

Waste Core Strategy Preferred Options Representations and recommended responses

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1 Document order and layout.

Waste Core Strategy Preferred Options Representations and recommended responses

Parts of representations have been grouped according to the policy or the section of the document to which they relate.

For the benefit of clarity, a table for each question box and, discrete paragraphs have been created and follow the order of the Consultation Document.

Please note: the third column denotes whether the individual 'agrees', 'disagrees' or 'neither agree or disagrees' with the policy/section of the document. Responses follow the following order:

- Agree (A)
- Disagree (D)
- Neither Agree or Disagree (N)

2 Consultation representations to Chapter one

Paragraph 1.5 (Technical Evidence Papers and Evidence Base)

Name	Organisation	A/ D /N	Representation
Mr Keith Owen	SLR Consulting Limited (on behalf of Biogen Power Ltd)	D	In this connection, it is noted that, in paragraph 1.5 of the Waste Core Strategy Preferred Options (WCSPO) it is stated that the evidence base is not part of the consultation document. This is considered to be an unusual stance to adopt since the WCSPO uses data derived from the technical evidence base. If consultees have concerns that these data may be in error or have been used in an incorrect fashion to derive the policies in the WCSPO, it follows that consultees must be able to make comments on this evidence base.
Mrs Caroline Romans	Secretary Central Bedfordshire and Luton Joint Local Access Forum	N	The layout of the documents do not lend themselves to a good public response. The consultation document is very lengthy and it is not easy to find the policies referred to. The technical documents are VERY technical! A bullet point summary may have helped non-experts to understand the documents and their layouts. On a positive note - the site tour on the consultation portal was useful.

Paragraph 1.5

Explanatory note:

- The Waste Core Strategy consultation document was written in plain English. However it is acknowledged that waste planning is a complex and difficult topic, and a Glossary has been included in order to make technical terms more understandable.

-The Evidence Base is purely factual.

Summary response:

- All consultation documents were capable of being commented on.

Recommended change:

1. Delete last sentence of paragraph 1.5.

Statement 1 (How much, Where, When, What facilities are needed and Who are the Key parties in managing waste)

Name	Organisation	A/ D /N
Mrs Margaret Pedley	Member of the public	A

3 Consultation representations to Chapter two

Paragraph 2.4 (The Strategic Highway Network)

Name	Organisation	A/ D/ N	Representations
Mr Rio D'Souza	Planning Officer Highways Agency	D	The strategic road network in this area comprises of the: A1: north-south linking the two sections of the A1(M) and passing to the east of Bedford; M1: north-south from Leeds to London and passing to the west of Luton; A5: north-south between Birmingham and the M1 passing through the west of the Plan area; and A421: east-west between the A1 and the M1 passing to the south of Bedford. It is noted that the Plan refers to the A6 as forming part of the strategic highway network. With regards to the Highways Agency's Strategic Road Network, the A6 does not form part of this and therefore has not been considered with respect to any of the potential sites in the Plan.

Paragraph 2.4 The Strategic Highway Network

<p>Explanatory note:</p> <p>-The A6 is not part of the Strategic Highway network defined by the Highways Agency, but is of strategic importance to the Local Authorities.</p>
<p>Summary response:</p> <p>- The A6 is an important road within the Plan area.</p>
<p>Recommended change:</p> <p>1. Retain the reference to the A6 in paragraph 2.4, and in Map 1.1.</p>

Paragraph 2.5 (Waste Management)

Name	Organisation	A/ D/ N	Representation
Mr Adam Ireland	Planning Liaison Officer Environment Agency	N	There is no specific mention of Construction and Demolition Wastes. Is this because it is treated as a subset of Commercial and Industrial Waste?

Paragraph 2.5 Waste Management

Explanatory note:

- Large volumes of wastes arise from the maintenance of utilities, and the construction and demolition activities including redeveloping land.

Summary response:

- These wastes are considered in the consultation document as well as Technical Evidence Paper 2.

Recommended change:

1. Add a reference to Construction and Demolition wastes, and refer to paragraph 4.46.

Paragraph 2.7 (Marston Vale Forest)

Name	Organisation	A /D N	Representation
Mr Ed Hiam		D	Objection: Singular mention of "Marston Vale Community Forest Charity," when there are numerous other Forest charities operating in the Vale and Shire of Bedford.

Name	Organisation	A / D N	Representation
Mr Antony Mould	Natural England	D	As well as identifying the Forest of Marston Vale initiative, it would be useful to recognise the existing biodiversity interest of the Marston Vale, as evidenced by the number of former minerals sites which are designated as County Wildlife Sites.
Darren Woodward	The Marston Vale Trust		<p>Waste Core Strategy Preferred Options Consultation</p> <p>Thank you for consulting the Marston Vale Trust on the above consultation document the contents of which have been noted.</p> <p>Having read through the document it seems appropriate to respond on the issues that will affect the continued regeneration of the Marston Vale rather than answering the individual prompt questions. Although I appreciate the need to support the consultation document with previous policies I did struggle with the various documents and can understand how members of the public would be intimidated by the consultation and therefore prefer not to respond.</p> <p>The Trust acknowledges the need for waste management sites within Bedfordshire. However, we are struck by the fact that 100% of the Preferred Sites and 50% of the Reserve Sites proposed are within the Marston Vale. As you are aware, in 1991, the Government designated the Marston Vale as one of England's 12 Community Forests, with a remit to use trees and woodlands to regenerate a landscape scarred by many decades of clay extraction, brick making and landfill activities. The core Government target of increasing tree cover from 3% to 30% by 2031 was prescribed in order to transform perceptions of the area, indicating a shift away from past industrial activities and stimulating environmentally-led regeneration. Accordingly, any further (new or additional) waste management activity within the Marston Vale area could be seen by some as being at odds with the existing Government prescription for environmental regeneration of the area through the creation of the Forest of Marston Vale.</p> <p>It is the Trust's view that any new waste management sites/operations deemed by the appropriate authorities to be best-located within the Vale must be made to very significantly contribute towards the creation of the Forest of Marston Vale. Such contributions will need to exceed those secured from historic waste management sites/operations in order to reflect their potentially retrograde impact on achievement of the Government's environmentally-led regeneration aspirations for the Vale. Furthermore there is a need to compensate local communities who have already endured decades of waste management operations within the area and who, quite reasonably, might have viewed this era as drawing to an end. The development of any further landfill operations in the Marston Vale may undermine social,</p>

Name	Organisation	A /D N	Representation
			<p>environmental and economic improvements that have been delivered by the Marston Vale Trust or by former waste sites that are restored or due for restoration i.e. Brogborough, Stewartby and Elstow. This sentiment has been reflected in previous responses by the Trust to Minerals and Waste Policy documents and is voiced in day to day contact with local people who live and work within the Vale. Again, such impacts must be fully mitigated and compensated for by any such development proposals in the event that the planning authorities deem the Marston Vale to be the optimum location for additional landfill sites.</p> <p>Waste sites within the Community Forest should be restored in accord with the vision for the area set out in the Forest Plan, ensuring that they help rather than hinder the delivery of the Community Forest Vision. In the case of landfill restoration, it is the Trust's policy, as set out in it's Woodland Creation Strategy (2000) prepared in constitution with key partners, that at least 50% woodland cover be created averaged across all landfill restoration schemes in the Community Forest.</p>

Paragraph 2.7 (Marston Vale Forest)

<p>Explanatory note:</p> <ul style="list-style-type: none"> - The Marston Vale is an area of considerable former mineral workings. It also has considerable biodiversity interest.
<p>Summary response:</p> <ul style="list-style-type: none"> - The general biodiversity interest of the Marston Vale is acknowledged. - Biodiversity is considered in TEP 4 and the Sustainability Appraisal. - The location of the Preferred Strategic sites is discussed at paragraphs 4.17 to 4.24. - The Spatial Distribution of Strategic Recovery sites is set out at page 30, while Non-Hazardous landfill sites is discussed at pages 50 to 51.
<p>Recommended change:</p> <ol style="list-style-type: none"> 1. Add reference to the general biodiversity interest of Marston Vale.

Paragraph 2.9 (Designated Areas)

Name	Organisation	A/ D/ N	Representation
Mr Paul Maison	British Waterways	A	1. The Bedford- MK waterway should be shown on Maps 1 and 2. It is now incorporated into Core Strategies and is thus a material consideration. 2. We welcome para 2.9 with the enhancement of the locality and its landscapes and features in the Leighton Buzzard and Heath and Reach areas.
Mr Michael Brooks		D	Within the designated areas listed in para 2.9, the thrust of planning policy is to integrate landscape, biodiversity, cultural heritage and public access. Enhancement, certainly, but protection where necessary. And, where relevant, these are just as appropriate to waste management developments as to minerals planning.

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Name	Organisation	A/ D/ N	Representation
Mrs Katharine Banham	Conservation Officer (Bedfordshire) The Wildlife Trust BCNP	N	The Wildlife Trust welcomes the recognition that it would not be appropriate to site waste facilities within the Chilterns Area of Outstanding Natural Beauty (AONB) or within areas intended for their enhancement, such as The Greensand Ridge. We feel however, that it is important to acknowledge that these enhancement areas already include some areas of high quality for biodiversity. These include nationally designated Sites of Special Scientific Interest and County Wildlife Sites. It would not be appropriate to place waste sites where they could degrade these high quality areas or in locations which would impact on the setting of the AONB.
Mr Antony Mould	Natural England	N	Natural England is pleased to see that the document identifies designated enhancement areas with opportunities for biodiversity and landscape. As well as these, the document could also usefully refer to the 11 strategic green infrastructure opportunity areas identified within the Bedfordshire and Luton Strategic Green Infrastructure Plan.

Paragraph 2.9 Designated Areas

Explanatory note:

- non-landfill (i.e. built) waste management developments have little scope to contribute the landscape, since they are structures and buildings similar to industrial uses.
- the location of waste management uses is the subject of advice in PPS10.
- the location of waste management uses within the Greensand Ridge, and Ouse and Ivel Valleys is not inappropriate.

Summary response:

- Both the Bedford-Milton Keynes Waterway and Green Infrastructure Opportunity Areas are matters which should be referred to within the Core Strategy.
- The AONB and its setting are not appropriate for the location of waste management facilities. However the saved Policy GE3 does set out when waste management proposals there would be appropriate.
- Locally designated wildlife sites are protected under saved Policy GE12.
- Green Infrastructure Opportunity Areas are designated in non-Minerals and Waste LDFs.

Recommended changes:

1. Identify the proposed Milton Keynes to Bedford Waterway in the Waste Core Strategy at paragraph 2.9.
2. Add a reference to the Green Infrastructure Opportunity Areas.

Paragraph 2.10 (AONB and Green Belt designations)

Name	Organisation	A/ D/ N	Representations
Mr Antony Mould	Natural England	N	Natural England is pleased to see the document assumes that the development of waste facilities would be inappropriate within the Chilterns Area of Outstanding Natural Beauty (AONB). However, it would also be useful to identify that development beyond the boundaries of the AONB may still have impacts on the setting of the statutorily designated landscape, with these impacts needing to be considered on a site-specific basis.
Mr Paul Maison	British Waterways	A	1. We generally support paragraph 2.10 but with recent abolition of Regional Spatial Strategies, there may be changes in housing targets and the need to redraw green belt land.
Mrs Nicky Upton	Harlington Parish Council	D	If land is to be taken out of green belt it should only be for essential housing and employment and not for ancillary uses better located on brown field sites e.g. Energy from Waste.

Paragraph 2.10 AONB and Green Belt designations

Explanatory note:

- the provision of housing is being progressed locally through non-minerals and waste LDFs, and the Plan takes into account the locations identified for housing growth.

- impacts on landscape will be considered under the Saved General and Environmental Policies until a General and Environmental Policies DPD is adopted.

Summary response:

- Both the Chiltern Hills AONB and the area designated as Green Belt are key considerations in the Waste Core Strategy concerning the location of waste sites.

Recommended changes: None.

Statement three (Objectives of the Waste Strategy 2007 for England)

Name	Organisation	A/ D/ N	Representation
Mrs Margaret Pedley		A	

Paragraph 2.13 (The Waste Hierarchy)

Name	Organisation	A/ D/ N	Representation
Mrs Margaret Pedley		A	

Paragraph 2.14 (Initiatives to reduce waste arising)

Name	Organisation	A/ D/ N	Representation
Mr Paul Maison	British Waterways	N	1. You cover in Para 2.14 the BEaR project. This para and para 2.51 may need to be amended in view of the future of the IPC mentioned earlier. However, we appreciate that this solution is important to Bedfordshire's waste strategy.

Paragraph 2.14 Initiatives to reduce waste arising

<p>Explanatory note:</p> <p>- the BEaR project is a procurement exercise by Central Bedfordshire Council.</p>
<p>Summary response:</p> <p>- Bidders for this contract may or may not propose new facilities which would be Major Infrastructure, to be determined by either the IPC or the Secretary of State. Either way, this will be unlikely to affect the outcome of the BEaR project.</p>
<p>Recommended changes: None.</p>

Paragraph 2.21 (Recovery of materials)

Name	Organisation	A/ D/ N	Representation
Mrs Nicky Upton	Harlington Parish Council	A	This should not preclude recovering plastics raw monomers from scrap plastic by the latest technologies in preference to incineration for EfW.

Paragraph 2.21 Recovery of materials

<p>Explanatory note:</p> <p>- it is acknowledged that the reuse of plastics can and does occur.</p>
<p>Summary response:</p> <p>- paragraph 2.19 refers to the reuse of recycleable materials.</p>
<p>Recommended change: None.</p>

Paragraph 2.23 (The Regional Spatial Strategy)

Name	Organisation	A/ D/ N	Representation
Mr Michael Brooks		D	References to the RSS in paras 2.23ff (and elsewhere in the document) should now be removed, as the Secretary of State has indicated is intention to abandon RSSs. This is not to deny that much of the evidence base used for preparing the draft RSS Review may still be relevant in supporting the Bedfordshire Waste Core Strategy proposals, but the wording will need to be amended to reflect this.
Mr Rio D'Souza	Planning Officer Highways Agency	D	Reference is made in the Plan to meeting the targets set by the Regional Spatial Strategy (RSS) but this has since been disbanded and is therefore no longer relevant to this Plan. No further reference is therefore made by the Highways Agency to any targets related to the RSS.
Mrs Caroline Romans	Secretary Central Bedfordshire and Luton Joint Local Access Forum	N	The Regional Spatial Strategy paragraphs will need to be reviewed as a result of the new Government's announcement on the future of this strategy.

Paragraph 2.23 The Regional Spatial Strategy

Explanatory note:

- The Secretary of State announced in July 2010 that Regional Spatial Strategies were abolished. That statement was then challenged in the High Court, with the result that RSS are once again part of the development plan. However the Localism Bill contains provisions for the abolition of the RSS. The passage and implementation of this legislation will therefore need to be monitored.

Summary response:

- Regional Spatial Strategies will remain a part of the development plan until they are abolished by the implementation of that part of the Localism Bill.

Recommended Changes: None

Paragraph 2.25 (The Regional Spatial Strategy)

Name	Organisation	A/ D/ N	Representation
Mrs Margaret Pedley		A	
Ms T Lennie		D	Why is it taking so long to reduce the London imported waste and why is it still so high in 2015/16?
Ms Louise	ERM (on behalf of Covanta)	N	Section 2.25 identifies that the East of England is planning for a progressive reduction of imported waste from London between 2010/2011 and 2015/2016. Only waste that has been subjected to comprehensive pre-treatment

Name	Organisation	A/ D/ N	Representation
Treacy	Rookery South Ltd)		will be accepted for landfill post-2015. Section 2.25 identifies that 'for the Marston Vale this restriction on types of wastes applies immediately'. No justification is provided for this statement at this point in the document.

Paragraph 2.25 The Regional Spatial Strategy

Explanatory note:

- The "apportionment" of London post treatment waste residual waste for landfilling originates from an agreement between London, the South East Region, and the East of England Region, before the 2008 Regional Spatial Strategy was published, concerning the amount of London waste that would be landfilled in each Region, and later within each constituent Waste Planning Authority."

Summary response:

- The Secretary of State announced in July 2010 that Regional Spatial Strategies were abolished. That statement was then challenged in the High Court, with the result that RSS are once again part of the development plan. However the Localism Bill contains provisions for the abolition of the RSS. The passage and implementation of this legislation will therefore need to be monitored.

- ERM representation is not correct.

Recommended changes: None

Paragraph 2.26 (The Growth Agenda)

Name	Organisation	A/ D/ N	Representation
Cllr Janet Nunn	Central Bedfordshire Council	D	It doesn't have to be like this, cementing over green areas and boosting the economy in the south east while elsewhere inner cities and former industrial towns struggle to keep going. Only today I heard that Smith and Nephew and a department store in Hull are to close, the former to transfer production to Poland and the latter

Name	Organisation	A/ D/ N	Representation
			causing 500 people to become jobless. What is the value of that brownfield site and those people, and why not revitalise there instead of beginning again?

Paragraph 2.26 The Growth Agenda

<p>Explanatory note:</p> <ul style="list-style-type: none"> - Paragraph 2.26 is purely factual.
<p>Summary response:</p> <ul style="list-style-type: none"> - the Waste Core Strategy is about providing land for the management of waste, and not about other employment uses. - This issue is being progressed through other LDFs.
<p>Recommended change: None.</p>

Paragraph 2.30 (Abolition of the Regional Assemblies and RSSs)

Name	Organisation	A/ D/ N	Representation
Cllr Janet Nunn	Central Bedfordshire Council	D	Disagree. I can understand the scaremongering, perhaps would do the same if I were to lose my job, but frankly as we need the data, we shall find a way to acquire it by joining up at local level and linking in with national.
Ms Louise Treacy	ERM (on behalf of Covanta Rookery South Ltd)	N	The policy of the newly elected Coalition Government (May 2010) to abolish Regional Assemblies and Regional Spatial Strategies is noted in section 2.30 of the WCS. 'Consequently in the future estimates of the anticipated growth of both housing and waste production may not be available, which would create considerable uncertainty in respect of the context for waste DPDs'. Regional Spatial Strategies have now been revoked as of 6th July 2010. Given that the RSS played such a key role in establishing future growth within the Region, it is suggested

Name	Organisation	A/ D/ N	Representation
			that further discussion would be useful at this point in the Strategy regarding the implications for waste projections in the absence of the RSS.

Paragraph 2.30 Abolition of the Regional Assemblies and RSSs

Explanatory note:

- The Localism Bill proposes that the Regional Spatial Strategies will be abolished. The progress on this bill, and its timescales for implementation if it becomes law, will need to be monitored.

Summary response:

- the supply of data for use in monitoring the Core Strategy will be a strong issue and require working arrangements involving cooperation with other Waste Planning Authorities.

Recommended changes: None.

Policy box one (Regional Spatial Strategy Policies)

Name	Organisation	A/ D/ N	Representation
Mr John Shephard (Partner J & J Design)	(Acorn Transport & Plant Hire Ltd)	D	Draft Policy 1 and the supporting text will need to be updated in the light of the letter from Communities and Local Government dated 6 July 2010 announcing the revocation of all Regional Strategies. The interim advice from government is that adequate land should be provided to support the sustainable management of waste (including the move away from disposal of waste by landfill). The Councils should continue to rely on the stakeholders evidence base during this transitional period. We would urge that this Waste Core Strategy should include its own clear objectives for the plan period.

Policy Box One Regional Spatial Strategy Policies

Explanatory note:

- Following the judgement in the High Court, the RSS is once more part of the development plan. However the Localism Bill contains provisions for the abolition of RSS and the progress of this Bill, and the likely timescales for its implementation, will need to be monitored.

Summary response:

- Clear objectives are set out on page 23 in Chapter 4.

Recommended changes: None

Paragraph 2.33 (RSS Policy 3- Imported Waste)

Name	Organisation	A/ D N	Representation
Mr Adam Ireland	Planning Liaison Officer Environment Agency	N	If the Covanta project at Rookery South is given permission, how much of a possibility is there that waste will be imported for treatment from outside the Planned Area? This policy suggests that the imported waste will have been previously treated outside the Planned area.

Paragraph 2.33 RSS Policy 3- Imported Waste

Explanatory note:

- RSS Policy WM3 plans for a progressive reduction in imported waste for landfilling, originating from London.
- The application to the Infrastructure Planning Commission by Covanta Energy seeks to import untreated waste from outside of the Plan area, including Authority areas to the West and East.
- RSS Policy WM3 is concerned solely with waste imported from London for landfilling, and not from elsewhere outside of the former East of England Region.

Summary response:

- Monitor the progress of the Localism Bill, and its implementation into law.

Recommended changes: None.

Paragraph 2.35 and Policy box 2 (RSS Policy- Planning for Waste Management)

Name	Organisation	A/ D/ N	Representation
Mr John Shephard (Partner J & J Design)	Acorn Transport & Plant Hire Ltd	A	Subject to rewording to omit the references from RSS, Policy 2 is broadly supported. It is considered that adequate sites for new Waste Transfer Stations in sustainable locations and close to waste arisings will remain vital for the successful delivery of the national Waste Management objectives and local targets. The Councils appear to propose only 'Strategic Sites' within the Core Strategy. However, it is submitted that the Core Strategy should clearly indicate the proposed LDD which will identify non-strategic sites, or the alternative procedure which will be expected to co-ordinate non-strategic site selection.
Cllr Janet Nunn	Central Bedfordshire Council	D	At face value, this appears reasonable, but there may be good reasons why Area A wants to take Area B's waste for a consideration that would finance investment in better facilities. A case by case approach would be more sensible than a sweeping rule that allows no nuancing.

Waste Core Strategy Preferred Options Representations and recommended responses

Name	Organisation	A/ D/ N	Representation
Ms Louise Treacy	ERM (on behalf of Covanta Rookery South Ltd)	N	<p>Section 2.25 identifies that the East of England is planning for a progressive reduction of imported waste from London between 2010/2011 and 2015/2016. Only waste that has been subjected to comprehensive pre-treatment will be accepted for landfill post-2015. Section 2.25 identifies that <i>'for the Marston Vale this restriction on types of wastes applies immediately'</i>. No justification is provided for this statement at this point in the document.</p> <p>This matter is discussed further in section 2.35 which quotes policy WM5 of the RSS as follows: 'the use of potential landfill capacity in the Marston Vale should reduce over time. New landfill development in the Marston Vale should not compromise proposals for environmental regeneration and housing development, and should only be permitted where the waste to be landfilled has been subjected to comprehensive pre-treatment such that the maximum practicable value has been recovered, and provision is consistent with Bedfordshire's waste apportionment in Policies WM3 and 4'. The provision to restrict imported waste from London in the Marston Vale as discussed in paragraph 3.3 above, contradicts policy WM5 which allows for the gradual reduction of landfill capacity in this area.</p>

Paragraph 2.35 and Policy Box 2

Explanatory note:

- Following the judgement in the High Court, the RSS is once more part of the development plan.
- sites for non-strategic facilities will not be identified in the Core Strategy. Waste Core Policy 7 (at page 45) sets out a Spatial Distribution of Non-Strategic Facilities.
- The Proximity Principle is a continuing Principle of EU Waste Directives. It can be simplified to waste should generally be managed as close as possible to its source.

Summary response:

- The Localism Bill contains provisions for the abolition of RSS. The progress of the Bill, and the likely timescales for its implementation, will need to be monitored.

