

Waste Issues and Options Core Strategy

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1 Translations

Finding out more

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2 Introduction

2.1 Bedfordshire County Council and Luton Borough Council are jointly preparing the Minerals and Waste Development Framework (MWDF) for Bedfordshire and Luton under the provisions of the Planning and Compulsory Purchase Act 2004.

2.2 The MWDF, upon adoption, will replace the existing Bedfordshire and Luton Minerals and Waste Local Plan 2005 – 2016. It will set out the policies and proposals for the development and use of land for minerals extraction and waste management within the County. It will guide decisions on planning applications and provide the spatial plan for Bedfordshire and Luton in relation to Minerals and Waste.

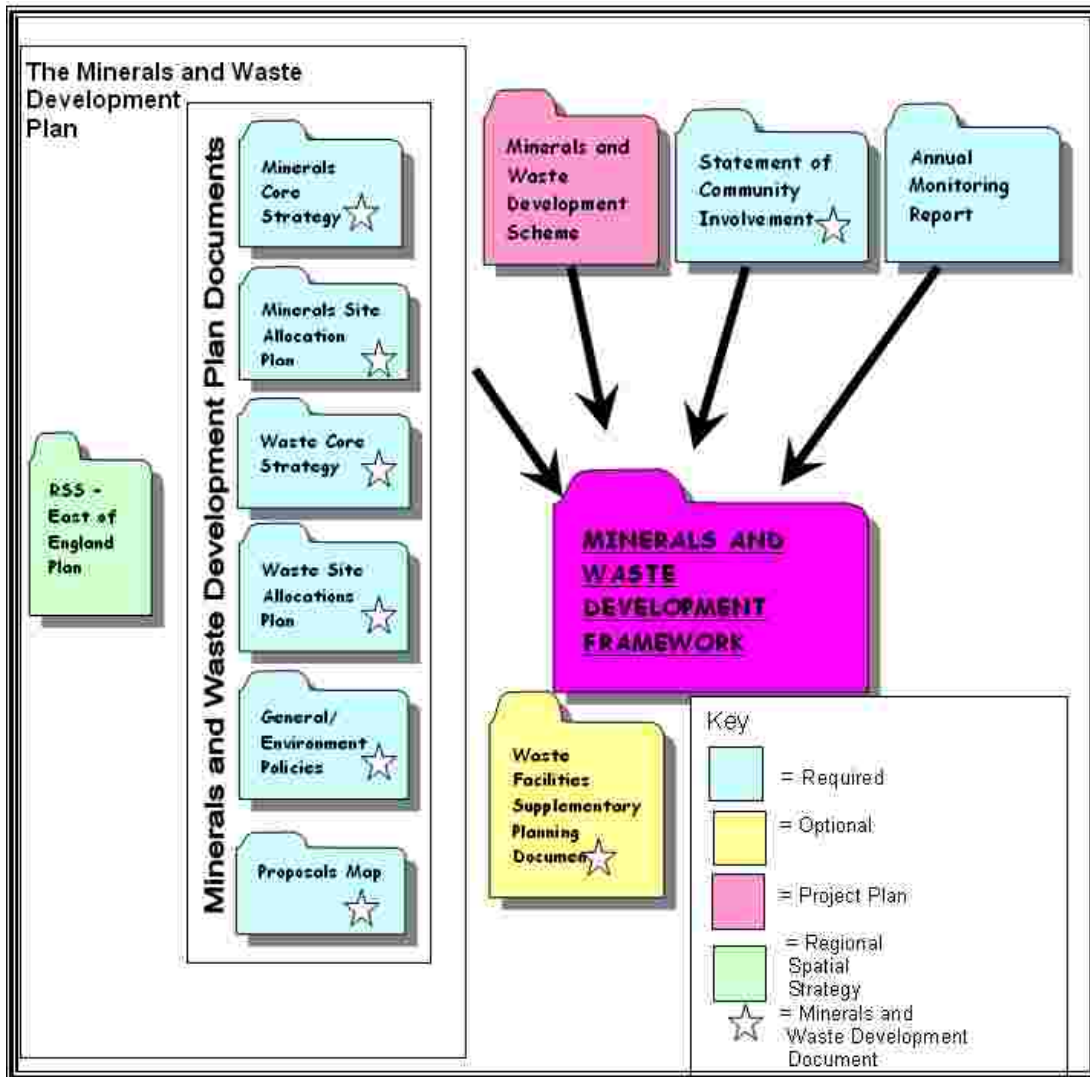
2.3 Picture 2.1 shows what will be contained in the Minerals and Waste Development Framework. Detailed information on each of the Documents to be produced and their associated timetables is provided in the Bedfordshire and Luton Minerals and Waste Development Scheme. Available at:

2.4 www.bedfordshire.gov.uk

2.5 Work has already commenced on the Minerals Development Plan Documents and the 'Preferred Options' for these documents will soon be published for consultation. The General Environment Development Control Policies within the adopted Minerals and Waste Local Plan have now been saved and consequentially will be reviewed as and when necessary.

2.6 This document is specifically in relation to the Waste Development Plan Documents aspect of the Framework and the timetable for the production of these documents is set out in Appendix 1.

Picture 2.1 Bedfordshire and Luton Minerals and Waste Development Scheme



3 Background

3.1 Bedfordshire and Luton are located within at the western border of the East of England Region. Its administration is split between the County Council and the three district – level authorities, together with Luton operating under a Unitary Council. This may be subject to change, depending on the final decision relating to the reorganisation of local government to create two unitary councils (Bedford Borough and Central Beds) to replace the current two tier set up.

3.2 The Governments “Sustainable Communities” agenda, supported by the Milton Keynes and South Midlands Sub- Regional Strategy (MKSM) and East of England Plan, sets out the significant growth proposals for Bedfordshire and Luton with over 90,000 new homes expected to be planned for by 2031. This level of growth in the area will consequently have significant implications for waste management.

3.3 The UK’s waste management systems are also facing a period of dramatic change, driven by European legislation, Government Targets, the need for improved environmental protection, and public expectations. Ways must be found of reducing the current dependency on landfill and move towards more sustainable methods of managing waste, in line with specific targets and the principles of the waste hierarchy

3.4 The Issues and Options Papers Part I and Part II is the first main stage in the production of the Bedfordshire and Luton Waste Development Plan Documents which will address the above issues at a local level.

3.5 The purpose of the Waste Development Plan Documents is to set out policies and proposals for waste management in line with National and Regional Policies and Targets.

What are Waste Development Plan Documents

Waste Development Plan Documents (WDPDs)	
Waste Core Strategy	Sets out the vision, objectives and strategy for waste management, in accordance with National and Regional Policies and Targets
Waste Site Allocations Plan	Identifies any specific sites that are required under the Core Strategy.

3.6 Part I of the Issues and Options Paper sets out the main Issues and Options that are needed to inform and prepare the Core Strategy.

3.7 Part II sets out all the nominated sites for potential waste sites within Bedfordshire and Luton in line with Regulations. At this stage there is no presumption in favour or otherwise of any of the sites.

3.8 There are various stages to the Waste Development Plan Documents production and as highlighted previously, this Issues and Options stage is the first to undergo consultation.

3.9 Following this there will be further consultation periods in which to get involved. These will be at the Preferred Options stage, the submission stage and if required the Public Inquiry, held by an independent Government Planning Inspector. The detailed timetable of these events can be seen in Appendix 1.

Sustainability Appraisal

3.10 All Development Plan Documents must be subject to Sustainability Appraisal (SA), including strategic environmental assessment. This involves considering the environmental, economic and social implications of the policies and proposals proposed during the Plans preparation. Therefore the Waste Core Strategy and Site allocations Plan will undergo Sustainability Appraisal

3.11 Bedfordshire County Council and Luton Borough Council have employed consultants Environ in conjunction with CAG consultants and MVA to undertake this Appraisal.

3.12 A Sustainability Appraisal Scoping Report, which sets the framework for the appraisal of policies and proposals has already been prepared through a workshop with technical bodies and a period of consultation. It is available through following links on the County Councils website.

3.13 This will be updated following further SA work undertaken alongside this Issues and Options and will assist in the preparation of the Preferred Options.

3.14 The final Sustainability Appraisal will be submitted alongside the submission of this plan to the Planning Inspectorate for Independent Examination.

Initial Waste Paper

3.15 Previous to this Issues and Option consultation, we gathered evidence and initial feedback from various sources.

3.16 Initial Technical Paper

3.17 In preparing this Issues and Options Paper, a technical paper was produced for consultation with technical bodies such as statutory bodies, minerals and waste industry, environmental groups and internal departments to ensure the scope of the areas identified were sufficient. Only 11 technical bodies responded and their responses assisted in the preparation of this document. However due to the limited number of responses the majority of the information within the Technical Paper has been repeated within this paper, to enable a wider response to the issues identified in the initial waste paper to be explored further to produce a sound evidence base for the Preferred Options. Responses to this initial paper will still be considered in the preparation of the next stage of the process

3.18 Initial Sites Paper

3.19 Many of the sites have previously undergone initial consultation with Technical Bodies such as the Environment Agency and English Nature and their responses have been included within Part II, relating to each individual site. There are a number of sites that have not undergone this initial consultation as they were submitted after this consultation and therefore this feedback will be gained through this consultation.

4 How to get involved

How to comment

4.1 This issues and options papers is being published for consultation for a nine week period starting on Monday 1st October and ending at 5:00pm on Friday 30th November 2007.

4.2 The easiest way is to comment on-line. Go to:

4.3 www.bedfordshire.gov.uk

4.4 From here click on the “Consultations” link on the left hand side of the screen and follow the links to the Waste Development Plan Documents. The online documents allow you to read and comment on the documents online and through registering with the site you will also be notified of all future work on the Minerals and Waste Development Framework

4.5 However if you don not want to comment online you can email mwplans@bedscc.gov.uk or write to Minerals and Waste Plans Team Bedfordshire County Council County Hall Cauldwell Street Bedford MK42 9AP

4.6 Please note that we cannot take comments by telephone, as we need to keep a clear audit trail for all the comments that we receive.

