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For more information about our minerals and waste planning policy go to:

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1. **FORMAT**

1.1 The inspector has raised issues and posed questions relating to matters which will be the basis for discussion at upcoming hearing sessions.

1.2 This document sets out Suffolk County Council’s answer to the issues and questions under the heading of *Matter 4 – Waste policies and sites*.

1.3 Issues and questions falling under matters 1, 2 and 3 are responded to in three other documents, one for each matter.

2. **ISSUES**

2.1 Whether the policies are positively prepared in terms of making adequate provision for waste.

2.2 Whether the policies are consistent with national policy with specific regard to protection of the environment.

2.3 Whether specific policy requirements are justified and reeffective.
3. General Questions

**Question 86:** Given the short period of time over which a decline in waste from London has been recorded, is the zero provision for London waste in the Plan based on a robust assumption?

The aspiration in the London Plan to cease the export of non-hazardous waste from the Capital by 2020 is very ambitious, but the imports into Suffolk from London are not very significant (1,500 tonnes in 2015 and 5,700 tonnes in 2017). Therefore, if exports from London are not reduced in accordance with the London Plan policy, this will not have a significant impact on the waste management plan for Suffolk.

**Question 87:** What growth assumption is used for commercial and industrial waste?

The economic growth assumption used for commercial and industrial waste is taken from the model developed for the East of England Local Government Association to support the setting of targets of jobs and housing by planning authorities in the East of England and neighbouring regions. This model produces forecasts of growth for different sectors of the economy which have been mapped on to the sectors used for assessing C&I waste arisings in the study commissioned by Defra to understand current C&I waste arisings.

Two scenarios were developed using a breakdown of these sectors, and also applying the gross GVA increase forecast for the East of England economy as a whole.

This approach produced two varying scenarios which have been modelled as “high” and “low” scenarios for planning purposes. It is acknowledged by Defra that the quality of the initial arisings figure is weak, and so the forecasts are also necessarily broad. The policy response to the poor quality of data in for this waste stream needs to be flexible to allow for development to come forward as necessary over the Plan period whichever scenario emerges in practice.

**Question 88:** What assumptions are made about future recycling rates?

Two scenarios have been used in the assumptions for recycling and composting rates for Local Authority Collected Waste; one assumes a combined recycling and composting rate of 51% and the other assumes a combined recycling and composting rate rising to 65% by 2030 in accordance with the Circular Economy Package adopted by the EU in 2018.

In 2017/18 the household recycling rate in Suffolk was 54%.

The assumptions for the recycling rate of C&I waste are very variable. There is no systematic process for measuring waste arisings from the C&I sector and much of the most easily recyclable material is backhauled for reprocessing and is not formally recorded as waste at all.

In Defra’s “C&I New Methodology to estimate waste generation by the Commercial and Industrial Sector in England” the recycling rate was estimated as only 21%. The previous estimate by Defra in its Commercial and Industrial Waste Statistics was 52%. For waste that has a similar composition to household waste it would seem reasonable to assume a recycling rate close to the household recycling rate of 54%. For waste that is more homogenous in nature, higher rates of recycling would be expected.

The policy response to this paucity of data is to make provision for the handling and bulking of waste materials from commercial and industrial sources so that it can be managed in the most sustainable way. This would include allowing for the development of transfer and bulking capacity as well as treatment and processing facilities.
**Question 89:** Should Paragraph 6.7 state the net treatment capacity that will be required in 2036 after recycling has been taken into account, and state what the available treatment capacity is?

An addition to paragraph 6.7 could be included as follows:

Using the “high” scenarios, total non-hazardous waste arisings by 2036 could be 0.47mt of LACW plus 1.09mt of C&I giving a combined total of 1.509 million tonnes of non-hazardous waste arising.

Using a conservative estimate of a 52% recycling rate, that would leave 0.724 million tonnes of residual waste to be managed.

Table 42 of the Waste Study shows that there is 427,000 tonnes per annum of treatment capacity plus 252,000 tonnes pa of incineration capacity giving a current total of 679,000 tpa of active management capacity, supplemented by the availability of landfill for the remaining waste.

**Question 90:** Do the figures for transfer capacity in the Suffolk Waste Study include any treatment capacity?

The figures given for transfer capacity refer to the capacity of facilities described as transfer facilities in their Environment Agency Permit. It is very likely that some treatment takes place at many of these facilities, although the quantity of waste treated at each facility is difficult to identify from the data provided by the operators of the facility.

Transfer facilities are an essential part of the network of facilities that are required for the sustainable management of waste. Once materials are separated into individual material streams they can be sent for reprocessing.

**Question 91:** How does the plan facilitate a move away from landfill?

The Plan only allows for new inert landfill when there is no acceptable alternative form of waste management further up the waste hierarchy (Policy WP11 c). Policy WP12 explicitly states that “the landfilling of waste that could practicably be recycled, composted or recovered will not be acceptable”.