Recommended change:

- Thorn Turn to become a Preferred site for Recovery operations.

Policy box 3 (BAMWS Policy- Overall Landfill Strategy)

Name	Organisation	A/ D/ N	Representation
Mrs Margaret Pedley		A	

Policy box 3 (BAMWS Policy- Overall Landfill Strategy)

<p>Explanatory note:</p> <p>- This is a Policy with respect to the management of Municipal waste in Bedfordshire.</p>
<p>Summary note:</p> <p>- This is a repeat of the BAMWS Policy.</p>
<p>Recommended change: None.</p>

Policy box 5 (Management of Municipal Waste in Bedfordshire and Luton)

Name	Organisation	A/ D/ N	Representation
Mrs Margaret Pedley		A	An excellent policy.
Mr Paul Maison	British Waterways	A	1. We support policy 5 "to end the landfill of untreated waste by the year 2010" but we are not sure of the way of doing so.

Policy Box 5 Management of Municipal Waste in Bedfordshire and Luton

<p>Explanatory note:</p> <p>- This is a Policy with respect to the management of Municipal waste in Bedfordshire.</p>
<p>Summary response:</p> <p>- This is a repeat of the BAMWS Policy.</p>
<p>Recommended change: None</p>

Paragraph 2.42 (The Bedfordshire Energy and Recycling Project)

Name	Organisation	A/ D/ N	Representation
Mr Michael Brooks		D	Whilst the reference to BEaR in para 2.42 is historically correct, this should now be abandoned since its function would be taken over by the Covanta proposal at Rookery South (c.f. para 2.51).
David Toland		N	I attended your open day exhibition last Thursday in Stewartby. There are a number of points I wanted to raise. The Bear Project was at one time part of a joined up arrangement between Luton County Council, Bedford Borough Council and Mid-Beds District Council to find ways of disposing of waste for this area. What happened one by one Luton and Bedford Borough Councils dropped out of this arrangement owing to spiralling costs although you suggest that this arrangement was dropped through changes in local government. The new Central Beds County Council have now decided to go it alone by advertising for tender contracts in the June edition of the EU Journal for a long term waste treatment solution. I would be grateful if you could explain to me how the three Councils intend working together on the waste/mineral development when they could not continue together on the Bear Project.

Paragraph 2.42 The Bedfordshire Energy and Recycling Project

Explanatory note:

- While the BEaR project was initiated by the former Bedfordshire County Council, it has been continued as a procurement exercise solely by Central Bedfordshire Council. The BEaR project is in relation to waste management, whereas the Waste Core Strategy is a planning Policy document, concerning the control of where and how waste management developments take place for all wastes.
- The Minerals and Waste Local Development Framework is owned by Bedford Borough Council, Central Bedfordshire Council, and Luton Borough Council who have agreed to develop these policy documents collectively using a Shared Planning Service for Minerals and Waste.

Summary response:

- The three Councils work together under a Service Level Agreement.

Recommended changes: None.

Paragraph 2.43 (Mineral Policy)

Name	Organisation	A/ D/ N	Representation
Mr Michael Brooks		N	Construction wastes are given only the briefest mention with very little incentive to reduce them or to encourage adequate separation. Much of the so-called 'soils' from construction operations are mixed with timber, brick and aggregate waste and yet are destined for landfill or 'void filling'. Much more needs to be done here.

Paragraph 2.43 Mineral Policy

<p>Explanatory note:</p> <p>- Construction and Demolition wastes can be used as a source of secondary aggregates.</p>
<p>Summary response:</p> <p>- construction wastes are discussed in detail at paragraph 4.46, and in Technical Evidence Papers 1 and 2.</p>
<p>Recommended changes: None.</p>

Paragraph 2.45 (Sustainable Community Strategies)

Name	Organisation	A/ D/ N	Representation
Mrs Margaret Pedley		A	Encouraging.
Mr John Shephard (Partner J & J Design)	Acorn Transport & Plant Hire Ltd	A	Whilst we agree with this paragraph as a statement of fact, the Preferred Option does not appear to identify any clear linkages with the Sustainable Community Strategies for each of the Councils. They do not appear to be listed and there does not appear to be any identification of the key challenges facing each part of the plan area and clear local objectives arising from that challenge. It is submitted that this may become an issue of 'soundness' if not rectified in the Submission Draft.

Paragraph 2.45 Sustainable Community Strategies

Explanatory note:

- **Local Development Documents** are a key tool for expressing the aspirations of communities.

Summary response:

- the linkages with Sustainable Community Strategies of the three Councils are discussed in Technical Evidence Paper 3, and the Objectives of the Waste Core Strategy are set out at page 23.

Recommended changes: Add column to table 2, Chapter 5 (Monitoring and Implementation), to show linkages with the Sustainable Community Strategy.

Paragraph 2.50 (Current local initiatives)

Name	Organisation	A/ D/ N	Representation
Cllr Janet Nunn	Central Bedfordshire Council	D	"...will each need to develop new arrangements and potentially new facilities..." - Aargh! While it is right that each area should assess its own risks and needs, in our current straitened circumstances as a nation we must surely not preclude cross boundary co-operation in the name of effective use of all our resources and how best to manage them.
Mr Paul Blunt		N	Provision of waste management facilities local to centres of waste production will focus the minds of those producing the waste. If it is carted off to another county/region it becomes somebody else's problem

Paragraph 2.50 Current local initiatives

<p>Explanatory note:</p> <p>- The three Councils are also responsible for management of municipal waste from their area. They are tasked by Government to increase their rates for the recycling and diversion from landfill of municipal wastes.</p>
<p>Summary response:</p> <p>- new facilities to handle municipal wastes may arise from Local Authority procurement exercises in order to achieve the higher rates of recycling. The Waste Core Strategy will need to monitor the emergence of any waste facilities as part of their Annual Monitoring Reports.</p> <p>- Cross boundary co-operation will inevitably lead to waste crossing boundaries which in large proportions would be contrary to PSS10, and involve large amounts of traffic movements over medium to large distances, and therefore be unsustainable.</p>
<p>Recommended changes: None.</p>

Paragraph 2.51 (The Covanta proposal)

Name	Organisation	A/ D/ N	Representation
Mr Martin Tett	Buckinghamshire County Council	A	Paragraph 2.51 states that in the Autumn of 2009 Covanta Energy was identified by BCC as their preferred bidder. However, as of March 2010 Buckinghamshire County Council has returned to the “two bidder stage” for its Procurement process. The two bidders are Covanta Energy at Rookery Pit South, and WRG at Calvert Landfill Site, Buckinghamshire. We would like this detail to be up-dated. We consider that it is insufficiently clear that there is both a proposed allocation in your plan and a proposed planning application (to the IPC) for different waste management proposals at Rookery Pit South. Is the proposed landfill site the whole area shown on map 4.5, page 38, as if so there seems to be a conflict with the land proposed for an Energy from Waste facility by Covanta Energy, which has not been identified within the plan. Or is the landfill proposed to be completed at Rookery before the recovery facility is located on the same site? Clearer boundary definitions would be helpful to define these proposals at Rookery Pit.

Waste Core Strategy Preferred Options Representations and recommended responses

Name	Organisation	A/ D/ N	Representation
Mr Ed Hiam		D	Covanta have failed to identify and make public in their initial planning application (unlike the investigations carried out by BeAR) the fact that a protecting Covenant exists on Rookery South that prevents its future use for waste disposal or treatment.
Mr John A C Edwards		D	Other comment and the local press have raised objections to the choice of site for the plant. I wish to comment on Buckinghamshire's choice of Covanta as the preferred partner. Covanta operates primarily in the USA. The Bedfordshire authorities should thoroughly review the extent to which Buckinghamshire has investigated Covanta's US operations on the ground, particularly in the Eastern states, and the level of satisfaction in the client authorities and the public, as I have been given to understand that their record is far from good there, particularly in the Boston area. While I make no allegation whatever against Covanta in this regard, there is no doubt that refuse processing and disposal in the USA is heavily infiltrated by the Mafia and caution must be exercised to avoid importing it here. There is substantial expertise and experience of waste processing within the EU and there can really be no reason to look further afield.
Mr Adam Ireland	Planning Liaison Officer Environment Agency	D	As Buckinghamshire County Council have rescinded their contract with Covanta Energy, this paragraph requires updating. Also the new coalition government is taking steps to dispense with the Infrastructure Planning Commission so this will also need amending.
Mr Michael Brooks		N	The Covanta proposal should receive more positive support in principle from the three Bedfordshire Waste Planning Authorities. There are, however, many detailed issues that need to be resolved, including visual impact (especially when viewed from Ampthill Park) and the need for a rail connection.

Paragraph 2.51 The Covanta proposal

<p>Explanatory note:</p> <ul style="list-style-type: none"> - Covanta Energy have applied to the Infrastructure Planning Commission for permission for a large energy from waste facility. - In the Autumn of 2009, Covanta Energy was identified by BCC as their preferred bidder. However, in March 2010 Buckinghamshire County Council returned to the “two bidder stage” for its Procurement process, and later announced that WRG were their Preferred Bidder.
<p>Summary response:</p> <ul style="list-style-type: none"> - An application from Covanta Energy has now been received.
<p>Recommended changes:</p> <ol style="list-style-type: none"> 1. Amend paragraph 2.51 to reflect changed status of Covanta in the Buckinghamshire MSW contract bidding process. 2. Amend text to make clear that the site is both a proposed allocation, and the site of the Covanta application to the Infrastructure Planning Commission (e.g. "The site is an allocation within the WCS and the subject of an application to the IPC by Covanta Energy").

Statement 4 (Potential interactions between the Waste Core Strategy and other parts of the LDF).

Name	Organisation	A/ D/ N	Representation
Ms Carmelle Bell	Thames Water	A	Statement 4 The recognition that “new or expanded settlements will need to have waste infrastructure incorporated ... including for sewerage ...” is supported. It is essential that development does not take place ahead of the provision of the infrastructure, including sewage treatment, necessary to service it to avoid unacceptable impacts on the environment such as sewage flooding of residential and commercial property and pollution of land and watercourses. Water and sewerage undertakers also have limited powers under the Water Industry Act to prevent connection ahead of infrastructure upgrades and therefore rely heavily on the planning system to ensure infrastructure is provided ahead of development either through phasing, where appropriate.

Name	Organisation	A/ D/ N	Representation
			<p>TWUL considers that future LDF documents should therefore refer to the phasing of developments to ensure that they do not take place ahead of the necessary provision of infrastructure.</p>
<p>Mr John Shephard</p>	<p>Acorn Transport & Plant Hire Ltd (Partner J & J Design)</p>	<p>A</p>	<p>Statement 4 is supported. However, clear criteria are required to aid site selection, for both 'strategic sites' and 'non-strategic sites'. It is submitted that these should include:</p> <ol style="list-style-type: none"> 1. A geographical spread of sites; 2. Sites should be well related to the principal highway network.
<p>Ms Louise Treacy</p>	<p>ERM (on behalf of Covanta Rookery South Ltd)</p>	<p>D</p>	<p>Potential interactions between the WCS and other parts of the Local Development Framework are identified in Statement 4. It is stated that the <i>'locations of waste management facilities will directly affect haulage distances that wastes travel from residential, commercial, retail, and industrial areas. According to Waste Strategy 2007 and PPS10, waste facilities should always be "proximate" (i.e. as close as possible) to the sources of waste arisings'</i>. It is submitted that this statement is incorrect.</p> <p>PPS10 and the Waste Strategy for England 2007, together deliver part of the national waste plan necessary for waste management in the UK. Waste DPD such as the WCS are also part of this plan, as required by the Waste Framework Directive. Neither document requires waste facilities to be as close as possible to the source of waste arisings. Instead, PPS10, at paragraph 16, requires that <i>'the core strategy of a waste planning authority should set out policies and proposals for waste management in line with the RSS and ensure sufficient opportunities for the provision of waste management facilities in appropriate locations (our emphasis) including for waste disposal'</i>. Thus what is explicitly required is a sustainable waste management infrastructure, with facilities provided in the right place and at the right time.</p> <p>The fourth key planning objective (at paragraph 3 of PPS10) requires local authorities' planning strategies to <i>'enable waste to be disposed of in one of the nearest appropriate installations.'</i> This was very deliberately a direct quote from the 2006 Waste Framework Directive. The Revised Waste Framework Directive (2008/98/EC) extends this concept to incorporate recovery facilities. However, requiring a location to be <i>'one of the nearest'</i> is very different, and much more considered appropriate installations approach than merely seeking, erroneously, to limit facilities to be <i>'as close as possible.'</i></p>

Name	Organisation	A/ D/ N	Representation
			<p>PPS10 further recognises that movements of waste will occur. It implicitly promotes this activity where it would deliver sustainable development, by expecting that development plans will consider the likely demand for waste management capacity arising within neighbouring authorities and where meeting this demand would be consistent with paragraph 7 of the PPS.</p> <p>Additional potential interactions between the WCS and other parts of the Local Development Framework include the following: '<i>Conflicts between emerging areas for new housing or employment, and sites identified for waste management facilities</i>', and '<i>new or expanded settlements will need to have waste infrastructure incorporated, as it is built, including for sewerage, construction waste, and for household wastes</i>'. It is submitted that the interactions identified above should be seen positively and should form part of an integrated approach to development. As identified at paragraph 4 of PPS10 '<i>waste management should be considered alongside other spatial planning concerns, such as transport, housing, economic growth, natural resources and regeneration, recognising the positive contribution that waste management can make to the development of sustainable communities</i>'. In addition, it is submitted that the WCS should promote developers to consider CHP potential in general developments such as residential, commercial, industrial, etc. This approach would support the development of sustainable communities.</p>
Mrs Margaret Pedley		N	Do we really have adequate roads to take all the extra traffic?
Mr Geoff Gardner	Hives Planning	N	1. The potential conflict between the siting of waste management facilities and the development needs of (particularly) the Northern Marston Vale Growth Area should be noted (Statement 4 bullet point 3).
Mr Paul Maison	British Waterways	N	Statement 4 considers potential interactions between the waste strategy and other parts of the LDF. The movement of waste would be a strong interaction where consideration of more sustainable transport modes would be an important interaction. In the medium term, the transport of waste by water via the new waterway should be kept in mind, particularly with the long time horizons of waste (and mineral) plans. In this context, statement 5 vision (last para) that " <i>the transport of waste within the Plan area will continue to rely on the local road network</i> " appears rather feeble and unimaginative, compared to other authorities' plans.

Statement 4

Explanatory note:

- **Planning for waste management is not a matter exclusive to the Minerals and Waste LDF. PPS10 says it is one of many matters to be considered when planning for an area.**

Summary response:

- **Clear criteria for site selection are set out at pages 30 to 32, and 44 to 53, as well as in Technical Evidence Paper Four.**
- **"Proximity" is not defined in guidance, but at paragraph 3 ('Key Planning Objectives') of PPS10 states - "help secure the recovery or disposal of waste without endangering human health and without harming the environment, and enable waste to be disposed of in one of the nearest appropriate installations".**
- **It is not considered that the Waste Core Strategy needs to be amended in order to be consistent with EC legislation and PPS10.**
- **The Preferred Strategic sites have been chosen specifically with road networks as a selection criteria. It tries to identify sites which have good access to the primary road network, so roads should be adequate.**
- **Concerning potential conflict with growth in the northern Marston Vale, this is identified in bullet point three, and page 35.**
- **The scope for alternative means of transport is limited in the Plan area, and the high capital investment required for rail freight interchanges make them unlikely means of transport of waste. In addition, transport by rail over short distances is generally uneconomical, so encourages the importation of waste. This would be contrary to the aims of self-sufficiency, and would undermine efforts to manage waste at one of the nearest appropriate installations.**

Recommended changes:

- 1. Refer to the Marston Vale as an area for housing and employment land growth.**
- 2. Refer to the need to phase in new waste water infrastructure is accepted.**

4 Consultation representations to Chapter three

Question one (The Spatial Vision)

Name	Organisation	N/ A/ D	Representation
Anonymous		A	We agree with the vision and in particular would highlight the need to have sufficient waste management capacity for most kinds of waste arising within the area.
Mr John A C Edwards		A	The Statement is no more than a common sense approach.
Mrs Nicky Upton	Harlington Parish Council	A	But, importation of London waste should be conditional on the use of rail.
Mr Antony Mould	Natural England	A	Natural England is supportive of the vision for reduced waste/reliance on landfill and increased recycling of resources/recovery of energy.
Mr Adam Ireland	Planning Liaison Officer Environment Agency	A	The Environment Agency would agree with the Vision and we support the re-use, recycling, composting and recovery of wastes from all sources. There is also a sustainable approach for the use of waste as a resource.
Mr Tim Deal	Lafarge Aggregates Ltd (Mr Spencer Warren Heaton Planning)	A	Question 1 – Spatial Vision The ‘Spatial Vision’ as set out is appropriate for securing the future management of waste within the Plan area.
Mr Jeremy Randall (DP9)	Barnswood Ltd	A	In summary, Barnswood Limited welcomes the publication of the Waste Core Strategy Preferred Options Consultation Document and supports its Spatial vision (question one).

Name	Organisation	N/ A/ D	Representation
Mrs A Lowe	Wilshamstead Parish Council	A	Agree, including the statement that waste management facilities should be as close as possible to urban areas. The Strategy however seems to concentrate facilities around Bedford and should look to each urban area having its own waste management facilities nearby. The vision should also be looking to minimise as far as possible the transportation of waste around the County.
Mr Shaun Askins	Strategic Waste Manager Luton Borough Council	A	Q1, agree: a) However as both DEFRA & DECC are looking at carbon/climate change as drivers and if as likely the definition of MSW is amended, this may require the documents 'visions' to change. b) Life Cycle Analysis is seen by many as the way forward
Mr Ian Pickering	Chairman Aspley Guise Parish Council	A	Response: Agree subject to the following: 1. London should develop its own waste treatment facilities and the handling of London's waste in Bedfordshire should be stopped. 2. The transport of waste should be minimized.
Mr Keith Owen	SLR Consulting Limited (on behalf of Biogen Power Ltd)	A	Biogen agrees with the vision as set out in the Core Strategy noting that it will require adequate provision to manage arisings from within the Plan area (ie the area under the jurisdictions of Central Bedfordshire, Bedford Borough and Luton Borough Councils). However, in response to Question 4, below, Biogen sets out its concerns that the Preferred Option does not provide adequate recovery capacity for mixed and non-metallic wastes arising in the Plan area and may not, therefore minimise the need for landfill. The Vision is set out in Statement 5, which in its final paragraph refers to "large numbers" of traffic movement. However, such movements are related to the capacity of individual developments and not all facilities will produce large numbers of movements. Accordingly the words "large numbers of" should be deleted and the words "the resulting" should be inserted before the words "traffic movements" at the end of the sentence. Reference should be made to the need for facilities to be close to the strategic highway network.
Mr Graham Gunby	Suffolk County Council	A	It accords with the waste hierarchy and is realistic in terms of transport issues.

Waste Core Strategy Preferred Options Representations and recommended responses

Name	Organisation	N/ A/ D	Representation
Central Bedfordshire Council Waste Disposal Authority	Central Bedfordshire Council Waste Disposal Authority	A	Agree in principle with the overall approach to waste management based on the waste hierarchy. However, there is no mention made as to what is financially practicable within the short and likely medium-term financial climate. A reference should be made to this in paragraph 2. Also, will transport be reliant on existing road networks or will new infrastructure be considered under this vision? This needs to be made clear.
Mr Michael Brooks		D	There is too much reliance on the road network in Statement 5. The use of rail should be a requirement for the transport of all waste to strategic facilities in Bedfordshire arising from outside the local area (Bedfordshire and Milton Keynes). Specifically, permission for a strategic waste facility at Rookery South should be contingent upon a rail connection being provided and used. The same could apply to Elstow South if this were developed.
Mr Hugh Roberts	Marston Moretaine Action Group	D	MMAG disagrees with the Vision. The Vision still provides for an apportionment of wastes from London, a degree of landfilling - albeit highly limited (London waste) & for waste facilities being appropriately sited so as to be able to accommodate large numbers of traffic movements. MMAG does commend the statement that facilities should be located as close as possible to urban areas and yet nowhere in the consultation is it clear how Luton will share in providing these facilities? MMAG appreciates the challenges to local authorities which waste presents: something has to be done with it. This Vision has been in development from 2007. Since then the economic recession and the election of a Coalition Government both challenge the growth predictions upon which projections are built and the planning frameworks which address them. The regional spatial strategies are to be abolished and there is to be a massive investment in anaerobic digestion: is the Vision relevant or indeed truly up to date? The future in 2007 would have looked a lot rosier than it does now.
Ms Lizzie Barnicoat (Elstow PC)	Elstow Parish Council	D	Question 1: Elstow Parish Council disagree with the Spatial Vision as the Plan area is not defined and reference is made to receiving an apportionment of wastes from London, the Council feel again there is no clear definition of the type of waste nor the volume of waste from London. The Council disagree strongly that Bedfordshire should receive or manage any waste from outside of Bedfordshire.
Mr Tom Gilbert-Wooldridge	Planner English Heritage	D	We do not agree with the vision as it lacks reference to environmental considerations, including the historic environment.

Name	Organisation	N/ A/ D	Representation
Mrs sue clark	chair planning committee cranfield parish council	D	Cranfield PC agrees that there should be a sustainable materials resources economy, that should maximise the reuse and recycling of wastes, and minimise the need or landfill. Facilities should be fully integrated, with waste management facilities located as close as possible to urban areas. however the proposals outlined in this document rely almost entirely on the Marston Vale, and do not meet the objective for facilities to be located close to urban areas. The transport of waste should not be entirely dependent on the road network. The use of rail should also be actively considered.
Ms D Sacks		N	There should be a reference to waste prevention within the Vision, since this is at the top of the waste hierarchy and success in this area would ameliorate the need for a greater capacity of other waste management facilities.
Councillor Lorraine Mawer		N	Why can't rail be used to transport waste? Moving waste by road results in more traffic and noise pollution. Fuel is expensive so rail could be more cost effective. One rail journey would probably be able to deal with a days worth of lorry loads rumbling through our towns and villages. In Central Bedfordshire since Newton Longeville has been used as a landfill site for London waste, the number of lorries passing through small villages along the A4146 for example is really disruptive for residents, with noise pollution, vibration, and speeding issues. Lorries also wear out the roads. To add insult to injury it isnt even our waste!
Mr Martin Lewis		N	I broadly agree with the objectives, however I am not keen on waste being soley transported by road. Clearly collection of MSW is only really practicable by road but localised transfer stations could be set-up to get waste off the roads and onto the rail network. Is there an oportunity to import waste from London via train for recycling or otherwise processing which could be operated to the financial benefit of the plan area? There is a large unused brownfield site alongside th railway Kempston which may be suitable as a transfer station or as a specialist processing location.
Mr Paul Blunt		N	It concerns me that there seems to be talk of reducing the amount of waste going to landfill, but also an assumption that an increase in housing development in the south east is going to lead to more waste (in addition to the ongoing waste from London). Current increases rates of recycling will not cope with the increase in waste produced. It feels to me that the policy is pushing us towards the Covanta incinerator solution, providing them with an open door through which they can walk their plans ("and through the recovery of energy and / or materials from waste")

Waste Core Strategy Preferred Options Representations and recommended responses

Name	Organisation	N/ A/ D	Representation
Mrs Sharon Threlfall	County Development Unit Hertfordshire County Council	N	Although Hertfordshire County Council welcomes waste management self sufficiency, the adoption of a Low Growth Scenario as a preferred option raises questions into the possibility of a lack of preferred strategic sites identified in this document, if growth levels prove to be higher than expected.
Mrs Sharon Threlfall	County Development Unit Hertfordshire County Council	N	Currently, Hertfordshire suffers from a lack of suitable landfill void space as a result of environmental constraints regarding Flood Zones and Groundwater Protection Zones. The landfill site at Westmill near Hertford, is the only operational landfill site left in the County and is therefore unable to accept waste arising from sources from outside the County.
Ms Penny Earey		N	I am concerned about the part about taking some waste from London. Doesn't this mean that householders in London might not feel responsible for the amount of waste they are producing if they don't have to find the space to bury their rubbish or recycle?
Dr Bill Temple-Pediani	Managing Director	N	Our request of the Waste Core Strategy is that MBT/MT plants treating both household and non-household waste are located on the Bletchley-Bedford-Kettering rail line so that waste biomass fuel produced at these locations may be delivered to the CHP station by rail. My discussions with the East West Rail Consortium confirm the Calvert-Bletchley rail section will be up-graded to W10 standard. That means Buckinghamshire CC will be able to develop a low cost MBT/MT plant near Calvert or Aylesbury to deliver additional waste biomass fuel to the CHP station by rail.
Mr Alan Bulpin	Planning & Estates Manager Waste Recycling Group	N	Statement 5 - Question 1 WRG contends that Planning Policy should not be overly prescriptive. The past 15 years has seen a significant change in waste treatments and it is inevitable the next 15 years will be equally dynamic. Planning Policy must retain flexibility to accommodate new technologies.
Ms D Sacks		N	There should be a reference to waste prevention within the Vision, since this is at the top of the waste hierarchy and success in this area would ameliorate the need for a greater capacity of other waste management facilities.

