

Waste Strategy Consultation respondees

INDEX:

The following individuals and organisations made formal responses to the Waste Strategy consultation document, issues between 16 February and 16 March 2001. Each respondee is numbered for indexing in the table of responses.

Local Authorities

- 1 BBC (Executive Committee)
 - 2 MBDC (Executive Committee)
 - 3 SBDC (Executive Committee)
 - 4 BCC (Officers: Sustainability section)
 - 5 BCC (Officers: Heritage and Environment Group)
 - 6 Milton Keynes
(Officers: Strategic Director – Environment / Head of Infrastructure)
 - 7 Cambridgeshire & Peterborough (Officers: Waste strategy co-ordinator)
- (total number of respondents in category = 7)*

Government and Agencies

- 8 Countryside Agency
 - 9 Environment Agency
 - 10 FRCA (Farming and Rural Conservation Agency)
 - 11 Go-East
- (total number of respondents in category = 4)*

Town and Parish Councils

- 12 Brogborough Parish Council
- 13 Cranfield Parish Council
- 14 Elstow Parish Council
- 15 Houghton Conquest Parish Council
- 16 Millbrook Parish Council
- 17 Stewartby Parish Council

18 Woburn Parish Council

(total number of respondents in category = 7)

NGOs

19 Aldwyck Housing Association

20 Bedford Castle Rotary Club

21 CPRE (Mid Beds) (Campaign for the Protection of Rural England)

22 Friends of the Earth (South Beds)

22A Friends of the Earth (Luton)

23 The National Trust

24 Wildlife Trust (Beds)

(total number of respondents in category = 7)

Universities

25 Cranfield University – Institute of Water and Environment

(total number of respondents in category = 1)

Waste and associated industries

26 A&J Bull Ltd (by agent: Voaden Sandbrook)

27 ESA (Environmental Services Association) (waste industry trade association)

27A Energy from Waste Association (waste industry trade association)

28 Lafarge (Aggregates)

29 Shanks Waste Solutions

30 SITA

31 Thames Water

32 Universal Environmental Services

33 Waste Recycling Group

(total number of respondents in category = 9)

Business and industry (general)

34 British Waterways

35 Railtrack

36 Beds and Luton Chamber of Commerce

(total number of respondents in category = 3)

Individuals

37 Mr D Cooper (Kettering, Northants)

38 Mr MC Edwards (Stewartby)

39 Mr A Goss (Sandy)

40 C'Ilr Tony Mitchell

41 Dr A Roby (Flitwick)

42 Ms Veronical Scargill (Wilshamstead)

43 Lord Howland (Bedford Estates, Woburn)

44 M Towlson (Bedford)

(total number of respondents in category = 8)

Total number of respondents = 46

Key Question 1: (Overall aim for maximum reduction in landfill)			
<i>Summary of representation</i>	<i>Raised by</i>	<i>Proposed response</i>	<i>Proposed modifications</i>
1. Support overall aim	1, 2, 3, 6, 8, 9, 11, 13, 14, 15, 16, 17, 21, 22, 22A, 23, 24, 29, 30, 38, 40, 42, 43, 44	Acknowledge support for strategic proposals	None
2. Oppose aim (“misguided and overly parochial”)	26	Disagree with sentiment -strategy makes ongoing provision for regional landfill, whilst seeking reductions in line with objectives of sustainable management of waste	None
3. Proposed reduction too hasty, and will lead to intensive EfW	22A	Disagree that proposals are too hasty: strategy proposes phased reduction to import of post-treatment residues only by 2010, and make ongoing provision thereafter. Means of landfill diversion by source authorities is not specified. Policy will be subject to ongoing monitoring.	None
4. Seek clarification that reduction will not mean complete end to imports	27	Not proposing complete end to imports. GLA in particular will need to export waste for foreseeable future. We will work with source authorities to ensure integrated approach to regional waste management.	None

5. Beds claypits are especially suited for landfill. Such sites are scarce regionally and nationally and it is thus not appropriate to unduly restrict their use	26	Over supply of Beds landfill would potentially undermine landfill diversion aspirations of National Waste Strategy.	None
6. Should manage Beds claypits as long term resource for landfill of waste which cannot be treated by other means – no good to squander on mass landfill as at present	41	Agree	None
7. Any further landfill consents should be for local waste only – plenty of remaining voidspace for imports and adding more would encourage more import	41	The strategy identifies overall voidspace requirements, but is not the appropriate vehicle to consider individual sites. The nature of wastes deposited at individual sites will be dealt with via Waste Local Plan and Development Control.	None - intent to reduce imports adequately covered
8. Landfill creates very long term hazard as well as short / medium term degradation – must be minimised	24	Agree and aim to minimise landfill use.	None
9. Strategic approach need to be fully (and explicitly) integrated and will necessarily include landfill.	20, 26, 33	Agree. Landfill will always have a role to play in Bedfordshire but must be integrated with other waste management options.	None
10. Welcome ongoing provision of landfill for duration of strategy period.	33	Acknowledged	None
11. Future waste management requirements best provided by major integrated (landfill-based) facilities, supported by local transfer facilities.	26, 33	Importance of integrated facilities to minimise transportation effects acknowledged, but do not necessarily need to be based around landfill.	None - intent to provide an integrated waste management service already covered