Policy WP10 provides that the treatment of waste that could reasonably be recycled or composted will not be acceptable.

**Question 92:** What methodology has been used for calculating future housing provision up to the end of the plan period, and how has this been included in the assessment of need for waste facilities?

Table 13 shows the number of additional dwellings planned by district. These figures were taken from the local plans of each district. This increase in new dwellings has been assumed to comprise one new household per dwelling, each of which will generate 1.2 tonnes of waste per annum. These arisings have been added to the existing quantity of local authority collected waste arising.

Historically, many districts have not delivered the numbers of new dwellings planned for, but it is considered prudent to plan for a quantity of waste arising at the higher end of the scale of possibilities.

**Question 93:** Have any assumptions been made about any change in the tonnage of waste generated per household over the plan period?
The quantity of waste generated per household is assumed to remain at 1.2 tonnes of waste per annum. The increase in the number of households will generate an increase in the amount of household waste arising over the plan period as shown in Figure 3.

The Government’s RWS will also encourage higher levels of recycling and lower levels of residual waste, although this is not possible to quantify at this stage. These changes are likely to include the charging for garden waste collections, as identified on p27 of the Study.

**Question 94: Does the Council envisage any reduction in movements of waste into and out of the county?**

No specific assumptions have been made regarding a reduction in movements into and out of the County. However, significant treatment capacity is planned in the neighbouring counties of Cambridgeshire and Peterborough, and it is likely that when this is operational, less residual waste will be sent to facilities in Suffolk.

4. **Policy WP1 – Management of Waste**

**Question 95: Should the policy refer to monitoring and review of the annual levels of waste arisings over the plan period?**

Agree. Amend policy as follows:

The County Council anticipates the following annual levels of waste arisings for which appropriate waste management facilities will be granted planning permission, provided they are in accordance with the Waste Hierarchy and the policies of the Development Plan and there are no other material considerations which indicate otherwise. Waste arisings will be monitored on an annual basis and will inform consideration of when to initiate an early review of the Plan if required.

5. **Policy WP2 – Proposed Site for Radioactive Waste Management**

**Question 96: Please describe the nature of the envisaged radioactive waste facility. Is the size of the potential facility known?**

Treatment, storage and onward transportation of radioactive waste arising from other Nuclear Power Stations. There are no details of the development available.

**Question 97: What is the identified need for a facility to process imported radioactive waste?**

There are no details of the development available.

**Question 98: Please explain the last sentence of paragraph 6.10. If a facility were proposed to deal with waste that is already on site how would this be controlled?**

Proposals for the management of on-site radioactive materials are determined by the District Council and are considered as part of the existing industrial process as opposed to imported waste radioactive materials that require treatment, storage or disposal.

**Question 99: There appears to be conflict with paragraph 6.7 (h) which states that it is not necessary to plan any provision, and this should be amended.**

Agreed. Amend the Plan accordingly.

h) the amount of radioactive waste to be managed is very small and much of it because it can either be accepted at normal landfills or at very specialised national facilities elsewhere, it is not considered necessary to plan any provision.
6. **Policy WP3 – Existing or Designated Land-Uses Potentially Suitable for Waste Development**

*Question: Should the text explain the reasoning behind the restrictions on specified types of waste management facility in specific areas?*

Agreed. Amend the Plan accordingly as follows:

Only one site has been proposed for waste development in the SMWLP. Planning applications for waste development on other sites will need to comply with policy WP3.

The categories below reflect the desire to protect the open countryside as well as the practical constraints on waste development.

7. **Policy WP7 – Anaerobic Digestion**

*Question 100: Should the text explain the reasoning behind allowing anaerobic digestion facilities to be integrated with waste water plants?*

Agreed. Amend the Plan accordingly as follows:

Anaerobic digestion facilities promote anaerobic degradation of organic wastes such as animal wastes, energy crops, and vegetable tailings. The process involves introducing the feedstock into a tank of bacteria rich slurry. This process produces methane gas that is normally used to drive a diesel generator and export the electricity to the grid. The main advantage of this over composting is that electrical power is produced. Co-locating with sewage treatment allows methane to be recovered from the sewage and at the same time removes a potential greenhouse gas from escaping into the atmosphere.

8. **Policy WP8 – Proposals for Recycling or Transfer of Inert and Construction, Demolition and Excavation Waste**

*Question 101: Whereas Policy WP3 states that waste management facilities may be acceptable within the specified areas, Policy WP8 states that proposals for recycling or transfer of inert and construction, demolition and excavation waste will be acceptable in those areas. As the environmental impacts of these facilities may be significant, would they be acceptable on all existing or allocated employment land or brownfield land?*

Agreed. Amend the Plan accordingly as follows:

Proposals for recycling or transfer of inert and construction, demolition and excavation waste will may be acceptable on land within the uses identified within Policy WP3.