4.7 Due to the open nature of the preparation of the Development Plan Documents, any comments received to the consultation will not remain confidential and will be in the public domain

4.8 **If you have any queries regarding this consultation, or any other aspect of the Minerals and Waste Development Framework, please contact the minerals and waste team at MWPlans@bedscc.gov.uk , or telephone the minerals and waste plans team on 01234 718028.**

Sustainability Appraisal Workshops

Public Workshops

4.9 To assist in the preparation of the Sustainability Appraisal we will be holding a number of workshops within Bedfordshire.

- Stewartby – Wednesday 31st October
- Dunstable – Thursday 1st November
- Bedford – Wednesday 7th November
- Biggleswade – Thursday 8th November

4.10 The workshops will run from 6.15 – 8.15pm, with registration from 6.00pm. For further details in relation to these workshops and to register for a place at an event, please contact Rachel Crozier on 0800 3894276 or rachelcrozier@organisingolutions.co.uk

5 Approach to Waste Streams and Types

5.1 The EC Waste Directive defines waste as

“any substance or object which the holder disposes of or is required to dispose of”.

5.2 Wastes are classified under EU legislation and include waste from a number of different waste streams. These can include municipal, commercial and industrial, construction and demolition agricultural, clinical, waste water, waste electrical and electronic equipment.

Waste Streams and Descriptions

5.3 The three main streams are discussed below in greater detail

Waste Stream	Description
Municipal Waste	This is the waste generated by households, commercial activities and other sources whose activities are similar to those of households and commercial enterprises. It is usually made up of residual waste, bulky waste, secondary materials from separate collection (e.g. Paper and Glass) household hazardous, street sweepings and litter collections.
Construction and Demolition Waste	This waste arises from activities such as the construction of buildings and civil infrastructure, total or partial demolition of buildings, road planings and maintenance. It is made up of numerous materials including concrete, bricks, wood, glass, metals, soils etc. May also include some hazardous materials such as solvents and asbestos.
Commercial and Industrial Waste (C & I)	The Environmental Protection Act 1990 s 5.75(7) defines industrial and commercial waste as “ Waste from premises mainly for trade, business, sport, recreation or entertainment”. For example these can include the production of basic metals, food, beverage, and tobacco products.

Waste Types and Descriptions

5.4 For the purposes of Waste Planning, including monitoring, within Bedfordshire, we have classified all the types of waste produced into 3 groups which are shown in the table below. Each waste type can be produced from any one of the above waste streams.

Waste Type	Description
Inert	Waste which, when deposited into a waste disposal site, does not undergo any significant physical, chemical, or biological transformations and which complies with the criteria set out in Annex 111 of the EC Directive on the Landfill of waste.
Non Hazardous	All those wastes that do not fall under the definition of hazardous waste and do not meet the waste acceptance criteria for inert waste
Hazardous	The Hazardous Waste Directive (91/689/EC) sets out the legal framework for the definition of hazardous wastes in Europe. Wastes are defined as hazardous if, for example, they are highly flammable, harmful, toxic, carcinogenic or corrosive. This includes waste from industrial chemical processes, oil refining, metal processes, solvents, waste oils, some chemical waste, asbestos and nuclear industry

Question 1

Have Bedfordshire and Luton identified the waste streams and types correctly? If not, please suggest alternatives

Monitoring of Waste Streams and Types

5.5 Currently we annually monitor waste management within Bedfordshire and Luton through surveying waste operators. It is intended to ask in future surveys to differentiate amount of waste types in relation to waste streams. For example, asking for differentiation between arisings from an MSW source or C&I source. This should enable us to see which was stream is producing the most hazardous, inert or non hazardous.

Question 2

Is this appropriate to monitor this level of detail? If not, please give reasoning.

5.6 Secondly to enable a detailed picture of inter – regional movements and those imports from outside the region we intend to ask for a further split within the Annual Waste Survey. This should enable the Councils to see if they are meeting the requirements of the Regional Spatial Strategy and National policy

Question 3

Is this further split appropriate? If not, please give reasons

6 Time Period of Plan Coverage

6.1 It is important at the outset to define an appropriate time period over which the Waste Core Strategy is to apply. The time period will influence the total waste arisings to be dealt with over the plan period and the consequential scale of provision for waste management facilities which will need to be made.

6.2 Government guidance (Planning Policy Statement 12: Local Development Frameworks), states that a core strategy document should have a coverage of at least 10 years beyond the anticipated date of adoption. As the anticipated adoption date of the Waste Core Strategy is the end of 2009, this means that the core strategy should at least cover the period up to the end of 2019.

6.3 However, the guidance also states that “the core strategy should aim to look ahead to any longer-term time horizon which is set out in the relevant regional spatial strategy”, which in this case is the East of England Plan with an end date of 2021 (we assume this to mean the end of 2021).

6.4 This leads to two issues. Firstly if the Core Strategy covers up until 2019 then being a shorter plan period, it results in a smaller quantity of waste arising’s to be considered and consequentially less management facilities needing to be provided. However this is not in accordance with the Regional Spatial Strategy (RSS) timescale therefore not accounting for the full waste arising projections included in the RSS and will not provide a wider outlook at waste management within Bedfordshire and Luton.

6.5 Whereas, if we plan up until 2021, we are in accordance with National and Regional Policy and have a complete picture of waste projections for the plan period. However, it will mean that we will need to ensure there are sufficient waste management facilities for these two extra years of waste arisings than if we were to have a plan till 2019

6.6 Alternatively there is the further issue of whether we plan for later than 2021. New waste facilities require significant investment and therefore the plan period may need to plan for beyond 2021 to allow developers greater assurances for investment. However this raises concerns as there are no projections for Bedfordshire and Lutons waste arisings past 2021 and secondly it would be in contradiction with National Policy. Therefore we have three options for the time period for the Core Stratgey, the 10 year plan up to 2019, the 13 year plan in accordance with the Regional Plan and lastly beyond the 13 years and outside the scope of the Regional and National Guidance.

Question 4

Should the end date for the Waste Core Strategy be:

a) End of 2019?

b) End of 2021?

c) Some other date? (Please specify and give reasons)

7 The Vision for Waste Development Plan Documents

7.1 Planning Policy Statement 12 (PPS12) says that a Core Strategy should set out the key elements of the planning framework for the area and should comprise a spatial vision and strategic objectives for the area; a spatial strategy; core policies; and a monitoring and implementation framework with clear objectives for achieving delivery.

7.2 With regards to Waste in particular, PPS12 states that the Core Strategy

“should set out a planning strategy for sustainable waste management which enables provision of waste management facilities in appropriate locations”.

7.3 PPS10: Planning for Sustainable Waste Management identifies that planning has an important role in delivering sustainable waste management:

- Through the development of appropriate strategies for growth, regeneration and the prudent use of resources; and
- By providing sufficient opportunities for new waste management facilities of the right type, in the right place, at the right time.

7.4 To explore the potential vision and objectives, we first explored the overarching policy approaches in which Waste Development Documents should be produced. Appendix 2 sets out the National, Regional and Local Policies and Strategies that we have deemed necessary to explore in formulating these potential objectives. These will remain overarching guidance throughout the preparation of the Waste Development Plan Documents

Question 5

Are there any other documents, strategies and policies that should be considered when preparing the Waste Development Plan Documents?

Proposed Strategic Vision

7.5 In order to adopt the principles within PPS10 we suggest the following to provide a spatial vision for Bedfordshire and Luton’s Waste Development Documents.

Statement 1

To ensure the provision of sufficient waste management facilities within Bedfordshire and Luton, in order to facilitate anticipated growth patterns and ensure economic development, all within a sustainable arena.

Question 6

Is this Vision appropriate for Bedfordshire and Luton's Waste Development Documents? If not, what do you propose the vision should contain?

Potential Waste Objectives

7.6 Following this proposed vision it is important to define a potential set of objectives to underpin the Waste Development Documents (core strategy and site allocations). Objectives will enable eventual policies to be clearly defined in terms of the desired outcomes, and will also eventually give a robust foundation for developing indicators and targets for monitoring purposes.

7.7 Potential Waste Objectives (in no particular order)

- To provide for sufficient capacity for the transfer, treatment and disposal of waste produced within Bedfordshire and Luton, plus a contribution to National and regional waste management requirements for the plan period, in accordance with National and Regional policy.
- To ensure management of waste is carried out in a sustainable way, and in a manner that conserves and, where possible, enhances our natural and cultural resources. Avoiding and where necessary, mitigating potential adverse impacts on the surrounding environment (including biodiversity, flora, fauna, water, air, soils and cultural heritage.)
- To maintain county self sufficiency and reduce the amount of waste that goes to landfill through by exceeding Waste Strategy 2007 targets. With the aim that by 2015, only post treatment residues of non inert waste goes to landfill.
- To promote the Waste Hierarchy and the use of waste as a resource, with an increase in recycling, composting and other recovery of waste.
- To encourage the management of waste at source in relation to all forms of development in order to promote the waste hierarchy.
- To minimise the impact of transportation of waste, including minimising the distance materials need to be transported by road, avoiding use of unsuitable roads; and encouraging the use of other modes of transport where applicable.
- To support economic growth and employment. In particular through:-

Facilitating the development of necessary infrastructure for waste development and other business development. For example development on Eco Parks.

Help meet existing business needs; and

Encourage innovation and enterprise within waste management.

7.8 We do not set out options for this issue relating to objectives as the potential range is too large. Instead, we ask the following questions:

Question 7

Are the above objectives appropriate?

If not, what should objectives be?

8 Waste Management Methods

8.1 In the current waste climate, waste technologies are being developed, promoted and utilised at a significant rate. Currently there are a vast array of different waste management methods and facilities available. To ensure that the Waste Development Plan Documents remain dynamic and have the ability to accommodate any new technologies, it is proposed to use a basic split in different waste management methods. The approach intends to classify all waste development into four categories, through which all waste development can be categorised. These are intended to be

- Materials Recovery - such as composting, recyclable processing etc, anaerobic digestion;
- Energy Recovery - such as pyrolysis/gasification, small scale thermal treatment, large scale thermal treatments, etc;
- Waste Transfer - such as civic amenity sites, waste transfer stations etc; and
- Disposal - such as landfill, both inert and non inert, and landraising.

8.2 However it is acknowledged that some management methods may have linkages to other, for example, transfer and recovery may potentially be one operational site.

8.3 When this occurs, when classifying, we will be adopting the approach that the main operation within a site will dictate how it is classified. For example, anaerobic digestion would therefore be classified as Materials Recovery as the process is mainly recycling with a very minimal amount of energy production.