12. Commercial and practical realities of major landfill diversion not properly explored	26	Aim of major landfill diversion has been explored and agreed at national and EU policy level.	None
13. Important to maintain flexibility in strategy	2, 28, 29	Agree. Strategy sets broad aims and targets only. Will also be subject to regular review.	None
14. Important to recognise temporary nature of landfill in assessing BPEO	26	Acknowledged	None
15. Landfill is useful for restoration of mineral workings – what else to do with existing voids if landfill minimised?	8, 5, 26, 28, 37, 39	Landfill is only one restoration option. Other options may be more beneficial. Most appropriate restoration schemes best considered on a site by site basis.	None
16. Anything is better than landfill	17	Aim to reduce landfill to practical minimum	None
17. Diversion (at least 50% by 2010) should be achieved by recycling / composting, not EfW	22A	Means of landfill diversion must remain responsibility of source authorities.	None
18. Available landfill void for non-inert waste is quoted as 21.8 mcm. Part of this will be unavailable for waste deposit as it will be taken up by daily cover and other engineering requirements. Actual available voidspace (Feb 2000) is 16.6 mcm.	29	Correction acknowledged.	Revised figure of 16.6 mcm will be used in future planning. No change to overall strategic aim.
Key Question 2: (Adoption of SERP 160 targets for imported wastes)			
<i>Summary of representation</i>	<i>Raised by</i>	<i>Proposed response</i>	<i>Proposed modifications</i>
19. Support SERP160	1, 2, 3, 6, 8, 9, 11, 13, 14, 15,	Acknowledged	None

	16, 17, 20, 21, 22, 23, 24, 25, 38, 40, 41, 42, 43, 44		
20. SERP160 appropriate whilst awaiting new RTAB guidance	9, 29	Agree	None
21. SERP160 approach sends appropriate message to source areas (i.e. responsible for sustainable management of own wastes)	1, 17, 22, 24, 38, 41, 42	Agree	None
22. Need to lobby government for powers to levy charge on regional waste imports	1	Further levy unlikely to be practical. May be better to explore greater access to existing landfill tax funds.	No modification to strategy - But will explore opportunities for greater uptake of landfill tax funds.
23. Oppose SERP160	26	Opposition noted - but SERP 160 remains current regional guidance, until superseded by new regional arrangements.	None
24. Status (and interpretation) of SERP160 as guidance is unclear – in any event superseded by WS2000	26, 27	SERP 160 remains current regional guidance, until superseded by new regional arrangements. Principles of SERP 160 do not contradict WS2000	None
25. In SERP160, Beds expected to make continued provision for regional waste (36.5mcm non-inert landfill for 1996-2010.)	26	All regions with landfill capacity should make a continued but reduced provision for imported regional waste. Strategy honours this requirement for Bedfordshire.	None
26. County self-sufficiency principle does not appear in <u>current</u> regional guidance (RPG9) or PPG10 (emphasis on regional	26, 27	County self-sufficiency is the most likely BPEO for our own waste, and also features in emerging RTAB	Continue to monitor strategy in light of emerging regional

self-sufficiency) – policy may actually impede regional self sufficiency and thus run contrary to PPG10		guidance. However, the strategy makes continuing provision for (reducing) regional imports - we are not proposing a complete ban on imported regional waste	guidance.
27. Beds landfill may be BPEO for regional wastes	27	This may hold for certain waste streams, but is unlikely to be true for most wastes. 'Waste hierarchy suggests that regional wastes should be recovered / treated at source wherever possible.	We will work in liaison with source authorities to identify most appropriate solutions for regional wastes.
28. SERP 160 proposals in line with proximity principle	41, 42	Agree	None
29. Assumption of EfW treatment in Greater London is unwarranted (current EfW moratorium) (also doubt possibility of achieving high diversion via recycling)	26, 27	EfW is assumed for modelling purposes only. In reality means of landfill diversion will be decided by source authorities, but there is not a 'do-nothing' option. Reduction in Beds landfill availability should help to drive more sustainable waste management practices in source authorities.	We invite liaison with GLA and other source authorities.
30. Strategy should refer to regional waste planing framework, including GLA waste strategy	9, 27	Agree, but both regional and GLA waste frameworks are still in formulation.	As above
31. Over-emphasis in Beds and Luton on SERP 160, combined with lack of regard to emerging regional policy (including GLA), could hamper work of RTAB	27	The waste strategy is designed evolve and take new regional policy into consideration as necessary. Bedfordshire and Luton are actively involved in RTAB strategy formulation,	None

