RTPI
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Email response sent to: evidence@ice.org.uk

Dear Professor Jowitt,

RESPONSE TO CONSULTATION PAPER: State of the Nation: Waste and Resource Management – Invitation to Submit Evidence

Thank you for the opportunity to respond to this consultation. The RTPI represents over 22,000 spatial planners, existing to advance the science and art of town planning for the benefit of the public.

This document responds to the *State of the Nation: Waste and Resource Management – Invitation to Submit Evidence.*

The response has been formed drawing on the expertise of members, including the Minerals and Waste Interest Group of the RTPI Environmental Planning and Protection Network.

Enclosed is the RTPI's response to the formal consultation questions.

If you require further assistance, have any queries relating to the enclosed or require clarification of any points made, please contact Matt Thomson, Head of Policy and Practice on 0207 929 9494 or email policy@rtpi.org.uk .

Yours sincerely,

Matt Thomson
Head of Policy and Practice

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1. What should be the defining characteristics of the UK's waste and resource management system in 2020, 2030 and 2050?

We think that this is fairly difficult to predict beyond the next 5-10 years. There are so many unknowns that will influence waste arisings - population rise/stasis/fall, the rate of new housing built, economic upturn/downturn, new waste management technologies providing new ways to reduce/recycle/reuse waste and providing new residual wastes, new products that become waste (e.g. new developments in packaging materials), that opinions about the longer term are highly speculative and perhaps not of much value. At present, the system continues to move from an isolated rural, basic and low value activity centred on landfill to a sophisticated, high value - and in some cases very visible - industry. It will be embedded into the community and business fabric of localities delivering materials to manufacturing and energy. Whether the plant will be large scale centred on sub-regional transport nodes or more small scale serving immediate localities is still a matter of choice that planning authorities need to address in their Waste Development Frameworks. Policy flexibility is needed so that we are able to respond to the changes in waste streams, amounts and technologies. We understand from our members that the North West Regional Technical Advisory Board is modelling different scenarios for a waste policy update in the Single Regional Strategy up to 2030 (it may be worthwhile to contact the group separately for further information).

In more general terms, we believe that consideration needs to be given to how all product and waste streams can be managed most efficiently. It may be that resource allowances and tax incentives for all producers may be the way forward as this tackles the resource efficiency issue upstream, as opposed to targets set only when something become a waste. Allied to this, a market place for waste would help to streamline the price and allocation of wastes for recyclate, fuel, etc. some of the higher calorific waste streams (wood, plastic, biomass etc.), whereupon life cycle assessment (LCA) and thinking may justify energy production as opposed to recycling. This needs to be considered in the light of both energy policy (incentives, need etc.) and market instability for recyclate, so there are options available for diversion when markets fail. Standards/thresholds will need to be set for recyclate quality to facilitate harmonisation of collection and treatment systems. In future the cost of energy for production and transport will be much greater and will drive markets for all materials up, especially where this is linked to supply constraint as well.

The contribution of community involvement in waste management must also be recognized. Community recycling can be a marginal activity, but can also have huge social and environmental benefits. In addition, community opposition to waste management facilities can be a barrier to progress, and we believe that education and general awareness is very important (see response to question 2 for further detail).

2. What are the opportunities and barriers for managing materials in a systematic, "joined-up" fashion across the economy?

Local barriers

Public concerns especially about health not being properly rebutted and the benefits that waste resource agenda has to addressing the strategic concern of energy and climate change. We believe that education and general awareness is the key. It has been demonstrated that households and businesses are more likely to separate waste where municipal practices and management encourage behavioural change. Communication with local residents will help allay fears they might have on the effect that a proposed waste treatment facility may have on their health/quality of life.

Lack of political will and leadership can be a barrier to effective waste management. Awareness campaigns for the public and communities are clearly essential for improved waste recycling performance, and political acceptance is essential to building local support for additional local waste management facilities, given the difficulties local authorities are facing in identifying acceptable new sites.

It has been suggested by our members that (in their experience) whilst small businesses are largely aware of the desirability of recycling their wastes, they are discouraged by that fact small quantities tend to make it difficult and costly for them. To redress this, it has been suggested that "Bring Site" facilities be provided for commercial and industrial waste from small businesses, in addition to those for household waste.

Operational barriers

The capacity of waste industry to actually mobilise the resources to invest in the infrastructure or even to submit well crafted applications; the problem of non-planning consents which overlap with the planning regime causing implementation; legislative drivers outside planning e.g. EIA, Habitats, Human Rights, etc that impinge on planning and have to be addressed no matter what planning system we have. Whilst effective cross boundary working already occurs there is still room for improvement.

There seems to be a misconception that planning is a barrier to managing waste and material resources. We fear that any more 'fundamental' reforms to the planning system will disrupt the momentum that is happening.

3. How can can/should the carbon impact of waste and resource management be measured and managed?

The Environment Agency uses a Life Cycle Analysis tool (WRATE) to measure the impact of a wide range of waste options. It calculates at least six parameters, including carbon impact assessment. We anticipate that LCA will become a more important part of waste planning with the introduction of the revised Waste Framework Directive and adoption of the Waste Hierarchy: http://www.environment-agency.gov.uk/research/commercial/102922.aspx

4. Will the UK's infrastructure for managing waste and material resources will be fit for purpose over the next 10, 20 and 40 years? If not, why not and what should be done?

