

West of England Joint Waste Core Strategy Consultation Statement

1. Introduction

- 1.1 The West of England Authorities have undertaken several stages of consultation and ongoing public engagement that has informed the preparation of the Joint Waste Core Strategy Submission document and the formulation of policy. This consultation statement gives an overview of this process. The consultation and ongoing engagement activity is described at Appendix 1.

2. Who was invited to be involved in plan preparation.

- 2.1 A West of England circulation list of all consultees and stakeholders was compiled from the lists used by individual Authorities in accordance with their Adopted Statements of Community Involvement. The stakeholders included members of the public, Town and Parish councils, community groups, voluntary groups, recycling organisations, environmental groups, the development industry and statutory stakeholders. This totalled some 2,400 email and postal addresses. The list was continually updated with any contact details supplied at workshops and events, representations to consultation or any other form of correspondence.
- 2.2 Letters or emails were sent to each contact on the list at each stage of consultation or ongoing engagement listed at Appendix 1. Each stage of consultation was clearly signposted on the West of England Partnership website and advertised in local press that covered the whole plan area.
- 2.3 Early frontloading discussions took place with GOSW, the Environment Agency and PINS. All other statutory consultees were kept informed and were invited to Stakeholder events.

3. How responses to the consultation informed policy.

- 3.1 Issues raised at each stage of consultation are summarised in the Progress Update, Preferred Options, and Issues and Options consultation reports respectively. The key issues raised and how they have informed the development of the JWCS Submission document are listed below:
- 3.2 **Scope of the JWCS**
The JWCS is technology neutral, covers all waste streams and seeks to provide a positive policy framework to ensure the waste infrastructure required in the West of England is delivered.
- 3.3 **Waste Minimisation**
Representations sought further emphasis to be placed upon waste prevention and for this to be presented as a policy in the JWCS. Policy 1- Waste Prevention has addressed this matter and the UAs are committed to continuing to work with Partner organisations to ensure that waste is pushed up the waste hierarchy. This is a fundamental principle embedded in the strategic vision and aims of the JWCS.

3.4 **Spatial Strategy for Residual waste treatment facilities**

The spatial strategy relates to the provision of residual waste treatment facilities. The approach in the JWCS has allocated specific sites and strategic areas to meet the indicative capacity requirements for catchment areas within the sub-region. All sites included in the JWCS were put forward and assessed at the plan making level with consideration of: Habitat Regulation Assessment, Strategic Flood Risk Assessment and representations to consultation. Any proposal will be subject to any key planning considerations appended to the JWCS, and development management policy. Likewise the decision not to include sites has been based upon the supporting evidence base and representations to the consultation and ongoing public engagement.

3.5 **Policy Framework for non-residual sites.**

Non-residual waste facilities will be dealt with through criteria based policy, and where appropriate Development management policies.

3.6 **Site specific impacts and considerations**

Some concern was expressed regarding health or amenity impacts of waste facilities at some proposed locations. These are most appropriately dealt with at the planning application stage and Development management policies in the JWCS will assist the decision making process.

3.6.1 However, following initial consultation on the sites that were recommended to be included, further work was carried out and all sites were re-evaluated to ensure up to date information was considered. In some instances this resulted in changes to recommendations for the allocation of sites, these recommendations were published in the revised detailed site assessment as part of the Progress update and further consulted upon.

3.7 **Approach to Landfill**

The evidence base concluded that even with challenging targets to divert waste from landfill, there may still be a requirement for the disposal of waste at landfill. Furthermore after consultation with neighbouring authorities the West of England authorities acknowledge that the current practice of sending waste for disposal in landfill outside of the sub-region is not a sustainable long-term solution. Therefore the policy approach to landfill is to consider applications where it can be demonstrated that the waste cannot practicably be reused, recycled or processed for recovery along with other more specific considerations.

3.7.1 The development industry supported this approach and suggested that there may be potential sites in the West of England that could be delivered through this approach if required.

3.8 **Phasing and deliverability of sites**

The deliverability of sites is demonstrated in the JWCS by consideration at the site assessment stage of their suitability, availability and any land ownership issues. Delivery of the facilities is reliant upon the development industry. Considerable effort has been made on both parties to engage in the process of preparing the JWCS and the involvement of the industry has informed the development of policy. Representations from the industry evidence this engagement and their intentions for sites they own or represent.

3.9 Approach to implementation and monitoring

It is acknowledged that planning applications for residual facilities may exceed the capacity required for residual waste treatment in some catchment areas within the sub-region. To ensure flexibility and subsequent deliverability of the spatial strategy, it is proposed that this issue is dealt with by a plan, monitor, manage approach. Robust monitoring will record capacity of applications and capacity that is actually delivered and operational. This will ensure that future applications can be considered against the requirement to conform with the Spatial Strategy and should indicate when or if a review of the capacity required in the JWCS is necessary.