		and we do not believe that there is conflict with emerging proposals at this stage.	
32. Concern over ability to fully implement, especially with regard to SoSETR call-in powers.	13	Acknowledged - DETR have been consulted on draft proposals and have raised no objection at this stage.	None - will continue to work in consultation with national government.
33. Must recognise regional role of Beds landfill, especially with regard to need of Greater London.	26, 27, 28, 33, 41	Acknowledged. Strategy makes ongoing provision for regional wastes.	None
34. Disagree that London can never be entirely self-sufficient	38	While 'zero waste' may be possible in the long term, we believe that for the period of the strategy there will remain a need for London to export (post-treatment) wastes.	None
35. Need to be more pro-active in discussing proposed regional import reductions with source authorities.	9, 22A, 30, 42, 43	Noted - we have invited discussion with source authorities at all stages of strategy development.	No modifications - we are committed to working in liaison with source authorities.
36. More detail required on planning mechanisms for restricting regional landfill supply	9	Not within the scope of this document. Detailed and use issues will be taken up in the Minerals & Waste Local Plan review.	None
37. Impractical and inappropriate to attempt import restriction at existing sites	27	Noted - Strategy does not propose to impose new restrictions on existing operations. Vision will apply to consideration of proposals for new facilities or extensions.	None
38. Concern if local cross-boundary waste movements to be opposed by strategy.	6	Strategy is based on assessment of overall need. We recognise that local cross-boundary movements (both in and out of Beds and Luton) may be	Make approach to local cross boundary movements more explicit in final strategy.

		BPEO, but consider that such movements will be marginal in context of overall strategy.	
39. Welcome discussion on local cross-boundary issues.	6, 7	Acknowledged. As above	None
40. Seek clarification that additional landfill will be provided for regional, not just local, wastes.	27, 33	The proposed reduction in landfill provision still allows for ongoing, but reducing, regional waste importation.	None
41. Need to assess constraints on reduction posed by existing contracts and permits	30, 39	Existing operations have been factored into strategy formulation- we do not propose restrictions on established obligations.	None
42. Need to assess need for Rookery and Elstow landfill proposals in light of SERP 160 based strategy	2	Agree. This will be addressed in the Minerals and Waste Local Plan review	None
43. Should be more publicity of regional import issues	42	Noted - regional issues will be subject to detailed public examination in context of Minerals and Waste Local Plan review.	None
44. "Appalled" to discover extent of regional waste import	20, 38	Acknowledged	None
45. Economic development - If businesses can't export waste to Beds, they'll have to move here to find disposal route!	38	Acknowledged. Novel principle!	None
Key Question 3: (Waste minimisation and proposal to explore possible Waste Minimisation Strategy)			
<i>Summary of representation</i>	<i>Raised by</i>	<i>Proposed response</i>	<i>Proposed modifications</i>
46. Support for proposed waste minimisation	1, 2, 3, 6, 8, 9,	Welcome support for strategy. It has	Intentions on the subject to be

strategy	11, 13, 14, 15, 16, 17, 22, 23, 24, 25, 26, 27, 33, 38, 40, 43	been decided and approved by members that a waste minimisation steering group will be formed. The aim is to actively push the issue forward and form a robust strategy for action.	updated in final draft
47. Expression of interest in joint working approach	1, 2, 6, 7, 9, 11, 25	Initial scoping meeting with local agencies scheduled. Will expand to other parties at earliest opportunity.	Further progress on this issue to be included at time of going to press.
48. Waste minimisation is a matter of urgent (top) priority	1, 2, 21, 22A, 42	Agree, we will work with partners to identify and take action on the most appropriate means to tackle waste minimisation	None
49. Need actions, not just strategies	24	Agree. See above re. steering group	None
50. Benefit in many 'grass-roots' projects – proposed strategy must not be a constraint	44	Agree. The aim is to better co-integrate, inform and enhance current projects, not to displace them.	None
51. Lack of vision re waste minimisation	22A	Acknowledged. We will work in partnership to develop a robust vision.	None - issues will be addressed by the waste minimisation group
52. Co-operative approach crucial to achieving progress	15	Acknowledged. See above re. steering group	None
53. Need extensive awareness raising (also for recycling and composting): crucial to make maximum use of media campaigns.	1, 13, 14, 16, 17, 21, 25, 40, 42	Acknowledged. See above re. steering group	None
54. Household collection capacity should be restricted to encourage domestic attention to waste minimisation	1	The forthcoming Municipal Waste Management Strategy will consider this option	None
55. Important to develop explicit (and	9	Agree, but waste minimisation is very	None - issue of targets will be

