

## Comments on Draft South East Plan By GAIN

GAIN, which promotes more sustainable waste management in Surrey, notes the status of the waste policies in the South East Plan.

Whilst we agree in principle with the inclusion of waste policies in the overall SE Plan, we ask for consideration to be given to the way in which waste policy is evolving rapidly at present. There may need to be greater provision for waste policy to be updated than for other issues where policy and practice are not undergoing such radical change.

We accept the principle of only considering areas of significant change since the EiP. In addition to those issues highlighted in red in the consultation, we wish to draw attention to two aspects of the Waste Plan where the consequences of drafting policy in a particular way were not fully appreciated at the time. We therefore commend to the Inspectorate two aspects of waste policy where issues have emerged that we submit warrant consideration at this EiP.

- 1) Presentation of recovery and landfill targets.
- 2) Insufficient attention given to harnessing energy from gas.

Policy W5:

Drafting of this policy needs to be reconsidered now that its consequences for county level Waste Plans are becoming apparent. The presentation of recovery targets as landfill targets is leading to confusion.

- 1) They are too crudely related to the biodegradable landfill limits resulting from the Landfill Directive and use different assumptions (LATS implementation was less clear at the time of preparing the SE Waste Strategy)
- 2) They do not relate clearly to Government recovery targets.
- 3) The landfill targets exclude landfill of recovery residues (This is either overlooked or causes confusion).

The European framework and national guidance are structured around “recovery” targets, with “recycling and composting” being treated as a subset of this.

However, in the current draft of the SE Plan, landfill targets are used instead of recovery targets. These give the impression that the un-recovered remainder of a recovery target is the landfill target. However, it is not as simple as this. There is usually some residue from recovery that needs to be landfilled too. Policy WD5 gives the impression that a 75% recovery target is the same as a 25% landfill target. The small print in para.. 8.5 of page 144 explains that there will also be landfill that is the residue from recovery and that this should be added to the landfill target. This can be overlooked when the targets in WD5 are considered by Local Authorities (Eg Evidence to Surrey County Council Environment and Economy Select Committee waste inquiry).

What was consulted upon in the draft SE Waste Strategy as a “recovery target” is now being presented as a landfill target. It would be a lot simpler and avoid many problems to stick to using a recovery target not a “landfill excluding landfill of recovery residue” target.

Also, a recovery target of 84% is higher than that being sought by Government and is distorting technology selection. (Reference: Technology selection grid in Draft Surrey Waste Disposal Plan.) There are pros and cons with all technologies and judgements need to be made. Several sustainable options risk being eliminated because of confusion over the landfill targets in W5. For example, strategies that would recover materials and energy from over 75% of waste and or which would landfill a treated, cleaned, bio-stable residue equating to more than 16% of waste risk being eliminated citing the targets in the SE Plan. We question whether it is appropriate to eliminate certain technologies that may offer many advantages because they achieve a recovery rate of slightly below 84% but pre-treat landfill residue or because they exceed a 16% landfill requirement but only landfill pre-treated, bio-stable material.

Greater care needs to be taken over the type of landfill being considered. Best practice landfill of cleaned and separated residues can in some circumstances be a good environmental option. Unsorted landfill that includes biodegradable material is quite another matter.

Policies W6 and W12:

Both these policies given inadequate attention to the very significant potential for harnessing energy (biogas) from biological treatment. Harnessing energy from waste should apply not only to combustion and landfill but also to composting of separated materials and to biological breakdown (eg Anaerobic Digestion) of residual waste.