4. How responses to the consultation shaped the spatial strategy.

4.1 The provision of residual waste facilities is addressed in the spatial strategy of the JWCS. The proposed locations for these facilities are suggested at the most sustainable locations with consideration of where waste arises, population and growth, flood risk, habitats regulation assessment and the flexibility and economies of scale. All other non-residual facilities are dealt with through criteria based policy.

4.2 Both the Issues and Options and the Preferred Options consultation received substantial representations that opposed inflexible large scale facilities, and supported local responsibility for waste and a preference for smaller facilities. The development industry were very clear in their requirements for the JWCS- they sought flexibility, economies of scale, and issues of deliverability to be considered.

4.3 The outcomes of consultation together with further technical work on the evidence base led to the Preferred option being recommended to Councillors as the most sustainable, deliverable and flexible spatial option to deliver the residual waste facilities required in the West of England.

5. Decision making process

5.1 Throughout the preparation of the JWCS, process and update reports were presented to the Planning, Housing and Communities Board, Executive Member briefings and the Joint Scrutiny Committee of the West of England Partnership (listed at Table 1).

5.2 In addition to this workshops were held to inform Councillors of the outcomes of consultation and the further work on the evidence base. Consideration of the evidence base and consultation responses informed Council decisions on; the development of JWCS policies and; which of the potential sites identified for residual waste treatment facilities would be allocated in the JWCS submission document.

5.3 The submission document will be considered at Cabinet and Full council meetings of the individual authorities throughout October and November 2009.

Table 1 Decision making process.

June-July 2006	Phase 1 Consultation: Awareness raising exercise Undertaken in parallel with consultation on the Joint Waste Management Strategy
Jan-March 2007	Issues & Options Consultation (Phase 2) Undertaken in parallel with consultation on the Joint Waste Management Strategy
12 th March 2008	West of England Waste Management and Planning Strategy Member Board Process on preparation of the Preferred Options Document noted.
17 th June 2008	West of England Waste Management and Planning Strategy Member Board Consideration of Preferred Options Document and Consultation plan
15 th August 2008	Joint Scrutiny Committee Consideration of site strategy options (ERM presentation)
5 th September 2008	Joint Scrutiny Committee Preferred Options document and consultation plan considered.
11 th September 2008	Planning & Housing Executive Member Briefing Preferred Options document and consultation plan considered.
10 th October 2008	Joint Scrutiny Committee Officer responses to the views of Joint Scrutiny and Scrutiny committees of the constituent authorities on the draft pre-consultation Preferred Options Document.
22 nd January 2009	Planning Housing & Communities Board Process report on JWCS noted.
24 th April 2009	Planning Housing & Communities Board Process report on JWCS noted
18 th June 2009	Leaders Briefing Process report on JWCS noted.
26 th June 2009	Partnership Board Process report on JWCS noted.
16 th July 2009	Planning Housing & Communities Board Process report on JWCS noted. Members views sought on the development of Scope and Policy document.
16 th July 2009	Councillors Workshop Presentation on the outcomes of consultation (subject to further views on progress update) and discussion on the development of the spatial strategy and policies to inform the preparation of the JWCS submission document.
4 th September 2009	Joint Scrutiny Committee Consider the outcome and response to the Public consultations and the proposed submission document.
7 th September 2009	Planning Housing & Communities Board Consider and give their views on the outcome and response to the Public consultations and the proposed submission document.
Mid Sept 2009	Councillor Workshops Consider and give their views on the submission document.
11 th Sept 2009	Partnership Board Consider the outcome and response to the Public consultations and endorse the proposed submission document.

Appendix 1: Stages of consultation and ongoing public engagement.

Action/Activity	Outcomes	Documentation
<p>Issues and Options Consultation January –March 2007 Alternative spatial options were put forward for consideration by the statutory stakeholders, the Public and other interested parties. This was undertaken in accordance with consultation processes as set out in individual UA Statements of Community Involvement (SCI).</p>	<p>Views were received from some 1,000 local people and organisations.</p> <p>Key issues raised by the community included: -Commitment to three 'R's Reduce, re-use, recycle. -Local responsibility for waste -Opposition for large facilities -Flexibility-preference for smaller facilities across a range of sites -Reduction in the transportation of waste to be treated</p> <p>Key issues raised by the development industry: -support options that provide flexibility and economies of scale.</p>	<p>Issues & Options Consultation Report 2007</p>
<p>Preferred Options Consultation January – March 2009 Three spatial options for strategic residual facilities were put forward for consideration by the statutory stakeholders, the Public and other interested parties in accordance with SCIs. Consultations included: -Preferred Options document, short leaflet & response form sent to 2,400 stakeholders & consultees. -Consultation Website -Press advertisements in local press -12 drop in sessions at local centres across the sub-region. -Individual Authority consultation with Parish/Town Councils & at Neighbourhood Partnership meetings.</p>	<p>Views were considered from some: -210 responses to the online consultation -165 attendees of drop in sessions and workshop events.</p> <p>Representations to the preferred options consultation sought clarification on: -scope of the JWCS; -waste streams to be covered; -further work on the evidence base; -site assessments.</p> <p>The Progress Update was produced in response to these representations and the full stakeholder and consultee list were given advanced notification on May 15th 2009 that the progress update would be available on 5th June 2009.</p>	<p>Preferred Options consultation report June 2009.</p> <p>Preferred Options schedules of representations June 2009.</p>
<p>Stakeholder Workshop 6th February 2009. A Stakeholder workshop was held in parallel with the consultation period and brought together stakeholders with in depth specialist knowledge.</p>	<p>Adverse weather conditions affected attendance. However, there were focused discussions, and break out sessions which were written up in a workshop report and informed the development of the JWCS.</p>	<p>Workshop Report June 2009.</p>