measurable) targets for waste minimisation projects		hard to quantify and targets must reflect this	addressed waste minimisation steering group, and in development of Municipal Waste Management Strategy.
56. Stakeholder engagement (similar to main waste strategy development) could be useful way forward.	13	Agree - may be the next step forward after the waste minimisation steering group has been formed	None
57. Commend appointment of dedicated BCC recycling and marketing officer	9	Acknowledged	None
58. Need to be realistic about levels of reduction likely to occur. National growth currently 3-5%.	33	Issue will be addressed by waste minimisation group.	None
59. Need to lobby government for local funding and central action to promote waste minimisation	1, 3, 14, 15	Agree. The subjects of funding and lobbying will be raised as the steering group is formed	None
60. Home composting is key element of waste minimisation – need to investigate means to increase participation	1	Agree. All authorities are actively promoting home composting, and issue will be further addressed in the Municipal Waste Management Strategy	None
61. Need to lobby government to include home composting in recycling performance targets	1	Agree. This would be a further incentive to promote such schemes.	None
62. Explore means of exerting influence on businesses to use less packaging	40	Acknowledged. Could be a possible project to be started by the waste minimisation steering group	None
63. Need to lobby business and industry for 'design for life' approach	22A	Acknowledged. Could be a possible project to come out of the waste minimisation steering group	None

64. No mention of 'Waste Book'	22A	Acknowledged. Could be mentioned in any forthcoming waste minimisation strategy	None
65. Four principles of waste minimisation good start	22A	Acknowledged	None
66. Four principles of waste minimisation appear confused - where did they come from?	9	Devised by ourselves. May need refining for future waste minimisation strategy	None
Key Question 4: (Adoption of SERP 160 targets for local commercial and industrial wastes)			
<i>Summary of representation</i>	<i>Raised by</i>	<i>Proposed response</i>	<i>Proposed modifications</i>
67. Support for SERP 160 approach	1, 3, 6, 9, 11, 13, 14, 15, 16, 17, 22, 23, 24, 28, 29, 38, 40, 43	Acknowledged	None
68. Oppose SERP160 approach	26	Disagree	None
69. Strategy should follow WS2000 target for C+I waste	26	Disagree. Aiming for higher rates of landfill reduction should result in higher rates of waste minimisation and recycling	None
70. Spare capacity available at Milton Keynes MRF	6, 34	Noted - as Municipal Waste Management Strategy develops we will work with other authorities as appropriate	None
71. Concern over nature and location of potential alternative facilities – need more detailed assessment of issues	3, 6, 13, 26, 43	Site specific issues will be covered in the MWLP review.	None

72. Diversion should be to recycling / composting facilities in preference to EfW	1, 9, 11, 17, 22, 22A, 39, 42, 43	Agree. It is our aim that only waste that cannot be removed from the waste stream by methods higher up the waste hierarchy be sent to EfW plant	None
73. Need more data on C+I waste streams	41	Agree.	We will address this issue in context of MWLP review
74. Source segregation key to future waste management	22A, 44	Agree	None
75. 'Alternative' facilities should be integrated with landfill sites.	26	Agree this will often be optimal solution, but not appropriate to inhibit alternative solutions by imposing blanket policy.	None
76. Need local waste sorting centres in industrial estates	22A	Agree with principle	We will liaise with Local Planning Authorities to address this issue.
77. Important to engage / inform public from outset as diversion strategy is developed and proposals for alternative facilities emerge	13	Agree - this strategy has been a first step in public engagement. Consultation will continue as diversion solutions are developed.	None
78. Interest in joint working to establish new facilities	6, 7	Acknowledged. We will work with other authorities as appropriate	Clarify intention to look into joint working
79. Important to maintain flexibility to cater for a range of facilities. LA's have only indirect control over C+I waste via land-use planning.	27, 33	Acknowledged - we intend to maintain maximum flexibility in MWLP review.	None
80. Need to investigate possible roles of LA's in promoting and facilitating C+I recycling (service provision?)	2	Agree, but direct service may not be appropriate.	None

81. 'Name and shame' wasteful businesses?	40	A possibility, but not first choice solution. We would seek a more co-operative approach in the first instance.	None
82. Need to consider long lead time for EfW plant whilst developing programmes.	27	Acknowledged - this is also true for other waste management facilities. This strategy will lessen lead-times by giving an explicit policy framework in which proposals may be assessed.	We will refine modelling to take account of realistic lead times.
83. EfW key part of integrated approach	27A	Acknowledged	None
Key Question 5: (Maintain levels of inert recycling provision)			
<i>Summary of representation</i>	<i>Raised by</i>	<i>Proposed response</i>	<i>Proposed modifications</i>
84. Support suggested approach	3, 6, 9, 13, 15, 17, 22, 26, 38, 39, 40, 42, 43, 44	Acknowledged	None
85. Should establish more permanent capacity (helps establish market stability)	1, 8, 28	Disagree - current approach establishes continuity of supply, whilst allowing flexibility to cater for future market developments.	None
86. Need to consider market demand, not just encourage more recycling. (e.g. highways policy for use of recycled materials)	27, 33	Agree. Considerable national activity on this issue. County council is also currently working on green procurement policy.	None
87. Weak approach - Not acceptable to lose inert wastes to landscaping – need positive policy to discourage diversion of inert materials to such sites	24, 28	Agree that the avoidance and re-use of inert waste is preferable to using it for inappropriate landscaping. However, inert waste landfill has an	None