As with question 1, we feel that this is difficult to accurately predict for the period of time stated. Of most importance is the need to ensure that flexibility built into regional and local policies to allow the opportunity to respond to changing circumstances.

In terms of treating similar waste streams and setting recycling targets, there are benefits of scale and harmonisation which should lead to more efficient infrastructure and reduce duplication of systems. The ‘resource recovery park’ concept will deliver new synergies. Consideration will however have to be given between the current disparity in mechanisms for the collection and disposal of Municipal Solid Waste (MSW) and Commercial and Industrial (C& I) waste streams.

Household recycling needs to be made easier and simpler for those people who are not self-motivated to separate waste, or who live in dwellings and residential layouts (e.g. small dwellings and flats) where storage of waste, domestic separation or recyclate and movement to collection points, is difficult or impracticable. Promotion of community-based recycling teams or groups might be one option, with rewards feeding back into local community projects. Considerations of design to support waste management are already set out as a policy requirement in PPS10 (paragraphs. 35-36). The planning policy framework is there; the need is for practical action on the ground in relation to existing development, and in the design of new housing and other development generating municipal waste, to remove present obstacles to recycling. Most people are not highly-motivated environmentalists but will respond (or at least do more) if it’s made easier for them.

At the moment, there appears to be capacity for handling waste, but not for treating, reprocessing etc. We believe there is a need to invest in new technologies to provide greater capacity to meet landfill diversion targets and quality standards (as mentioned above). This is a complex issue because of the amount of material that is exported for reprocessing; however it is notable that many countries are now imposing their own standards for acceptance of recyclate.

5. Which innovations will be most important in ensuring maximum value is extracted from material resources as they move through the economy?

We suggest that “emerging technologies” would be somewhat a more suitable term – it is difficult to predict innovations before they happen. Generally, we think that the substitution of the most hazardous substances for alternatives, achievement of the maximum economic value through the chain by managing the life cycle (i.e. design for deconstruction) and reducing waste and energy losses through conversion will make the greatest contributions.

We believe that a much more coherent approach to plastics recycling is required, and this is a good example of the need to make things easier for people. Paper/card, glass and metal are now generally separated effectively in many, maybe most, household/kerbside systems. However, there is a variety of plastic packaging used in the home, with only some is collected; in some areas none are collected at kerbside, plastic bottles only at local Bring and Civic Amenity sites, and bulky rigid plastics at civic amenity sites. This leaves a large range of material marked as recyclable which fits in neither category, which obviously does not contribute much to achieving ‘maximum value’.

In all circumstances we stress the importance of getting development right for the site and planning for all opportunities.

<u>Detailed Questions:</u>

6. Will the landfill targets 2013 and 2020 be met? If not what action is required?

This will vary throughout the country. However, we would imagine that the 2013 target will be hard to meet on the grounds that investment in new and improved infrastructure has been delayed by the economic downturn. But if matters continue on current trends there is every chance the 2020 target will be met. What we need is all the stakeholders signing up to a coherent approach which planning authorities have an important role. If a region isn't meeting targets, the Local Planning Authorities must talk (and act) on resource sharing, cross boundary waste management etc.

7. Over the next 10 to 20 years will/should energy from waste (EfW) form a greater part of waste and resource management? If so should the focus be on heat, energy or a combination of the two? What are the barriers and how should they be overcome?

We think that even on the basis of the challenging targets in the Waste Framework objective EfW/Combined Heat and Power (CHP) will have to form a part of waste and resource management - we will still have a major waste 'disposal' issue. Too much plastic is still going into the general household/business waste stream, to various destinations, often including landfill. Plastic is a potential fuel and could displace some of the fossil fuels we will inevitably have to continue to burn for a considerable time. The managing of bio-waste should also include all options for recovery (i.e. land recovery, anaerobic digestion (AD), compost, fuel).

Our members suggest that CHP is preferable to EfW, as a more sustainable and efficient model overall. However there needs to be a balance between incentives as CHP can reduce electrical energy generation (which could be seen as negatively affecting revenue). There is also going to be competition from non-waste biomass generation, which may look more favourable to investors as there will be no need for Waste Incineration Directive (WID) and sources can be fully renewable, potentially qualifying for higher grants. Harmonisation of carbon costs and incentives might help.

EfW/CHP will always depend on circumstances so planning cannot be too prescriptive. The waste management field is constantly changing and new technologies are appearing fast. A better option than EfW/CHP may come along, and this must be monitored, and policies must be flexible enough to take account of technological improvements.

8. Is this the sector able to cope with increased quantities of recycled and reused products? Are there markets for these materials? If not what areas are wanting and what actions are required?

There should be a continued market for recyclate and values should increase over time, suggesting that investment in capacity/facilities should take place. However the mix between good quality material, lower quality and reject (i.e. for solid recovered fuel) needs to be found. Care is going to have to be shown in the setting of incentives such that they do not distort markets in contravention of sustainability objectives, (i.e. promoting EfW over recycling). We need to have flexible plans that allows infrastructure to be built that can adapt to market changes.

9. Are there reliable sources of affordable finance available to support the delivery of new and upgraded infrastructure? If not what should be done to address the situation?

No comment