9. **Policy WP11 – Approval of Sites for Disposal of Inert Waste by Landfilling or Landraise**

*Question 102: What is meant by the first sentence of the policy ‘Additional void space … for the deposit of inert waste may be acceptable…’*

Agreed. Amend the Plan accordingly as follows:

Additional void space or areas of landraise for the deposit of inert waste may be acceptable where: Proposals for the disposal of inert waste by landfilling or landraising may be acceptable where:
**QUESTION 103: SHOULD THE POLICY REFER TO POLICY MP6?**
Agreed. Amend the Plan accordingly as follows:

The proposals comply with the environmental criteria set out in Policy GP4 and progressive restoration requirements in MP6.

**QUESTION 104: SHOULD THE POLICY INCLUDE A REQUIREMENT FOR RESTORATION?**
Agreed. See previous response.

10. **POLICY WP12 – DISPOSAL OF NON-HAZARDOUS OR HAZARDOUS WASTE BY LANDFILLING OR LANDRAISING**

**QUESTION 105: WHAT IS MEANT BY THE FIRST SENTENCE OF THE POLICY ‘ADDITIONAL VOID SPACE ... FOR THE DEPOSIT OF NON-HAZARDOUS OR HAZARDOUS WASTE MAY BE ACCEPTABLE...’?**
Agreed. Amend the Plan accordingly as follows:

Additional void space or areas of landraising for the deposit of non-hazardous or hazardous waste may be acceptable where:

Proposals for the disposal of non-hazardous or hazardous waste by landfilling or landraising may be acceptable where:

**QUESTION 106: DOES THE POLICY ADEQUATELY PROMOTE WASTE TREATMENT IN ACCORDANCE WITH THE WASTE HIERARCHY? SHOULD IT STATE THAT DISPOSAL BY LANDFILLING OR LANDRAISING WOULD BE A LAST RESORT?**
Disagree. Policy already states “The landfilling of waste that could practicably be recycled, composted or recovered will not be acceptable.”

**QUESTION 107: SHOULD THE POLICY INCLUDE A REQUIREMENT FOR RESTORATION?**
Agreed. Amend the Plan accordingly as follows:

The proposals comply with the environmental criteria set out in Policy GP4 and progressive restoration requirements in MP6.

11. **POLICY WP15 – TRANSFER, STORAGE, PROCESSING AND TREATMENT OF HAZARDOUS WASTE**

**QUESTION 108: WHAT IS THE JUSTIFICATION FOR THE 5% REQUIREMENT IN THE POLICY?**
Practically speaking a small element of waste categorised as hazardous which includes waste electrical equipment for example is likely to be collected at non-hazardous sites.

12. **POLICY WP18 – SAFEGUARDING OF WASTE MANAGEMENT SITES**

**QUESTION 109: PLEASE EXPLAIN THE REQUIREMENT THAT “ANY MITIGATION REQUIRED FALLS ON THE DEVELOPMENT THAT RECEIVES PLANNING PERMISSION LAST”.**
Where existing business or other use could have a significant adverse effect in any proposed new development, the applicant must provide suitable mitigation before the development is completed so that the existing use is not disadvantaged by new development.

**QUESTION 110: SHOULD THE TYPES OF DEVELOPMENT THAT MAY BE “POTENTIALLY CONFLICTING” DEVELOPMENT BE DEFINED?**
No because it would be possible to miss some potential types of development which might present a problem.

13. **POLICY WS1 – SIZEWELL A NUCLEAR POWER STATION**

**QUESTION 111: SHOULD THE FIRST SENTENCE STATE THE TYPE(S) OF DEVELOPMENT THAT WILL BE ACCEPTABLE?**

Agreed. Amend the Plan accordingly as follows:

> Development will be acceptable so long as the proposals, adequately address the following:

- Proposal for the management of waste arising from the decommissioning of Sizewell A together with other waste from sister stations in accordance with the national policy to share waste facilities, will be acceptable so long as the proposals, adequately address the following:

**QUESTION 112: SHOULD CRITERION (C) REQUIRE DEMONSTRATION OF EXCEPTIONAL CIRCUMSTANCES IN ACCORDANCE WITH NATIONAL POLICY?**

Agreed. Amend the Plan accordingly as follows:

c) potential impacts upon the Suffolk Coasts & Heaths AONB and the exceptional circumstances that justify development with the AONB;

**QUESTION 113: SHOULD CRITERION (F) ALSO REQUIRE SURFACE WATER MITIGATION MEASURES?**

No because the existing drainage is sufficient.

**QUESTION 114: WHAT IS THE JUSTIFICATION FOR THE REQUIREMENT TO SAFEGUARD EXISTING PYLONS?**

Existing pylons are required for Sizewell B and C.