		important role in restoration of old mineral workings.	
88. Need rigorous definition of 'inert' waste	44	Definitions already exist	None
89. Need locational policy to prevent nuisance from recycling sites	21	Site specific issues addressed via MWLP.	None
90. Should encourage longer life in building design to reduce C+D waste	41	Agree. This issue is being addressed by the construction industry as part of a wider sustainable construction program.	We will continue to work with Local Planning Authorities to address waste issues arising from new development.
91. Need to link policies on inert recycling and promotion of brownfield development	43	This issue will be taken up via land-use plans.	None - see above.
92. Will require close monitoring	44	Agree, we maintain regular monitoring of all minerals and waste issues.	None - regular monitoring already takes place in context of MWLP
Key Question 6: (Limited use of EfW in preference to landfill) (note: comments on EfW returned under KQ7 are brought forward here)			
<i>Summary of representation</i>	<i>Raised by</i>	<i>Proposed response</i>	<i>Proposed modifications</i>
93. Support for principle	1, 3, 6, 8, 9, 11, 13, 14, 15, 16, 17, 20, 24, 27, 27A, 30, 38, 39, 40, 41, 42, 43	Acknowledged	None
94. <u>Incineration</u> unacceptable in principle (dioxins)	22, 22A	Acknowledge concerns over incineration, but disagree that this option can be discounted outright.	Issues regarding incineration will be further explored.
95. EfW should be deployed wherever possible for residual wastes.	1	Disagree with wholesale application of EfW solutions, but agree that EfW has a role, after maximum practicable re-	The optimum scale of EfW development will be developed in context of Municipal Waste

		use, recycling and composting.	Management Strategy and MWLP
96. EfW proposals contrary to consensus of stakeholder workshops	22A	Disagree. The stakeholder dialogue indicated support for selective use of EfW solutions.	None
97. EfW consumes resources - can only have absolute minimum role after maximum recycling and composting	22A, 44	The strategy advocates a maximum practicable level of recycling and composting prior to EfW. Residual waste may be seen as a resource when used to generate electricity.	None
98. EfW essential if targets to be met	27A	Agree, especially regarding long term targets	None
99. Concern over nature and location of potential EfW facilities – need more detailed assessment of issues and potential impacts (i.e. need more confidence in safety)	3, 6, 13, 16, 21, 22, 26, 40, 42, 43	Acknowledged. The exact type of EfW facility will not be determined at this stage (allowing flexibility to accommodate emerging technologies). Land use and other impacts will be considered in the MWLP review and Municipal Waste Management Strategy.	None - we will develop EfW policies in MWLP and Municipal Waste Management Strategy
100. Technology continues to develop – need to maintain flexibility	3, 9, 29, 42	Agree - see above	None
101. Alternative thermal treatments seem preferable to traditional incineration	15, 22, 22A	This is possible - we will develop EfW proposals in light of BPEO.	None
102. Alternative thermal treatments are as yet unproven commercially and are likely to be more expensive than traditional incineration	27A	Nature of technology will be determined in light of BPEO.	None
103. Alternative EfW technologies not considered in strategy	22A	Reference is made to alternative technologies, but not specifically as	None

		they have not yet been identified. This issue will be developed in Municipal Waste Management Strategy.	
104. Incineration already cost-effective in comparison with landfill.	27A	Will become more so as landfill tax escalator applies.	None
105. Case for PFI funding for EfW	9	This option will be explored	None
106. Best to develop several smaller facilities in phased manner, rather than commit to single large central plant	9, 43	Acknowledged. Another option would be to build a modular plant which can be added on to as necessary. Will be covered in the Municipal Waste Management Strategy and MWLP review	None
107. Inappropriate to hold EfW as 'reserve' option, given major capital investment, planning requirements, and lead-time. Strategy needs to give clearer direction on EfW.	17, 27, 30, 33	EfW is not a reserve but a treatment option to be considered prior to disposal to landfill. To be developed further in the Municipal Waste Management Strategy	We will develop EfW policy in context of Municipal Waste Management Strategy and MWLP. Not possible to give precise indications at this stage.
108. Important to recognise critical minimum scale for EfW plant (in terms of economic viability)	33	Acknowledged. To be discussed further in the Municipal Waste Management Strategy, and in liaison with neighbouring authorities.	None
109. Crucial that EfW does not impede waste minimisation and recycling/ composting	9, 11, 22A, 43	Agree - strategy gives priority to materials recovery.	None
110. Stewartby or Kempston could be good sites for regional EfW plant, serving wide area.	37	We do not propose regional EfW plant in the strategy.	None
111. No consideration of EfW implications of ban on landfill of tyres.	32	Noted - this issue will be addressed in the MWLP.	None
112. EfW plant could be more flexible if able	11	Such issues will be covered in more	None