Name	Organisation	N/ A/ D	Representation
Mrs Margaret Pedley		N	My concern is the use of the local road network, will this really be possible, as our roads are often already congested?
Ms Louise Treacy	ERM (on behalf of Covanta Rookery South Ltd)	N	<p>The spatial vision for the future development of the Plan area is set out in Statement 5 of the WCS. Question 1 asks the reader whether they agree or disagree with this vision. The Vision is generally agreed with and its implementation over the Plan period would be in accordance with the thrust of national planning policy. Notwithstanding the foregoing it is considered that specific elements of the vision require clarification.</p> <p>The Spatial Vision identifies that by 2027 'the plan area will have sufficient waste management capacity for most kinds of wastes (our emphasis) arising within its area'. It is submitted that this statement should be more specific and that the wastes for which there will not be sufficient waste management capacity should be identified, along with how these wastes are expected to be managed with the deficit of capacity in place. The Vision also states that '<i>the Plan area will maximise the reuse and recycling of wastes, and minimise the need for disposal</i>'. It is considered that this sentence should be amended to ensure that the recovery of waste is also maximised in accordance with the waste hierarchy.</p> <p>The Spatial Vision has informed the identification of a number of strategic objectives, which in turn have contributed to the identification of the preferred option. The objectives are grouped under the heading 'Statement 6' on page 23 of the document as follows:</p> <ol style="list-style-type: none"> 1. Manage as much as possible of wastes arising from within the Plan area and the agreed apportionment of London wastes; 2. Promote the reduction of waste arisings; 3. Move away from a dependence upon landfilling; 4. Provide greater capacity for the recovery of materials and energy; 5. Protect the biodiversity and landscape fabric of the Plan area; 6. Protect the safety of the road network in the Plan area;

Waste Core Strategy Preferred Options Representations and recommended responses

Name	Organisation	N/ A/ D	Representation
			7. Protect the cultural, social, and environmental heritage of the Plan area.
Mr John Shephard (Partner J & J Design)	Acorn Transport & Plant Hire Ltd	N	The Vision is broadly supported but should include a presumption in favour of the use of rail for strategic sites and waste flows. The final paragraph should refer to 'Facilities' being appropriately sited. It should also be recognised that rural areas are also sources of various waste arisings and non-strategic facilities will be associated with reduced traffic movements.

Question one

Explanatory note:

- The Spatial Vision is a broad statement of the state of the Plan area at the end of the period of the Plan, i.e. 2027. Detailed Core Policies are set out later in the document.

Summary response:

- Given the characteristics of the Plan area, and that the Plan is a planning policy document, the Waste Core strategy consultation document addresses the intended end state of the Plan area.

- The suggested higher reliance upon rail transport of waste by rail is not preferred, since it would only be appropriate for waste travelling long distances, which would therefore be from outside of the Plan area. This would be contrary to the first part of the Vision.

- Life Cycle Analysis is not relevant to planning for waste, but is a mechanism for comparing waste technologies. Planning is about the identification of suitable land, and not directly about technologies.

Recommended changes:

1. Amend The Spatial Vision, second paragraph to read: 'The prevention of waste arisings will be promoted, as well as the reuse and recycling of wastes that do arise, while the the requirement for the disposal to landfill will be minimised.'

Question two (Waste Core Strategy Objectives)

Name	Organisation	N/ A/ D	Representation
Ms Carmelle Bell	Thames Water	A	<p>Statement 6: The objective of “<i>Promote the reduction of waste arisings</i>” is supported, however in relation to our role as a statutory sewerage undertaker however, it should be recognised that as population growth increases, so inevitably does the amount of sewage sludge, which is the waste product of the sewage treatment process. TWUL has to respond to any increase in the amount of sewage sludge produced as a consequence of the increase in production of wastewater from new development. This may require upgrades to existing infrastructure or the provision of new infrastructure. Increases in population and more stringent effluent quality standards, will result in greater volumes of sludge, which will require a larger land bank to recycle to. This is likely to necessitate the transportation of sludge over greater distances, often by road to treatment centres, including cross regional, sub-regional and local authority boundary movement. TWUL considers that plans and strategies should continue to recognise the importance of providing an adequate network of wastewater treatment facilities. In developing their plans and strategies, waste-planning authorities should work together with TWUL to ensure adequate treatment facilities can be provided. These will serve the additional capacity created by economic growth and meet the environmental improvement targets required by river basin management plans and legislation such as the EU water framework directive. In particular, plans and strategies should recognise the issues surrounding the treatment, recycling and disposal of wastewater sludge. They should support a network of treatment and disposal facilities. The precise size and mix of these facilities will vary over time with changes in the quantity produced and the availability of recycling and disposal routes.</p>
Ms D Sacks		A	The objective of preventing waste should have a higher priority, but notwithstanding this the objectives are supported.
Mrs Margaret Pedley		A	I hope and trust this will be upheld though the waste core strategy that is being planned.
Mr Geoff Gardner	Hives Planning	A	1. We support the objective of restricting waste management facilities to deal with arisings from Bedfordshire only (Statement 6).

Name	Organisation	N/ A/ D	Representation
Ms Penny Earey		A	Again, I am all in favour of the objectives except for the part where we have to take a proportion of London's waste. Surely we need to be minimising the movement of waste, and we also need to be fostering an approach whereby we realise that we are all responsible for the amount of waste we produce, therefore we should be aware of where it goes and what happens to it - not that it's shipped off to another county.
Mr Martin Lewis		A	I agree with the objectives. In response to other comments regarding London exporting waste to this area; If we currently process waste for London it is not reasonable to just stop outright, what we should do though is to try and reduce the volumes over time to minimise the transport costs (I'm thinking mainly of the environmental impacts) which is what the objectives are working towards. London is a substantially developed area meaning there are not likely to be many appropriate sites for dealing with waste locally coupled with the fact that a large amount of waste will be produced. The type of "we don't want your rubbish" sentiment is a little futile if followed to it's logical conclusion; no one would be able to get rid of any waste. Luton wouldn't take it from Bedford, Bedford wouldn't take it from Stagsden, Stagsden wouldn't take it from 9 Church End and so on. We need workable national and regional plans. Personally I see it as an opportunity to bring a bit more employment to the area.
Mr John A C Edwards		A	Coherent and positive aims
Mr Paul Blunt		A	As stated by others, in principle the objectives are a common sense approach. I understand there is little capacity for London to deal with its own waste as it is already highly developed, but it would be very interesting to see what the "agreed apportionment" actually entails, whether it is a fixed amount or is allowed to increase proportionally with future development, and what proportion of London's waste is taken by Bedfordshire in comparison to other counties. Although I also agree with Objective 4, I again get the feeling this opens the door for a large incinerator development.
Mrs Nicky Upton	Harlington Parish Council	A	But, this is required by the EU, so disagreement is pointless.
Mr Antony	Natural England	A	While Natural England is broadly supportive of the identified objectives in Statement 6, they could be improved by recognising potential enhancement opportunities for the biodiversity and landscape fabric and cultural, social

Waste Core Strategy Preferred Options Representations and recommended responses

Name	Organisation	N/ A/ D	Representation
Mould			and environmental heritage of the Plan area. This issue is highlighted in the accompanying Sustainability Appraisal.
Mr Adam Ireland	Planning Liaison Officer Environment Agency	A	We would agree with the Objectives of the Core Strategy and would suggest that rather than just “ <i>Promote the reduction in waste arisings</i> ”, it be more ambitious by using the word “Ensure”.
Mr Tim Deal (Mr Spencer Warren) Heaton Planning	Lafarge Aggregates Ltd	A	Question2 – The objectives as set out are supported.
Mrs Margaret Pedley		A	
Mr Tom Gilbert-Woodridge	Planner English Heritage	A	We broadly agree with the list of objectives and welcome the specific reference to protecting the cultural heritage of the Plan area.
Mr Jeremy Randall	DP9 (Barnswoods Ltd)	A	Question two: In summary, Barnswood Limited welcomes the publication of the Waste Core Strategy Preferred Options Consultation Document and supports its Spatial vision (question one) and agrees with its objectives.
Mrs A Lowe	Wilshamstead Parish Council	A	Agree though the PC would like to see these objectives include protection of the regeneration of former aggregate sites for recreational and/or development.

Name	Organisation	N/ A/ D	Representation
Mr Shaun Askins	Strategic Waste Manager Luton Borough Council	A	Q2 agree: Broadly agree on this question, however the impact of the current fiscal change and increasing wider policy changes will need to be reflected , in particular point 4 , as the focus must be on point 2 as per WSE 2007 and WFD i.e. the waste hierarchy!
Mrs sue Clark	chair planning committee cranfield parish council	A	Cranfield parish council broadly agrees with these aims, with the following caveats. With the abolition of the Regional Assembly, is the East of England Plan still valid, and is Beds still obliged to take a fixed amount of waste from London? Conversely, could Beds end up taking more waste from London, if the apportionment is no longer valid? The statement "provide greater capacity for the recovery of materials and energy" is vague. This needs to be more tightly defined, so that it applies specifically to the waste arisings within Bedfordshire.
Mr Ian Pickering	Chairman Aspley Guise Parish Council	A	Response: Agree subject to the following: 1. London should develop its own waste treatment facilities and the handling of London's waste in Bedfordshire should be stopped. 2. The transport of waste should be minimized.
Ms Louise Treacy	ERM (on behalf of Covanta Rookery South Ltd)	A	Question 2 asks the reader whether they agree or disagree with the Core Strategy Objectives. These objectives are substantially agreed with. However, it is considered that the wording of objective number 1 could be strengthened. Rather than stating that 'as much as possible of wastes' arising within the Plan area will be managed, it would be more useful to include a target figure. This approach would enable constructive monitoring of the objective to be undertaken to determine progress over the lifetime of the Plan. It is further suggested that an additional strategic objective should be included to promote the reuse and recycling/composting of waste, in accordance with the provisions of the Waste Hierarchy.`

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Name	Organisation	N/ A/ D	Representation
Mr Keith Owen	SLR Consulting Limited (on behalf of Biogen Power Ltd)	A	<p>Response to Question 2</p> <p>Biogen broadly supports the objectives set in Question 2, albeit that the objectives are general and unquantified. The objectives of “protection” of safety of the road network is unclear, and references to protection of biodiversity and cultural heritage set out in the final objectives could be mistaken for a blanket ban on any development which may have a non-material impact on these values and these objectives could be better expressed as seeking to avoid material impacts on these issues of importance.</p>
Central Bedfordshire Council Waste Disposal Authority	Central Bedfordshire Council	A	<p>-Objective 1 - should clarify the statutory nature of waste imported from London</p> <p>-Objective 4 - the use of the word ‘recover’ or ‘materials recovery’ in place of recycling/composting is confusing throughout the document. References should stick to the definitions described in the waste hierarchy and the objective should read, ‘Provide greater capacity for the recycling, composting and energy recovery’. -Objective 6 - should this statement include keeping roads congestion free as well as safe?</p> <p>- An 8 th objective could be added, ‘To provide proximal facilities, close to good road networks, to reduce transport issues and support the carbon agenda’.</p>
Mr John Shephard (Partner J & J Design)	Acorn Transport & Plant Hire Ltd	A	<p>The Core Strategy Objectives are supported subject to (5), (6) and (7) being amended to ‘Protect and enhance.....’. Development Management should recognise the opportunities for enhancement flowing from proposals in order to achieve ‘the sustainable management of waste’.</p>
Mrs Caroline Romans	Secretary Central Bedfordshire and Luton Joint Local Access Forum	D	<p>An additional objective should be added - Protect the existing Rights of Way network</p>
Ms T Lennie		D	<p>Again it is the ‘agreed’ apportionment of London waste that is the sticking point. Can you re-examine the agreement? Is it binding?</p>

Name	Organisation	N/ A/ D	Representation
Mrs Katharine Banham	Conservation Officer (Bedfordshire) The Wildlife Trust BCNP	A/D	<p>The Wildlife Trust supports Objective 5 of Statement 6 which aims to protect the biodiversity in the plan area. This Objective could be strengthened by recognising that this includes designated sites such as Sites of Special Scientific Interest and County Wildlife Sites as well as the wide variety of Biodiversity Action Plan Habitats and Species which occur within these sites and more widely across the County. This plan also has the opportunity to promote the enhancement of sites for biodiversity both in the operation of waste sites and in their restoration following use. We feel it would be better to alter Objective 5 so that it reads: 'Protect and enhance the biodiversity and landscape fabric of the Plan area', as suggested in the Sustainability Appraisal. Under the Natural Environment and Rural Communities Act 2006, section 40, "Every public authority must, in exercising its functions, have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity. Conserving biodiversity includes, in relation to a living organism or type of habitat, restoring or enhancing a population or habitat." The change suggested to Objective 5 would also bring it in line with this Act.</p>
Mr Hugh Roberts	Marston Moretaine Action Group	D	<p>The objectives of the Waste Core Strategy are to:</p> <ul style="list-style-type: none"> (1) Manage as much as possible of wastes arising from within the Plan area, and the agreed apportionment of London wastes; (2) Promote the reduction of waste arisings; (3) Move away from dependence upon landfilling ; (4) Provide greater capacity for the recovery of materials & energy; (5) Protect the biodiversity and landscape fabric of the Plan area; (6) Protect the safety of the road network in the Plan area; (7) Protect the cultural, social and environmental heritage of the Plan area. <p>MMAG disagree with these Core Objectives - they are not ambitious enough - they should seek to ensure the local authorities are exemplars in producing waste management solutions that challenge why so much waste is produced in the first place : the first rung on the waste hierarchy. MMAG believes local authorities should manage waste solely within their jurisdictions in accordance with the 'proximity principle' of waste management</p>

Waste Core Strategy Preferred Options Representations and recommended responses

Name	Organisation	N/ A/ D	Representation
			and cease any dependence from landfilling. The Core Objectives make no attempt to address climate change or measure the carbon footprint of this strategy if adopted. Residents of Central Bedfordshire may be surprised to see that they are to be volunteered as a waste dumping ground for Luton Borough.
Ms Lizzie Barnicoat	Elstow Parish Council	D	Question 2: Elstow Parish Council disagree with the Core Strategy Objectives in relation to objection 1. there is no definition or reference regarding London wastes, the statement includes 'agreed' yet no reference to who has agreed
Mr Graham Gunby	Suffolk County Council	D	It should also refer to managing an amount of waste equivalent to that arising within the plan area.
Mr Antony Mould	Natural England	A/D	While Natural England is broadly supportive of the identified objectives in Statement 6, they could be improved by recognising potential enhancement opportunities for the biodiversity and landscape fabric and cultural, social and environmental heritage of the Plan area. This issue is highlighted in the accompanying Sustainability Appraisal.

Question two

Explanatory note:

- the Glossary set out definitions of the terms used.

Summary response:

- The Objectives set out at page 23 implement the Vision set out at page 22. Objective 2 seeks to promote the reduction of waste arisings. The Plan provides for the anticipated low growth scenario in terms of waste arisings which is based upon realistic assumptions. This in turn ensures that it is not providing excessive capacity for landfill and recovery of waste.
- Some clarification is appropriate.
- London's waste - this is answered in the response to paragraph 2.33, RSS Policy 3: Imported Waste, page 30.

Recommended changes:

1. Provide a definition of the waste streams which may continue to require management beyond the plan area, (principally hazardous, low level radioactive, and clinical wastes);
2. Amend Objectives 5 and 7 to include enhancement, as well as protection.
3. Amend Objective 6 to refer to "protect and enhance the safety and value to users of the highway network in the Plan area."
4. Add an 8th objective 'To provide proximate facilities, close to good road networks, to reduce transport issues and support the carbon agenda'.
5. Amend Objective 1 to refer to '... London's post-treated residual waste for landfilling.'

5 Consultation representations to Chapter four

Statement 7 (Additional Recovery Capacity for the High and Low Scenarios)

Name	Organisation	N/ A/ D	Representation
Mr Martin Tett	Buckinghamshire County Council	N	<p>Recovery Waste Growth Projections:</p> <p>The Council notes that you have chosen the lower growth projection for additional required recovery capacity. We would expect that within the Waste Core Strategy Submission document that you show how you could address the diversion targets for the high growth targets, as a contingency position to your preferred waste capacity figures of 'low growth' and that there would be no impact on the surrounding counties if the waste arisings end up higher than the low growth expectation. It is suggested that the Bedfordshire Authorities should undertake their own waste projection forecasts given that RSS figures and targets have been removed.</p>
Mr Shaun Askins	Strategic Waste Manager Luton Borough Council	N	<p>Statement 7:</p> <p>The growth scenarios noted in the document, in particular the MSW aspects need further investigation to reflect both the current state of play and the nature of the three unitary authorities set up in Bedfordshire. This is a key area for all three and is related to 'overall growth areas' and hence should be a partnership document outside of any particular one authority project parameters and ideally maintained as a live resource / document.</p>
Mr Paul Maison	British Waterways	N	<p>Statement 7</p> <p>Could express the role of the recovery plant more explicitly. How does a low growth scenario compared with a higher option affect the BEaR project?</p>

Statement seven

Explanatory note:

- Alternative Options were put forward in order to justify the deviation from the Regional Spatial Strategy, since compliance with the RSS was a legal requirement before July 2010.
- the High Growth Scenario is based on the forecasts of waste arisings and required capacity set out in the Regional Spatial Strategy for the East of England (2008), whereas the Low Growth Scenario is based on more recent projections of Municipal wastes and Commercial/Industrial wastes.
- Monitoring will allow for adjustments to be made throughout the Plan period in respect of the additional recovery required.`
- the BEaR project is a procurement exercise to enable Central Bedfordshire Council to increase its recycling rates. The Low Growth Scenario was developed using the best available and recent information on MSW arisings from the three Councils. MSW arisings, and Local Authority forecasts for future arisings will be monitored, and the Plan will be reviewed at 5 yearly intervals.
- The need for pre-treatment and the national targets for recycling and diversion from landfill, are leading to a review of the Recovery Capacity Requirement figures.

Summary response:

- The Recovery Capacity Requirement figures are under review , and will be monitored throughout the period of the Plan.

Recommended changes: None.

Paragraph 4.6 (Justification for choosing the Low Growth Scenario)

Name	Organisation	A/ D/ N	Representation
Ms D Sacks		A	The low growth scenario looks by far the most likely. There remains the possibility that even this forecast will be too high, especially if work on waste preventions measures are successful. Waste arisings per head or per

Name	Organisation	A/ D/ N	Representation
			household vary considerably between authorities and there is room for significant reductions in MSW arisings per head in Bedfordshire.

Paragraph 4.6 Justification for choosing the Low Growth Scenario

<p>Explanatory note:</p> <p>- The level of waste arisings should be monitored throughout the Plan period. This monitoring will show whether there is a need at any time during the Plan period to identify additional recovery capacity.</p>
<p>Summary response:</p> <p>- The circumstances of the national economy, as well as more upto date data on MSW arisings, all lead to the conclusion that the Low Growth Scenario is more realistic.</p>
<p>Recommended change: None.</p>

Questions three and sixteen (The Preferred sites for landfilling of Non-Hazardous wastes)

Name	Organisation	A/ D/ N	Representation
Mr Chris Evans	Ministry of Defence	A	<p>Statement 8- The preferred sites for landfilling non-hazardous wastes.</p> <p>Rookery Pit South- MOD Interests Cardington</p> <p>Elstow Pit South (Reserve site)- MOD Interests Cardington</p>

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Name	Organisation	A/ D/ N	Representation
			The waste facility locations listed in the table above are unlikely to cause a concern to MOD if used as landfill sites as Cardington is not an operational aerodrome. The MOD should however be consulted on other waste facility developments (if applicable) within this zone to ensure that they do not infringe the statutory safeguarding requirements.
Mrs Nicky Upton	Harlington Parish Council	A	It allows access by both north, south and east, west.
Mr Shaun Askins	Strategic Waste Manager Luton Borough Council	A	Although with Elstow South current use as an 'amenity fishing lake' its inclusion maybe an academic point especially with the current environmental permitting regime / requirements
Mr Ian Pickering	Aspley Guise Parish Council	A	-
Mr Tim Deal Mr Spencer Warren Heaton Planning	Lafarge Aggregates Ltd	A	Question 3:– Do you agree or disagree with the identification of Rookery Pit South, and Elstow Pit South as a Reserve site, for the landfilling of Non-Hazardous Wastes? Lafarge currently operate the aggregate rail sidings at Elstow and do not object to the proposals for non-hazardous landfill at Elstow south. The operations by Lafarge may provide some support for the recovery of wastes prior to disposal at the landfill site with the crushing and screening of construction and demolition waste for the supply of secondary aggregates.
Mr Graham Jenkins (Director White Young Green Planning)	O & H Properties Ltd	A	We agree with the identification of Rookery Pit South as a site for the land filling of non-hazardous waste. The proposed allocation reflects the strategic and accessible location of the site, and its inherent technical suitability for landfill (as acknowledged by the Environment Agency at the time of the 2007 'Issues and Options' consultation). It is particularly noteworthy that Rookery South is the only identified non-hazardous landfill site which could also accommodate a Waste Recovery Operation (referred to in our response to question 5), and, vice versa, the only potential strategic recovery site which could also accommodate landfill.

