Issue No: 2
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ISSUE 2 – WHETHER THE STATISTICAL BASIS FOR THE CS IS ROBUST AND JUSTIFIES THE VISION AND STRATEGIC OBJECTIVES

Question 1: Statistical base: Municipal Solid waste

1. The assumption that MSW will increase appears to be based on the belief that waste growth is an inevitable consequence of population and economic growth (See CD1.1 Key Issue 1). Recent evidence from DEFRA however points to the contrary. Between 2000-1 and 2008-9, UK household waste per person decreased by 5.1 per cent. This trend has continued, and between the financial years 2009/10 and 2010/11, UK household waste decreased by a further 0.9 per cent. More striking is the overall decrease in waste. In the UK, in 2008, total waste generation was estimated at 288.6 million tonnes (mt). This is a decrease of 6.0 per cent from 2006 (307.1mt) and 11.3 per cent from 2004 (325.3mt) (DEFRA, 2011).

   Between 2004-2008, the UK population grew from 59.8679 million to 61.3935 million, an increase of 1.5256 million, or 2.54% (World Bank, 2011). Over the same period, economic growth in the UK increased by 8% (ONS, 2011). Yet, far from driving up waste levels, these fell over the 4 years by 11.3%. The empirical evidence therefore indicates an unshackling of waste growth from population and economic growth. This is not reflected in the modeling undertaken by GCC to predict future waste levels, which we believe are too high and should be reduced.

2. Waste predictions within the WCS assume a 60% recycling and composting rate by 2020 and an aspiration for 70% by 2030. We contested these in our previous submission, but believe that new evidence makes our case stronger:

   - Firstly, we have been told that the projections and estimates are not based on an analysis of the composition of MSW waste in the county. We would contest that if you do not consider what is in residual waste you cannot estimate how much of that is recyclable or compostable. Incidentally, the last analysis of content of Gloucestershire's waste was undertaken in 2008, and a new analysis is overdue.
   - Recent research by WRAP has found that 74% of MSW in Wales is recyclable and compostable now, with up to 90% being so in the future:

     'A recent report by Environment Agency in Wales for the Welsh Assembly Government identified that up to 90% of MSW in Wales could potentially be recycled. The 90% figure includes more paper,

plastic film, disposable nappies, other glass, other organics and fines. Some of the other organics (such as wood based cat litter) and fines could be placed into an organics collection, but further developments in recycling technology, together with additional recycling infrastructure (particularly for disposable nappies) would be required in order for up to 90% of MSW to be classified as being potentially recyclable or compostable.' (WRAP Cymru, 2010)

- The latest survey from Lets Recycle shows that South Oxfordshire District Council has already exceeded a recycling rate of 70%, at 70.56%. More telling are the top rates achieved by councils for dry recyclates and for composting. Surrey Heath BC is recycling 52.68% of its dry recyclates, whilst Staffordshire Moorlands has a 40.82% composting rate (Lets Recycle, 2011). Added together, these demonstrate that it is eminently possible to achieve a recycling and composting rate of over 90% now.
- Over the next 15 -20 years, the infrastructure and markets required to support increased recycling and composting are very likely to develop. For instance, one of the main priorities of the new £3bn Green Investment Bank will be waste (Greenwise, 2011). The modeling for Gloucestershire's waste projections however does not consider this possibility.

In conclusion, we reiterate out view that the recycling and composting figures for MSW are inadequate. We believe targets of 70% recycling/composting by 2020 and 80% by 2030 are more realistic and achievable, and that this in turn requires a considerable reduction in the projected residual waste figures. Therefore we question the soundness of the MSW projections.

Question 2: Statistical base: Commercial and Industrial Waste

1. We share the Inspector's concern about lack of clarity in this area. DEFRA's Commercial and Industrial Waste Survey 2009 shows that Gloucestershire's figures for C & I waste, at 528,000 tonnes per annum, are the highest of any waste authority in the South West (DEFRA, 2011, b). Particularly high are the quantities of chemical waste (127,000 tonnes compared with 25,000 in Bristol for instance) and mixed waste (132,000 tonnes compared with 91,000 in Wiltshire). Why has Gloucestershire got so much C & I waste? Is it because we are importing and managing more waste than we are generating?