8.4 The Regional Waste Management Strategy describes using Construction and Demolition Waste during the backfilling of quarry voids during restoration or landfill engineering as a beneficial use. Therefore this raises the issue of whether this type of operation should be considered recovery rather than landfill

Question 8

Is the above split of waste management methods appropriate or is more detail required? If so, please explain how

Question 9

Should we consider promoting the use of inert waste for purposes such as backfilling of quarry voids during restoration or landfill engineering and restoration as a beneficial use and recovery rather than landfill?

Question 10

Are there any other issues relating to Waste Types and Waste Management that we have not considered within this Chapter

9 Waste Arisings and Projections

9.1 We have previously asked a selection of Technical Bodies, through the Initial Waste Paper, the following questions relating to the methods for projecting waste arisings within Bedfordshire and Luton for the Plan period. Unfortunately due to lack of responses relating to this question, it is felt that to make an informed decision on this subject to open up this question to general consultation.

9.2 The approach that Bedfordshire and Luton adopt for projecting waste arisings over the plan period is a crucial one. Assessing the projected arisings alongside existing capacity will provide us with a greater ability to identify the requirement for future waste management facilities within the plan period.

9.3 All Authorities have to adopt challenging but achievable targets to minimise waste and implement the overall aim of recycling, composting and recovering value from waste in accordance with the Waste Hierarchy. Therefore firstly we need to establish the recovery rates we will be anticipating throughout the Plan Period. There are three possible targets we can attempt to meet. These are Waste Strategy 2007 Targets, the targets as set out in the Proposed Modifications to East of England Plan or the Best Value Performance Indicators (BVPI) for Bedfordshire.

9.4 Each are set out below for clarity

Waste Strategy 2007 Targets

- Recycling and Composting of household waste - at least 40% by 2010, 45% by 2015 and 50% by 2020; and
- Recovery of Municipal waste (MSW)- 53% by 2010, 67% by 2015 and 75% by 2020
- Commercial and industrial waste (C&I) landfilled are expected to fall by 20% by 2010 compared to 2004 and to halve the amount of C& I by 2012.

Regional Waste Management Targets

9.5 The Proposed Modifications to East of England Plan set Waste Management Targets for the Region.

- Municipal Waste(MSW) must have a recovery rate of 50% at 2010 and 70% at 2015;
- Commercial and Industrial waste is to have a recovery rate of 72% at 2010 and 75% at 2015; and
- Eliminate the landfilling of untreated municipal and commercial waste in the region by 2021

Best Value Performance Indicators

9.6 Best Value Performance Indicators (BVPIs) are a statutory set of 90 indicators developed by Government Departments to measure the performance of local authorities. The data is collected and audited annually by the Audit Commission. The BVPI relating to Waste range from BV82a(i) to BV91(b). The Waste Disposal Authorities have been given statutory performance targets for recycling and composting. It is through aiming for these BVPI Targets that the Waste Disposal Authority have projected their recovery rates

Table 9.1 BVPI figures for Bedfordshire

Ref	Description	2005/6 Target	2006/07 Target	2007/08 Target	2008/9 Target
82a(i)	Percentage of household waste arisings which have been sent by the authority for recycling Recycling %	17.35%	19.00%	20.20%	21.00%
82a(ii)	The tonnage of household waste sent by the Authority for recycling Recycling total tonnage	New for 2005/06	39,863	42,956	46,078
82b(i)	The percentage of household waste sent by the Authority for composting or treatment by Anaerobic Digestion Composting %	7.50%	13.00%	14.00%	15.00%
82b(ii)	The tonnage of household waste sent by the Authority for composting or treatment by Anaerobic Digestion Composting total tonnage	New for 2005/06	27,275	30,069	32,913
82c(i)	Percentage of the total tonnage of household waste arisings that have been used to recover heat, power and other energy sources Energy Recovery %	1.60%	0.05%	2%	3%
82c(ii)	Total tonnage of household waste arisings that have been used to recover heat, power and other energy sources Energy Recovery total tonnage	New for 2005/06	104.90	4296	6583
82d(i)	Percentage of household waste that	73.53%	67.95%	64%	61%

Ref	Description	2005/6 Target	2006/07 Target	2007/08 Target	2008/9 Target
	has been landfilled Landfill %				
82d(ii)	The tonnage of household waste arisings that have been landfilled Landfill total tonnage	New for 2005/06	142,564	137,459	133,845

Question 11

Which targets are appropriate for use in projecting Waste Arising's for the Development Plan Period?

- a) Waste Strategy 2007 Targets
- b) Regional Waste Management Targets
- c) Best Value Performance Indicators

If none of the above are appropriate, what do you suggest?

10 Waste Arisings within Bedfordshire and Luton

10.1 The main waste streams and projections for the Plan period within that Bedfordshire and Luton have to provide waste facilities for are explored within this Chapter. They are

- Municipal Solid Waste
- Commercial and Industrial
- Construction and Demolition
- Hazardous Waste
- Waste Imports

MSW Arising Projections

10.2 In relation to ascertaining MSW Arising Projections, we have used two different projections for MSW arisings which feed into the overall waste projections for the plan period.

10.3 Firstly the Waste Disposal Authorities, both at Luton and Bedfordshire, have their own internal projections for waste arisings up to 2021.

10.4 Secondly the Proposed Modifications to the East of England Plan also have projections for MSW arisings within Bedfordshire and Luton up to 2021.

10.5 This chapter takes both sets of projections and applies each set of the aforementioned targets, to present a collection of possible waste arisings, recovery and landfill rates for Bedfordshire and Luton for the duration.

10.6 These two projections combined with the three target approaches produce five variables for MSW arising projections that could be used and these are:

- Bedfordshire and Luton Waste Disposal Authority MSW Projections using our own BVPI figures
- Bedfordshire and Luton Waste Disposal Authority MSW Projections using Regional Waste Targets
- Bedfordshire and Luton Waste Disposal Authority MSW Projections using Waste Strategy 2007 projections.
- East of England Plan MSW Projections with Regional Waste Targets
- East of England Plan MSW Projections with Waste Strategy 2007 Targets

10.7 After setting out the projections we will ask which ones are the most appropriate for us to utilise for the plan period.

Options 1, 2 & 3 for MSW

10.8 Options 1, 2 & 3

10.9 The first three options utilise the figures for Municipal Solid Waste arisings, up to 2021, as projected by Bedfordshire County Council and Luton Borough Council's Waste Services Team. The figures have used actual recovery at 05/06 and then in each option applied the targets, as set out previously. For a thorough year by year breakdown of predicted waste arisings see Appendix 3.

Table 10.1 Option 1 - Bedfordshire and Luton Waste Disposal Authority MSW Projections with BVPI Targets Applied

Year	Beds MSW Arisings (Tonnes)	Beds Recovery using BVPI (Tonnes)	Beds landfill through BVPI (Tonnes)	Luton MSW Arisings (Tonnes)	Luton Recovery Using BVPI (Tonnes)	Luton Landfill through BVPI (Tonnes)	Total Beds and Luton BVPI recovery (Tonnes)	Beds and Luton landfill through BVPI (Tonnes)
2005/06 (ACTUAL)	220,320	60,382	159,938	98,362	25,173	73,180	85,555	233,127
2010/11	230,000	85,000	150,000	100,000	40,000	65,000	125,000	205,000
2015/16	250,000	90,000	160,000	110,000	50,000	60,000	140,000	220,000
2020/21	270,000	100,000	170,000	115,000	50,000	65,000	150,000	235,000
Total over plan period	3,900,000	1,400,000	2,000,000	1,700,000	700,000	1,000,000	2,100,000	3,500,000

Table 10.2 Option 2 - Bedfordshire and Luton Waste Disposal Authority Projections with Regional Targets applied

Year	Beds MSW Arisings (Tonnes)	Beds Recovery using Regional Targets (Tonnes)	Beds landfill through Regional Targets (Tonnes)	Luton MSW Arisings (Tonnes)	Luton Recovery Using Regional Targets (Tonnes)	Luton Landfill through using Regional Targets (Tonnes)	Total Beds and Luton Regional Recovery (Tonnes)	Beds and Luton landfill through Regional Targets (Tonnes)
2005/06 (ACTUAL)	220,320	60,382	159,938	98,362	25,173	73,189	85,555	233,127
2010/11	230,000	120,000	120,000	100,000	50,000	50,000	170,000	170,000
2015/16	250,000	180,000	80,000	110,000	80,000	30,000	260,000	100,000
2020/21	270,000	170,000	110,000	115,000	70,000	45,000	240,000	150,000
Total over plan period	3,900,000	2,200,000	1,700,000	1,700,000	970,000	730,000	3,100,000	2,500,000

Table 10.3 Option 3 - Bedfordshire and Luton Waste Disposal Authority Projections with Waste Strategy 2007 Targets Applied

Year	Beds MSW Arisings (Tonnes)	Beds Recovery using WS2007 Targets (Tonnes)	Beds landfill through WS2007 Targets (Tonnes)	Beds Recycling, Reuse, Composting Targets (Tonnes)	Luton MSW Arisings (Tonnes)	Luton Recovery Using WS2007 Targets (Tonnes)	Luton Landfill through WS2007 Targets (Tonnes)	Luton Recycling, Reuse and Composting Targets (Tonnes)
2005/06 (ACTUAL)	220,320	60,382	160,000	60,382	98,362	25,173	73,189	25,173

Year	Beds MSW Arisings (Tonnes)	Beds Recovery using WS2007 Targets (Tonnes)	Beds landfill through WS2007 Targets (Tonnes)	Beds Recycling, Reuse, Composting Targets (Tonnes)	Luton MSW Arisings (Tonnes)	Luton Recovery Using WS2007 Targets (Tonnes)	Luton Landfill through WS2007 Targets (Tonnes)	Luton Recycling, Reuse and Composting Targets (Tonnes)
2010/11	230,000	125,000	110,000	90,000	100,000	55,000	50,000	40,000
2015/16	250,000	170,000	80,000	115,000	110,000	75,000	40,000	50,000
2020/21	270,000	200,000	70,000	140,000	115,000	85,000	30,000	55,000
Total	3,900,000	2,300,000	1,600,000	1,600,000	1,700,000	1,000,000	700,000	700,000