Name	Organisation	A/ D/ N	Representation
on behalf of Mr David Reavell			We note that the consultation document contains an analysis of landfill requirements within 'Statement 15', but that 'Statement 8' and 'Question 3' lies within the text relating to recovery capacity. However, reference to the supporting Technical Evidence Paper 2 (which itself is confusing since table references in the text do not correspond with the tables referred to) provides a range for cumulative landfill from 9.9 million tonnes (high growth scenario) – table 12 [8] to 7.2 million tonnes low growth scenario – table 13 [9]. It is noted that these figures are summarised in 'Statement 15'. This range is less stark than the recovery requirements (discussed in response to question 4), but both figures might be regarded as a minimum in view of the challenging recovery targets which have been set (which in our view, and for reasons explained in response to Question 4 are themselves underestimated). It is recognised that the waste hierarchy prioritises waste recovery and re-use, with landfill at the bottom of the hierarchy. However, given the uncertainties associated with waste forecasts, recovery rates, and overestimates of existing capacity (discussed in response to Q4), the Core Strategy needs to include flexibility to accommodate contingencies. This relates primarily to the need to increase recovery rates to reflect the limited existing available capacity, and both a fall back of landfill pending such recovery increases and / or landfill pending a transitional period associated with bringing additional recovery on stream. In those terms, the Rookery South site is uniquely placed to satisfy the calculated requirements, with flexibility to accommodate either the high or low growth scenarios.
mrs sue clark	chair planning committee Cranfield parish council	D	No information is given in this document outlining why either of these sites is suitable, there is simply the statement that more landfill capacity is required, and these sites are suitable. Cranfield PC cannot comment on the suitability of one site above the other without more information on the 2 sites. The PC is however aware that the lagoons at Rookery South are an important wildlife habitat. how would the use of this site for landfill meet the objective in statement 6 to protect the biodiversity and landscape fabric of the plan area?
Mr Graham Gunby	Suffolk County Council	D	Both sites would be required to meet the agreed sub-regional apportionment.
Mrs Katharine Banham	Conservation Officer (Bedfordshire) The Wildlife Trust BCNP	D	

Name	Organisation	A/ D/ N	Representation
Mr Antony Mould	Natural England	D	<p>Natural England’s purpose is to ensure that the natural environment is conserved, enhanced and managed for the benefit of present and future generations, thereby contributing to sustainable development. Both preferred sites for landfilling of non-hazardous waste are designated as County Wildlife Sites (CWS), and therefore to agree with their identification for landfilling would be contrary to our purpose. While we acknowledge that the Waste planning authority must consider a range of factors in determining strategic sites, we would highlight the following issues that need to be considered in relation to the biodiversity interest of the preferred sites: The importance of local sites is recognised in both national (PPS9) and local (Bedfordshire and Luton Minerals and Waste Local Plan) planning policy. Key principle (iii) of PPS9 states that ‘in taking decisions, local planning authorities should ensure that appropriate weight is attached to designated sites of....local importance’. There is no mention of the CWS designations anywhere within the consultation document, and only brief mention of great crested newts as a possible constraint at Rookery Pit South, which is misleading.</p> <p>Saved Policy GE 12 of the local plan states that planning permission will only be granted for proposals which would adversely affect locally designated nature conservation sites where any adverse effect is reduced as far as practicable and is outweighed by other planning benefits of the proposal. In addition, protective measures for rare or threatened species or their habitats are identified in Saved Policy GE 13. Again the strategy should recognise the biodiversity value of the preferred sites, and identify measures to ensure that any impacts to these sites, and the habitats/species they support are appropriately mitigated and compensated for. This would ensure better consistency with existing policy and the objective for biodiversity given in Statement 6 of the strategy itself.</p> <p>The Sustainability Appraisal does recognise that the sites are CWS (although for Rookery Pit at least the identified interest of the site needs updating), and identifies significant potential negative effects for biodiversity. The appraisal states that by monitoring habitats/species and agreeing management plans for the sites, the impacts can be reduced to minor impacts. This is a simplistic view – off-site compensation habitat as well as long-term management (both on and off-site) are already recognised requirements for Rookery South Pit, and similar conditions may apply to Elstow Pit South, subject to an assessment of ecological impacts. There are further complicating factors for Rookery Pit, in relation to the current proposed Low Level Restoration (LLR) scheme – see comments on Para 4.20 for further details.</p>

Name	Organisation	A/ D/ N	Representation
Mrs A Lowe	Wilshamstead Parish Council	D	<p>Disagree. See comments above under landfill.</p> <p>The PC considers that this strategy contradicts the Regional Spatial Strategy Policy 2 which states new landfill should not compromise new proposals for environmental regeneration or housing development. Landfill at Elstow South would compromise both. Landfill. The PC agree that some landfill capacity must be established for Bedfordshire rubbish in the future. The amount required should reflect tight re-cycling targets. The PC object to the identification of Elstow South as a Landfill site. They recognise that it is nominated as a reserve site to Rookery South but just because only two sites were put forward by landowners it doesn't make Elstow South a suitable site, albeit reserve.</p> <p>Below are the PC's main reasons for its unsuitability:</p> <p>-If selected Elstow South would only offer a partial solution to the predicted landfill needs of Bedfordshire (7+million tonnes by 2027).</p> <p>-In 5-7 years another site would be needed. Rookery South however would provide the total capacity required.</p>
Mr and Mrs D Franklin		D	<p>We object strongly to these proposals for the following reasons:</p> <p>The use of this site will only add traffic congestion as above (the traffic congestion will increase to such an extent, that the existing road network will not be able to cope). If these sites are used our main concern is the draining of the lakes. Will all the water be pumped out before rubbish is tipped in? If not the surplus water will be polluted and pumped into Harrowden Brook. This is assuming surplus water will take this path anyway. As for controlled waste, this is only as good as the supervision, and as human beings are involved, and money being the criteria, what can I say. We are aware that the existing tip was never capped properly e.g. it should have been capped with clay and covered with earth. No clay was used, a consequence of which the chemical reaction can leach into the surrounding area. What of the future??</p>
David Toland			<p>Looking at the Exhibition last Thursday, on your map you identified a site at Rookery Pit South for incineration and recycling which could be interpreted as support for Covanta's application for planning permission to the IPC. No other commercial company was mentioned in your survey and I think it was totally unacceptable that Covanta should have been identified in this survey. Your leaflet expressed the proposal that Covanta's incinerator</p>

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Name	Organisation	A/ D/ N	Representation
			<p>was the way forward for waste disposal including from beyond our area yet in your waste core strategy preferred options consultation document you are saying that all other waste from outside the region is broadly not favoured. Can you explain this to me in layman terms.</p> <p>I do not want incineration as a way forward for waste disposal there are other options, chemical, biological which will generate more energy with less damage to the environment.</p> <p>I appreciate that your waste core strategy preferred options consultation document does not make the decisions on what goes where but on the otherhand your conclusions for sites for waste disposal will eventually lead to what goes where.</p> <p>I look forward to hearing from you.</p> <p>David Toland</p>
Mr Hugh Roberts	Marston Moretaine Action Group	D	<p>MMAG does not agree. There is much about this consultation which is self fulfilling - we have waste and a large hole in the ground in Rookery Pit South ; how can we design the criteria to ensure the only destination for the waste is Rookery Pit ? To do so would be at odds with Waste Core Objective (5) which seeks to protect the biodiversity and landscape fabric. The RSPB has noted the significant roosting/feeding movements of numerous species between the Pillange Lake, Marston Vale Millennium Country Park, Stewartby and Brogborough Lakes.. Rookery Pit South situated next to the Millennium Country Park is now an ecologically integrated and co-joined wild life site.</p>
Mr Alan Bulpin	Planning & Estates Manager Waste Recycling Group	D	<p>Statement 8 - Question 3: WRG disagree with the Preferred Site order. Rookery South is identified as a preferred site for non-hazardous landfill with Elstow South as a reserve site. Placing Elstow as the reserve site is inappropriate for the following reasons: Unlike Rookery, where landfilling would only restore part of the site, Elstow can provide a complete life cycle solution, i.e. whilst the site could provide significant void it would be completely filled and restored during the Plan period. Filling of Elstow South provides the only long-term solution for the stabilisation of Elstow North, the boundary of which (in WRG's view) has been badly engineered and is a potential environmental liability for the Council. The northern end of the Vale is a better location for future landfill as previously recognised by the East of England Strategy. Rookery lies in the very heart of the Vale adjacent to the Millennium Country</p>

Name	Organisation	A/ D/ N	Representation
			Park, the flagship for the Marston Vale Forest and an important visitor attraction. Elstow South has very good access to the A6. It feeds onto a roundabout on the A6 via a short but length of highway that has no properties on it and is now a service-only route into the Wixam development. The highway was designed to provide continued HGV access to Elstow South and to the Lafarge asphalt plant and aggregates depot.
Mr Michael Brooks		D	Landfilling at Rookery South is not compatible with the Coventa proposal for an energy-from-waste plant here. Therefore, Elstow South should be the preferred site, although the amount of landfill capacity required should be much reduced if the Coventa proposal went ahead.
Ms Lizzie Barnicoat	Elstow Parish Council	D	<p>Question 3:</p> <p>Elstow Parish Council strongly disagree with the identification of Elstow Pit South as a Reserve site for land filling non-hazardous waste on the following grounds:</p> <ul style="list-style-type: none"> • The site would require vast amounts of capping and preparation before the site could be used, during the Public Enquiry in 2003 into the Minerals and Waste Local Plan the Inspector quoted £10 million for such work. Within the current financial climate and with government funding not available it makes this sites inclusion as a Reserve site unrealistic. Also the capacity of the site as detailed within the consultation document is not sufficient to meet the demands of the Low Growth Scenario in the short or long term, therefore it adds to the fact that this site must be totally removed and an alterative included. • The two sites identified are both within the Borough of Bedford, it seems illogical and unfair that the Borough provide both an identified and a reserve site when none have been considered or included from Central Bedfordshire or Luton. • There is no traffic management plan in place to deal with the increased vehicular movements, the types of vehicles accessing the site would be heavy goods vehicles, at present the Borough of Bedford does not have an up to date Local Transport Plan or an up to date Freight Strategy. The infrastructure is not sufficient either to deal with vehicles accessing the site from the site along the A6 as this is predominately a single carriage road. • The site is in very close proximity to a carp fishing lake; this would be affected by the proposal, and is one of the top 5 in the country.

Name	Organisation	A/ D/ N	Representation
			<ul style="list-style-type: none"> • Within the consultation document Statement 6 references 'protect the cultural, social and environmental heritage of the Plan area', Elstow South is a designated County Wildlife site as listed in the Bedford Borough Allocations and Designations Plan (map 2) document so this site contradicts the statement totally and is strong reason to remove the site. • Within the consultation document there is reference to proximity of the site not being close to new developments, the Elstow South site will be within 100 yards of the proposed Wixams extension as detailed in the Bedford Borough Allocations and Designations Plan (AD4) document. • The Elstow South site must also be removed for the reasons listed in the Inspector's report during the Public Inquiry in 2003 as all the points still stand and the conclusion was the site is not suitable. Elstow Parish Council strongly oppose the use of this site and will challenge very strongly as previously they have to ensure this site is not used. The Parish Council suggest the consideration of other sites within Central Bedfordshire and Luton as a reserve site i.e. Brogborough.
Mrs Katharine Banham	Conservation Officer (Bedfordshire) The Wildlife Trust BCNP	D	<p>Both the preferred sites for non-hazardous landfill, Rookery South and Elstow Pit, are designated as County Wildlife Sites (CWS) and therefore, we object to their inclusion. They are designated because they contain a mosaic of habitats including open water bodies fringed by marshes and grassland. These habitats support a huge variety of wildlife including nationally rare and protected species.</p> <p>The importance of CWS is recognised by both local and national planning policy. Key Principle (ii) of Planning Policy Statement 9 says that "<i>Plan policies and planning decisions should aim to maintain, and enhance, restore or add to biodiversity and geological conservation interests.</i>" It goes on to say that "In taking decisions, local planning authorities should ensure that appropriate weight is attached to designated sites of international, national and local importance; protected species; and to biodiversity and geological interests within the wider environment."</p> <p>Although CWS are marked on the maps in Technical Evidence Paper Four they are not referred to in this consultation document or within the Sustainability Appraisal. Therefore we do not consider that they have been given appropriate weight. Saved Policies GE12 and GE13 of the Bedfordshire and Luton Minerals and Waste</p>

Name	Organisation	A/ D/ N	Representation
			<p>Local Plan state that where CWS, undesignated sites which are important for wildlife or rare/protected species are to be adversely affected by a waste proposal it will only be granted “<i>where any adverse effect is reduced as far as practicable and is outweighed by other planning benefits of the proposal.</i>”</p> <p>Although we accept that many factors need to be considered in the location of landfill sites it is vital that these local and national policies are followed and that proposed sites are adequately assessed for the impact that they would have on biodiversity. In line with national and local policies we suggest that a section is added which clearly recognises the negative impact that the allocation of these preferred sites would have on designated biodiversity sites and reviews how acceptable this is. The Low Level Restoration Scheme for Rookery South is almost agreed. Due to the harm that this will have on biodiversity, a mitigation scheme is included which involves the protection and management of Rookery North and the northern wall of Rookery South. It also includes the creation of ditches and a balancing pond to regulate water levels in both Rookery North and Rookery South. These measures aim to allow the main features of the biodiversity interest to be maintained and are necessary to allow the Low Level Restoration scheme to progress. We do not believe that allocating Rookery South for landfill is consistent with this restoration scheme as it would destroy these biodiversity features. We advise that the progress of the restoration scheme should be taken into account.</p>
Mrs Chris McDonnell		D	<p>Waste Core Strategy - South Lake and the mechanical biological treatment plant The proposed landfilling of South Lake has been an issue for many years - I think this is unacceptable for the following reasons: The Wixams development is far too close to the south lake and the noise and pollution of a tip will be a serious issue for all residents and may even detract sales of the properties. The A6 has been widened and extended to cope with the residential traffic of a major development NOT to cope with additional lorry movements. Noise and pollution will be an issue for all residents of Elstow and Wixams.</p>
Mrs sue clark	chair planning committee cranfield parish council	D	<p>No information is given in this document outlining why either of these sites is suitable, there is simply the statement that more landfill capacity is required, and these sites are suitable. Cranfield PC cannot comment on the suitability of one site above the other without more information on the 2 sites. The PC is however aware that the lagoons at Rookery South are an important wildlife habitat. how would the use of this site for landfill meet the objective in statement 6 to protect the biodiversity and landscape fabric of the plan area?</p>

Waste Core Strategy Preferred Options Representations and recommended responses

Name	Organisation	A/ D/ N	Representation
Mr Rio D'Souza	Planning Officer Highways Agency	N	<p>The Highways Agency notes that both sites would have an impact on the Trunk Road network, namely the A421, and therefore it is recommended that should either of these sites go ahead, that the Highways Agency request that further analysis is undertaken so as to determine the likely impact of these sites. The Highways Agency is aware that this is the case for Rookery Pit South. The level of impact will depend on the amount of traffic that the sites will generate as well as the origins of the waste and the routes taken to reach the sites.</p> <p>Statement 11 identifies two potential sites for non-hazardous waste. These are the same two sites named in Statement 8 and the Highways Agency has commented on these sites in paragraphs 3.2 and 3.3. Statement 11 Potential Non-Hazardous waste Landfill sites - Rookery Pit South (WSD34) - Elstow South (WSD16) Each of the potential sites identified in the Plan was assessed using sustainability and planning criteria. This was set out in Technical Evidence Paper 4. The Highways Agency has not seen a copy of this Paper. The spatial distribution of the sites across the Plan area resulted in six options which form the basis of Statement 12. Policy 6 was then developed which takes forward the preferred option in terms of spatial distribution of sites.</p>
Ms Lizzie Barnicoat	Bedford Borough Access Forum	N	<p>Elstow South Lake and its surrounding area offer a superb opportunity to provide outdoor access for the Wixams development, especially the planned northern extension which will abut the lake, and Elstow, there is no other lakeside access in the immediate area. The greenways within the Wixams will provide potential non road access to Elstow South and there are already non grade level crossings of the A6 in existence to provide access from Elstow in the east and Wilstead in the south. Currently there are no public rights of way to the north, east or west of the Wixams and the Elstow South site presents the potential for the access network to be improved so such reference needs to be included in the document.</p>
Mr Adam Ireland	Planning Liaison Officer Environment Agency	N	<p>Additional Information for the proposed non-hazardous landfill sites.</p> <p><u>Rookery Pit South Rookery Pit</u> is proposed as potential non hazardous landfill. Rookery is a large Oxford clay void, which is non aquifer with underlying Kellaways Sand secondary aquifer. We would support this proposal with respect to our Landfill Location Policy. This site provides a suitable location to create an engineered landfill containment to Landfill directive standard. The site is subject to a low level restoration scheme. There is a proposal to construct a large energy from waste plant in the northern section of the Rookery South pit. Rookery South pit is approximately 1 kilometre square. The site could potentially use rail access.</p> <p><u>Elstow South</u></p>

Name	Organisation	A/ D/ N	Representation
			<p>Elstow South is proposed as a back up landfill void. Elstow is located in the Oxford Clay void which is non aquifer with underlying Kellaways Sand secondary aquifer.</p> <p>Elstow South is subject to the following constraints.</p> <ul style="list-style-type: none"> - The construction of a landfill at Elstow South would require the dewatering of the existing lake. -There would also need to be appropriate engineering controls in place to ensure the stability of the existing Elstow North landfill site which forms the northern side of the lake. -The Elstow South site is adjacent to the Wixams and could be used by inhabitants as a amenity/recreation area. Elstow North landfill and Elstow South void are under different controls of ownership. This could lead to difficulties in the pollution prevention engineering and it is likely that an area of separation would be required between the Elstow North and South sites. This may impact upon the landfill yield of the Elstow South site.
Mr Tom Gilbert-Woodridge	Planner English Heritage	N	<p>Question 3: Preferred sites for landfilling non-hazardous waste</p> <p>We have concerns regarding the future use of Rookery Pit South and any proposal needs to carefully consider the impact on the surrounding historic environment, demonstrating that the impact can be adequately mitigated. We have been involved in pre-application correspondence with regards to the Covanta Energy proposal as part of the Infrastructure Planning Commission process. The site is located in a significant historic landscape close to a number of designated heritage assets, which are not picked up in full by the Evidence Base document on page 401. This includes Stewartby Conservation Area to the north and the listed chimneys and brick kilns at the former brickworks, as well as the Grade II registered park and garden of Ampthill Park to the south, with the scheduled remains of Ampthill Castle and the Grade II* listed Ampthill Park House. To the south-east is the scheduled and Grade I listed remains of Houghton House, which is in the guardianship of English Heritage and open to the public. The Grade II listed South Pillinge Farm is located within 100 metres of the site, with the Grade II listed Millbrook railway station a few hundred metres further west. The use of Rookery Pit South for the landfilling of non-hazardous waste will require careful design and adequate mitigation to avoid harming the surrounding historic environment. The cumulative impact with other proposed uses, namely strategic recovery facilities and composting, needs to be taken into account.</p>

Name	Organisation	A/ D/ N	Representation
Ms Louise Treacy	ERM (on behalf of Covanta Rookery South Ltd)	N	Further, it is noted from a review of chapter 4 (page 25) that Rookery Pit South, which is located within the Marston Vale, has been identified as the Preferred Site for the landfilling of non-hazardous waste. This designation does not reflect the earlier restriction on landfilling in the Marston Vale as discussed in paragraph 3.3 above.
Ms Louise Treacy	ERM (on behalf of Covanta Rookery South Ltd)	N	<p>Statement 8 of the draft WCS identifies the preferred sites for landfilling of non-hazardous wastes which are firstly, Rookery Pit South, with Elstow Pit South as a reserve site. Question 3 asks the reader whether they agree or disagree with the selection of these sites. It is not possible to agree or disagree in this instance having regard to the manner in which the draft WCS document has been structured. The supporting text to Question 3 does not provide any information to discuss or demonstrate the preferred sites identified; rather the text only considers the preferred growth scenario. It is acknowledged however, that some landfill capacity will be required over the Plan period.</p> <p>Non-hazardous waste landfill capacity within the Plan area is considered in sections 4.39 - 4.45 of the draft WCS. As previously identified, the preferred site for the landfilling of non-hazardous waste is Rookery Pit South, with Elstow Pit South identified as a reserve site. Question 16 asks the reader whether they agree or disagree with these designations.</p> <p>In order to provide an ordered and logical approach to the WCS it is submitted that all of the evidence base in relation to future nonhazardous landfill capacity should be grouped together.</p> <p>While Elstow South is identified as a Reserve Site, it is stated in section 4.45 that <i>'there are considered to be no planning reasons why both of these sites would be unable to come forward during the Plan period.....it must be stated that both of these sites are required in order to ensure that sufficient Non-Hazardous waste landfill space forecast to be required will be made available in practice'</i>. This statement contradicts section 4.25 of the Strategy which states that <i>'if more than one of the Preferred Strategic Non-Hazardous waste landfill sites were applied for to be operational at the same time, this would be resisted, in order to protect their capacity for the entirety of the Plan period'</i>.</p> <p>Section 4.40 of the document identifies that <i>'together, these two sites represent a total potential capacity of between 9 and 11 million cubic metres'</i>. Thus if both of these sites came forward during the Plan period as suggested in section 4.45, this would exceed the non-hazardous landfill void space sought under the preferred Low Growth Scenario (7.2 million tonnes).</p>

Name	Organisation	A/ D/ N	Representation
Mr Keith Owen	SLR Consulting Limited (on behalf of Biogen Power Ltd)	N	Response to Question 3: While Biogen does not object to the identification of sites for landfill disposal it does question the assumption implicit in the background data in Technical Evidence Paper 2 that landfilling of non-hazardous waste will continue at a rate of around 250,000 tonnes per annum throughout the Plan period. As detailed below, in the response to Question 4, there must be serious doubts that landfilling at this scale will persist with landfill tax rising to £80/tonne by 2014.
Central Bedfordshire Council Waste Disposal Authority	Central Bedfordshire Council	N	Rookery Pit South is within Central Bedfordshire and would support both the objectives to manage waste locally and, being central, the council's carbon agenda and would provide a lower cost transport solution.
Mr & Mrs R Worthington-Ellis		N	After the meeting on the proposed waste disposal plan - we feel that there are many problems for us the residents in the area, after many years living with the North Tip we were told that it would be capped and closed many years since, and the Transfer Station was to be temporary, that is still there and in use, the final cap was never put in place as the money ran out after the capping of the Sundon Tip, Capping the North Tip will involve an enormous amount of traffic (heavy lorries) also an ever greater amount of money, this would surely be a necessity if the lake was to be drained? Would the north Tip be stable enough to stand the lack of pressure when all the water was drained and would the leachate poison the surrounds if there was a collapse? With all the cost of this enormous undertaking we feel that the Council would inevitably be tempted to try and re-coup some of this money by selling space for landfill rubbish from other authorities, e.g. London?