to take multiple fuels (e.g. bio-fuel crops)		detail in the Municipal Waste Management Strategy	
113. EfW not necessary (all diversion by recycling and composting)	22, 22A	Not considered feasible at this stage. Would require huge cultural changes not possible within the early target timescales - in any event recycling and composting may not be BPEO for all wastes.	None
114. Need to fully justify statement that EfW is preferable to landfill	28	This issue has been fully explored at National and European policy levels.	None
115. EfW could be combined with end-of-pipe materials recovery process	41	Agree. It is likely that the optimum 'end-of-pipe' treatment will be an integrated plant combining materials recovery with EfW.	Re-work proposals for 'end-of-pipe' treatment plant to shift emphasis from EfW to integrated plant.
116. Choice of EfW vs. landfill for residual wastes needs more investigation to identify BPEO in local context	22A, 43, 44	This will be further addressed in the Municipal Waste Management Strategy. Work to date suggests a need for EfW in Beds to meet Government targets.	BPEO will be addressed in the Municipal Waste Management Strategy
Key Question 7: (Target organic waste for MSW management; 3-stream collection (option 2B) vs. mixed waste processing (1C))			
<i>Summary of representation</i>	<i>Raised by</i>	<i>Proposed response</i>	<i>Proposed modifications</i>
117. Support priority for maximum recycling and composting	1, 3, 8, 9, 11, 13, 17, 22, 22A, 24, 25, 31, 38, 40, 41, 42, 43	Acknowledged	None
118. Agree priority capture of organic MSW	1, 3, 9, 22, 31, 43	Acknowledged	None

119. In vessel composting more efficient and preferable to open windrow	41	Acknowledged. To be covered in more detail in the Municipal Waste Management Strategy	None
120. Question assumption of 20% of MSW stream suitable for potential recovery by composting (total organic fraction thought to be nearer 50-60%). Need to justify 20% figure.	9, 39	Approximate figure derived from generic household waste composition data (compostable kitchen & garden waste, Appendix 1, Analysis of Waste Management Options Report).	Targets for composting to be developed in Municipal Waste Strategy
121. Support for 2B in principle	1, 2, 3, 6, 9, 11, 13, 15, 17, 19, 21, 22, 23, 27A, 30, 39, 42, 43, 44	Acknowledged	None
122. 3-stream is vital, but not with max EfW	22A	Acknowledged. EfW only to treat residual waste following maximum practicable recycling and composting	None
123. 2B in line with developments in Luton – if implemented in Beds, potential for cost efficiencies on joint facilities	41	Acknowledged. Intention is to work together wherever appropriate.	None
124. Important not to preclude development of other options at this stage	1, 2	Agree. The strategy identifies broad directions only - maximum flexibility is maintained.	None
125. Orange bag is not working and should be replaced with 3-stream system asap	22A	Problems with Orange-Bag start-up Acknowledged, but system is improving. Future collection method will be developed in Municipal Waste Management Strategy.	None
126. Any increase on number of kerbside collection containers must be properly	1	Initial sustainability appraisal work will be further developed in the Municipal	None

assessed for impacts (life cycle costing, waste minimisation assessment)		Waste Management Strategy	
127. New kerbside collection systems should be subject to payment of recycling credits from WDA	1	Kerbside systems will be designed by WDA/WCA collaboration	None
128. Concern over ability of districts to adequately fund option 2B	1, 3	Noted, but there is no cost-free option for meeting Government targets.	None
129. Dispute assertion that SSA shows 2B is the most sustainable option.	9, 22A	SSA by necessity involves degree of subjectivity.	None
130. Need more work on local environmental impact of options	9, 25	Acknowledged - Will be considered in more detail as Municipal Waste Strategy develops.	None
131. If chosen, three-stream system should be piloted prior to full implementation	30	Agree. Any new scheme will be subject to market testing and pilot trials.	None
132. source segregation (i.e 3 stream) is key to efficient waste management (ensuring high quality of recycled materials, EfW feedstock)	9, 22A, 25, 44	Agree	None
133. 3-stream collection could help raise waste awareness	39	Agree	None
134. Option 1C better in short term due to lower initial cost, but 2B better in longer term.	37	Disagree that an option should be chosen based on cost alone. See sustainability report to see why option 1C was not considered further	None
135. Need more information to make informed choice between 2B and 1C	1, 16, 26	Agree - current thinking suggests that in approach integrating mixed waste processing with EfW may be the most appropriate solution	Continue research into optimal 'end-of-pipe' treatment system