Table 10.4 Option 3 - Totals Continued

Year	Beds and Luton Total Predicted Recovery using WS2007 Targets (Tonnes)	Beds and Luton total Predicted Landfill using WS2007 Targets (Tonnes)
2005/06 (ACTUAL)	85,555	230,000
2010/11	180,000	160,000
2015/16	245,000	120,000
2020/21	300,000	100,000
Total	3,200,000	2,400,000

Options 4 & 5 for MSW

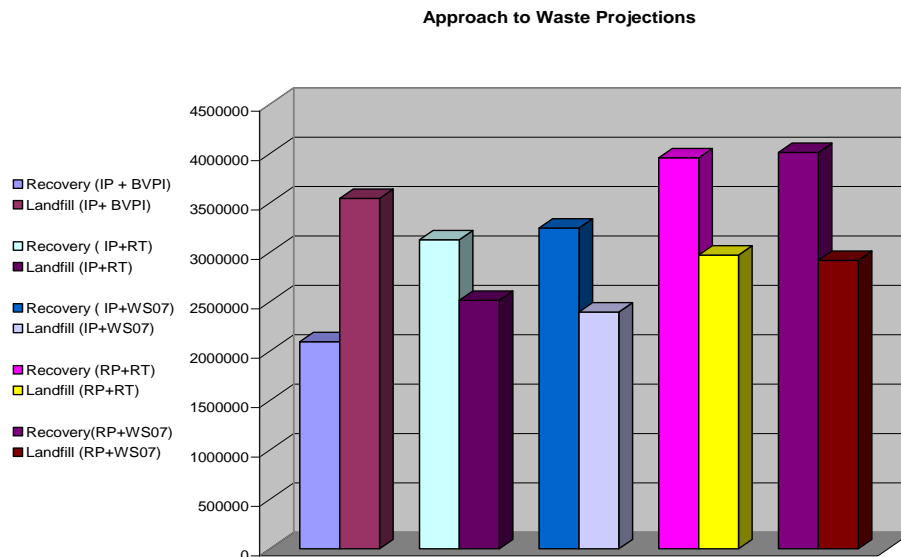
10.10 The East of England (EoE) Plan, when adopted, will include projected waste arisings for Municipal Solid Waste (MSW). The East of England Regional Assembly have responded to the proposed modifications of the EoE Plan, with revised waste figures. These figures have been used for calculating the projections and calculations in the last two options relating to MSW waste.

10.11 In both options we have used actual 2005/06 recovery rates and then applied the Regional Targets and the Waste Strategy 2007 Targets up to 2021. For full year by year breakdown see Appendix 3

Table 10.5 Options 4 & 5 - Regional Waste Arising Projections with Regional and National Targets applied

Year	Beds and Luton Regionally predicted MSW Arisings (Tonnes)	Recovery Rates for MSW using Regional Targets (Tonnes)	Beds and Luton Predicted Landfill using Regional Targets (Tonnes)	Recovery Rates for MSW using WS2007 Targets (Tonnes)	Recycling, Reuse and Composting Targets from WS2007 (Tonnes)	Beds and Luton Predicted Landfill using WS2007 Targets (Tonnes)
2005/2006	320,000	85,555	233,127	85,555	85,555	233,127
2010/11	440,000	220,000	220,000	230,000	175,000	210,000
2015/16	460,000	320,000	140,000	300,000	210,000	150,000
2020/21	470,000	340,000	140,000	360,000	240,000	120,000
Total	7,000,000	4,000,000	3,000,000	4,000,000	2,900,000	3,000,000

Picture 10.1 Approach to Waste Projections



10.12 Key

- **IP+BVPI** = Internal Projections with Best Value Performance Indicators (Option 1)
- **IP+BVPI** = Internal Projections with Regional Targets (Option 2)
- **IP+WS2007**= Internal Projections with Waste Strategy 2007 Targets (Option 3)
- **RP+RT** = Regional Projections with Regional Targets (Option 4)
- **RP+WS2007** = Regional Projections with Waste Strategy 2007 Targets (Option 5)

10.13 The chart above illustrates (in tonnes) the differences in recovery rates and landfill rates produced through the five different options for waste arisings, recovery and disposal.

Question 12

Which Option do you think is most appropriate approach to use in the formulation of our Waste Development Plan Documents

- 1) Bedfordshire and Luton Waste Disposal Authority MSW Projections using our own BVPI figures
- 2) Bedfordshire and Luton Waste Disposal Authority MSW Projections using Regional Waste Targets
- 3) Bedfordshire and Luton Waste Disposal Authority MSW Projections using Waste Strategy 2007 projections.
- 4) East of England Plan MSW Projections with Regional Waste Targets
- 5) East of England Plan MSW Projections with Waste Strategy 2007 Targets

If you do not believe any of the above approaches are appropriate, please state which approach you would use.

Commercial and Industrial Waste

10.14 Due to the difficulties of obtaining local detailed information on Commercial and Industrial waste arisings (C & I), Bedfordshire and Luton have utilised the Commercial and Industrial Waste Projections as set out in EERA's response to the proposed modifications to the East of England Plan.

10.15 For these C & I projections we have applied both the Regional Targets and Waste Strategy 2007 Targets. For ease of reference, these are set out again below

Waste Strategy 2007 Target for Commercial and Industrial Waste

- Commercial and industrial waste (C&I) landfilled are expected to fall by 20% by 2010 compared to 2004 and to halve the amount of C& I by 2012.

Regional Targets for Commercial and Industrial Waste

10.16 The Proposed Modifications to East of England Plan set Waste Management Targets for the Region.

- Commercial and Industrial waste is to have a recovery rate of 72% at 2010 and 75% at 2015; and
- Eliminate the landfilling of untreated municipal and commercial waste in the region by 2021

10.17 However the Waste Strategy 2007 has highlighted that the Government will soon be setting a new national target for the reduction of commercial and industrial waste going to landfill and this will need to be incorporated into the preparation of the Waste Development Plan Documents.

Table 10.6 Commercial and Industrial Waste Projections

Year	Bedfordshire and Luton Regionally Predicted Commercial and Industrial Arisings	Recovery Rates for Commercial and Industrial using regional Targets	Bedfordshire and Luton Predicted Landfill using regional targets	Recovery rates for commercial and industrial using WS2007 Tagrtes	Bedfordshire and Luton Predicted commercial and industrial landfill using WS2007 targets
2005/06	661,000	219,000	442,000	219,000	442,000
2010/11	661,000	475,920	185,080	300,000	350,000
2015/16	661,000	495,750	165,250	330,000	330,000
2020/21	661,000	495,750	165,250	330,000	330,000
Total	10,600,000	7,000,000	3,600,000	5,000,000	5,600,000

Question 13

Is it appropriate to use the Regional Figures for projecting Commercial and Industrial Figures for the Plan period? If not what projections should we use and where would we obtain the relevant information?

Construction and Demolition

10.18 Construction and Demolition Waste (C & D) is an area where accurate data is exceedingly difficult to obtain. This waste stream largely consists of soils, brick, concrete and material arising from road repairs and maintenance. As such it has great potential for reuse or recycling and therefore never enters the conventional waste stream. Construction and Demolition Waste can also be used for beneficial purposes such as backfilling of quarry voids during restoration or landfill engineering and restoration.

10.19 As mentioned there is very limited information on Construction and Demolition Wastes. The ODPM^(a) published a report into this area, however it only split the arisings by regions, not on a Waste Planning Authority basis. This report showed that the majority of the C & D Arisings was either recovered or used for beneficial purposes, with only 14% going to landfill.

10.20 The ERM Study ^(b)discusses the net arisings of Construction and Demolition Waste at a regional level. This report makes the assumption that the growth rate for this waste stream will remain relatively constant over time. This assumption reflects, in part, the impact of the landfill tax and the Aggregates Levy.

10.21 The approach that Bedfordshire and Luton plan on using for the Waste DPDs is to use the predictions for the plan period as set out in the ERM Study and use the 50% recovery rate and 80% beneficial rate as set out in the Regional Waste Management Strategy.

a [ODPM \(2004\) Survey of Arisings and Use of Construction, Demolition and Excavation Waste as Aggregate in England in 2003](#)

b [ERM\(2005\) Study of Existing Waste Facilities Capacity and Future Needs in East of England: Final Report](#)

Construction and Demolition Waste Arisings and Recovery figures 2005 - 2021 (000's Tonnes)					
	2004/5	2009/10	2014/15	2020/21	Total
C& D Arisings from ERM study	1650	1760	1943	2232	7585
Recovery using RWMS 50% Target	825	880	971.5	1116	3792
Landfill as a result of using RWMS 50% Target	825	880	971.5	1116	3792
Using RWMS 80% Beneficial Use	1320	1408	1554.4	1785.5	6067
Landfill as a result of using RWMS 80% Target	330	352	388.6	446.5	1517

Question 14

Is it appropriate to use the figures from the ERM Study for Construction and Demolition Waste for the Plan Period? If not, what figures should we use?

Question 15

Is it appropriate to use the Regional Waste Management Strategy for the East of England projections of 50% recovery and 80% for beneficial use with the projected C& D Handled? If not, what targets should we use?

