

West of England Joint Waste Core Strategy

Statement of Common Ground

Between

The Partnership Authorities comprising, Bath and North East Somerset, Bristol City, North Somerset, and South Gloucestershire Councils.

and

Gloucestershire County Council.

1. Introduction.

1.1 This statement of common ground relates to the representations made by Gloucestershire County Council to the pre-submission (publication) draft of the West of England Joint Waste Core Strategy (JWCS).

1.2 The Partnership Authorities responded to the representation from Gloucestershire County Council and further discussions took place on 1st September 2010.

1.3 This statement of common ground sets out the areas subsequently agreed by the Local Planning Authorities.

2. Background

2.1 A summary of the representation from Gloucestershire County Council is provided below:

2.2 General approach

2.2.1 Gloucestershire County Council supports the proposals to ensure recovery and recycling targets and that the JWCS acknowledges that there will still be a role for new disposal capacity over the plan period. However, it is not clear as to how this landfill provision will be made, Gloucestershire County Council contends that the policy for landfill provision is not clear and not particularly proactive. Therefore unsustainable practices of exporting waste for disposal could potentially continue as recognised at paragraph 6.10.4 of the JWCS.

2.2.2 Gloucestershire County Council has stated that it is not clear how the landfill policy 8 will be implemented, in terms of prioritising brownfield land.

2.3 Identification of sites

2.3.1 Gloucestershire County Council suggested that the JWCS could identify sites/areas of search to be identified in a landfill DPD.

2.4 Hazardous waste

2.4.1 Gloucestershire County Council has suggested that the JWCS submission document is lacking a policy on hazardous waste, and seems to be reliant upon provision being made for hazardous waste elsewhere in the South West.

3. **Matters subsequently agreed.**

3.1 General approach

3.1.1 Both parties agree that the JWCS clearly sets out that there is a requirement for additional landfill capacity within the West of England to meet its own needs over the plan period to 2026.

3.1.2 The Partnership Authorities acknowledge that the practice of exportation of waste to disposal is not a sustainable option and are committed to meeting their own needs over the plan period (JWCS para 6.10.4).

3.1.3 Both parties recognise that whilst not a wholly acceptable approach, the practice of exportation of waste to Gloucestershire for disposal to landfill may continue to occur in the short term, until new provision is made in the West of England. It is understood that whilst Gloucestershire County Council is not as constrained by lack of capacity in the short term, both parties agree that the exportation of waste to landfill cannot be a long-term solution to dealing with the non-treatable residues of West of England's waste. The Topic Paper produced for the Inspector on "Future Capacity Requirements" contains phased requirements for landfill over the plan period. Both parties suggest this information is included in the schedule of changes to the JWCS, at the monitoring section, to ensure the provision of landfill is effectively monitored and managed.

3.1.4 Over the plan period as additional provision for landfill/landraise is made in the West of England, and with continued engagement and co-operation between the LPAs; it is expected that the practice of exportation will be avoided.

3.2 Identification of sites

3.2.1 The approach taken by the Partnership Authorities in the JWCS is a criteria based policy. Whilst this has not allocated sites, as preferred by Gloucestershire County Council, this approach is agreed by both parties to potentially identify areas of search for landfill by setting out those areas that are unsuitable because of environmental or policy constraints and considering the rest of the plan area as, in effect, a potential "area of search". If the intention by the Partnership is that these remaining areas are an 'area of search' Gloucestershire County Council recommends that the JWCS make this clear in the policy and text. The Partnership Authorities consider that the JWCS achieves the same aim by setting out broad locations and would agree that the proposed clarifications can be made.

3.2.2 The Partnership considers that, through a call for sites and extensive consultation, it has proactively sought suitable locations, as updated in the Landfill Review Paper May 2010. Gloucestershire County Council still has some concerns of whether enough investigation has occurred but both parties agree that there

should not be a time delay in the adoption of the JWCS The Partnership considers that there is a clear mechanism identified in the JWCS for identification of landfill provision underpinned by robust monitoring that will identify if any necessary intervention is required (for example which may lead to a review of the JWCS, either in whole or part). Gloucestershire County Council does not agree on this or how the criteria within Policy and other concerns relating to Landfill are outlined in their additional written representation.

3.3 Hazardous waste

3.3.1 The Partnership Authorities have, in their changes to the submission document of the JWCS, clarified, at paragraph 6.10.11, that policy in the JWCS is appropriate to consider proposals for both both hazardous and non hazardous waste. However, the evidence base did not highlight hazardous waste management as an issue for the plan area, with anticipated arisings remaining broadly constant across the plan period and comprising a relatively small amount of the waste arising in the West of England. The policy context for hazardous waste is also dealt with at national level and therefore the Partnership Authorities do not consider there to be any policy imperative to repeat policy in the JWCS. Acknowledgement is made in para 6.10.10 that policies 8 and 9 also apply to proposals for hazardous waste disposal facilities in the Plan area.

3.3.2. Gloucestershire Council still has some concerns as to whether the JWCS contains sufficient provision for treatment/recovery of hazardous wastes which may arise from the envisaged provision for waste recovery facilities such as those which may come forward under Policy 5 or as otherwise submitted (i.e. recent proposals for thermal/biomass energy generating plants in the Avonmouth/Sevenside area). Gloucestershire County Council has some additional concerns which are outlined within their written representation.

4. **Agreement**

On behalf of Gloucestershire County Council:

Name: Kevin Phillips, Minerals and Waste Policy Manager

Signed: 

Date: 22.10.10

On behalf of the Partnership Authorities of Bath and North East Somerset, Bristol City, North Somerset, and South Gloucestershire Councils:

Name: Ian Collinson Head of Planning, Housing & Infrastructure

Signed: 

Date: 22.10.10.