<p>May/July 2009 Discussions with neighbouring authorities, Environment Agency, GOSW and the Planning Inspectorate.</p>	<p>Discussions informed policy direction issues including:</p> <ul style="list-style-type: none"> - The current practice of sending waste for disposal in landfill outside of the sub-region is not a sustainable long-term solution. - The approach of allocating strategic sites and broad locations for residual waste treatment. - The approach of criteria based policy for non-residual or non-strategic waste facilities - Development management policies - Phasing and deliverability of sites - Approach to implementation and monitoring 	<p>-Feasibility Study -potential for exporting non-hazardous waste to landfill</p> <p>-PINS advice note from frontloading visits 7th and 16th July.</p>
<p>Progress Update 5th June-31st July 2009 (extended to 10th august to incorporate further views on updated Scope & Policy doc) All stakeholders and consultees were notified of further technical work undertaken to support the evidence base and were given an opportunity to provide further views on:</p> <ul style="list-style-type: none"> -Statement on Scope of the Joint Waste Core Strategy -Sustainability Appraisal (interim comment) -Feasibility Study -potential for exporting non-hazardous waste to landfill -An Assessment of the current future waste management capacity needs -Revised Detailed Sites Assessment-(of sites for the location of facilities to treat residual waste) -Habitats Regulation Assessment of the Joint Waste Core Strategy -Strategic Flood Risk Assessment of the potential locations for waste facilities <p>The Progress Update was published on the West of England Partnership website and advertised in the local press.</p>	<p>Some 38 representations were received to the progress update.</p> <p>Some 27 delegates attended the industry workshop on July 8th 2009.</p> <p>Key issues raised by the community included:</p> <ul style="list-style-type: none"> -site specific concerns relating to health and amenity impacts of potential facilities on sites recommended for inclusion in the JWCS -looking for innovative solutions to treat waste. <p>Key issues raised by the development industry:</p> <ul style="list-style-type: none"> -whether sites or broad locations will be identified in the JWCS. -issue of distribution of sites to deliver spatial strategy, concern of the potential of several site allocations at Avonmouth. -role of potential urban extensions -merits of particular technologies, and potential benefits, for example Combined Heat and Power. 	<p>Progress Update consultation report August 2009.</p> <p>Progress Update schedules of representations August 2009.</p>

<p>Development industry Workshop on 8th July 2009. A Workshop was held in parallel to the Progress Update and provided the opportunity for further continued engagement with the development industry.</p>	<p>Some 27 delegates attended the event and were provided with the opportunity to discuss the further work on the evidence base to support the JWCS and emerging policy direction of the JWCS. Industry and stakeholder views informed the preparation of the JWCS submission document.</p>	<p>Workshop Report August 2009.</p>
<p>Scope & Policy Document v2 – 22nd July-10th August 2009 Following discussion with Councillors at a workshop on 16th July, the scope and policy document, published as part of the Progress update, was further refined and policies developed. All stakeholders and consultees were notified of the release date of the revised document one week prior to its availability.</p> <p>All stakeholders and consultees were notified when the Scope and Policy Document v2 was available on the website and sent an electronic or paper copy, and were given a further opportunity to contribute views.</p>	<p>Views received included suggested policy wordings, or issues to consider which have informed the further development of polices in the JWCS submission document.</p>	<p>Progress Update schedules of representations August 2009.</p>
<p>Additional sites highlighted for further assessment. 14th August-1st October 2009. As a result of the Progress Update two sites were highlighted to require further assessment –Warne Rd in Weston-Super-Mare and Cabot Park in Avonmouth. Stakeholders and Consultees were notified that a site assessment report on these sites was available for further comment.</p>	<p>The draft Submission document presented for consideration at the Joint Scrutiny Committee on 4th September, included the consultants recommendations on these additional sites, with Warne Rd included in the proposed list of sites. This is subject to further views of Councillors at meetings throughout September- November and any further views of Stakeholders and consultees.</p>	<p>Site Assessment Report ERM August 2009.</p>