider appropriate for Suffolk? Will this material have to

travel, or is there scope for small incinerators spread more widely to prevent long distance travel and serve the areas in which they are built. The Society asks that any proposals for new incinerators or landfill sites only follow after full exploration of waste minimisation, recycling and composting options have been exploited first.

Waste Water Treatment Plants

Policy WCS15 Waste Water Treatment Plants

This Policy might be clearer. ‘Unacceptable environmental impacts’ needs to be further explained in this context. Perhaps a note in Appendix 6: Glossary would be helpful.

Nuclear waste

Policy WCS16 Treatment, storage and disposal of Low and Very Low Level radioactive waste at Sizewell nuclear power stations

“Facilities for the treatment, storage or disposal of LLW or VLLW generated at Sizewell nuclear power stations will be acceptable with the Nuclear Licensed Area at Sizewell where: - Facilities are located and designed in order to minimise adverse impact on the environment.”

What is being proposed at bullet point 3? Does “facilities” mean a new specialised treatment and storage plant for the disposal of low-level radioactive material? Before this is undertaken will consideration be given to existing suitable site buildings like the turbine hall basement space at Sizewell A, where it is understood that low level waste could be safely stored, and would be a sustainable use and avoid further build on the site. This Policy needs to be developed to be more clearly understood by stakeholders and the general public, and an explanation of what Low Level Radioactive Waste consists of – like gloves and paper that has come in to contact with low-level contaminated material. This explanation could be added to your Appendix 6: Glossary.

Managing Intermediate Level Waste and Spent Fuel

Policy WCS17 Treatment and storage of Intermediate Level radioactive waste and spent fuel generated at Sizewell nuclear power stations

This Policy needs to separate ‘Intermediate Level radioactive waste’ from ‘spent fuel’, as they require ultimately separate and different

processing. ‘Spent fuel’, we understand, should go to a custom designed national depository (in the THORP thermal oxide reprocessing plant) at Sellafield. As it stands, this Policy will not be acceptable.

Sustainable Construction and Demolition, Climate Change Mitigation and Adaptation, and Design of Waste Management Facilities

8.52 This policy seeks to facilitate the efficient use of resources by promoting the principles of sustainable construction. This embraces waste minimisation, re-use and recycling during construction and demolition, together with the use of recycled and secondary materials during construction and design principles that maximise the sorting, recycling and composting of waste arising from the use of the development itself. This policy is intended to be used primarily by District Councils during their consideration of development proposals.

The Society supports fully the waste minimization hierarchy.

Policy WCS19 Sustainable construction and demolition

Bullet point 2 ... Design principles and construction methods **“which embody low carbon living technology and materials, both inside and out” and minimise the use of ...** could usefully be added to help the direction of this Policy.

Policy WCS20 Climate change mitigation and adaptation

Bullet point 2... Be planned so as to minimise carbon dioxide emissions ... **is not explicit, and may give little reduction. This Policy could be strengthened by saying ... Be planned to embrace the potential to harness natural energies, both in the design and servicing of the buildings, minimise embodied energy and running costs using carbon neutral energy sources.**

Bullet point 4 Take account of potential changes in climate. **This point should create responsibility – perhaps it could read ... Plan, monitor and manage for potential changes in climate.**

Policy WCS21 Design of waste management facilities

Whilst this Policy is dealing with design the Society considers that the insertion of the words in bold below would give sustainable guidance.

Waste management facilities will be considered favourably where they **are environmentally well located, and** incorporate:

It is environmentally sound to reduce the amount of bio-degradable waste going to landfill sites, in line with the Landfill Directive. The provision of new landraise sites and waste incineration plants should be strictly limited, and dependent on the local authorities having achieved demanding targets for waste reduction and recycling. However, whilst there has been progress in delivering results much municipal waste, we understand, still ends up in landfill sites.

Government needs to provide strong leadership to ensure that waste reduction is seen as a priority by local government, business and individuals, and whilst work has been done in this area, challenging targets for waste minimisation should continue to be pursued. More is required of the retailing and manufacturing sector for the discouragement of over-packaged goods. Encouragement, where available, for 'locally purchased' food (that which avoids the food packaging distribution chain), and food wastage, particularly at supermarkets, would aid this process.

Society is dealing with the end result of waste – its creation in the first place must be addressed if we are to become sustainable as a nation. The Society asks to be kept informed on the draft Waste Core Strategy. Thank you for your consideration of these points.

Yours sincerely,

Linda Clapham
Suffolk Preservation Society

cc: SPS Trustees/Executive Committee