Questions three and sixteen

Explanatory note:

- The Waste Core Strategy identifies the sites for the landfilling of Non-Hazardous wastes. The details of how these sites would operate is more relevant to the planning application stage.
- Technical Evidence Paper 4 considers the planning merits of the potential Strategic sites, and sets out the site selection process.
- The only potential sites for landfilling non-hazardous wastes proposed by landowners and the waste industry were Rookery Pit South and Elstow Pit South. Whether or not the Plan area continues to accept London's waste does not change the number of landfill's which need to be identified (i.e. The Plan won't have to identify additional sites since the volumes of residual waste from London will be relatively small when compared to the locally arising residual requiring disposal).
- The Sub Regional Apportionment of Recovery capacity is of limited relevance, since Regional Spatial Strategies are due to be abolished under the Localism Bill. In addition, more reliable information on arisings have been used to derive the waste recovery capacity requirements.

Summary response:

- The planning merits of these sites are discussed at paragraphs 4.42 to 4.44, and TEP4.
- No support is given or implied for a specific application or proposal since the purpose of planning policy documents is to identify land suitable for waste management uses.
- Detailed issues such as traffic management would be matters to be considered in the determination of an application.
- Sites designated as County Wildlife Sites are subject to Saved Policy GE12, which requires adverse effects to be reduced as far as practicable, and is outweighed by other planning benefits.
- The afteruse of these sites has the scope to contribute to landscape and biodiversity enhancement.

Recommended changes:

1. Amend paragraph 4.45 to read: 'Both Rookery Pit South and Elstow South are deliverable and can be implemented during the Plan period for the landfilling of Non-Hazardous wastes.'

Questions four and seventeen (Choosing the Low Growth scenario)

Name	Organisation	A/ D/ N	Representation
Ms D Sacks		A	<p>The low growth scenario looks by far the most likely. There remains the possibility that even this forecast will be too high, especially if work on waste preventions measures are successful. Waste arisings per head or per household vary considerably between authorities and there is room for significant reductions in MSW arisings in Bedfordshire. It is important not to overprovide for landfill since that can have the effect of blighting areas of land and allowing waste to be managed further down the waste hierarchy than is desirable.</p> <p>The low growth scenario should be the preferred option for the reasons explained in response to question 4.</p>
Mr Shaun Askins	Strategic Waste Manager Luton Borough Council	A	Broadly agree on this question, however the impact of the current fiscal change and increasing wider policy changes will need to be reflected , in particular point 4 , as the focus must be on point 2 as per WSE 2007 and WFD i.e. the waste hierarchy !
Mr Ian Pickering	Chairman Aspley Guise Parish Council	A	
Mrs A Lowe	Wilshamsted Parish Council	A	<p>Agree. There is no point in providing extra capacity just in case the Low Growth Scenario is wrong. Future waste generation should be pro-actively managed to ensure the Low Growth Scenario is met or bettered. There should be regular public reports on the progress towards these targets.</p> <p>Agree. How is this different from question 4?</p>
Mr Shaun Askins	Strategic Waste Manager Luton Borough Council	A	Q4 , agree, Subject to confirmation as noted in response 14 above

Waste Core Strategy Preferred Options Representations and recommended responses

Name	Organisation	A/ D/ N	Representation
Mr Ian Pickering	Chairman Aspley Guise Parish Council	A	
mrs sue clark	chair planning committee cranfield parish council	A	Agree should plan for low growth scenario. There should be a contingency plan, however. See earlier comments
Mr Adam Ireland	Planning Liaison Officer Environment Agency	A	We would agree with the choice of a Low Growth Scenario. Due to recent data on waste arisings and with future plans to minimise waste, the choice seems justifiable.
Ms Lizzie Barnicoat	Elstow Parish Council	A/D	Question 4: The Parish Council agree as the Low Growth Scenario will provide better value for money, however, the Council wish to stress that the use of sites within Elstow is not to included in any way to satisfy this scenario. Elstow Parish Council will challenge very strongly as previously they have to ensure that no sites within Elstow are used. Question 17: The Parish Council agree with the use of the Low Growth Scenario, however, there is no reference to how well London waste has been treated, it has been stated within the document. The Council continue to object to the Plan needing to include provision for London waste.
Central Bedfordshire Council Waste Disposal Authority	Central Bedfordshire Council Waste Disposal Authority	A	Agree - It is important to state that waste growth assumptions have been affected by the economic downturn. In the last two years, CBC has seen a decline in waste arisings. The BEaR Project will be re-modelling in the very near future to provide a more up-to-date projection of CBC's waste arisings (base year 2009/10). How much these new assumptions would change the overall growth of the plan area as a whole remains to be seen as will be dependant on the trends experienced by the other authorities (Luton Borough Council and Bedford Borough Council). The lower growth rate assumption is probably the most sensible one to use but assumption should be reviewed periodically when new data becomes available.
Mr Graham	Suffolk County Council	D	Because the low growth scenario does not accord with the agreed sub-regional apportionment and hence is incorrect.

Name	Organisation	A/ D/ N	Representation
Gunby			
Mr Martin Lewis		D	It is stated in this paper that waste management facilities are capable of operating with a 6-fold variance in waste processing capacity. So why get hung up on the high or low projections when we could ensure adequate capacity for both scenarios?
bond		D	Important to work on a zero growth scenario
Mrs Nicky Upton	Harlington Parish Council	D	There is no medium growth scenario
Mrs Nicky Upton	Harlington Parish Council	D	It would be prudent to assume the worst case scenario for planning.
Mr Graham Jenkins (Director White Young Green Planning) On behalf of Mr David Reavell	O & H Properties Ltd	D	<p>We do not agree with the calculations based upon either of the waste growth scenarios.</p> <p>The figures are derived from calculations based upon existing recovery capacity of 436,500 tonnes per annum, which includes some 255,000 tonnes of recovery capacity at Goosey Lodge. The text of the Technical Evidence Paper 2 confirms that this facility is able to accept food wastes and / or animal by-products only. It is therefore not available for either MSW or C & I wastes. The footnote number 7 to the 'future recovery capacity requirements' (Technical Evidence Paper 2, page 40) confirms that if the Goosey Lodge capacity is discounted, then overall capacity falls to 181,500 tonnes per annum with a consequent increase in the capacity deficit by 255,000 tonnes per annum.</p> <p>In these circumstances, we consider that the calculations of additional capacity requirement set out in 'Statement 7' are underestimated for both the high and low growth expectations by 255,000 tonnes per annum. On the high growth expectation, this would increase the requirement in 2010/11 from 336,900 tonnes to 591,900 tonnes, and in 2027/28 from 820,800 tonnes to 1,075,800 tonnes. For the low growth expectation, the figures would increase in 2010/11 from 91,565 tonnes to 346,565 tonnes, and in 2027/28 from 250,460 tonnes to 505,460 tonnes.</p>

Name	Organisation	A/ D/ N	Representation
			<p>Notwithstanding these under estimates, the two growth scenarios set out in ‘Statement 7’ and amplified in Technical Evidence Paper 2 are themselves noted as being ‘substantially divergent’ (Para 4.3) with a significant recovery capacity range from some 820,000 tonnes in 2027/28 for the high growth expectation, to some 250,000 tonnes in 2027/28 for the low growth expectation. In the short term (to 2015) additional recovery capacity ranges from 546,450 tonnes (high growth) to 200,734 tonnes (low growth).</p> <p>For reasons explained above re Goosey Lodge, we consider that all such figures are under estimated.</p> <p>In response to question 4, we consider that:</p> <ul style="list-style-type: none"> (i) There is insufficient justification for adopting a ‘low growth expectation’; and (ii) The calculations for low and high growth are themselves under estimated by 255,000 tonnes per annum. <p>In those circumstances we consider that in addition to providing a base figure based upon the real available recovery capacity (i.e. excluding the 255,000 tonnes per annum at Goosey Lodge) a scenario should be adopted based upon a mid range growth expectation, between the high and low extremes. This would provide a more realistic baseline, and a more robust base for the calculations of recovery and landfill provision.</p> <p>Question 17 For the reasons explained in response to Question 4, we do not agree with the ‘low growth scenario’, which we consider has not been properly justified within the consultation document or supporting evidence papers. As noted in response to Question 4, the difference between the high and low growth scenarios is less stark for landfill than for resource recovery, and, consistent with our response to the recovery capacity requirement, we consider that there would be a basis for developing a mid range scenario for both recovery and landfill (which would indicate a landfill requirement for some 8.6million tonnes). However, it is recognised that such increased provision (however logical) may run counter to the principles of the waste hierarchy, and that, at the outset, the Plan could proceed on the basis of the low growth scenario for landfill. It will however be important for the Plan to monitor landfill requirements over the defined period, in the context of actual recovery rates, and to revise the residual landfill requirement if appropriate. As noted in response to Question 3, the Rookery South site has inherent flexibility to accommodate any revised requirements.</p>

Name	Organisation	A/ D/ N	Representation
Mr Hugh Roberts	Marston Moretaine Action Group	D	MMAG disagrees with this projection. The low growth scenario requires 7.2 million tonnes of void space for the landfilling of non-hazardous waste at 2027/2028 and coincidentally the consultation also estimates Rookery Pit South to have a potential capacity of 7-8 million cubic metres !
Mr Hugh Roberts	Marston Moretaine Action Group	D	MMAG does not agree for the same reasons as given in Q4.
Mr Alan Bulpin	Planning & Estates Manager Waste Recycling Group	D	Statement 9 - Question 4: The WCS proposes adopting a low growth strategy – WRG object to this on the basis that, whilst it may be politically expedient to assume low growth, strategic planning should seek to over-provide rather than under-provide. A reasoned middle provision would be preferable.
Mrs Sharon Threlfall	County Development Unit Hertfordshire County Council	D	Although Hertfordshire County Council welcomes waste management self sufficiency, the adoption of a Low Growth Scenario as a preferred option raises questions into the possibility of a lack of preferred strategic sites identified in this document, if growth levels prove to be higher than expected. It is noted that the authorities do not intend to produce a Site Allocations DPD, and therefore it is unclear how the Plan can demonstrate adequate waste site provision, particularly if the Low Growth Scenario is exceeded or any strategic sites not come forward. Should this happen, Hertfordshire County Council is concerned of the implication of any excess waste arising on its facilities close to Central Bedfordshire.
Mr Keith Owen	SLR Consulting Limited (on behalf of Biogen Power Ltd)	D	Forecasting Future Waste Arisings The wide divergence in recovery capacity requirements set out in Statement 7 in the WCSPO, in relation to low growth and high growth expectations illustrates the difficulties inherent in making adequate provision for waste facilities. It is considered that the Preferred Option in the Waste Core Strategy implies a precise knowledge of future arisings and treatment methods and may, therefore, be making inadvertent underprovision for sustainable treatment methods and overprovision of landfill capacity.

Name	Organisation	A/ D/ N	Representation
			<p>To address these concerns, Biogen suggest that a more flexible approach should be adopted which would allow the development of sufficient waste management capacity to manage future waste arisings in the Plan area by addressing the uncertainties in the waste arisings and growth forecasts and then also by taking account of the increases in landfill tax which will have a major impact on future demand for landfill capacity and, as a knock-on effect, will increase demand for treatment capacity.</p> <p>In the era before landfill tax, there was an argument that over-allocation of waste disposal facilities (primarily landfills) would provide no incentive to push waste up the hierarchy of treatment options. However, the landfill tax escalator has steadily eroded any price advantage that landfill may have had in relation to more sophisticated and sustainable waste management practices such that there is no reason to restrict the availability of non-landfill waste treatment facilities.</p> <p>With this in mind the rationale behind the selection of the appropriate growth and landfill diversion targets that have been chosen as the Council's Preferred Option have to be questioned. In choosing an "option", or more correctly a scenario, it has to be recognised that the council has only limited ability to influence the amount of waste arising in its jurisdiction and that the key drivers will be;</p> <ol style="list-style-type: none"> 1. the growth (or otherwise) of the national economy; 2. the amount of waste produced per capita (in terms of MSW) or per unit of productivity (in respect of C&IW); 3. the rebalancing of the economy away from public and service sector industries towards manufacturing industry; and 4. the cost of waste management (influenced by landfill tax as well as by gate prices at landfills and at competing waste treatment facilities). <p>In relation to the fourth key influence on waste arisings, the Government has signalled that landfill tax will continue to rise by £8/tonne per annum to a level of £80/tonne by 2014.</p> <p>Major uncertainties still remain regarding the future rate of economic growth and the ability to decouple waste generation, particularly in relation to poorly quantified C&IW arisings, from such growth.</p>

Name	Organisation	A/ D/ N	Representation
			<p>Given these uncertainties, it appears that the Preferred Option errs on the side of inappropriate caution and risks there being an underprovision of sustainable waste treatment facilities for C&IW. The same risks are less likely to apply in the better developed MSW sector where arisings and treatment methods are well understood and where long term contracts to manage these wastes will shortly be in place although it should be noted that the Preferred Option still assumes that significant volumes of MSW will be consigned to landfill over the Plan period and makes no allowance for an alternative strategy in which the waste management authorities choose an option with almost 100% diversion from landfill in order to mitigate the risk of continuous escalation of Landfill Tax.</p> <p>In para 1.10 of Technical Evidence Paper 1, it is acknowledged that the " lack of data on the amount of C&I waste generated is one of the most serious barriers to effective planning for waste management ". Para 1.11 goes on to acknowledge that " without an accurate figure for C&I waste arisings, it will not be possible to confidently provide sufficient capacity to manage these wastes in coming years ".</p> <p>Having identified these concerns, it appears unjustified that the Preferred Option that has been put forward is the low growth scenario and that no account has been taken of the potential requirements for waste treatment facilities should a higher baseline exist and/or higher growth scenario to be realised. Indeed, it may be considered that a more credible outcome is that neither scenario set out in the Technical Evidence Paper is accurate and that the actual amount of waste arisings will be somewhere between the two estimates.</p> <p>The choice of the lower estimate appears, therefore, to be unduly restrictive and does not allow sufficient flexibility to cater for changes in the pattern of waste arisings, further diversion of waste away from landfill and inter sub-regional flows of waste to the closest appropriate facility for management.</p> <p>Accordingly, it is considered that a more reasoned and robust approach to forecasting should be applied. This would involve using the low growth forecast for MSW arisings given the robust data set that is available and the clear evidence that per capita growth in MSW arisings has halted. Indeed, Waste Strategy 2007 suggests that a growth rate of 0.5% per annum would be appropriate which would be consistent with underlying population growth.</p>

Name	Organisation	A/ D/ N	Representation																				
			<p>However, noting the uncertainties associated with the available C&IW data (as acknowledged in Technical Evidence Paper 1), it is considered that it would be prudent to use the average of the low and high growth figures to forecast potential C&IW arisings in order to provide sufficient flexibility to meet future requirements for treatment capacity for this particular waste type.</p> <p>On this basis, and given the uncertainties acknowledged in respect of arisings of C&IW, the preferred option should make provision for total waste arisings of MSW and C&IW in the Plan area as set out in Table 1.</p> <p style="text-align: center;">(Table one- Waste Arisings Forecast for Bedfordshire and Luton)</p> <table border="1" data-bbox="698 587 2112 906"> <thead> <tr> <th data-bbox="698 587 1064 651">Year</th> <th data-bbox="1064 587 1435 651">MSW Arisings/kt</th> <th data-bbox="1435 587 1787 651">C&I Arisings/kt</th> <th data-bbox="1787 587 2112 651">Total</th> </tr> </thead> <tbody> <tr> <td data-bbox="698 651 1064 715">2010/11</td> <td data-bbox="1064 651 1435 715">330</td> <td data-bbox="1435 651 1787 715">637</td> <td data-bbox="1787 651 2112 715">967</td> </tr> <tr> <td data-bbox="698 715 1064 778">2015/16</td> <td data-bbox="1064 715 1435 778">359.3</td> <td data-bbox="1435 715 1787 778">699.6</td> <td data-bbox="1787 715 2112 778">1058.9</td> </tr> <tr> <td data-bbox="698 778 1064 842">2021/22</td> <td data-bbox="1064 778 1435 842">381.4</td> <td data-bbox="1435 778 1787 842">792</td> <td data-bbox="1787 778 2112 842">1173.4</td> </tr> <tr> <td data-bbox="698 842 1064 906">2027/28</td> <td data-bbox="1064 842 1435 906">402.4</td> <td data-bbox="1435 842 1787 906">886.5</td> <td data-bbox="1787 842 2112 906">1288.9</td> </tr> </tbody> </table> <p>Recovery Capacity Requirements Having set out a robust method for forecasting waste arisings, which caters effectively for uncertainties in the arisings of C&IW, provision can be made to manage these arisings in a sustainable fashion. At its most straightforward, this could utilise the landfill diversion targets set out in Technical Paper 1 for both MSW and C&IW. This approach would yield the landfill and recovery capacity requirements set out in Table 2.</p>	Year	MSW Arisings/kt	C&I Arisings/kt	Total	2010/11	330	637	967	2015/16	359.3	699.6	1058.9	2021/22	381.4	792	1173.4	2027/28	402.4	886.5	1288.9
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			<p align="center">(table 2 Waste Management Capacity Forecast for Bedfordshire and Luton)</p> <table border="1"> <thead> <tr> <th>Year</th> <th>Landfill capacity required /ktpa</th> <th>Recovery capacity required/ ktpa</th> <th>Total Waste Management capacity required/ ktpa</th> </tr> </thead> <tbody> <tr> <td>2010/11</td> <td>343.3</td> <td>623.6</td> <td>967</td> </tr> <tr> <td>2015/16</td> <td>282.7</td> <td>776.2</td> <td>1058.9</td> </tr> <tr> <td>2021/22</td> <td>312.4</td> <td>861.0</td> <td>1173.4</td> </tr> <tr> <td>2027/28</td> <td>242.3</td> <td>946.6</td> <td>1288.9</td> </tr> </tbody> </table> <p>In reality, the rapid increase in Landfill Tax to £80/tonne is likely to reduce still further the amount of residual waste that is being landfilled when compared to forecasts made before the decision to continue the tax escalator had been made. As such the landfill capacity forecast set out in Table 2 is probably an overestimate and Biogen does not consider that in 15 years time some 340,000 tonnes of waste arising in the Plan area will still be consigned to landfill.</p> <p>Indeed, the Preferred Option scenario, which suggests that in 2026/27 over 250,000 tpa of non-hazardous waste arising in the Plan area, is also considered to be unduly pessimistic. The Plan should be sufficiently flexible in order to allow additional quantities of waste to be diverted away from landfill which suggests that the provision for waste recovery facilities would have to be increased even if the Low Growth scenario were preferred.</p> <p>Allowance for Existing Recovery Capacity:</p> <p>To determine the additional recovery capacity that is required in the Plan area, one needs to take account of the existing capacity that is available.</p>	Year	Landfill capacity required /ktpa	Recovery capacity required/ ktpa	Total Waste Management capacity required/ ktpa	2010/11	343.3	623.6	967	2015/16	282.7	776.2	1058.9	2021/22	312.4	861.0	1173.4	2027/28	242.3	946.6	1288.9
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			<p>Technical paper 1 suggests in para 2.9 that existing treatment capacity is c 436,500 tonnes of which 255,000tonnes is provided at the Goosey Lodge facility. However, this facility has been constructed to process food and animal by-product wastes and as such not all of this capacity is able to treat wastes arising in the Plan area as the arisings of such wastes are limited to c 110,000 -127,000 tpa during the Plan period (see Table 30 in Technical Evidence Paper 2).</p> <p>Furthermore, two other significant facilities in the Plan area are focussed on recovery of the food waste stream as described in Appendix A to Technical Evidence Paper 2. The Biogen Greenfinch AD facility can process 30,000 tpa of food waste arising in MSW and C&IW. Furthermore, the Tempsford composting facility is reported as having the capacity to process 48,000 tpa of C&IW per annum, 60% of which is food waste. This gives the Tempsford facility the capacity to process 28,800 tpa of food waste.</p> <p>In all, the Plan area has capacity to process 313,800 tpa of food waste at these three facilities.</p> <p>Appendix A confirms that the remaining recovery capacity in the Plan area for MSW and C&IW is focussed entirely on the green waste (78,700 tpa) and waste wood (44,000 tpa) content of these waste categories.</p> <p>It is evident from this analysis that there is no permitted recovery capacity in the Plan area for mixed and non-metallic waste streams which, according to Urban Mines¹, amount to 614,500 tpa in the Plan area. In reality, the mixed and non-metallic waste streams will include some food and wood wastes but there is clearly a significant requirement for facilities to treat and recover value from these wastes as well as from the metallic wastes that also arise in the Plan area.</p> <p>This situation is summarised in Table 3 which compares current recovery capacity with waste arisings as detailed in the Technical Evidence Papers (TEPs). Details of the sites are provided in Appendix 1.</p>

