

HAMPSHIRE MINERALS AND WASTE DEVELOPMENT FRAMEWORK
CORE PLANNING STRATEGY
PUBLIC EXAMINATION – JANUARY 2007

Response by
The Berkshire Unitary Authorities Joint Strategic Planning Unit

Matter 5 Self Sufficiency

Issue (i) Is Policy S3 consistent with Policy W3 in the adopted (July 2006) Regional Waste Strategy (RPG9) and the draft South East Plan?

1. It is the opinion of the Berkshire Joint Strategic Planning Unit (JSPU) the Policy S3 is not consistent with either RPG9 (July 2006) or the draft South East Plan.
2. Topic paper 1 by Hampshire County Council argues in section five that the policy of "No provision will be made for London's Waste" is based on sustainability issues.
3. RPG9 is very clear and states provision for London's waste should only be made where a single or multiple number of criteria are met. Unfortunately, RPG9 does not specifically include sustainability as one of the criteria.
4. The draft South East Plan also includes the same criteria along with an explicit requirement for Waste Planning Authorities to provide landfill capacity for the apportionment of London's exported waste.
5. Since Policy S3 is quite clear in stating, "No provision will be made for London's waste" it must be contrary to Policy W3 of the draft South East Plan.
6. By removing the last sentence of Policy S3 the conflict between the plans can be avoided.
7. It is recognised that Policy W3 of the draft South East Plan is a very contentious policy and both Government Office South East and the South East England Regional Assembly conceded as much at the South East Plan Inquiry in December 2006. However, until such times as Policy W3 in the draft South East Plan is modified the concern of the Berkshire Unitary Authorities is that any under provision in one part of the plan area will have to 'picked up' by another.

Issue (ii) To what extent should Policy S3 provide for landfilling of a proportion of London's waste?

8. The plan should aim to provide for the entire apportionment requirement identified in the South East Plan provided that such provision can clearly be shown to be needed, that any facility will bring demonstrable benefits to Hampshire and the South East and that the new facility at the proposed location is the most suitable location between London and Hampshire.

Issue (iii) should the “net self-sufficiency” approach be more flexible to accommodate movements of waste between catchment areas, including sewage sludge?

9. It is difficult to see how movements between catchment areas can be monitored accurately enough to ensure a more flexible approach is viable.

Matter 6 Recycling and Composting

Issue (i) Are the recycling/composting rates realistically achievable, and do the MWPA's have sufficient control over meeting the proposed recycling/composting rates?

- 10.No comment

Issue (ii) Do the Policies take sufficient account of commercial waste, or should there be a specific policy covering this type of waste?

- 11.It is hard to see that the increased cost involved in monitoring commercial waste would justify a separate specific policy on this issue, since commercial waste is more price sensitive than any other waste stream in that it will always go to the cheapest location regardless of the distance travelled.

Issue (iii) Are the figures for waste management and capacity, including recycling/composting and recovery/treatment, soundly based and appropriate for the county, and are they consistent with the latest RPG9 (Policy W7) and draft South East Plan?

- 12.Since no provision is made for the disposal of London's Waste the figures cannot be consistent with RPG 9 or the draft South East Plan.

Issue (iv) Should Policy S5 include more specific criteria and locational guidance to direct the search for new sites to meet the required capacity?

- 13.No comment

Issue (V) How will the plan deal with the provision of additional capacity to handle commercial and industrial waste?

- 14.No comment

Matter 7 Landfill

Issues (i) (ii) (iii) and (iv)

15. The approach adopted by Hampshire of linking landfill and mineral voids is both realistic and appropriate, however, the failure to take account of London's Waste as required by both RPG9 and the draft South East Plan means that a) the figures used in relation to landfill capacity and non-recyclable inert waste are an underestimate and b) sufficient provision for landfill is not made.

16. However, if a caveat was added to Policy S6 stating that London's Waste has been excluded from the policy and that this amounted to 2.2 million tonnes then conformity could be achieved.