Hazardous Waste Projections

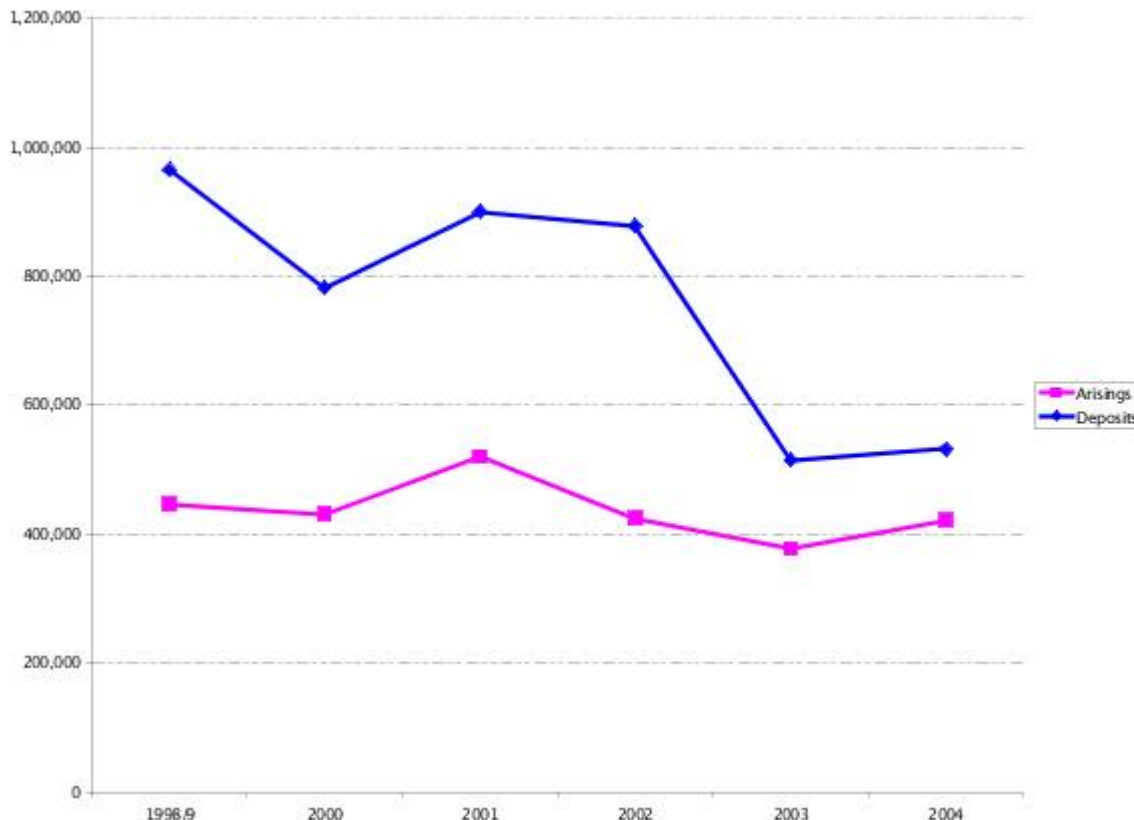
10.22 There is a lack of recent comprehensive data relating to hazardous waste arisings and capacity within Bedfordshire and Luton. In December 2006 ERM produced "Analysis of Current Hazardous Waste Arisings in East of England". This report looked at the Hazardous waste situation within the East of England. Approximately 377,000 tonnes of hazardous waste was produced in 2003 and predicted a future reduction in the amount of hazardous waste produced.

10.23 However, the Environment Agency figures show a rise in waste arisings between 2003 and 2004, from 377,000 tonnes to 422,110. This could have been due to the impending restrictions at time on hazardous waste facilities and therefore should be treated with caution. The figure for 2004 seems to be more in keeping with average production figures since 1998/9. <http://www.environment-agency.gov.uk/>

10.24 In relation to Hazardous waste deposited within the East of England, there appears to be decreasing trend from 1998/9 with 964,995 tonnes to 531,488 in 2004.

10.25 The year on year figures for both arisings and deposits within the East of England are highlighted in the chart below

Picture 10.2 Hazardous Waste Arisings and Deposits (Tonnes per annum)



10.26 The Environment Agency produce annual figures for each Waste Planning Authorities arisings. The figures for 2004 for Bedfordshire and Luton can be seen in the table below.

	Hazardous Waste Arising Figure (Tonnes)	Hazardous Waste Disposal within Bedfordshire and Luton (Tonnes)
Total of all Hazardous European Waste Classes	37,035	135,288

10.27 Following the introduction of the hazardous waste restrictions in July 2004, and the requirement to register hazardous sites, Bedfordshire and Luton have no hazardous landfill sites as none of the operators within Bedfordshire and Luton chose to register their sites as taking hazardous waste. For the plan period the Councils propose to use these two figures as they are the most recent for waste planning within the Waste Development Plan Documents. EERA has commissioned a study into the arisings and management of hazardous waste in the region with a view to developing a Hazardous Waste Strategy. We will have regard to these documents as and when this and its related documents are produced.

Question 16

Is it appropriate to use the Environment Agency's figures for hazardous waste for 2004 within the preparation of development plan documents and review this in light of the regional study into arisings and management of hazardous waste? If not, what figures do you propose we use?

10.28 As shown in the table above, waste arisings within Bedfordshire and Luton are significantly lower than the amount deposited within the County.

Question 17

Consequently should the Councils plan for only arisings or disposal instead?

Waste Imports

10.29 The adopted Minerals and Waste Local Plan 2005 aims to reduce the quantity of waste over the plan period. It states that landfill proposals which include the importation of waste from outside the area will not be granted unless it can be demonstrated that there is a need for the imported waste to be deposited in the Plan area which cannot be met either within the region from which the waste originates or elsewhere within the neighbouring regions, having regard to the proximity principle. The two relevant existing policies are shown below.

Statement 2**W2 - Imported Wastes**

The aim of the Plan is to reduce the quantity of imported waste over the Plan period 2000-2015 having regard to the strategic aims set out in the Plan. Landfill proposals which include the importation of waste from outside the plan area will not be granted planning permission unless it can be demonstrated that there is a need for the imported waste to be deposited in the Plan area which cannot be met either within the region from which the waste originates or elsewhere within neighbouring regions, having regard to the proximity principle

W3 County Self- Sufficiency

Proposals for facilities primarily intended for the management of imported wastes by any means other than landfill will not be granted permission

Question 18

Is it appropriate for Bedfordshire County Council and Luton Borough Council to continue this stance relating to waste importation within our projections for the Plan Period? If not, please give reasoning.

10.30 Exact quantities that move across regional boundaries are difficult to ascertain as market forces dictate where waste is disposed at a certain point. The Councils are assuming that apart from waste imports from London, waste movements between sub-regions are broadly equal and therefore do not need to be accounted for in our figures.

10.31 The apportionment of waste imported from London is set by the RSS. Subject to the Regional Spatial Strategy, Bedfordshire has to accept 15.2% of London's waste exported to the Eastern Region for landfill.^(c)The total imported waste for landfill that Bedfordshire and Luton must deal with up to 2021 is 3,201,000 tonnes, and therefore this figure should be addressed in the projections that we use for the plan period .For a breakdown year by year of Londons imports into Bedfordshire and Luton see Appendix 3

c [Taken from the Jacobs Babtie Addendum Report 2007](#)

Question 19

Is it appropriate for the Councils to use the East of England's apportionment for London's Waste? If not, please give reasoning and an alternative approach.

11 Joint Working

11.1 Following on from DEFRA's publication^(d) another issue that requires discussion is whether we should consider joint working with neighbouring Waste Planning Authorities and consider creating larger waste facilities to process larger quantities of waste, (through either importing or exporting). "Economies of Scale" aim to consider the optimal geographic levels for waste collection and disposal activities in a range of local authority areas and types. We are currently joint working with Luton Borough Council but this publication and the Regional Spatial Strategy still raises two questions

Question 20

Should we consider the implications of adjoining Counties existing Waste Sites in the formulation of our documents?

Question 21

**Should we consider Economies of Scale in preparing our Waste Development Documents?
Please give reasoning for your answer.**

d [Economies of Scale \(April 2007\)](#)

12 Current Waste Capacity

12.1 To be able to establish the need for future waste management facilities, we need to establish the existing capacity within Bedfordshire and Luton. However obtaining maximum capacities from operators is very difficult. Therefore to ascertain these figures we have used a variety of methods, from Planning Applications to Supporting Statements from Appeals as well as an annual survey.

12.2 For a list of all sites please refer to Appendix 4

Waste Management Capacity

12.3 The Table below sets out the annual permitted throughput capacity for existing sites within Bedfordshire as at June 2007.

Waste Management Method	Number of Sites	Capacity (Tonnes Per Annum)*
Materials Recovery	23 sites	720,500
Energy Recovery	3 sites	190,000
Waste Transfer	15 sites	1,000,000
Disposal	10 Sites	Not Known
Total Waste Management Facilities	51 Sites	1,910, 500

*Taken from Bedfordshire County Council records

12.4 The table below sets out the annual throughput capacity for sites in Luton as at August 2007

Waste Management Method	Number of Sites	Capacity (Tonnes Per Annum)
Materials Recovery	2 MRF	125,000tpa
	2 Civic Amenity Sites	20,000tpa
Total Waste Capacity		145,000tpa

12.5 Luton have two civic amenity sites and two material recovery facilities as highlighted above. We are currently working with Luton to ascertain if there are any other sites.

Question 22

Is it sufficient to use these capacity figures within our calculations during the plan preparation? If not, please give reasoning and suggest what other figures we could use.

Landfill Site Capacity

12.6 The table below sets out the land fill waste capacity for both Non Hazardous Landfill and Non - Inert Landfill within Bedfordshire as at 1st April 2007.^(e)

Total Non Hazardous Landfill (3 sites)	3,738,000 cu metres ^(f)
Total Inert only Landfill (9 Sites)	No information available ^(g)

12.7

Question 23

How can the Councils obtain accurate capacity figures from the inert landfill industry to allow us to plan for future inert waste sites?

Annual Waste Site Throughput

12.8 The authorities undertake an annual waste survey to try and obtain complete figures for waste throughputs at permitted sites within Bedfordshire and Luton.

12.9 Actual responses are difficult to obtain from waste operators as it is not compulsory for them to return their figures unless there is an existing condition on the planning permission requesting such information. Consequently our knowledge on actual waste throughput within the sites of Bedfordshire and Luton is limited. As can be clearly seen below returns are very poor for 06/07

12.10 This years 06/07 survey has returned the following data:

- e [WRG \(2007\). The capacity has been provided for all sites but is at different dates. Arlesey - Feb 2007, Stewartby - March 2007 and Brogbrough - May 2007. For forward plan purposes we have assumed that the figure is at April 1st 2007](#)
- f [WRG \(2007\). The capacity has been provided for all sites but is at different dates. Arlesey - Feb 2007, Stewartby - March 2007 and Brogbrough - May 2007. For forward plan purposes we have assumed that the figure is at April 1st 2007](#)
- g [Unfortunately only one operator returned their figures for their inert landfill site therefore unable to report this figure](#)

Waste Management Method	Notes	Throughput 06/07
Composting	2 sites Returned	15,000tpa (Also we know that the WDA have composted 27,700 tonnes 06/07)
Aggregates Recycling	2 Sites Returned	15,000tpa
Material Recycling Facility/ Transfer Station	3 Sites Returned	40,000tpa
Thermal Waste Treatment	1 site	42,000tpa
Energy from waste	Not Returned	
Woodchipping	Still awaiting clarification	
Civic Amenity Sites	Still awaiting clarification	
Landfill (Non Inert)	3	2,300,000cu m
Landfill (Inert)	Not Returned	

12.11 The EA have been able to provide various figures on waste throughput for some of the sites for 04/05 (See Table below), though at this moment it's a combined figure and therefore we are unable to differentiate which sites are included and which ones are not^(h)It must also be highlighted that some of the sites within Bedfordshire are exempt from EA monitoring. These can include composting sites etc. If we compare what we have received from our annual survey with the EA figures we can see a dramatic difference. Therefore the figures below can only be used as a very rough guide and some of them can hardly be considered any use at all.