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			<p style="text-align: center;">Table 3- Waste Recovery Capacity and Current Arisings</p> <table border="1"> <thead> <tr> <th>Waste Type</th> <th>Existing Recovery Capacity/ ktpa</th> <th>Current Arisings/ ktpa</th> <th>Current Recovery capacity shortfall/ ktpa</th> </tr> </thead> <tbody> <tr> <td>Food</td> <td>313.8</td> <td>111</td> <td>-202.8</td> </tr> <tr> <td>Green</td> <td>78.7</td> <td>80</td> <td>1.3</td> </tr> <tr> <td>Wood</td> <td>44.0</td> <td>82</td> <td>38</td> </tr> <tr> <td>Mixed</td> <td>0</td> <td>Up to 614.5</td> <td>Up to 614.5</td> </tr> <tr> <td>Total</td> <td>436.5</td> <td>861.2</td> <td></td> </tr> </tbody> </table> <p>As illustrated in Table 3, although the treatment capacity in the Plan area is 436.5 ktpa, the existing capacity to treat wastes arising in the Plan area is much smaller due to the significant over-provision of food waste recovery capacity.</p> <p>The actual capacity to treat MSW and C&IW arising in the Plan area is in the order of 234 ktpa made up of 111 ktpa of food waste recovery capacity and 78.7 and 44 ktpa of green and wood waste recovery capacity respectively. The capacity to treat waste arising in the Plan area will rise slightly as the amount of food waste generated in the Plan area rises throughout the Plan period from 111 ktpa to 127 ktpa as detailed in Table 30 in TEP 2.</p> <p>Future Recovery Capacity Requirements. This calculation of actual capacity available to treat wastes arising in the Plan area set out above allows the potential requirement for future recovery facilities for MSW and C&IW to be determined as set out in Table 4.</p>	Waste Type	Existing Recovery Capacity/ ktpa	Current Arisings/ ktpa	Current Recovery capacity shortfall/ ktpa	Food	313.8	111	-202.8	Green	78.7	80	1.3	Wood	44.0	82	38	Mixed	0	Up to 614.5	Up to 614.5	Total	436.5	861.2	
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			<p style="text-align: center;">Table 4- Additional Waste Recovery Capacity Requirements for Plan Area</p> <table border="1"> <thead> <tr> <th>Year</th> <th>Total Recovery capacity Requirement/ ktpa</th> <th>Total recovery capacity at permitted facilities/ ktpa</th> <th>Future recovery capacity provision/ ktpa</th> </tr> </thead> <tbody> <tr> <td>2010/11</td> <td>623.6</td> <td>233.7</td> <td>389.9</td> </tr> <tr> <td>2015/16</td> <td>776.2</td> <td>240.1</td> <td>536.1</td> </tr> <tr> <td>2021/22</td> <td>861.0</td> <td>251.4</td> <td>609.6</td> </tr> <tr> <td>2027/28</td> <td>946.6</td> <td>268.2</td> <td>678.4</td> </tr> </tbody> </table> <p>The need for provision for more recovery capacity (for the full range of wastes arising in the Plan area) than that set out in the Preferred Options document is reinforced by comparing even the low growth forecast of waste arising and recovery requirements with the current recovery capacity for wastes arising in the Plan area.</p> <p>Table 5 shows that even if the low growth forecast were correct, there would still be a need for almost 420,000 tpa of waste treatment capacity by the end of the Plan period. In the probable event that Landfill Tax reduces landfill inputs below the 250,000 tpa level on which these forecasts are based, the recovery capacity requirement may raise to as much as 670 ktpa.</p> <p style="text-align: center;">Table 5- Additional Waste Recovery Capacity Requirements for Plan Area based on Low Growth in Waste Core Strategy Preferred Option</p> <table border="1"> <thead> <tr> <th>Year</th> <th>Total Waste Arisings/ Ktpa</th> <th>Allowance for Lanfill Disposal/ ktpa</th> <th>Total recovery capacity requirement/ ktpa</th> <th>Permitted Capacity to treat wastes arising in Plan area/ktpa</th> <th>Future Recovery capacity needed/ ktpa</th> </tr> </thead> <tbody> <tr> <td>2010/11</td> <td>833.9</td> <td>306</td> <td>527.9</td> <td>233.7</td> <td>294.2</td> </tr> </tbody> </table>	Year	Total Recovery capacity Requirement/ ktpa	Total recovery capacity at permitted facilities/ ktpa	Future recovery capacity provision/ ktpa	2010/11	623.6	233.7	389.9	2015/16	776.2	240.1	536.1	2021/22	861.0	251.4	609.6	2027/28	946.6	268.2	678.4	Year	Total Waste Arisings/ Ktpa	Allowance for Lanfill Disposal/ ktpa	Total recovery capacity requirement/ ktpa	Permitted Capacity to treat wastes arising in Plan area/ktpa	Future Recovery capacity needed/ ktpa	2010/11	833.9	306	527.9	233.7	294.2
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			Year	Total Waste Arisings/ Ktpa	Allowance for Lanfill Disposal/ ktpa	Total recovery capacity requirement/ ktpa	Permitted Capacity to treat wastes arising in Plan area/ktpa	Future Recovery capacity needed/ ktpa
			2015/16	873.5	236.3	637.2	240.1	397.1
			2021/22	905.3	245.4	659.9	251.4	408.5
			2027/28	942.4	255.7	686.7	268.2	418.5
<p>Conclusions:</p> <p>It is acknowledged that forecasting waste arisings is a very difficult business but it is considered that the Preferred Option could be improved in three ways as follows;</p> <p>1 The low growth forecast used is unduly precise, particularly given the acknowledged uncertainties regarding the arisings of commercial and industrial waste (C&IW), and could result in an under-provision of facilities needed to Biogen Power Waste Core Strategy Preferred Options Consultation Response 100712 Waste Core Strategy reps Final.doc 8 manage waste in a sustainable fashion. The approach of using an average of the high-range and low-range forecasts for C&IW would avoid such inflexibility;</p> <p>2 The assessment of the capacity gap between the forecast of recovery capacity and that which has already been permitted in the Plan area fails to take account of the capacity of these permitted facilities to treat the range of wastes that will arise in the Plan area. Making allowance for this, demonstrates that the Preferred Option contains a serious underprovision of recovery capacity in order to treat the mixed and non-metallic wastes arising in the Plan area, even if the low-growth forecast were adopted; and</p> <p>3 The Preferred Option assumes that over 250,000 tpa of waste arising in the Plan area will still be consigned to landfill in 2026/27 which is considered unrealistic given that Landfill Tax will reach £80/tonne by 2014. It is considered that it would be sensible to make allowance to treat all of the waste arisings in order to benefit from the changes to waste management practices which the escalating landfill tax rate will encourage.</p>								

Name	Organisation	A/ D/ N	Representation
Mr Keith Owen	SLR Consulting Limited (on behalf of Biogen Power Ltd)	N	<p>Question 17 Please refer to the answer to question 4.</p> <p>Paragraph 4.49 seems to suggest that the test of 'deliverability' is being confused with 'availability' - these are separate criteria in PPS12. Further there is no clear assimilation of when the preferred sites can be expected to start meeting the residual need, when the need is now. There is limited comment at 4.52 - 4.57 but this does not deal explicitly with timing issues. Whilst there may have been some consideration of this issue there is no explanation of the reasoning on this point, and therefore it is not possible for consultees to assess this for themselves. Further information should therefore be provided to deal with this issue.</p>
Mr Martin Tett	Buckinghamshire County Council	N	<p>Revocation of East of England Plan:</p> <p>The Secretary of State has now confirmed the revocation of Regional Spatial Strategies, and so reference to the targets and policies in the East of England Plan (EEP) is now largely redundant. We consider that the publication draft WCS will now need to consider the extent to which it will provide for waste imports from London within the context of "localism". In particular the publication draft should set out the commitment, or otherwise, of the Bedfordshire Authorities to meeting the former EEP apportionment for the provision of landfill capacity for London's waste (a provision of 240,000 tpa to 2015 and 120,000 tpa from 2015 onwards) within Bedfordshire.</p>
Ms Louise Treacy	ERM (on behalf of Covanta Rookery South Ltd)	N	<p>The requirement for additional recovery capacity to 2027/2028 has been considered under a scenario of both low and high growth expectations. The requirement under the Low Growth Scenario is 250,460 tonnes per year by 2027/2028, whilst under the High Growth Scenario the forecast requirement is 820,800 tonnes per year by 2027/2028. Statement 9 of the WCS states that <i>'the preferred option for the amount of waste to be managed is . the Low Growth Scenario, which requires 250,460 tonnes of recovery capacity and 7.2 million tonnes of void space for the landfilling of Non-Hazardous Wastes, (at 2027/2028)'</i></p> <p>The rationale for the preferred growth option is discussed briefly in section 4.6 of the Strategy. It is stated that <i>'to contrast the two growth Low Growth Scenario '</i>. No further discussion is included within the text scenarios, by 2015 an additional recovery capacity of 546,000 tonnes per annum would be required under the High Growth Scenario; compared to an additional 200,000 tonnes per annum recovery capacity under the Low Growth Scenario. However, the amounts of both Municipal wastes as well as Commercial/Industrial wastes arisings in recent years, have been significantly less than the 3% growth rate set out in the Regional Spatial Strategy (East of England Plan). In addition, there are a range of initiatives concerning the reduction of waste arisings, at</p>

Name	Organisation	A/ D/ N	Representation
			<p>national and local level, which support the belief that the growth in wastes will be generally lower rather than higher, during the Plan period. Consequently the Preferred Option for Waste Growth is the Low Growth Scenario'.</p> <p>No further discussion is included with the text or the accompanying TEP to support the choice of the Low Growth Scenario.</p> <p>Question 4 asks the reader whether they agree or disagree with the preferred growth option. This submission has deviated from the order of the questions in the WCS in order to retain focus on one topic at a time. A submission shall be made to Question 3 later at paragraph 3.33. In short, the Low Growth Scenario would not appear to be 7 inappropriate, but that is not what is presented in the WCS. Instead, all that is presented is the calculated recovery capacity requirements over the lifetime of the WCS.</p> <p>Given the variance in the recovery capacity figures under the High and Low Growth Scenarios (i.e. 820,800 tonnes and 250,460 tonnes per year respectively) it is considered that the rationale in support of the preferred low growth option is somewhat brief. In addition it is considered that the evidence base for same should be included within the text of the WCS (rather than the TEP) in order to facilitate a comprehensive understanding of how the projections have been calculated.</p> <p>It is acknowledged that recent waste arisings have grown less than the 3% forecast in the RSS. Whilst recent arisings may indicate long term trends, they may also simply, and transitionally, reflect a short term trend (for example as a result of the economic recession). As such, these reduced arisings may not be indicative of future trends once economic activity increases. The projections for the capacity requirements that are contained within the WCS for recovery and for landfill are considered further below.</p> <p>A review of TEP 1 and 2 that accompany the WCS was undertaken to determine the manner in which the Low Growth Scenario was selected as the preferred option. It is noted that RSS figures based on data from 2003/2004 were used to calculate the MSW high growth forecasts. The MSW figures from BEaR data were used to calculate the low growth forecasts and are actual historical arisings data taken from the Waste Flow Data system. Thus the BEaR figures were considered more accurate and reliable than the RSS figures for the purposes of the WCS.</p>

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			<p>The Low Growth Scenario forecasts the MSW and C & I arisings for each year, subtracts the current existing capacity of 436,500 tonnes and concludes that the outstanding wastes are those remaining to be recovered. Thus, referring to TEP 2 (table 15) and Statement 7 of the WCS, Table 2.1 below summarises the forecast arisings and forecast recovery capacity requirements as presented in the draft WCS</p> <p>Table 2.1 Summary of Forecast Arisings and Forecast Recovery Capacity Requirements from the draft WCS-Low Growth Scenario</p> <table border="1"> <thead> <tr> <th>Year</th> <th>Forecast Arisings (tonnes per annum)</th> <th>Existing Capacity (tonnes per annum)</th> <th>Forecast Recovery capacity requirement (tonnes per annum)</th> </tr> </thead> <tbody> <tr> <td>2010/11</td> <td>528 065</td> <td>436 500</td> <td>91 565</td> </tr> <tr> <td>2015/16</td> <td>637 234</td> <td>436 500</td> <td>200 734</td> </tr> <tr> <td>2021/22</td> <td>659 858</td> <td>436 500</td> <td>223 358</td> </tr> <tr> <td>2026/27</td> <td>682 370</td> <td>436 500</td> <td>245 870</td> </tr> <tr> <td>2027/2028</td> <td>686 960</td> <td>436 500</td> <td>250 460</td> </tr> </tbody> </table> <p>Research undertaken by Covanta in preparing the Rookery South RRF DCO application has identified that, on average, approximately 376,000 tonnes per annum of residual waste will arise per year within the Bedfordshire and Luton sub region over the years 2014/2015 - 2048/49 (please refer to Need Assessment in Appendix II for details). Table 2.1 above indicates that by the end of the Plan period, the draft WCS forecasts a need for recovery capacity of 125,540 tonnes per annum less than the figure identified by the research undertaken by Covanta.</p> <p>The existing recovery capacity is considered in TEP 2, identified as 436,500 tonnes/annum. TEP 2 includes the capacity provided by Goosey Lodge in its approximation of existing capacity, even though the same document recognises that this is limited to the types of waste that it can receive, i.e. it is not readily available to take residual MW or C&I waste. Further, TEP 2 includes capacity that is permitted but not yet operational. Thus, the</p>	Year	Forecast Arisings (tonnes per annum)	Existing Capacity (tonnes per annum)	Forecast Recovery capacity requirement (tonnes per annum)	2010/11	528 065	436 500	91 565	2015/16	637 234	436 500	200 734	2021/22	659 858	436 500	223 358	2026/27	682 370	436 500	245 870	2027/2028	686 960	436 500	250 460
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			<p>column entitled 'Existing Capacity' in Table 2.1 above, includes an additional 49,000 tpa of waste management capacity that is not yet existing. If Goosey Lodge and permitted only capacity is subtracted from the 'Existing Capacity' figure used in TEP 2, the Forecast Capacity Requirement would be very different, as shown below in table 2.2 .</p> <p>Table 2.2 Summary of Forecast Arisings and Forecast Recovery Capacity Requirements from the draft WCS, with amended 'Existing Capacity'</p> <table border="1" data-bbox="698 523 2114 1011"> <thead> <tr> <th data-bbox="698 523 963 692">Year</th> <th data-bbox="963 523 1305 692">Forecast Arisings (tonnes per annum)</th> <th data-bbox="1305 523 1756 692">Existing Capacity, minus Goosey Lodge (255 00 tpa) and permitted only capacity (49 000tpa)</th> <th data-bbox="1756 523 2114 692">Forecast recovery capacity requirement (tpa)</th> </tr> </thead> <tbody> <tr> <td data-bbox="698 692 963 756">2010/11</td> <td data-bbox="963 692 1305 756">528 065</td> <td data-bbox="1305 692 1756 756">132 500</td> <td data-bbox="1756 692 2114 756">395 565</td> </tr> <tr> <td data-bbox="698 756 963 820">2015/19</td> <td data-bbox="963 756 1305 820">637 234</td> <td data-bbox="1305 756 1756 820">132 500</td> <td data-bbox="1756 756 2114 820">504 734</td> </tr> <tr> <td data-bbox="698 820 963 884">2021/22</td> <td data-bbox="963 820 1305 884">659 858</td> <td data-bbox="1305 820 1756 884">132 500</td> <td data-bbox="1756 820 2114 884">527 358</td> </tr> <tr> <td data-bbox="698 884 963 948">2026/27</td> <td data-bbox="963 884 1305 948">682 370</td> <td data-bbox="1305 884 1756 948">132 500</td> <td data-bbox="1756 884 2114 948">549 870</td> </tr> <tr> <td data-bbox="698 948 963 1011">2027/2028</td> <td data-bbox="963 948 1305 1011">686 960</td> <td data-bbox="1305 948 1756 1011">132 500</td> <td data-bbox="1756 948 2114 1011">554 460</td> </tr> </tbody> </table> <p>Table 2.2 demonstrates that, in reality, the Bedfordshire and Luton sub region requires very much more recovery capacity than has been forecast by the draft WCS. This is readily demonstrated using the growth and recycling assumptions used by the authorities in their preparation of the draft WCS.</p> <p>It is recognised that within the draft WCS the term 'recovery' refers to materials recovery as well as energy recovery. Therefore it would not be prudent to conclude that all of the Forecast Recovery Capacity Requirement would necessarily be the sort of residual waste that is intended for Covanta's Rookery South RRF. However, the figure is very much higher than that calculated in the Need Assessment which has been undertaken by Covanta, demonstrating that the Need Assessment calculation is entirely reasonable and cautious in terms of its findings.</p>	Year	Forecast Arisings (tonnes per annum)	Existing Capacity, minus Goosey Lodge (255 00 tpa) and permitted only capacity (49 000tpa)	Forecast recovery capacity requirement (tpa)	2010/11	528 065	132 500	395 565	2015/19	637 234	132 500	504 734	2021/22	659 858	132 500	527 358	2026/27	682 370	132 500	549 870	2027/2028	686 960	132 500	554 460
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2027/2028	686 960	132 500	554 460																								

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			<p>Further, while Covanta's Need Assessment uses the Low Growth Scenario waste forecast, the assumptions regarding the manner in which waste is treated is different. In TEP 2, the future waste arisings are forecast and then the regional recovery targets (of 50% to 2014/15, then 70% from 2015/16 to 2026/27) are applied to identify the proportion of wastes that should be recovered. The remainder is assumed to go to landfill. As the draft WCS then goes on to use this calculation, and an exaggerated existing capacity figure to identify the amount of required recovery capacity in the future, this method effectively appears to cap the amount of recovery capacity that may be provided within the Plan area; stifling delivery of the waste hierarchy.</p> <p>Instead, Covanta's Need Assessment for Rookery South RRF uses the Low Growth Scenario to identify future waste arisings, then applies assumptions in regard to recycling/composting of each waste stream (reaching 60% for MW by 2020 and 65% for C&I waste by 2025) and assumes the rest is residual waste available for other treatment; i.e. diversion from landfill. This method actively promotes reasonable assumptions about waste growth (as expressed by the local planning making authorities) and high levels of recycling/composting which seeks to promote the use of waste management methods that would avoid the disposal of waste to landfill; the option of last resort.</p> <p>It is submitted that the appropriate recovery targets should be seen as minima and not as a maximum or rigid cap on the delivery of management routes that would divert waste from landfill. The draft WCS should promote increased recovery rates over the Strategy period in order to move waste up the waste hierarchy and away from landfill. This approach would be entirely consistent with national planning policy and is the approach used by Covanta (as described in above).</p> <p>Should a greater diversion from landfill be achieved than is currently encouraged in the draft WCS, there is the potential to divert a substantial amount of waste from landfill, even having regard to the proportion of post-treatment wastes that would be accepted from London.</p> <p>Landfill Projections</p> <p>The draft WCS seeks to identify additional capacity according to high and low scenarios for waste growth. Under the High Growth Scenario, a requirement for 9,979,201 tonnes of additional landfill capacity has been calculated while under the preferred Low Growth Scenario the requirement is 7,216,521 tonnes. It is noted that Table 13</p>

Name	Organisation	A/ D/ N	Representation
			<p>of TEP 2 identifies that the yearly landfill requirement will decrease from 544,254 tpa in 2010/2011 to 371,814 tpa in 2027/2028. Notwithstanding the foregoing, as discussed in sections 3.28 - 3.31 above, it is submitted that the landfill capacity allowed for within the draft WCS seems quite high.</p> <p>Statement 8 of the draft WCS identifies the preferred sites for landfilling of non-hazardous wastes which are firstly, Rookery Pit South, with Elstow Pit South as a reserve site. <i>Question 3</i> asks the reader whether they agree or disagree with the selection of these sites. It is not possible to agree or disagree in this instance having regard to the manner in which the draft WCS document has been structured. The supporting text to Question 3 does not provide any information to discuss or demonstrate the preferred sites identified; rather the text only considers the preferred growth scenario. It is acknowledged however, that some landfill capacity will be required over the Plan period.</p>
Mr Keith Owen	SLR Consulting Limited (on behalf of Biogen Power Ltd)	N	<p>Response to Question 3:</p> <p>While Biogen does not object to the identification of sites for landfill disposal, it does question the assumption implicit in the background data in Technical Evidence Paper 2 that landfilling of non-hazardous waste will continue at a rate of around 250,000 tonnes per annum throughout the Plan period. As detailed below, in the response to Question 4, there must be serious doubts that landfilling at this scale will persist with landfill tax rising to £80/tonne by 2014.</p>

Question four and seventeen

Explanatory note:

- New information shows that the range of wastes allowed to be managed at the Goosey Lodge facility are considerably broader than previously believed. There is therefore no question mark over the nature of the capacity available at this facility, and at all permitted facilities in the Plan area.
- The Sub-Regional Apportionment of Waste Capacity was stated in the Regional Spatial Strategy. However the Localism Bill proposes to abolish Regional Spatial Strategies, and the Low Growth Scenario is based on more upto date MSW data from the Councils, and a recent study of commercial and Industrial wastes.
- It is acknowledged that pre-treatment of waste will increase the diversion of waste, and reduce the volume of waste that will be disposed of to landfill. However there will continue to be residues from all technologies for which the only suitable waste management route is for it to be landfilled.

Summary response:

- The Preferred Option for the amount of waste to be managed is the Low Growth Scenario since it is based on the most upto date data on both MSW and Commercial and Industrial waste arisings in the Plan area. However the forecasts of arisings and capacity requirement are under review, including the targets for recovery (which includes comprehensive pre-treatment).
- Paragraph 2.33 and Objective 1 make clear that the Plan is committed to landfilling the agreed apportionment of London waste.
- The recovery targets used are not intended to operate as a cap. Higher levels of recovery and recycling will result in a reduced requirement for landfill, and the monitoring of the plan after its adoption will ensure that the Plan provides sufficient capacity throughout its period.

Recommended changes: None.

Paragraphs 4.7, 4.8 and 4.9 respectively ('The Spatial Distribution of New Strategic Facilities' and 'What is a Strategic site?')

Name	Organisation	A/ D/N	Representation
Mr John Phillips (Phillips Planning Services) on behalf of Mr Dave Watson	F&R Cawley Ltd	N	<p>Geographic Distribution 1:</p> <p>The strategy identifies the geographic distribution of waste arisings but then inadequately justifies the proposed distribution of facilities and possibly their over concentration in the Marston Vale.</p> <p>2. Para 4.7 states that, “The majority of the population in the Plan area, are located in the south, whereas existing large scale recovery facilities are located in the north of the area.”</p> <p>3. Firstly it is unclear in this context, what definition of ‘recovery’ is being used and whether it includes or excludes waste transfer and MRF facilities.</p> <p>4. It is also unclear what ‘waste’ is being referred to and whether the reference is to waste arising solely within the County or whether it is referring to the capacity of facilities accepting waste from a much wider geographic area.</p> <p>The statement is incorrect both in implying that no large scale facilities are located in the south, if ‘large’ follows the definition of strategic and non strategic, and in stating that existing large facilities are located in the north rather than the middle of the plan area.</p>
Mrs Margaret Pedley		N	I am really concerned that the highway linkages will be improved in time, to avoid congestion and protect accidents happening to the general public through this extra movement of traffic..
Mr John Phillips (Phillips Planning Services) on behalf of Mr Dave Watson	F&R Cawley Ltd	N	<p>Scale of facilities:</p> <p>The strategy asserts but does not give any clear evidence that very large facilities achieve overall economies of scale. A more comprehensive cost/benefit evaluation is required of alternative distributions of facilities including the transport and sustainability costs of locating very large facilities relatively remote from where the main sources of waste arise in the County. A clearer statement of the present situation is required including a comprehensive survey and list of all waste facilities in the County, their location and purpose.</p>

Paragraph 4.7, 4.8, 4.9

Explanatory note:

- Recovery is defined in the Glossary.
- Strategic sites are identified as important for enabling the Objectives of the Plan to be achieved.
- Sites could only be considered if they were available, and in particular, if the landowner is willing for the land to be used for a waste use.
- The Plan does not propose specific technologies.
- KTI did not provide sufficient information for their site to be considered further.
- Economic assessments are not relevant to the core strategy which is a planning policy document.
- The suitability of the highway network is one of the criteria used in the site selection process.

Summary response:

- No issues were raised which necessitate these paragraphs to be amended.

Recommended change: None.

Question 5 (Definition of a Strategic site)

Name	Organisation	A/ D/ N	Representation
Mr Adam Ireland	Planning Liaison Officer Environment Agency	A	While in general agreement with the definition of a Strategic Site, smaller sites like some composting or MRFs can be strategically significant for reducing transport costs, operational issues and employment.
Ms Lizzie Barnicoat (Elstow PC)	Elstow Parish Council	A	Question 5: The Parish Council agree with the definition of a Strategic site, however, the Council wish to stress that the use of sites within Elstow for this purpose are not to included in any way to satisfy this definition. Elstow Parish Council will challenge very strongly as previously they have to ensure that no sites within Elstow are used.
Mr Alan Bulpin	Planning & Estates Manager Waste Recycling Group	A	Question 5: WRG broadly supports the definition of a Strategic Site. Strategic Sites should be capable of accommodating a variety of waste treatments and / or a high volume of just one or two waste treatment / disposal facilities.
Mr Graham Jenkins (White Green Planning) on behalf of Mr David Reavell	O&H Properties	A	Question 5: We generally agree with the definition of a strategic site, but consistent with our response to questions 32 – 38 of the 2007 Issues and Options consultation, we consider that there should be a higher end tier of an ‘integrated waste management park’ which would represent a strategic site but with a range of waste management facilities, together with the ability to landfill both treated waste and waste residues from an on-site waste management facilities. The Rookery South site is the only potential strategic recovery site from the list within ‘Statement 10’ which would be able to satisfy this high end strategic site definition.
Mrs A Lowe	Wilshamstead Parish Council	A	Agree , but the PC cannot see as Strategic Sites are essential how can Reserve sites be classed as strategic. The PC also do not with the statement in Para 4.13 that there are only two possible sites for landfill. In truth only two sites were offered by landowners and this doesn't mean that there aren't any other possible sites.
Mr Graham Gunby	Suffolk County Council	A	The definition is reasonable although different from our definition which referred to non-hazardous landfill and to residual waste treatment facilities of 100,000 tonnes upwards.