136. Mixed waste processing could be better than EfW for residual post-recycling treatment (i.e. option 2C)	1, 22A	Ideal solution is likely to integrate both mixed waste processing and EFW	Continue research into optimal 'end-of-pipe' treatment system
137. Doubt that 1C can meet targets, given current performance	25	Scenario 1C could potentially meet 2005 targets, but would rely on integration with EfW to realise further targets	None
138. Concern over quality of mixed waste 'compost' and difficulties with outlets for this product	6, 22, 22A, 25	Agree. Issue of mixed waste processing is not yet resolved.	None
139. "compost" from mixed waste processing useful for landfill cover and restoration	26	Noted - although such market may be limited, especially in long term. Issue of 'compost' quality to be resolved	None
140. 2-stream approach would require maximum performance from HWRCs.	20	To meet targets, <u>all</u> options will require maximum performance from HWRC's	None
141. Cost modelling of options does not appear to include planning and procurement costs	9	Costs are based on typical contract prices at time of report. This includes all contractors' costs, but not internal planning costs.	Costing will be refined in Municipal Waste Management Strategy.
142. Acceptable to incur higher initial relative costs to establish recycling systems	15	Acknowledged. This is unavoidable	None
143. Luton seems to be doing well – can Beds authorities learn anything from this?	11	Authorities in Bedfordshire and Luton already work closely together. Lessons of experience and best practice will be shared.	None
144. Concern that recycling / composting MSW options modelled in target-based manner (i.e. to WS2000 targets only) – could go much further (50-60%	9, 22A	We plan to recycle/compost as much as is practicable, the targets are a minimum requirement.	None

recycling)			
145. Need to revise MSW management systems to holistically manage, and resource, integrated strategy – operating company or ‘virtual unitary’?	2, 3	The desirability and feasibility of a joint management structure are to be explored. This will be covered in more detail in the Municipal Waste Management Strategy	None
146. Important not to let internal disputes over cost distribution undermine optimum strategic choice	14	The Districts and County have worked together throughout the strategy development. Final solutions and associated cost burdens will be jointly agreed.	None
147. Important to maintain flexibility in light of emerging technologies.	33	Agreed. The strategy sets broad aims only - maximum flexibility will be maintained	None
148. Three-stream scheme will depend on successfully engaging householders (key role for BCC recycling / marketing officer) – need to communicate performance once established	20, 30, 43	Acknowledged. To be covered in more detail in the Municipal Waste Management Strategy	None
149. Need to explore positive incentives to boost participation rates	40	To be covered in more detail in the Municipal Waste Management Strategy	None
150. Need to be explicit on how waste growth projections derived – is it appropriate to plan for growth?	9, 22A	See Analysis of Options Report Figures based on current waste growth and will be monitored and revised in future revisions to the waste strategy as appropriate	None
151. Modelling of recycling systems should not include provision for higher volumes	1	The worst case scenario was considered in the Analysis of Options Report on the basis that it is better to	None

of waste		have a high recycling capacity, rather than one that isn't high enough and may mean targets are not met. Actual growth (reduction) rates will be monitored. Notably, latest figures indicate a current growth rate in line with modelling.	
152. Potential to develop waste water treatment plant for organic MSW (AD, composting)	31	This option will be explored in more detail in the Municipal Waste Management Strategy	None
153. Development of existing systems (kerbside, HWRCs) should be sufficient to meet short term targets.	33	Noted. Existing systems will be optimised but we believe it is necessary to plan for longer term solutions now.	None
154. Need to capture greater range of materials via Orange Bag	11, 22A, 44	If practicable and markets for the materials can be found. To be covered in more detail in the Municipal Waste Management Strategy.	None
155. Important to address both regulatory control and <u>market development</u> for recyclates.	2, 27, 33	Agree. Hopefully WRAP will help to address this issue	
156. Need adequate storage space for recovered materials (prior to onward transport to reprocessors)	37	Acknowledged. Will be a planning issue in due course	None
157. Need to consider issues of space re multiple kerbside containers	38	Acknowledged. Will be covered in more detail in the Municipal Waste Management Strategy	None
158. Even occasional landfill of collected recyclables is bad for public confidence.	37	Acknowledged. There have been teething problems with the Orange bag scheme, but situation is now	None

		improving.	
159. Can recycling at a loss be justified in terms of public expenditure?	37	Recycling at a limited loss is can be justified in short term by social and environmental benefits until materials markets improve	None
160. Bring sites will continue to play important role in recycling – will continue to facilitate as appropriate	1	Agree. Bring site have essential role in integrated system.	None
161. Garden waste may be better for EfW than composting (takes long time to compost)	41	We believe that for clean garden waste, composting (ideally home composting) is preferable to EfW.	None
General comments			
<i>Summary of representation</i>	<i>Raised by</i>	<i>Proposed response</i>	<i>Proposed modifications</i>
162. Commend stakeholder-based approach to strategy development	8, 9, 26, 41	Acknowledged	None
163. Commend broad scope of strategy	9, 26, 41	Acknowledged	None
164. Commend incorporation of Sustainability Appraisal in strategy formulation	9	Acknowledged	None
165. Commend emphasis on partnership working	21	Acknowledged	None
166. Strategy lacks imagination – close to a ‘do-nothing’ option	22A	Disagree. Strategy designed to achieve BPEO and will continually evolve as situations change	None
167. Interest for joint working to address mutual issues	7, 6	Interest welcomed. Opportunities for joint working will be explored	More explicit support for joint working
168. Expression of interest in joint working to	1	Agree. Could form part of the remit for	None