Site Type	Site Input/ Throughput (Tonnes)
Landfill (Co Disposal)	4, 380,000 ^(h)
Landfill (Non Inert)	5,000
Landfill (Inert)	333,000
Treatment Plants	51,000
Transfer Sites	659, 000

12.12 We are hoping to work more closely with the EA in the future to obtain more detailed figures as recommended by National Guidance in PPS10.

Question 24

Are there any better suggestions for ways in which Bedfordshire and Luton can obtain better throughput figures for the permitted Waste Sites within Bedfordshire and Luton?

Question 25

Should it be standard planning practice for Bedfordshire and Luton to attach a planning condition to all planning permissions for the return of throughput figures on an annual basis?

^h Taken from <http://www.environmentagency.gov.uk/subjects/waste/1031954/315439/1434288/1434293/1489075/?lang=en>
ⁱ This figure appears extremely high and not in line with any previous or later survey work, so should be used in caution

13 Recycled and Secondary Aggregates

13.1 We mentioned at the front of this Issues and Options paper that the Minerals Development Plan Documents are being prepared separately to the Waste Documents. However there was one issue that arose within the preparation of the Minerals Document that has been decided needs to be included within the Waste Development Plan Documents as a waste issue. This is Secondary and Recycled Aggregates.

13.2 National Policy is to increase the use of recycled and secondary materials as substitute for natural minerals. It is a prime objective of regional minerals policy to increase supplies of secondary aggregates and encourage greater use of mineral waste in the construction industry in accordance with the principles of sustainable development.

13.3 In Bedfordshire the main source of alternative minerals is the recycling of construction and demolition wastes.

13.4 There is no reliable and comprehensive data on production of recycled and secondary aggregates available for Bedfordshire and Luton.

13.5 Previous work on this issue was undertaken in the Minerals Issues and Options Paper and is currently discussed in the Minerals Preferred Options (Sept 2007).

13.6 Through this consultation and in light of the national guidelines it has been considered most appropriate to plan for aggregate recycling in line with National and Regional Guidelines, i.e to plan for aggregates recycling equivalent to 42% of the land won supply. Basing this on the 1.93mtpa sub regional apportionment for land won aggregates; this would give a figure of 0.81mtpa.

13.7 As previously stated there is currently a total aggregates recycling capacity of approximately 600,000 tonnes per annum. Although the survey data is poor in this area, and the fact that actual production rates can vary in this area, it is considered appropriate to employ a plan-monitor-manage approach to provision of any new capacity, with new provision only being made appropriate when it can be demonstrated that existing capacity is being fully utilised.

Question 26

When, through this plan – monitor – manage approach, it is deemed necessary to make provision for additional aggregate recycling facilities how should this be done:

- 1) Identify sites for temporary facilities**
- 2) Identify sites for permanent facilities**
- 3) Set locational facilities**

14 Sewage Treatment Works

14.1 Sewage Treatment facilities, together with alternative methods for management of sewage sludge are in ever increasing demand due to continuing population growth and higher environmental standards.

14.2 The East of England Capacity Delivery Strategy Study: Phase One (Dec 2006) by Halcrow has indicated that various Sewage Treatment Works within Bedfordshire and Luton may require expansion within the Plan Period due to the anticipated growth within the area. However, though correspondence with Anglian Water, they have explained that due to the uncertainty of specific sizes of growth, their specific areas and the consequential impact on waste water facilities in Bedfordshire and Luton, it is potentially very hard to identify specific sites at this time. Therefore the Councils consider it appropriate to adopt a Plan – Monitor – Manage approach for identifying sewage treatment works.

Question 27

Is it appropriate to adopt a Plan-Monitor and Manage approach to identifying Sewage Treatment works for the plan period? If not, what approach should we take?

14.3 Policy W18 in the existing Minerals and Waste Local Plan states that proposals for new sewage treatment works will only be granted permission, when it can be demonstrated that the need for the development cannot be accommodated at an existing site.

Question 28

Is it appropriate to maintain this approach for identifying future potential Sewage Treatment works? If not how should future STW sites be identified.

14.4 There is also the potential for utilising sewage treatment facilities for combined management of other organic wastes, particularly for co-digestion AD processes and combined composting operations. Bedfordshire County Council currently encourage such development and expects proposals for new sites to investigate the potential for co-treatment of other organic wastes.

Question 29

Is it still appropriate to maintain this encouragement for combining such developments? If not please give reasons

15 Vehicle Dismantling and Metal Recovery Facilities (VDMRF's)

15.1 There are many vehicle dismantling and metal recovery facilities in Bedfordshire and Luton. Many have become established without specific planning permission and therefore consequently are not well located in terms of an environmental and amenity point of view.

15.2 Through the End of Life Vehicle (ELV) Act 2003 all VDMRF sites that deal with end of life vehicles must be licensed by the Environment Agency. Consequentially they maintain a list of all known VDMRF's that deal with ELV's.

15.3 Historically these types of sites had been dealt with by the relevant District Planning Authority. However due to Regulations introduced in 2003, these types of site have now been clarified as a County Council Planning matter.

15.4 At the current time Bedfordshire County Council and Luton Borough Council have no established approach to identifying VDMRF's, their capacity, their throughput and potential arisings as this area is an area previously not monitored. Therefore this is an area that needs to be investigated throughout the Development Plan Documentation

15.5 Due to the nature of the operations at VDMRF's the WPA consider classifying these sites as Waste Transfer Stations.

Question 30

Should the Waste Development Documents classify VDMRF's as Transfer Stations or should we have a specific policy relating to VDMRF? If so, what areas should it cover?

16 Spatial Strategy

16.1 One of the main outcomes of the Public Inquiry into the Bedfordshire and Luton Waste Plan 2005 was the need to identify sites for all or most types of waste management. The Inspector recommended that the Councils investigate preferred areas or areas of search to be identified for future waste development. There are many issues we need to consider with undertaking this.

16.2 Historically Bedfordshire has played a major role in provision of landfill facilities for disposal of non-hazardous and hazardous wastes due to the existence of worked out clay pits in the County and its geological suitability. Currently there are three non hazardous landfill sites within Bedfordshire, Brogborough, Arlesey and Stewartby. Two of these sites are within the Marston Vale area, which has proved ideal for landfill engineering and has been an area of historical landfilling.

Question 31

Due to the clay pits and geology of the area, is it appropriate for Marston Vale to continue as the main area for sites for future non inert landfill? If there should not be this automatic presumption, please give reasons why not?

Approach to Identifying Sites

16.3 The Government's call for a spatial plan means that the Council's need to establish the approach that would be most suitable to adopt to ensure our waste development needs are met within the County for the plan period.

16.4 The Councils are suggesting a 3 tier approach to identifying waste management facilities; Strategic Sites, Large Sites, All other sites

Strategic Sites

16.5 This tier of waste development would be to consider strategic waste development sites, for example a waste treatment plant. To enable classification of a strategic waste development it is first essential to classify the capacity threshold for this tier.

Question 32

What capacity threshold should a site have to class it as a strategic waste development site?

- a) Over 75,000tpa
- b) Over 100,000tpa
- c) Over 150,000tpa
- d) Other

Please indicate which you would consider appropriate, with reasoning

Question 33

The Councils consider that it is appropriate to be site specific, and therefore identify the sites that would fall within Strategic Sites in the Waste Development Plan Documents.

Do you agree with this approach? If not please give reasoning

Large Waste Development Sites

This would consider large waste development sites. This could include facilities such as Waste Transfer Stations and Material Recycling Facilities.

As with Strategic Sites, we first need to establish what capacity threshold would constitute a large site.

Question 34

What capacity threshold should a site have to class it as a large waste development site?

- A) 15,000tpa to strategic site capacity**
- B) 25,000tpa to strategic site capacity**
- C) 40,000tpa to strategic site capacity**
- D) Other**

Please indicate which you would consider appropriate, with reasoning

Question 35

The Councils consider that it is appropriate to be site specific, and therefore identify the sites that would fall within Large Waste Development Sites in the Waste Development Plan Documents. Do you agree with this approach? If not please give reasoning

If it is considered appropriate to be identifying sites for large operations, the Councils will therefore need to ensure that the locations of large waste sites are in the most appropriate areas for effective waste management.

Question 36

Should large waste sites be located;

- a) **Within or in close proximity to urban areas**
- b) **In Rural areas**
- c) **In Rural/Urban fringe**
- d) **Other,**

Please give reasoning for your answer

All other sites

16.6 This tier of waste management sites would be for smaller sites such as composting and minor transfer / recovery operations. These sites would be those with a capacity threshold less than what is considered a large site. As these would be smaller and in order to ensure sufficient flexibility, the councils feel that it is inappropriate to be site specific at this level of waste management operations, and instead have a criteria based approach on which to assess these sites, as and when applications are submitted

Question 37

Is it appropriate to have a criteria based approach for these types of operations? If not, what would you suggest?

Conclusion to the 3 Tier Approach

Question 38

Are these Tiers, as set out above, an appropriate approach for site selection for the plan period? If not please give reasoning.

Extension vs New Site

In relation to all the tiers and the identification of Sites within Tier 1 or Tier 2 or developing the criteria for Tier 3 approach, the issue of expansion to existing sites or creation of new sites is raised and needs to be explored.