Waste Core Strategy Preferred Options Representations and recommended responses

Name	Organisation	A/ D/ N	Representation
Central Bedfordshire Council Waste Disposal Authority	Central Bedfordshire Council Waste Disposal Authority	A	Agree with the approach (4.9 and 4.10) but a statement box would be useful to clarify the actual definition.
Mr Shaun Askins	Strategic Manager Luton Borough Council	A	
Mr Ian Pickering	Chairman Aspley Guise Parish Council	A	
Mr Martin Tett	Buckinghamshire County Council	A	Strategic Sites and the definition: The Council supports the allocation within the Core Strategy of strategic sites to meet the Authorities' projected waste arisings and need for new facilities. We are pleased to see that these strategic sites are to be supported by a network of non-strategic facilities. Overall we agree with the definition of strategic sites as stated within paragraph 4.9 and 4.10, although we would also classify a strategic site as one providing the necessary infrastructure i.e. road or rail waste transfer stations which are essential to delivering the overall Waste Core strategy. In paragraph 4.21, the strategy states that the Rookery South and Brogborough sites are centrally located and can receive wastes from "nearly all of the plan area". We note this and would like confirmation of the catchment areas of these sites, showing the areas which will not be covered and how this shortfall will be addressed, without impact upon the surrounding counties.
Mrs Nicky Upton	Harlington Parish Council	D	The definition should include the relationship to existing transport links (new ones may never be funded) and the current needs of people and the local economy.
Mr Hugh Roberts	Marston Moretaine Action Group	D	MMAG does not since the plan is self fulfilling : ultimately the only site which meets the criteria of being essential to the achievements of the objectives is Rookery Pit South.

Name	Organisation	A/ D/ N	Representation																				
Mr Keith Owen	SLR Consulting Limited (on behalf of Biogen Power Ltd)	D	<p>Biogen disagrees with the definition of a strategic site in the WCSPO document.</p> <p>It is considered that sites which could provide waste recovery capacity of over 75,000tpa can not reasonably be called strategic sites. Indeed it is not considered that the Biogen Twinwood facility, with a proposed capacity of 120,000tpa should be considered as a strategic facility. Elsewhere, in the Waste Core Strategy Preferred Options document, waste facilities are divided into small, medium and large, with large facilities being considered strategic.</p> <p>It appears that the 75,000 tpa cut-off is arbitrary and without an evidence base and accordingly, it is proposed that the small, medium and large/strategic scale facilities should be identified as set out in Table 6. This takes account of the possible need for facilities to manage hazardous waste which it is considered should also be viewed as being of strategic importance irrespective of their size.</p> <p style="text-align: center;">Table 6- Indicative Waste Treatment Facility Capacity and Scale</p> <table border="1"> <thead> <tr> <th>Capacity/ ktpa</th> <th>Facility Scale</th> <th>Facility Type</th> <th></th> </tr> </thead> <tbody> <tr> <td>0-36,500</td> <td>Small</td> <td>Facility for treatment of non-hazardous waste</td> <td>capacity of less than 100 tonnes/day as per schedule 1, T&CP (EIA)Regulations 1999</td> </tr> <tr> <td>36,500- 150,000</td> <td>Medium</td> <td>Facility for treatment of non-hazardous waste</td> <td></td> </tr> <tr> <td>N/a</td> <td>Large/strategic</td> <td>Hazardous waste disposal/treatment facility</td> <td>Would require EIA as per Schedule 1- EIA Regs</td> </tr> <tr> <td>Greater than 150,000</td> <td>Large/strategic</td> <td>Mass burn incineration/ large scale MBT</td> <td>As per description of large scale thermal plants in Planning for Waste Management Facilities</td> </tr> </tbody> </table>	Capacity/ ktpa	Facility Scale	Facility Type		0-36,500	Small	Facility for treatment of non-hazardous waste	capacity of less than 100 tonnes/day as per schedule 1, T&CP (EIA)Regulations 1999	36,500- 150,000	Medium	Facility for treatment of non-hazardous waste		N/a	Large/strategic	Hazardous waste disposal/treatment facility	Would require EIA as per Schedule 1- EIA Regs	Greater than 150,000	Large/strategic	Mass burn incineration/ large scale MBT	As per description of large scale thermal plants in Planning for Waste Management Facilities
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Waste Core Strategy Preferred Options Representations and recommended responses

Name	Organisation	A/ D/ N	Representation
			<p>With the current threshold of 75,000tpa for a strategic site, and such a limited number of sites, there is a serious danger that the development of medium scale waste management technologies, with capacity of say 80,000tpa, would be excluded from the Plan area, as they may be unable to access one of the limited number of strategic sites.</p> <p>This is of particular importance given the possible level of treatment and recovery capacity that the analysis set out above, in response to Question 4, indicates will probably be required. The probable requirement for an additional 650,000 tpa of recovery and treatment capacity would indicate the need for up to nine strategic sites based on the 75,000 tpa criterion. The WCSPO document only identifies 10 potential strategic sites which suggests both that the threshold is wrong and that the number of sites should be increased.</p>
Mr Martin Lewis		N	I agree because the statement appears to cover all requirements of the objectives identified earlier in the document. I disagree because I think we should be maximising rail transport for waste and that is not covered (because it is not identified as one of the objectives).
Caroline Romans	Secretary Central Bedfordshire and Luton Joint Local Access Forum	N	As the process of identification (TEP 4) does not take into account Public Rights of Way, the Central Bedfordshire and Luton Joint Local Access Forum would question its validity.
Mr Martin Tett	Buckinghamshire County Council	N	Waste Recovery Technologies: It is not clear what recovery technologies the plan is proposing or whether it is “technology neutral”. Potential allocations are proposed as materials and energy recovery sites. This does not acknowledge that Energy from Waste proposals have been made in respect of the Rookery South site.
Ms Louise Treacy	ERM (on behalf of Covanta Rookery South Ltd)	N	Question 5: of the Strategy asks the reader whether they agree or disagree with the definition of a Strategic Site. However, there is no rationale provided to explain why 75,000 tonnes per annum has been selected as an appropriate minimum for facilities for the recovery of materials and/or energy. This matter requires clarification. Further, very little evidence is provided to demonstrate why facilities for the management of clinical or hazardous waste streams are to be considered strategic, or where they would be located.

Name	Organisation	A/ D/ N	Representation
Mr John Phillips (Phillips Planning Services) on behalf of Dave Watson	F&R Cawley Ltd	N	We question the need to draw such an artificial and precise definition in terms of annual throughput and question its value, particularly as no evidence is given as to how the figure of 75.000 tonnes per year is derived and how it will be used as a planning tool. If there is a need to define strategic and non strategic sites, which we question, the definition should be flexible to allow for differing locations and waste facilities. This is particularly relevant as the definition of 'recovery facilities', page 27 of Technical Evidence Paper 2 which we assume is used throughout the strategy document, specifically excludes waste transfer stations and materials recovery facilities (MRFs).

Question five

Explanatory note:

- Strategic sites are not defined in PPS12 or other guidance. However they are intended to achieve the Objectives of the Core Strategy.

Summary response:

- Strategic Sites have been subject to the selection process set out in Technical Evidence Paper 4.

- In order to be deliverable, a prospective Strategic landfill site has to have the support of the landowner, as well as be broadly acceptable in respect of its geology and landform.

- the definition of a Strategic site originated from the Issues and Options consultation, and is discussed in Technical Evidence Paper 4.

- Rights of Way vary in their degree of use, and it is more appropriate to consider the likely impact on adjacent land users, including rights of way.

- The Plan identifies land suitable for waste management and not waste technologies.

- Clinical and Hazardous waste facilities are considered in Waste Core Policy 6, at page 43.

Recommended change: None.

Statement 10 (Potential Strategic Recovery Sites)

Name	Organisation	A/ D/ N	Representation
Mr Alan Bulpin	Planning & Estates Manager Waste Recycling Group	A	<p>Statement 10: WRG supports the inclusion of the site at the former Brogborough landfill as a Potential Strategic Recovery Site.</p>
Dr Bill Temple-Pediani	Managing Director KTI Energy	N	<p>As you are already aware, my company proposes a 90MWe rail-linked renewable CHP station on the Bletchley-Bedford rail line delivering green electricity and heat to existing and new properties in Milton Keynes. This project complies absolutely with Waste Infrastructure Delivery Programme Information Note on Combined Heat & Power, issued by Defra in January 2009, which most WDAs reprehensibly neglect to mention in their WDFs.</p> <p>The location of renewable CHP station has faced criticism from Roy Romans and Anne Samme. They are both wrong. The CHP station is a WID-compliant multi-fuel facility receiving waste and virgin biomass fuel (RDF, SRF, wood chip, rubber chip, straw and poultry litter) from outlying MBT/MT plants, farmers and growers preferably by rail. The CHP station is authorised by Environment Agency for the purpose of electricity and heat generation and not waste disposal. Consequently, treatment by your waste officers of the station as though it is a waste management facility is plainly wrong under the law of England & Wales. My company is not prepared to move the CHP station from its present location albeit we would have no objection if it were located instead immediately north of the rail line rather than south of it. That takes care of objection from Ms Samme because south of the rail line apparently lies in Green Belt. At 90MWe net electricity output over 8,000 hours per annum, the annual demand of high calorific value waste biomass fuel is 600,000 t/a. The fuel catchment for this sub-regional energy facility is the South Midlands. Our request of the Waste Core Strategy is that MBT/MT plants treating both household and non-household waste are located on the Bletchley-Bedford-Kettering rail line so that waste biomass fuel produced at these locations may be delivered to the CHP station by rail. My discussions with the East West Rail Consortium confirm the Calvert-Bletchley rail section will be up-graded to W10 standard. That means Buckinghamshire CC will be able to develop a low cost MBT/MT plant near Calvert or Aylesbury to deliver additional waste biomass fuel to the CHP station by rail. If you study Renewables Obligation Order 2009 you will find Decc allows ROCs for good quality CHP. The outcome of a successful CHP</p>

Name	Organisation	A/ D/ N	Representation
			<p>scheme is that additional electricity and heat revenues will achieve least cost household and non-household waste management. What we describe to the Minerals & Waste Planning Unit is modern waste management aimed at Milton Keynes achieving Low Carbon Economic Area status as promoted since 2008 by the Department of Business Innovation and Skills. We seriously question why in 2010 any WDA or contractor should contemplate a mass burn incinerator which destructs a sustainable resource without full recovery of its energy and material value. For the information of Mr Romans, it is normal to convert 33-50% household waste residues to RDF or SRF. That leaves 50-67% of the raw feedstock for material recovery either as paper, card, metal or compost. This arrangement meets with the full approval of Defra, Decc, EA, and Wrap with no justification for criticism from the public sector unreasonably suffered by my company over the past 7 years. Please request your officers to familiarise themselves with waste practices endorsed by Government so the flow of unhelpful comment from your public sector might cease. Kindly enter this configuration into your Waste Core Strategy for public study. Additional detail you might require already rests with Mr Romans and Ms Samme.</p>
D.J. Edwards		N	<p>I should like the following noted for inclusion in the consultation. Wherever possible transfer of waste should take place by rail. Sites most suited for railhead application should receive priority. This village as well as other Bedfordshire and Hertfordshire villages are blighted by 38 - 42 tonne artic lorries crash banging (not to mention speeding) through all day long. These vehicles bring London's waste to the tip at Newton Longville (Bucks). This site is within MK boundary and ideally suited to rail transfer. MK City Council are irresponsible in giving planning permission for the site. Don't make the same mistake as them!</p>
Mr Rio D'Souza	Planning Officer Highways Agency	N	<p>Statement 10 identifies ten potential strategic sites. The Highways Agency has not commented further on these ten sites. Statement 13 lists the four strategic sites that have been selected to be taken forwards from the original ten. "Statement 10 Potential Strategic Recovery Sites - Elstow North (WSD01) - Thorn Turn (WSD02) - Brogborough (WSD13) - Stewartby (WSD14) - Land at Arlesey Landfill Site (WSD15) - Stewartby Sidings (WSD31) - Chelveton Airfield (WSD33) - Rookery South (WSD34) - Roxton (WSD46) - Twinwoods (WSD54)"</p>
Mrs Margaret Pedley		N	<p>I am concerned that if the Twinwoods site WSD54 is used that the roads are improved to take the extra traffic. Please could you ensure that a safe network of roads is linked to this proposed site, Twinwoods (WSD54) so that the safety and protection of the local residents will be upheld.</p>

Name	Organisation	A/ D/ N	Representation
Mr Tom Gilbert-Wooldridge	Planner-English Heritage	N	<p>Statement 10:</p> <p>Potential Strategic Recovery Sites We note that some of the sites listed in Statement 10 are identified as preferred sites in Statement 13.</p> <p>With regards to the non-preferred sites, we would like to highlight our previous concerns with regards to WSD14 (Stewartby), WSD31 (Stewartby Sidings), WSD33 (Chelveston Airfield) and WSD54 (Twinwoods) as stated in our letters dated 9 March 2007, 29 November 2007 and 31 March 2008. Our comments made in relation to WSD14 and WSD31 do not appear in full within the Evidence Base document and our comments regarding WSD54 do not appear at all.</p>
Mr Chris Evans	Ministry of Defence	N	<p>Statement 10- Potential Strategic Recovery Sites:</p> <p>Location MOD Interests Elstow North- also proposed as a waste electrical and electronic equipment facility) Cardington</p> <p>Thorn Turn: No Safeguarding interests</p> <p>Brogborough: No Safeguarding interests</p> <p>Stewartby: Cardington</p> <p>Land at Arlesey Landfill sites: RAF Henlow</p> <p>Stewartby Sidings: Cardington</p> <p>Chelveston Airfield: No Safeguarding interests</p> <p>Rookery South: Cardington</p> <p>Roxton: No Safeguarding interests</p> <p>Twinwoods: No Safeguarding interests</p>

Waste Core Strategy Preferred Options Representations and recommended responses

Name	Organisation	A/ D/ N	Representation
			t is acknowledged that the site at Rookery Pit is considered to be suitable for the construction of energy from waste facilities. The office should be consulted on such developments if they infringe the published safeguarding height criteria.
Mr Paul Maison	British Waterways	N	Ten strategic waste recovery sites are identified. It will be important to protect the future environment of the Bedford-Mk Waterway in those sites that have the potential to damage such an environment.
Ms Louise Treacy	ERM (on behalf of Covanta Rookery South Ltd)	N	Ten potential Strategic Materials and Energy Recovery sites are identified in paragraph 4.11. The methodology which was used to identify these sites is discussed in TEP 4. Two sets of criteria were used to assess the potential strategic sites including: (i) planning criteria consisting of the waste policies which were saved from the Bedfordshire and Luton Minerals and Waste Local Plan adopted in 2005, and (ii) sustainability criteria which were developed based on the Sustainability Appraisal criteria used previously by Environ in carrying out their appraisal of different DPDs.

Statement 10 Potential Strategic Recovery Sites

<p>Explanatory note:</p> <ul style="list-style-type: none"> - Ten potential Strategic Recovery sites were listed in Statement 10 at page 27.
<p>Summary response:</p> <ul style="list-style-type: none"> - The site proposed by KTI Energy was not considered, since insufficient information was supplied. - Transport by rail involves a high capital investment and would only be suited to waste to be imported from elsewhere. Apart from post-treatment residual waste from London, no importation of waste is considered appropriate.envisaged. - It is not expected that any of Preferred Strategic Recovery sites will impact on the Bedford to Milton Keynes Waterway.
<p>Recommended changes: None.</p>

Paragraph 4.16 (Site Assessment Information)

Name	Organisation	A/ D/ N	Representations
Mrs Caroline Romans	Secretary Central Bedfordshire and Luton Joint Local Access Forum	N	It is not clear within this where Public Rights of Way have been taken into account. It appears that within the Technical Evidence papers which inform the strategy, there is one passing reference to Rights of Way in relation to Marston Vale and none at all regarding access to existing (or potential new) green spaces. This is a matter of concern for the Central Bedfordshire and Luton Joint Local Access Forum, especially as one site (Brogborough) impacts on a major east/west bridleway.

Paragraph 4.16

<p>Explanatory note:</p> <p>- Rights of Way vary in their degree of use.</p>
<p>Summary response:</p> <p>- Rights of Way in isolation are not considered as a criterion for the selection of sites. The information in Technical Evidence Paper 4 about potential Strategic sites does include Rights of Way.</p>
<p>Recommended changes: None.</p>

Question six (The Preferred Option for the Spatial Distribution of Strategic Recovery Sites)

Name	Organisation	A/ D/ N	Representations
Mr Jenkins (White Green Planning) on behalf of Mr David Reavell	O&H Properties	A	<p>Question 6:</p> <p>We agree that the preferred option for the spatial distribution of recovery sites should be based upon a small number of large sites, with the principal sites located centrally. This meets the requirement of strategic accessibility (noted in paragraphs 4.21 and 4.22), and would provide for economies of scale associated with the substantial investment required to develop the extensive new capacity which is acknowledged to be needed (also noted in Technical Evidence Paper 4 p 85).</p>

Name	Organisation	A/ D/ N	Representations
Mr Shaun Askins	Strategic Waste Manager Luton Borough Council	A	<p>a) However it should be noted that currently only smaller recovery sites eg 2k Manufacturing in Luton (25,00tpa) have been successfully planned and more importantly implemented and that large strategic facilities face an uncertain future in terms of the uncertainty of planning policy changes and the fiscal constraints all infrastructure projects are facing and it maybe that adjacent authorities strategic facilities will be utilised to provide materials recovery or energy recovery.</p> <p>b) Taking into account the sites put forward in statement 10, the preferred sites in statement 13 are acceptable, and although the</p> <p>c) limitations placed solely on Rookery South which is a large 95h site as opposed to the other three sites may raise some concerns.</p>
Mr Keith Owen	SLR Consulting Limited (on behalf of Biogen Power Ltd)	A	<p>Biogen supports the distribution of strategic (large scale) materials and energy recovery facilities throughout the Plan area. It is considered that the location of a several large facilities centrally within the Plan area could impose an unacceptable cumulative impact on an area, and lead to significant travel distances from some parts of the plan area. By contrast a spread of facilities throughout the Plan area would place more properties close to at least one facility whilst at the same time maintaining competition. This could potentially reduce overall travel distances. Biogen would support a small increase in the identified number of Preferred Strategic sites to provide effective coverage of the plan area, and to provide the necessary flexibility that will be required if the low growth forecast is not achieved and/or landfill diversion is better than assumed in the WCSPO. Inspection of Map 4.1 illustrates that the inclusion of the Twinwood site together with the existing sites would provide effective coverage of facilities for the whole plan area. Biogen would be prepared to accept that the capacity of the facility should be restricted to 120,000tpa (ie below the suggested threshold for a Strategic site) to reflect its location in the north of the County, and to prevent excessive importation of waste from adjoining areas.</p>

Name	Organisation	A/ D/ N	Representations
Central Bedfordshire Council Waste Disposal Authority	Central Bedfordshire Council Waste Disposal Authority	A	<p>Policy 6 states that the Preferred Option for the Spatial Distribution of Strategic Recovery sites is: ‘A small number of large sites, with the principle sites located centrally, and a Reserve site located towards the major centres of population’.</p> <p>CBC agrees with the principle of a small number of large sites in locations near centres of population, provided acceptable level of environmental impact. The reason being, to restrict environmental impact of sites rather than spreading the impact across a larger number of smaller sites. The transportation impact of moving large quantities of waste would also be reduced with this approach.</p> <p>Thorn Turn, as a Reserve Strategic site, is the only site identified that covers the southern plan area and is well located near the large conurbations of Luton, Houghton Regis, Leighton Buzzard and Dunstable. This makes the Thorn Turn site sustainable in terms of proximity to major urban areas and would support any further residential growth proposed in the area. The identification of Thorn Turn as a ‘Preferred Strategic site’ is considered by CBC as an important and necessary allocation to address the spatial imbalance mentioned above and provides a site in the south within the urban growth area identified in the Luton and South Bedfordshire Joint Committee Core Strategy. The delivery of significant housing and associated infrastructure around the Thorn Turn site provides potential for future energy demand. Any heat or power produced by a waste treatment facility at Thorn Turn could be utilised by these proposed dwellings, increasing the efficiency of a waste treatment facility and reducing the carbon footprint of both the urban extension and a waste treatment infrastructure</p>
Ms Louise Treacy	ERM (on behalf of Covanta Rookery South Ltd)	A	<p>Question 6: of the Strategy requests feedback in relation to the preferred option identified above. An approach based on a smaller number of larger sized sites is generally demonstrated to be the most deliverable option and often fulfils many sustainability criteria too. Appendix III of this submission contains a document entitled ‘Residual waste treatment in The findings of this assessment confirmed that the Cornwall: An assessment of costs and environmental impacts of single and multiple facilities’. benefits for a single plant significantly outweighed those of multiple plants for all technologies considered (including EfW). This approach is therefore considered to be appropriate for the WCS but additional information to explain and demonstrate this approach should be included in the supporting text.</p>
Ms D Sacks		D	<p>Smaller facilities are more likely to provide the flexibility needed for the long term delivery of the waste management strategy. Very large facilities are likely to encourage the importation of waste into the Bedfordshire area, rather than encouraging other communities to manage their own waste in accordance with Waste Strategy</p>

Name	Organisation	A/ D/ N	Representations
			2007 and PPS10. While concerns of cost effectiveness must be taken into account to ensure deliverability, there are many technologies that can be delivered in small and flexible modular units.
Mrs Nicky Upton	Harlington Parish Council	D	This is unlikely to meet with the expectations of local tax payers and may be more costly than alternatives.
Mr Hugh Roberts	Marston Moretaine Action Group	D	MMAG disagrees as the preferred option is for a small number of principal sites located centrally and once it boils down to only Rookery Pit South and Elstow as meeting the criteria.
Ms Lizzie Barnicoat (Elstow PC)	Elstow Parish Council	D	Question 6: Elstow Parish Council feel very strongly that a large number of smaller size sites equally distributed across the Plan should be used as the Preferred Option for the Spatial Distribution of Strategic Recovery Sites. The Parish Council strongly disagree with the use of Elstow North as a WEEE facility, as having just one identified site for electronic items means a large bias to that one area receiving all such items from the whole of Bedfordshire. This naturally is detrimental to the environment and does not follow the government policy on reducing carbon footprint, through transport. It would be far more sensible and carbon friendly for smaller sites in operation in each area. The Council wish to stress that the use of the site within Elstow for this purpose will be challenged very strongly as previously they have to ensure that no sites within Elstow are used.
Mrs A Lowe	Wilshamstead Parish Council	D	Disagree. The PC would prefer a number of smaller sites distributed in/near each centre of population. This is more equitable in that each centre looks after its own waste and minimises transportation of waste. The PC questions how a Reserve Recovery site can be located towards the centres of population when these are spread all over the County.
mrs sue clark	chair planning committee cranfield parish council	D	The preferred option for Principal sites located centrally, and a reserve site located towards the major centres of population does not meet the criteria outlined in statement 5 which states that waste management facilities should be located as close as possible to urban areas. The PC therefore does not agree that all the principal sites should be located in the Marston Vale. There should be a more equitable spatial distribution, with sites being identified close to the major urban centres. it is too easy just to allow all the sites to be concentrated in

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Name	Organisation	A/ D/ N	Representations
			the Marston Vale. Thorn Turn should be included as a Principle site, not just a Reserve site, to improve the spatial distribution.
Mr Ian Pickering	Chairman Aspley Guise Parish Council	D	Disagree - Strategic Sites should be close to the centres of population to minimise the need to transport waste
Mr Al Morrow (Phillips Planning Services)	Chelveston Renewable Energy Ltd	D	The spatial strategy proposes a small number of strategic waste sites centrally located within the County all of which will be within the Marston Vale. Chelveston Renewable Energy Ltd. considers this approach to be fundamentally unsound. It will produce an inherently unsustainable pattern of strategic waste treatment sites in that all of them will be centralised into one area rather than being spread out more within the County where they will be more accessible. Central government policy in Planning Policy Statement 10 : Planning for Sustainable Waste Management and in current adopted regional policy within the Adopted East of England Plan May 2008 encourage the creation of a sustainable pattern of waste treatment sites of different scales and types which will be accessible to the whole of the population and the waste treatment industry.
Mr Graham Gunby	Suffolk County Council	D	Because the distance between Luton and the furthest most facility is 30 miles and restricting the catchment to less than that distance would be overly restrictive.
John Shepard (Partner J &J Design)	Acorn Transport &Plant Hire Ltd	D	The consequences of the preferred strategy appear to be considerable: transportation costs including CO2 emissions bringing waste arisings from parts of the plan area which are more remote from the small number of selected sites including the Luton/Dunstable conurbation and the East Bedfordshire/A1 corridor where significant growth is either committed or proposed.
Mr Alan Bulpin	Planning & Estates Manager Waste Recycling Group	N	Question 6: The County should also have due consideration of the spatial distribution of Strategic Sites across the County.

