

## Waste & Minerals Core Strategy – Preferred Strategy

### **Response from the Green Group of Councillors, Brighton & Hove City Council**

*December 2009*

#### **Note**

A significant portion of this Waste & Minerals Core Strategy depends on Brighton & Hove's Municipal Waste Strategy which is still in draft form. As a result the Green Group's response to the recent consultation on the city's Municipal Waste Strategy is included with this submission.

#### **General Comments**

Overall we believe that the document currently lacks ambition. We would like to see it moving beyond the basic steps of the nationally agreed waste hierarchy model. For example much firmer planning for municipal food waste collection should be incorporated. Additionally more work should be done on how local authorities, as major purchasers in their own right, can contribute to reducing commercial and construction waste through their own procurement processes.

We strongly support the document's rejection of taking London's waste in the Core Strategy area.

#### **Specific Comments**

- 2.40-2.41 confirm that residues from incineration will need to be trucked to elsewhere in the country for processing. However, the sustainability and resilience of such arrangements are not explored. It is of further concern that arrangements have not been confirmed as to how hazardous bottom ash from Newhaven will be handled - suggestion of another facility at the Newhaven site are cause for concern.
- It seems inconsistent that the 'Spatial Vision' on page 27 states that "The growth in waste will have stopped", which we too would warmly welcome. However table 6 on page 17 states that significant additional landfill capacity will be needed up to 2027, even in the minimum scenario.
- We strongly support the final sentence of 7.7 which suggests seeking reduced construction waste through requirements on all built developments.
- Issue W1 "There is a need to minimise the amount of waste that is produced" is a key issue from which many other future trends will be set. We believe that selecting just a single preferred option on this issue is insufficient. We do not accept the mutual exclusivity of the options presented and argue that many of those listed could be pursued at the same time by the local authorities. If pursued then perhaps further landfill and landraise sites can be avoided.

- On issue W2 “The need for additional waste recovery and land disposal capacity” we support option W2c and not the chosen option of W2b. We believe the maximum resources reasonably possible should be diverted from preparing landfill capacity towards greater minimisation, reuse and recycling.
- Section 9’s use of the term ‘recovery’ is very misleading, as shown in some tables, it means diversion from landfill, mainly to incineration. As page 131 of the document notes, “energy obtained from packaging waste through a dedicated municipal incinerator may no longer be called recovery.”
- Appendix A, page 114, CS1a - Waste minimisation: The vague delivery target of “commencing background work to inform the preparation of subsequent policy/strategy documents” within two years of the Core Strategy’s adoption is grave cause for concern. Such a slow process would certainly jeopardise any chances of hitting regional and national targets.

## **Conclusion**

Whilst recognising that this Waste & Minerals Core Strategy has to address a number of difficult issues for the area, we believe that at the moment the preferred strategy is weak, lacks ambition and will fail to deliver the environmental benefits such a strategy urgently needs to.

*Prepared by Cllr Jason Kitcat*