Question 39

Is it more desirable in principle to permit capacity extensions to existing sites or seek the identification of new sites? Please give reasoning for your answer

Integrated Waste Treatment Sites (Eco - Parks)

Finally within this site selection chapter we raise the issue of Integrated Waste Treatment Facilities or "Eco-parks". At its most simplistic, an Eco-Park would take the form of an industrial estate situated around a major operation such as a Landfill or a Material Recovery Facility (MRF) whereby the tenants of the park either produce secondary materials or use them as a feedstock in their production process. It allows various waste operations to work together and share resources

Question 40

Should Bedfordshire County Council and Luton Borough Council include "Eco – Parks" in preparation of their Waste Development plan Documents? Please give reasoning

Question 41

Could it be considered appropriate to co – locate the "Eco- Parks" with Non Inert landfill sites within Bedfordshire? Please give reasoning for your answer

Conclusion to Spatial Strategy and Approach to Site Selection

Question 42

Is there anything else that needs to be considered in preparing a spatial strategy? If so, please suggest what else we could explore as an approach.

Question 43

Are there any other issues that Bedfordshire and Luton should consider in their approach to site selection? If not, please suggest what else we could explore as an approach.

17 Other Issues

17.1 The Bedfordshire and Luton Local Plan Inspectors Report 2004 set out the initial key issues to be discussed within the preparation of the Waste Development Plan Documents. We have already discussed the need to identify sites, the approach to identifying landfill need, and inert material within non inert sites within this document. There are two remaining issues that need to be discussed. They are conversion factor and impact of Newton Longville

Conversion Factor

17.2 Landfill void capacity is measured by volume (Cubic Metres), whilst the waste to be deposited is measure by weight (tonnes). It is therefore necessary to derive a conversion factor to enable an assessment of landfill need to be translated from anticipated tonnes of waste to the size of landfill required to accommodate disposal. The Adopted Minerals and Waste Local Plan 2005 has the 1:1 conversion factor, however it does acknowledge the possibility of 1.2:1 as a conversion factor due to the local survey work on the 3 sites within Bedfordshire. The Regional Waste Management Strategy also uses a conversion rate of 1:1. This issue therefore needs to be resolved during the preparation of the Development Plan Documents

Question 44

What approach do you suggest should be taken with regards to the Conversion Factor? Please give reasoning

Question 45

Should we have individual conversion factors for:

- a) Non - Inert Waste
- b) Inert Waste
- c) Hazardous Waste
- d) If so, what should they be?

Newton Longville Site

17.3 Planning permission was granted by neighbouring Milton Keynes Council in February 2002 for the landfill of a void and bio - materials recovery facility, with approximate void available of about 17 mcm. This site has the potential to be rail based and to accommodate waste from London. This site was not taken into account in assessing the need for voidspace in Bedfordshire within the Bedfordshire and Luton Minerals and Waste Local Plan 2005.

17.4 We have already raised the discussion topic of working with other Waste Planning Authorities and this section does not attempt to readdress that. However we do need to discuss the importance of Newton Longville in its own right.

Question 46

Do you think the Councils still need to consider Newton Longville, when assessing landfill voidspace capacity for the plan period? Please give reasoning

Question 47

If you do believe we should utilise Newton Longville, how do we approach this?

17.5 Hopefully we have scoped the main areas that will need to be considered and discussed in the preparation of the Waste Development Plan Documents.

Any Other Issues

Question 48

Question 48

Are there any other areas that we have not outlined or discussed within this paper? If so, please give full description

18 Appendix 1

DPD Production Timetable

Table 18.1 Waste Development Plan Document Preparation Timetable

DPD Production Stage	Waste Core Strategy	Waste Site Allocations Plan
Evidence Gathering To identify information that will be required to produce the Waste Development Plan Documents	Feb 06 – April 07	Feb 06 – April 07
Issues and Options Consultation To identify and consult on the main issues and options to be included within the Waste Development Plan Documents	April 07 – June 08	May 07 – June 08
Preferred Options Consultation To identify and consult on the preferred options for the Waste Development Plan Documents following the responses received at issues and options stage.	June 08 – July 08	June 08 – July 08
DPD Submitted Final documents are submitted to the Planning Inspectorate to consider its “soundness”.	Jan 09	Jan 09
DPD Consultation This submission is accompanied by 6 weeks consultation to allow for representations to be made.	Jan 09 – Feb 09	Jan 09 – Feb 09
Pre Exam Meeting	April 09	Oct 09
Examination	June 09	Dec 09
Receipt of Inspectors Binding Report	Oct 09	April 10
Adoption	Dec 09	June 10

19 Appendix 2

Policy Documents

19.1 Government guidance states that Development Frameworks should have regard to a range of policy statements and strategies at the national, regional and local levels. These include national Planning Policy Statements (PPS), Regional Spatial Strategies (RSSs) and Local Community Strategies.

19.2 These have been considered in the formulation of the issues and Options Paper

19.3 European and National Policy Framework

- European Waste Framework Directive
- European Landfill Directive and Landfill Regulations, which implement the Directive in the UK
- European Hazardous Waste Directive
- European Directive on the Conservation of Natural Habitats and of Wild Flora and Fauna (otherwise know as the Habitats Directive) and associated Regulations.
- Planning Policy Statement 1 (PPS1): “Delivering Sustainable Development”
- Planning Policy Statement 10 (PPS10): “Planning for Sustainable Waste Management”
- Planning Policy Guidance (RPG13) “Freight Best Practice Programme”
- Planning Policy Statement 23 “ Planning and Pollution Control”
- Planning Policy Statement 25 “Development and Flood Risk”
- Other Planning Policy Statements as and when produced
- Waste Strategy 2000
- Waste Strategy 2007

19.4 Regional Policy Framework

- The East of England Plan (Regional Spatial Strategy) (draft) (Proposed Modifications) 2006
- Regional Waste Management Strategy 2003
- Milton Keynes and South Midlands Sub Regional Growth Strategy 2005
- Mayor of London’s Municipal Waste Management Strategy 2003
- Regional Transport Strategy
Regional Freight Strategy

19.5 Local Policy Framework

- The current adopted Minerals and Waste Local Plan (January 2005).
- Districts and Luton Borough Local Plans and LDF's (as and when produced)
- The Bedfordshire Authorities Waste Management Strategy 2000
- The Bedfordshire Authorities Municipal Waste Management Strategy 2004
- Community Strategies for Bedfordshire (including the district strategies) and Luton.
- Bedfordshire and Luton Biodiversity Action Plan 2001
- Bedfordshire and Luton Green Infrastructure Plan
- Bedfordshire Local Transport Plan 2005/06 - 2010/11
- Bedford Outdoor Improvement Plan
- Bedfordshire Road Safety Strategy
- Bedfordshire and Luton Minerals Development Plan Documents
- Chilterns AONB Management Plan “The Framework for Action 2002 - 2007

19.6 Other Considerations

- Adjoining Councils Strategies and Plans
- Adjoining Regions Spatial Strategies
- Any Strategic Flood Risk Assessments produced by the Districts.
- The emerging Historic Environment Character Assessment, Landscape Character Assessment and Freight Strategy being produced by Bedfordshire County Council

20 Appendix 3

Waste Figures

Figure 20.1 Complete Projections for Options 1, 2 & 3

	Beds Predicted MSW Arisings	Luton predicted MSW Arisings	Beds BVPI MSW Recovery	Beds Landfill	Luton predicted MSW Arisings	Luton BVPI MSW Recovery	Luton Total Landfill	B & L Predicted Total MSW	B & L Predicted Total BVPI Recovery	B & L Predicted Total Landfill	Recovery Rates for Beds using Regional Targets	Landfill Rates For Beds using regional targets
2005/2006	220,320	99,362	60382	159,938	99,362	25173	73,189	318,682	85,555	233,127	60382	159,938
2006/2007	219,026	99,816	70493	148,533	99,816	27231	72,585	318,842	97,724	221,118	71764.2	147,262
2007/2008	220,496	101,270	81941	138,555	101,270	32333	68,937	321,766	114,274	207,492	83146.4	137,348
2008/2009	225,471	102,725	83525	141,946	102,725	36812	65,913	328,195	120,337	207,858	94528.6	130,942
2009/2010	230,175	104,179	85136	145,039	104,179	38878	65,301	334,354	124,014	210,340	105910.8	124,265
2010/2011	234,586	105,633	86578	148,916	105,633	40991	64,732	340,219	127,471	212,748	117,293	117,293
2011/2012	238,842	107,087	88106	150,836	107,087	43257	63,800	346,028	131,363	214,666	129889.2	108,553
2012/2013	242,964	108,541	89453	153,511	108,541	45742	62,799	351,595	135,195	216,310	141485.4	101,478
2013/2014	246,830	109,996	90705	155,925	109,996	48098	61,898	358,626	138,803	217,823	153581.6	93,049
2014/2015	250,297	111,450	91959	158,338	111,450	48922	62,528	361,746	140,881	220,865	165677.8	84,619
2015/2016	253,963	112,904	93222	160,741	112,904	49660	63,244	366,867	142,882	223,985	177,774	76,480
2016/2017	257,682	114,358	94508	163,174	114,358	50293	64,065	372,040	144,801	227,239	175471.2	62,311
2017/2018	261,401	114,358	95795	165,606	114,358	50293	64,065	375,759	146,888	229,871	173166.4	68,233
2018/2019	265,120	114,358	97082	168,038	114,358	50293	64,065	379,478	147,375	232,103	170865.6	94,254
2019/2020	268,839	114,358	98368	170,471	114,358	50293	64,065	383,197	148,861	234,536	168562.8	100,276
2020/2021	272,558	114,358	99648	172,910	114,358	50293	64,065	386,916	149,941	236,975	166,260	106,298
Total	1,908,469	1,733,753	1406823	2,591,576	1,733,753	688472	1,045,281	5,642,222	2,095,365	3,546,857	2,155,261	1,753,200