educate and promote recycling (in Bedford link to Pride in Bedford campaign)		the new recycling and marketing officer or future waste minimisation projects	
169. Need more extensive public consultation on strategy	1	Agree. Approximately 1,000 groups and individuals were invited to participate in stakeholder events. This was only a first stage in the inclusive approach to problem solving. The Municipal Waste Management Strategy will involve wider public consultation.	None
170. Need more comparative study, cases from both UK and abroad	40	Other countries and authorities were studied for background information. New case studies are continually investigated (as encouraged by Best Value).	None
171. Strategy good on intent but not much on how to be achieved	11	Waste Strategy is only intended to identify aims. Implementation will be covered in more detail in the Municipal Waste Management Strategy and MWLP.	None
172. Should report progress since 1998/99 base year	40	The strategy is designed to evolve as new information becomes available. The Municipal Waste Management Strategy will incorporate more up to date figures	None
173. Important not to let artificial administrative boundaries impede optimal regional and local cross boundary solutions.	37	Agree. BPEO and the proximity principle will be applied. We do not intend to restrict local cross-boundary movements, but believe that regional	None

		waste movements are likely to be BPEO only in exceptional circumstances.	
174. Need regular monitoring and defined period for review of strategy	2, 9	Acknowledged. The strategy is intended to evolve continually ("living document") and also be subject to five-year comprehensive review.	Make more explicit reference to review period and to how progress is to be monitored
175. Need to ensure incentives for waste minimisation (e.g small bins) do not result in fly-tipping problems.	38	Agree. To be covered in more detail by the waste minimisation steering group and the Municipal Waste Management Strategy	None
176. No consideration of exports of waste from Beds – need to develop policy for this?	9	Exportation from Beds is minimal.	None
177. Medford & Milton Keynes Canal proposal could provide opportunity for barge transport of waste – especially to MK MRF	20	This option could be explored in the Municipal Waste Management Strategy, although lead-time for canal would preclude this as a short-medium term solution.	None
178. Desire to know when existing facilities likely to close and where any alternative replacements may be.	12, 18	Future potential waste management sites will be identified in the Minerals and Waste Local Plan review, due for completion in 2003.	None
179. Need policies to encourage rail transport of waste (looking not just at delivery to disposal sites, but also collection from major producers)	22A, 35	It is already policy to encourage the transportation of minerals and waste by methods other than road (MW24, SP68)	None
180. Concern over local traffic impacts from waste transport – need more attention to	17, 18, 22A	Agree, as above	This intent could be reiterated in the strategy

minimising transport			
181. Need to establish facilities in south of County to minimise transport (to Elstow)	22A	Agree this is an attractive proposition. To be covered in the Municipal Waste Management Strategy and Minerals and Waste Local Plan review	None
182. BCC should investigate establishment of second tidy tip in Bedford area (reduce travel distances)	1	This need is recognised and will be addressed in Municipal Waste Management Strategy and MWLP.	None
183. How appropriate is EU landfill (minimisation) policy in UK context?	37	Applies to the EU as a whole and does not take the relative abundance of suitable landfill void in the UK into account. Nonetheless landfill is wasteful of resources and EU policy must be adhered to.	None
184. No mention of ELV's (end of life vehicles), nor EU ELV Directive in strategy.	32	Specific origins of waste and relevant directives have not generally been referred to in this overarching waste strategy. ELV issue will be addressed in Municipal Waste Management Strategy.	None
185. EfW as planning policy / condition for major new settlements.	3	Unlikely to be appropriate to impose blanket requirement, but this issue is already addressed on case by case basis.	None
186. HWRC's encourage car use (counters benefits of recycling)	44	Agree this can be an issue. HWRC's should only be used for waste that cannot be collected by waste collection vehicles due to waste type or quantity. It may be possible to justify extra car useage in short term	None

		to establish recycling awareness, but long term role of HWRC vs. kerbside must be addressed. The appropriate balance will be addressed in Municipal Waste Management Strategy.	
187. Monitor potential EfW developments in Milton Keynes	3	Acknowledged	None
188. Barkers Lane tidy-tip is "far from user friendly"	20	Service provision at tidy-tips is subject to ongoing review. Improvement of Barkers Lane site has been identified as early priority	None