   Use of landfill to dispose of this waste, at 114,000 tonnes, is again the highest in the South West. Analysis needs to be undertaken to determine why we have so much waste, where it is coming from, and whether it will continue to come from these areas in the future. For instance, if it is coming from out of county, what provision are other counties making to deal with their C & I waste and will this affect Gloucestershire figures in

future? Confidence in C&I waste predictions is undermined by this lack of clarity, bringing into question the soundness of the WCS.

2. Since the production of the WCS, DEFRA has released information which indicates that a reduction target for C & I waste, rather than an assumption of 0% growth, would be more appropriate. In 2009, the industrial sector accounted for 24.1 million tonnes (mt) of waste, a decline of 13.5mt since 2002/3, which is a massive 35.9% reduction. The commercial sector produced 23.8mt of waste in 2009, a decline of 6.5mt since 2002/3, which is a 21.45% reduction (DEFRA, 2011). There is a clear and very significant downward trend in C&I waste – why is this not reflected in the Gloucestershire C&I waste projections? Rather than 0% growth projection, the WCS should be estimating a substantial further decrease in this waste stream, and planning accordingly.

3. There has also been a significant change in the way this reducing C&I waste is dealt with. 'A total of 25.0 mt, or 52 per cent, of C&I waste was recycled or reused in England in 2009, compared to 42 per cent in 2002/3' (DEFRA, 2011). In contrast, of the 528,000 tonnes of C & I waste in Gloucestershire, only 210,000 tonnes is recycled (DEFRA, 2011, b). This equates to 39.77%. Gloucestershire should be aspiring to at least the national average, which is clearly achievable, plus anticipating a continuation in increasing recycling trends. Therefore there is a significant potential to increase recycling of C&I waste in the county, yet the WCS appears to make provision only for increased recovery of C&I waste and not for increased recycling (CD1.1 para 3.25), although, as the Inspector has highlighted, it is unclear what is meant by recovery here. Also we can see no targets set for the recycling of C&I waste, which seems to be a serious omission that goes right to the heart of the soundness of the WCS. We suggest that these targets should be similar to those we are recommending for MSW waste – 70% by 2020 and 80% by 2030.

Question 6: The Vision and Strategic Objectives

1. There seems to be a misapprehension within the WCS that strategic can only be used to describe something large. Yet a strategy can equally consist of a number of small facilities. A proposal for small, dispersed facilities is just as strategic as one advocating one large facility, so long as the aims and objectives of the proposal are clear. The WCS does not demonstrate sufficiently why one or two large sites are considered preferable to several small ones.

2. Zone C is justified in the WCS partly because it is stated that most of Gloucestershire's waste is produced there (See CD 1.1 Key Issue 2). In terms of MSW, this is simply not true. There is no indication that residents in the Severn Vale produce more waste per household than elsewhere. Nearly half the county's residents do not live in the Vale (Gloucestershire Research & Intelligence, 2011), and therefore a similar proportion of waste is not produced there. And in terms of C&I waste, it seems likely

that much of this is generated outside of county, and we have been given no information as to where it is coming from. A large quantity of waste would therefore have to be transported by road from across the county and beyond to Zone C.

3. PPS10 para 3 requires waste planning authorities to 'provide a framework in which communities take more responsibility for their own waste'. The plan for large 'strategic' facilities based in Zone C away from communities prevents delivery of this key objective, both because of scale and location. Communities are much more likely to be involved in facilities which are small, local and well-understood.

4. Paragraph 3 of the Vision, and other related sections in CD1.1, should be amended to remove the requirement for strategic sites to be >50,000 tonnes and to be located in Zone C, thus supporting smaller facilities dispersed throughout the county and near to where waste arises.