

Notes from Waste Minimisation Training Session February 27th 2007

Comments from Workshop 1:

Assessing an example of a waste statement against the SPD checklist

Table 1

The WMS is fairly comprehensive, but in certain places, under certain headings it is a bit vague.

The waste statement would be much easier to read and an assessment of it made much more easy if it were set out following the format of the checklist on page 6 of the SPD. Evidence of repetition because of the confused layout.

The WMS is particularly vague on the issue of the reuse of materials on site. Not enough information has been provided.

The WMS is very detailed on certain aspects (e.g. Waste storage boxes) where perhaps the information is easier to provide. e.g. paragraphs 2.5 – 2.6 waste storage where Building Regulations documents have been followed and discussions taken place with the Waste Collection Authority in respect of their particular requirements and methods of collection.

The development is of a significant size, (80 residential dwellings / 2 blocks of 10 flats / 1000 sq. m of office floor space / 6 retail units / community centre) the WMS could have included more information on all aspect of waste minimisation in the development – proportionate to its size and how much waste will be generated.

Even though these requirements are potentially putting more pressure on DC Officers who have yet another checklist to deal with. The SPD is a good start for Gloucestershire as these requirements are coming through anyway via national legislation and national and regional policy.

Table 2

Generally the statement was considered to be okay.

Identify client or contractor responsibilities for producing WMS – should the author have minimum qualifications?

Balance between general issues and specifics is difficult to judge. In the case of this example, there is a mixture of general and specific issues, but it is not easy to determine a suitable mix in all cases. This would improve as experience is gained over time.

Some evidence of individual (site specific) thought in the statement, but could be a bit 'off the shelf'. There is a danger that this could be a tick-box exercise if WMS's are not case specific.

How will they prove that they will do what they say? – What records are required to be kept? Monitoring and enforcement processes – It may be appropriate to use building control officers to assist in monitoring implementation.

Construction/demolition tonnages.

Difficult to understand where these came from (are they estimates?). To what extent are we concerned with accurate data and how close to actuals should estimates be?

The statement needs to be a living document – it should move with the process and be updated to reflect changes in circumstances.

The statement should concentrate on priority materials. Follow the 80:20 rule.

Table 3

The statement addresses the issues in the SPD.

General Comments about SPD: Incorporating recycled materials maybe an issue in developments in Conservation Areas/involving Listed Buildings i.e. the suitability of recycled products.

Concerns raised regarding enforcement: Manpower needed to properly ensure that the statements are implemented. Who will audit the sites? Skills gap in-house – e.g. is 30% recovery target enough, in some developments yes but others it may not be. Therefore how do we know when rates are too low and we should push for higher rates? How do you enforce the recycling targets which aren't reached?

Possible solutions: Monitor 1 in 10 developments, condition the approval of specific recycled materials rather than referring to targets.

Concern that this yet another requirement for applicants to factor into their developments but agreed that Planners are in a good position to raise awareness

Concern that Planning could be overlapping a Building Control function.

The types of design/layout solutions required, as highlighted in Carlos Novoth's presentation, are clearly related to Planning and are very tangible/practical measures that can be incorporated into new developments to help minimise waste.

Table 4

The example statement is generally OK, appears to reflect requirement of the SPD.

Weak on the operational and occupation aspect.

The architect needs at initial stage of design consider issues of waste minimisation

Statement indicating that targets and actions will be carried out "where possible" should be avoided as it becomes too easy to not deliver.

It could include more details about waste minimisation related to the specific layout of the proposed development

Design and Access Statement – aware that applicants are required to submit a lot of supporting information - waste minimisation information could be requested as part of the statutory design and access statement.

Concern becomes generic – group was concerned that applicants would submit bland non-specific statements - need to emphasise that the statement fully reflects the proposed development.

Skills to assess content – officers were concerned that they didn't have requisite skills to assess the quality of the statement, as they are not waste planners.

Applicants may challenge the need for this information at appeal.

Delays due to need to re consult on application. Need to be careful that the requirement for this information doesn't result in delays

Enforce – there was concern that aspect of this and other statements may be difficult to enforce and monitor.

10% recycled material by value - Cost is a key issue as applicants are likely to be resistant if there is significant cost implications

Applicants for smaller developments may find this a greater burden but cumulatively small development can give rise to considerable waste and is as important to require statements on small sites as it is on larger developments.

Comments from Workshop 2:

Including a revised waste minimisation policy in the emerging Waste Core Strategy

Table 1

The group considered that WLP Policy 36 was a reasonably good policy in itself. There was not a great deal lacking in it and not too much to be added or changed. However the problem at district DC level was that the policy was just not used. If County level policies were referred to it was generally those in the Structure Plan. Generally there are so many policy considerations (even in the district local plan) that this policy is often overlooked or not considered.

Policy 36 requires a scheme for the sustainable management of waste during the construction and occupation phases. The design stage needs also to be addressed.

The policy is aimed at all development i.e. anything requiring planning permission. The question was asked: Is this realistic? The SPD introduces a threshold to deal with this issue but it is not in the policy to which the SPD is supplementary.

Table 2

The policy could emphasise greater use of recycled materials

Could use two separate policies: one for bigger developments and one for smaller developments.

Emphasise waste hierarchy – use additional text to explain

Define thresholds/targets within body of text. Provide an overview of SPD targets, but refer to main SPD document for detail.

Make sure whole life of building is included - planning, design, construction, occupation, and demolition.

Clarify term 'raw material'. Does this mean just virgin material or should it include recycled raw materials too?

Table 3

The policy should include a commitment to "demonstrate" recycling/re-use etc

The policy should include a target or a percentage to aim for.

Concern about phrase 'minimise use of raw materials'. What does this mean?

The policy doesn't consider energy implications of recycling. It should emphasise on-site waste management

Should emphasise design and layout in the policy and infrastructure e.g. communal composting

There are different local priorities across the County and different districts will attach different weight to this policy. Some district's may give more weight to other factors e.g. securing provision of open space in developments rather than recycled materials.

Table 4

The policy is too vague - targets may make policy more effective and easier to enforce though it was noted that targets can be difficult to attach and could make the policy outdated quickly. (see comments below re targets)

Add a Pre/Design Stage – spell out in policy the respective stages of development where waste minimisation should be considered i.e. design, development, occupation.

Policy should be redrafted to state that there is a presumption in favour of development which demonstrates waste minimisation. If applicant doesn't provide such evidence the onus is on them to justify why they're not minimising waste. Ensure that the onus is on the applicant to fully justify not re using materials/building on site or meeting targets.

SPD and policy to state specific targets for:

- Brownfield
- Greenfield
- Type/Scale of Development

Policy should make it clear that waste is a resource to be used. The word resource is more positive as apposed to waste, which is considered negative.

Positive / Proactive specific awareness buy in – Overall Green Policy

General point - professional, developers, applicants, councillors need to be trained and educated to ensure policy is properly implemented.