Figure 20.2 Complete Projections for Options 1, 2 & 3

Recovery Rates for Luton Using Regional Targets	Landfill Rates for Luton using Regional Targets	Total Regional Recovery	Total Regional Targets Landfill	Beds MSW Recovery figures using WS2007 Targets	Luton MSW Recovery Figures Using WS2007 Targets	Beds Reuse, Recycling and Composting	Luton Reuse, Recycling and Composting	Bedfordshire Landfill Rates using WS2007 targets	Luton Landfill Figures using WS2007 targets	Total Beds and Luton Recovery Using WS2007 targets	Total Beds and Luton Landfill using WS2007 Targets	Total Beds and Luton Reuse, Recycling using Waste Strategy 2007
25173	73,189	85555	233,127	60382	25173	60382	25173	159,938	73,189	85555	233,127	50346
30721.6	89,095	102485.8	216,356	73172	31335	67072	28591	145,854	88481	104507	214,335	59927
36270.2	105,000	119418.8	202,350	85961	36265	73763	32010	134,535	85,005	122227	199,540	68276
41818.8	120,906	136347.4	191,848	98751	40209	80453	35428	126,720	92,515	139960	189,235	75637
47367.4	136,811	153276.2	181,076	111540	43364	87144	38847	118,635	100,814	154905	179,449	82211
52,916	52,747	170209	170,010	124330	55885	93814	42265	110,256	49,648	180315	159,904	98250
59268.4	47,819	188657.6	157,372	133495	59917	97924	45973	105,447	47,170	193412	162,617	103890
65620.6	42,921	207106.2	144,399	142660	63649	102014	45681	100,304	44,692	206509	144,996	109531
71973.2	38,022	225554.8	131,071	151625	67782	108103	47390	94,805	42,214	219607	137,019	115171
78325.6	33,124	244063.4	117,743	160990	71714	110183	49098	89,307	38,736	232704	126,043	120812
84,678	28,226	262482	104,415	170155	75646	114283	50806	83,808	27,258	245891	121,066	126452
81694	32,664	257165.2	114,875	177008	77670	118662	52081	80,674	36,888	256678	117,362	129751
78710	35,648	251878.4	123,881	183960	79695	123081	53355	77,541	34,663	263555	112,204	133050
75726	38,832	246591.6	132,886	190713	81719	127481	54630	74,407	32,899	272432	107,048	136349
72742	41,516	241304.8	141,892	197565	83744	131880	55904	71,273	30,514	281309	101,888	139648
69758	44,600	236016	150,898	204418	85768	136279	57179	68,140	28,590	290186	96,730	142942
97263	700,990	3,129,024	2,514,198	2266825	979836	1630568	712411	1,641,644	753,916	3246661	2,395,560	1692247

Picture 20.1 Total projections for Options 3&4

Year	Regionally Predicted MSW Arisings	Recovery Rates for MSW Arisings using regional Targets	Landfill Rates using regional targets	Recovery Rates for MSW using Waste Strategy 2007 Targets	Landfill Rates for MSW using Waste Strategy 2007 Recovery Targets	Recycling and Composting using Waste Strategy 2007 Targets
2005/06	318,682	85,555	233,127	85,555	233,127	85,555
2006/07	377,000	112,244	264,756	114,872	262,128	103,484
2007/08	392,000	138,933	253,067	144,189	247,811	121,413
2008/09	407,000	165,622	241,378	173,506	233,494	139,342
2009/10	422,000	192,311	229,689	202,823	219,177	157,271
2010/11	438,000	219,000	219,000	232,140	205,860	175,200
2011/12	441,000	239,040	201,960	246,816	194,184	181,200
2012/13	445,000	259,080	185,920	261,492	183,508	187,200
2013/14	448,000	279,120	168,880	276,168	171,832	193,200
2014/15	452,000	299,160	152,840	290,844	161,156	199,200
2015/16	456,000	319,200	136,800	305,520	150,480	205,200
2016/17	459,000	322,668	136,332	315,516	143,484	211,560
2017/18	463,000	326,136	136,864	325,512	137,488	217,920
2018/19	467,000	329,604	137,396	335,508	131,492	224,280
2019/2020	470,000	333,072	136,928	345,504	124,496	230,640
2020/2021	474,000	336,540	137,460	355,500	118,500	237,000
TOTAL	6,974,000	3,957,285	2,972,397	4,011,465	2,918,217	2,869,665

The 2005/06 recovery figure is actual combined figures for Bedfordshire & Luton

For Modelling Purposes only. to obtain residues only to landfill by 2021 as indicated in regional targets typical incineration technology has been assumed, with process residues of 29% by weight. For capacity modelling a steady reduction to residues only landfill by 2021 as target of the RSS has been assumed

Picture 20.2 Commercial & Industrial Projections and Londons Waste

Year	Commercial and Industrial as Set by Region	Regional Recovery using Regional Commercial and Industrial Targets*	Landfill of C&I Following Recovery using regional targets	Landfill of Commercial using 03/04 figure and Waste Strategy**1	Recovery amounts if use 2007 Strategy for Landfill Targets are used	Londons Waste	NOTES
2005/06	661,000	219,000	442,000	442,000	219,000	361,000	Last actual recovered figure from 2002/3 taken from ERM Study
2006/07	661,000	270,384	390,616	424,200	236,800	336,000	** the 442,000 was reached through taking the 03/04 recovery figure from the total 661000
2007/08	661,000	321,768	339,232	406,400	254,600	312,000	1 - The targets have been taken from the Waste Strategy 2007 Executive summary, chapter 8.
2008/09	661,000	373,152	287,848	388,600	272,400	287,000	C&I waste figures have been taken from the Regions response to the Proposed Modifications to the RSS.
2009/10	661,000	424,536	236,464	370,800	290,200	263,000	For regional target of recovery of commercial and industrial after 2015/16 we have maintained the 75% recovery rate
2010/11	661,000	475,920	185,080	353,000	308,000	238,000	
2011/12	661,000	479,886	181,114	341,750	319,250	214,000	
2012/13	661,000	483,852	177,148	330,500	330,500	189,000	
2013/14	661,000	487,818	173,182	330,500	330,500	165,000	
2014/15	661,000	491,784	169,216	330,500	330,500	140,000	
2015/16	661,000	495,750	165,250	330,500	330,500	116,000	
2016/17	661,000	495,750	165,250	330,500	330,500	116,000	
2017/18	661,000	495,750	165,250	330,500	330,500	116,000	
2018/19	661,000	495,750	165,250	330,500	330,500	116,000	
2019/2020	661,000	495,750	165,250	330,500	330,500	116,000	
2020/2021	661,000	495,750	165,250	330,500	330,500	116,000	
Total	10,576,000	7,002,600	3,573,400	5,701,250	4,874,750	3,201,000	

21 Appendix 4

Existing Waste Sites

21.1 Bedfordshires existing Waste Management Facilities

21.2 Landfill

Table 21.1 Existing Landfill Sites

Type of Operation	Site Name	Operator
Landfill	Brogborough	WRG
Landfill(Inert Only)	Old Linslade Manor	Thomas Bros Excavations Ltd
Landfill	Stewartby	WRG
Landfill (Inert Only)	Willington (incl Octagon Farm)	Lafarge Aggregates Ltd
Landfill (Inert Only)	Lodge Farm	JFL Hill Ltd
Landfill (Inert Only)	Thrift	L B Silica Sand Ltd
Landfill	Arlesey	WRG
Landfill (Inert Only)	Whitsundoles	Aggregate Industries UK Ltd
Landfill (Inert Only)	Elstow	Bedfordshire County Council
Landfill (Inert Only)	Sundon	Bedfordshire County Council

21.3 Materials Recovery Facility/ Transfer Station

Table 21.2 Materials Recovery Facility/Transfer Station

Type of Operation	Site Name	Operator
Hazardous Waste Transfer Station	Stewartby	Veolia Environmental Services
MRF	Elstow North	Shanks
MRF	Blackburn Road	Dunstable Waste Group Ltd
MRF	Kempston Court	Paul Riches Skips
MRF	Old Sand Quarry	SC Bradshaw Haulage Ltd
MRF	Manor Road	G Moore Haulage Ltd
MRF	Cow Close	FD O'Dell & Sons Ltd
Transfer Station	Kempston Court	Paul Riches Skips
Transfer Station	Elstow Waste Transfer Station	Shanks
Transfer Station	Cow Close	FD O'Dell & Sons Ltd
Transfer Station	Blackburn Road	Dunstable Waste Group Ltd
Transfer Station	Manor Road	G Moore Haulage Ltd
Transfer Station	Plot 2 Station Road Industrial Estate	Amphill Skips
Transfer Station	TwinwoodsBusinessPark	B & W Waste Management Service
Transfer Station	Chiltern Green Road	J Roscoe Milne Partnership
Transfer Station	Harmill Industrial Estate	JP Callanan and Son Ltd

21.4 Energy from Waste

Table 21.3 Energy from Waste Plants

Type of Operation	Site Name	Operator
Energy from Waste Plant	Colmworth Golf Course	DS Prigmore
Thermal waste treatment	Goosey Lodge Industrial Estate	Wykes Engineering
Energy from Waste Plant	Great Field	Biogen

21.5 Anaerobic Digestion

Table 21.4 Anaerobic Digestion

Type of Operation	Site Name	Operator
Anaerobic Digestion	Oakley Littlewood	Bedfordia Farms Ltd

21.6 Composting

Table 21.5 Composting

Type of Operation	Site Name	Operator
Composting	Haynes	Material Change Ltd
Composting	Faldo Farm	R Beechener
Composting	Goosey Lodge Industrial Estate	Wykes Engineering
Composting	Etonbury Farm	D Beatham
Composting	Herne Grange Farm	Heathcote Farms
Composting/Woodchipping	Great Field	Growing Beds
Composting	Elstow North	BCC Waste Disposal
Composting	Grange Farm	Growing Beds

21.7 Aggregates Recycling

Table 21.6 Aggregates Recycling

Type of Operation	Site Name	Operator
Aggregates Recycling	Land at Barford Road	Ibbott & Moorby
Aggregates Recycling	Goosey Lodge Industrial Estate	Wykes Engineering
Aggregates Recycling	Harmill Industrial Estate	JP Callanan and Son Ltd
Aggregates Recycling	Manor Road	G Moore Haulage Ltd
Aggregates Recycling	Cainhoe	CEMEX
Aggregates Recycling	Cow Close	FD O'Dell & Sons Ltd
Aggregates Recycling	Mentmore Road	Re Agg
Aggregates Recycling	Brogborough	WRG
Aggregates Recycling	Willington (incl Octagon Farm)	Lafarge Aggregates Ltd

21.8 Civic Amenity Sites

Table 21.7 Civic Amenity Sites

Type of Operation	Site Name	Operator
Civic Amenity Site	Bedford Tidy tip	BCC Waste Disposal
Civic Amenity Site	Ampthill Tidy Tip	BCC Waste Disposal
Civic Amenity Site	Biggleswade Tidy Tip	BCC Waste Disposal
Civic Amenity Site	Leighton Buzzard Tidy Tip	BCC Waste Disposal
Civic Amenity Site	Dunstable Tidy Tip	BCC Waste Disposal

Waste Issues and Options Core Strategy