Name	Organisation	A/ D/ N	Representations
Mr Rio D'Souza	Planning Officer Highways Agency	N	Location of the sites centrally should in theory reduce the need to transport the waste long distances. Provision of a reserve site towards the major centres of population would further support this. However, as shown in Map 4.1 of the Plan it would result in a number of sites all located in the Bedford / south Bedford area with no sites to the east of the area towards Sandy and Biggleswade. However, the actual location of the sites is still fundamental in determining the level of impact that they would have on the Strategic Road Network. Therefore, even though the Highways Agency agrees in principle with Question 6, the locations of the sites will influence the overall decision particularly with regards to the level of impact. In some instances, mitigation may be needed to reduce the effect of the sites or strategies developed so as to limit these effects.
Mr Rio D'Souza	Planning Officer Highways Agency	N	"Statement 12 Options for the distribution of Strategic (large scale) materials and energy recovery sites: A small number of larger sized sites: - Equally distributed throughout the Plan area - Or centrally located across the Plan area. A large number of smaller size sites: - Centrally located within the Plan area - Equally distributed across the Plan area Distributed: - Equally in/near centres of population - In locations unrelated to centres of population."

Question six

Explanatory note:

- The geography of the plan area is described in paragraphs 2.1 to 2.10.

Summary response:

- There are arguments for and against large sites. Small sites provide flexibility, but are unable to achieve economies of scale. Large sites can also co-locate a number of different types of facilities.

- the deliverability of sites which meet the preferred Spatial distribution will need to be monitored.

- the Plan area is limited in extent, and it is most appropriate to limit the impact of waste management developments to a smaller number of locations.

Recommended change:

Policy 6 - amend to say "A small number of large sites, with the sites located centrally, and a reserve site located towards the major centres of population."

Statement 13 - amend to say "Land at Rookery Pit South (WSD34) for locally arising waste only".

Question seven (Identified Strategic Sites)

Name	Organisation	A/ D/ N	Representation
Ms D Sacks		A	The inclusion of these sites is justified in the Technical Papers, but it would also be useful to show the capacity of the proposed sites and assess them in relation to the aspirations for development in the Marston Vale.
Mr John A C Edwards		A	These seem the sites least likely to encounter opposition
Mrs G Stoehr	Guilden Morden Parish Council	A	All the waste processing sites are to the west of the M1 and traffic to /from these sites will have no impact on our parish (Guilden Morden. The Waste Core Strategy Preferred Option appears to be well thought out and should meet the needs of Central Beds based on best available data and various assumptions. Guilden Morden Parish Council support the preferred option and applaud a well thought through strategy.
Mrs Nicky Upton	Harlington Parish Council	A	But, with reservations reference Herne Grange Farm and Faldo Farm.
Mr Graham Jenkins (White Young Green Planning) on behalf of Mr David Reavell	O&H Properties	A	Question 7: We agree with the sites identified as strategic sites, but, in relation to land at Rookery Pit south (WSD34) there is no justification to single the site out as being “for locally arising wastes ONLY”. The Document contains no rationale or explanation for this comment, nor is there any explanation in any of the supporting technical evidence papers. The comment is repeated in paragraph 4.23, but again without explanation as to its rationale. The reference to ‘locally arising wastes ONLY’ should thus be removed, and Rookery Pit South (WSD34) should, in the absence of any justification, enjoy the same unqualified ‘preferred strategic recovery site’ status as Elstow North (WSD01) and Brogborough (WSD13). Indeed, given that the Rookery South site enjoys unique advantages, and is the only identified strategic recovery site which is also able to accommodate landfill, there is every reason to avoid placing arbitrary restrictions on its potential waste management function or catchment area.
Mr Ian Pickering	Chairman Aspley Guise Parish Council	A	

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Name	Organisation	A/ D/ N	Representation
Mr William Shearer	Bedford Estates C/o Bidwells	D	On behalf of The Trustees of Bedford Estates, we write to make an objection to the proposals to identify Rookery Pit South as the location for a substantial Resource Recovery Facility under the Minerals and Waste Local Development Framework. The Trustees are aware of plans for the development of the site by Covanta Energy and their proposal to submit an application for a Development Consent Order from the new Infrastructure Planning Commission later this summer. The trustees question the need for this third facility site within the area and wish to object to this proposed allocation on the grounds that the need for this capacity is not proved, and the question of the health impact on nearby residents makes it an inappropriate site for development.
Mr Antony Mould	Natural England	D	<p>In relation to Elstow North, Natural England has no further comments.</p> <p>In relation to Brogborough Landfill, this site is within 600m of Marston Thrift SSSI and is bordered by a CWS to the North and South (as identified within the Sustainability Appraisal). While it is unlikely that development at this site would have a significant effect on the SSSI, Natural England's views on any recovery site proposals would depend on details of what the development was, an assessment of its potential effects on nearby sites, and the adequacy of any mitigation proposed as necessary. It should be recognised that development at this site would only be permitted if it could be demonstrated that there will be no significant effects on Marston Thrift SSSI. In relation to Rookery Pit South, see Q3.</p> <p>In relation to Thorn Turn, the site is within 400m of Houghton Regis Marl Lakes SSSI (as identified within the Sustainability Appraisal). There is potential for impacts (hydrology, air pollution/deposition) to the SSSI, and Natural England's views on a recovery site at this location would depend on details of what the development was, an assessment of its potential effects on the SSSI, and the adequacy of any mitigation proposed as necessary. It should be recognised that development at this site would only be permitted if it could be demonstrated that there will be no significant effects on the special interest features of Houghton Regis Marl Lakes SSSI.</p>
Mr Hugh Roberts	Marston Moretaine Action Group	D	MMAG does not agree as the list is designed to ensure only Rookery Pit will emerge as the most suitable. The BEaR Project tendering process should be allowed to run its course and see what alternative proposals will be offered by the market - the Core Waste Strategy effectively rigs the market in favour of the Covanta proposal. It suggests to providers of a large facility that there is a large site readily available for use - Rookery Pit South !

Name	Organisation	A/ D/ N	Representation
Mr David Binns	Ramblers Association	D	<p>I refer to your letter of the 3rd of June 2010 and thank you for consulting our association on this matter. Through our member Roger Chick we have previously responded to your Minerals and Waste Framework Consultation and you have our observations on the detrimental affect that various sites are likely to have on the use of public rights of way, located both on and adjacent to the sites.</p> <p>The smell and unsightliness of the Marston Vale brickworks is well remembered and members are very uneasy about the Covanta 'Energy from Waste' project at Rookery Pit South and fear that it will reduce the enjoyment of walking in the surrounding countryside. We trust that due weight will be given to the affect of these installations on public enjoyment of the countryside and rights of way in the final choice of sites, particularly in the final selection of the reserve sites WSD01 Thorn Turn, WSD33 Chelveston, and WSD29 Wigney Wood. For the reasons stated the Ramblers' Association is against the use of these sites. Yours sincerely, David Binns.</p>
Mr Jeremy Randall	DP9 (Barnwoods Ltd)	D	<p>Barnwood Limited however, specially wishes to comment on the Consultation Document in respect of question 7.</p> <p>Paragraph 4.24 states that 'land at Thorn Turn WSD2, is identified as a Reserve Site. This site is presently with the designated Green Belt. However the Luton and South Bedfordshire Joint Committee Core Strategy Preferred Options document published in 2009 indentified an urban extension to the north of Dunstable and Houghton Regis, and which includes the land at Thorn Turn '.... The land at Thorn Turn would then be able to provide a location for facilities to carry out either the transfer and/or recovery of wastes from the Luton and Dunstable area.' Barnswood Limited also notes the Evidence Base findings (chapter 7), which addresses the land at Thorn Turn. In relation to question 7, Barnswood Limited recognises that a reserve strategic recovery site at Thorn Turn would be in close proximity to Dunstable and Houghton Regis and the future growth area would help to reduce waste management issues associated with transport; however they do not agree that Thorn Turn is the most suitable location for a strategic recovery site, when considering the alternative strategic recovery sites. Should the land to the north of Dunstable and Houghton Regis be released from the Green Belt as part of the adoption of the Luton and South Bedfordshire Core Strategy, and be allocated as a Strategic Urban Extension then large parts of the land around Thorn Turn is likely to be suitable for a mix of commercial and residential uses. Areas close to the existing Dunstable and Houghton Regis conurbation are more likely to be suitable for residential-led mixed uses. With this</p>

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			<p>in mind, an allocation for a strategic recovery site at Thorn Turn, potentially in close proximity to sensitive uses is not considered particularly appropriate or compatible. It is considered that a strategic recovery site should be sustainably located, but away from potentially sensitive receptors, such as residents and residential dwellings. In addition, it is to be noted that a strategic recovery site at Thorn Turn would be located approximately 400 metres from a County Wildlife Site, which also encompasses a Site of Special Scientific Interest. Any strategic recovery centre at Thorn Turn would need to have regard to these environmental designations and ensure mitigation is put in place.</p>
Mr and Mrs D Franklin		D	<p>We object strongly to these proposals for the following reasons:</p> <p>The use of this site will only add traffic congestion as above (the traffic congestion will increase to such an extent, that the existing road network will not be able to cope).</p> <p>If these sites are used our main concern is the draining of the lakes. Will all the water be pumped out before rubbish is tipped in? If not the surplus water will be polluted and pumped into Harrowden Brook. This is assuming surplus water will take this path anyway.</p> <p>As for controlled waste, this is only as good as the supervision, and as human beings are involved, and money being the criteria, what can I say.</p> <p>We are aware that the existing tip was never capped properly e.g. it should have been capped with clay and covered with earth. No clay was used, a consequence of which the chemical reaction can leach into the surrounding area.</p> <p>What of the future??</p>
Mrs A Lowe	Wilshamstead Parish Council	D	<p>Elstow North seems to have been selected for a special electrical/electronic treatment site, a composting site and an unspecified treatment plant. The PC needs more information on these facilities in order to comment in detail. However the PC objects that it does appear that Elstow (North & South) would take a disproportionate amount of waste compared to other areas of the County and will become the waste capital of Bedfordshire.</p>

Name	Organisation	A/ D/ N	Representation
Mrs A Lowe	Wilshamstead Parish Council	D	<p>Disagree as these should be spread around the County. This wouldn't preclude these identified sites being included in the recovery of materials/recycling as Elstow North is currently used for.</p> <p>Note 1. The PC is sure that Elstow South as well as Rookery South has great crested newts as these are numerous in the surrounding area.</p> <p>Note 2. It is the PCs understanding that Elstow North & South as well as Brogborough and Rookery South lie within the Forest of Marston Vale.</p>
Mr Geoff Gardner	Hives Planning	D	<p>Waste Core Strategy Preferred Options Consultation Document June 2010 ('the Consultation Document')</p> <p>This letter represents an objection to the proposal for a major waste facility proposed in the Consultation Document at the Rookery South Site (WSD 34): Landfilling of Non-Hazardous wastes (Statement 8, 11, 16) Recovery site (Statement 10) Strategic Recovery Site, locally arising wastes only (Statement 13)</p> <p>Hives Planning Ltd (HPL) act on behalf of Hanson Building Products Limited (Hanson), now part of the Heidelberg Cement Group, which owns or controls significant areas of land in the Northern Marston Vale Growth Area (NMV) located in the former District of Mid-Bedfordshire (now Central Bedfordshire) and Bedford Borough. Much of this land has been quarried for brick clay then processed into brick making at the works located at Stewartby. The closure of the brickworks was announced in November 2007, due to the difficulties in meeting the British Air Quality standards when making bricks from the locally sourced Oxford Clay.</p> <p>Hanson is preparing comprehensive development proposals for its land in the NMV, straddling the District and Bedford Borough areas. Within the Borough Hanson submitted a planning application for the development of the former brickworks at Stewartby in 2008 and is now looking at a wider area including land at Kempston Hardwick and Broadmead. Within the District Hanson is promoting land known as the 'Camel' site to the west of Houghton Conquest. Part of the 'Quest' Pit to the south-east of Stewartby (also partly within the Borough) is the location for the NIRAH (National Institute for Research into Aquatic Habitats) proposal.</p>

Name	Organisation	A/ D/ N	Representation
			<p>These developments constitute a comprehensive mixed use development proposal which seeks to provide part of the development required in the Northern Marston Vale Growth Area identified in the Bedford and Central Bedfordshire Core Strategies, having first been proposed in the Government's Sustainable Communities Plan (2003) followed by the Milton Keynes South Midlands Sub Regional Strategy (2005) (MKSM), as reinforced in the East of England Plan or RSS (2008) (EoEP). Policy 5. The Government's planning policy for waste management is contained in Planning Policy Statement 10. This provides the following guidance: "In deciding which sites and areas to identify for waste management facilities, waste planning authorities should:</p> <p>(i) assess their suitability for development against each of the following criteria: the extent to which they support the policies in this PPS; the physical and environmental constraints on development, including existing and proposed neighbouring land uses; the cumulative effect of previous waste disposal facilities on the well-being of the local community, including any significant adverse impacts on environmental quality, social cohesion and inclusion or economic potential; the capacity of existing and potential transport infrastructure to support the sustainable movement of waste, and products arising from resource recovery, seeking when practicable and beneficial to use modes other than road transport . give priority to the re-use of previously-developed land, and redundant agricultural and forestry buildings and their curtilages." (para 21, emphasis added)</p> <p><i>The Consultation Document proposes to provide waste facilities for "wastes arising from within the Plan area, and the agreed apportionment of London" (Objectives, Statement 6). This objective is supported . Covanta/ Rookery South 7. The Covanta proposal (para 2.51) is a proposal for a large facility, including energy from waste, which would take wastes from Bedfordshire, Buckinghamshire and elsewhere. This would not be in conformity with the Statement 6 Objective. The proposal would also have an adverse impact on the development of the Stewartby site, which seeks to fulfil part of the needs of the Growth Area. We have already lodged objections to the proposal. Northern Marston Vale Growth Area 8. There is an obvious potential conflict with the siting of a waste management facility to serve the needs of Bedfordshire, and the Growth Area needs for housing and other development. Whilst the waste arisings implications for growth are mentioned in the Consultation Document (paras 2.26 - 2.30), the potential conflict between a waste management site and other development is not mentioned and should be.</i></p>

Name	Organisation	A/ D/ N	Representation
			<p>We propose the following additional text is required in the 'Growth Area' section of the Waste Core Strategy: There is an obvious potential conflict with the siting of a waste management facility to serve the needs of Bedfordshire, and the Growth Area needs for housing and other development. The siting of any waste management facility must not adversely affect potential development sites in the Growth Area.</p> <p>We also propose that the following text replaces that in Statement 4 bullet point 3 Conflicts between emerging areas for new housing and employment, including the needs of the Northern Marston Vale Growth Area , and sites for waste management facilities. Access to Rookery South</p> <p>A "strategic" waste facility at Rookery South of whatever nature will generate significant numbers of vehicular movements. The site gains sole access from Green Lane, which a narrow unclassified lane, and vehicles going northwards to the A421 would have to pass through the railway level crossing. Southwards, Green Lane leads to Stewartby Way which comprises a quiet two lane road through the centre of Stewartby village and includes a bridge with restricted headroom beneath the London to Bedford railway line. Such access would be wholly inadequate and requires significant improvement by the developers of the waste facility and this should be noted in the Waste Core Strategy.</p> <p>We propose the following wording for paragraph 4.57 Rookery Pit South: Vehicular access to this site would need to be taken from the A421 via Green Lane. Green Lane and its junctions will require significant improvement and the current railway level crossing must be replaced by a bridge. The developer of the waste facility will be required to fund the design and implementation of the road improvements and railway bridge, including obtaining the agreement of Network Rail. Vehicles would not be permitted to access the site from the south through Stewartby Village. The site contains a substantial population of Great Crested Newts which would need to be relocated adequately prior to development of the site. Summary</p> <p>We support the objective of restricting waste management facilities to deal with arisings from Bedfordshire only (Statement 6).</p> <p>The potential conflict between the siting of waste management facilities and the development needs of (particularly) the Northern Marston Vale Growth Area should be noted (Statement 4 bullet point 3).</p>

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Name	Organisation	A/ D/ N	Representation
			Should a waste facility be developed at Rookery South then Green Lane and its junctions will require significant improvement, and the level crossing must be replaced by a bridge. These improvements must be funded by the waste facility developer and this should be noted in the Waste Core Strategy (paragraph 4.57). Yours sincerely HIVES PLANNING Geoff Gardner Director
Mrs A Lowe	Wilshamstead Parish Council	D	Elstow North seems to have been selected for a special electrical/electronic treatment site, a composting site and an unspecified treatment plant. The PC needs more information on these facilities in order to comment in detail. However the PC objects that it does appear that Elstow (North & South) would take a disproportionate amount of waste compared to other areas of the County and will become the waste capital of Bedfordshire.
Mrs A Lowe	Wilshamstead Parish Council	D	Disagree as these should be spread around the County. This wouldn't preclude these identified sites being included in the recovery of materials/recycling as Elstow North is currently used for. Note 1. The PC is sure that Elstow South as well as Rookery South has great crested newts as these are numerous in the surrounding area. Note 2. It is the PCs understanding that Elstow North & South as well as Brogborough and Rookery South lie within the Forest of Marston Vale.
Mr James Paynter	John Drake & Co	D	The site at Thorn Turn appears to have been selected as a Reserve Strategic Recovery Site on the basis that it is well located, with existing infrastructure nearby and with a future road scheme to be constructed. Since however this consultation document was prepared the following has been confirmed:- 1. The Local Inquiry for the A5/M1 Link (Dunstable Northern By Pass) has been postponed by the Government Office for the East of England as confirmed in a letter dated 10 June 2010. 2. The abolition of Regional Strategies and the return of decision making powers on housing and planning to local councils. The reaction to point 2 generally by LPA's in relation to their emerging LDF's has been either to halt or slow down preparation of the Core Strategies and other DPD. Consequently the weight of these two drivers as per paragraph 4.18 and 4.24 of the Waste Core Strategy Preferred Options Consultation Document have been significantly reduced and therefore we do not consider this a suitable site if this altered situation remains. Any alteration of the green belt boundary is also brought into doubt which in isolation is a significant enough reason for not supporting this site if it remains within that area.
Mr Graham Gunby	Suffolk County Council	D	Because it is not clear why there is a restriction at Rookery Pit South for locally arising wastes only.

Name	Organisation	A/ D/ N	Representation
Mr Al Morrow Phillips Planning Services	Chelveston Renewable Energy Ltd	D	<p>The strategy proposed is in direct conflict with the objective referred to above in that it centralises waste treatment into one area which although close to Bedford is quite distant from areas to the north, west and south of the county. This approach does not co-ordinate properly with other policy documents which seek to run-down the extent of waste processing taking place within the Marston Vale. The Vale has suffered extensively over the previous decades from clay extraction and landfill operations. Despite this it now forms a key part of the Milton Keynes and South Midlands Sub Regional Strategy Growth Area and is entering something of a renaissance with the running down of the larger landfill operations and a good start being made on the large numbers of new housing proposed for it. It is not the right place to locate all of the strategic waste treatment sites for Bedfordshire. This strategy will simply continue the legacy of poor environmental quality within the Martson Vale. It also runs counter to the general thrust of the Adopted East of England Plan May 2008 and the Milton Keynes and South Midlands Sub Regional Strategy which is that the environment of the Vale should be enhanced not degraded. The strategy proposed continues the perception that the Marston Vale is the dumping ground of the County. The more sustainable option would be to allocate a large number of smaller sites equally across the Plan area. This would provide a more sustainable pattern of waste recovery sites located closer to the sources of waste and avoid concentrating waste treatment all in one part of the County.</p>
Mrs Katherine Banham	Conservation Officer (Bedfordshire) The Wildlife Trust BCNP	N	<p>Our response to Statements 8, 11 and 16 explain our reasons for objecting to the identification of Rookery South as a site for landfill. This also covers its inclusion as a Preferred Strategic Recovery site which would harm the results of the mitigation provided under the Restoration Scheme which is about to be agreed.</p> <p>It is also important to note that there are designated sites which could be negatively affected by the inclusion of Brogborough Landfill and Thorn Turn as Strategic Recovery Sites. The identified site at Brogborough Landfill is close to Marston Thrift Site of Special Scientific Interest (SSSI), Brogborough Lake County Wildlife Site (CWS) and Holcot Wood CWS. The type of waste activity which occurs at Brogborough Landfill will determine if these designated sites will become degraded by it. We advise that the presence of these sites is noted within the document and a commitment to only allowing suitable activities which will not harm them should be made. This would be in accordance with local (Saved Minerals and Waste Local Plan) and national (PPS9) planning policy. The Reserve Strategic Recovery Site at Thorn Turn is located less than 300m from the Houghton Regis Marl Lakes SSSI/Houghton Regis Chalk Pit CWS complex. Marl lakes are one of the rarest forms of standing water in Britain and as only a few</p>

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			<p>sites exist in southern England it is vital that their future is secured. The lakes are particularly susceptible to water quality issues and any waste activities at Thorn Turn would need to demonstrate that there would be no adverse affect on this nationally important site.We recommend that recognition of this is included in the Waste Core Strategy.</p> <p>The reasons of the identification of these sites are discussed, along with any concerns associated with them, in sections 4.17 to 4.24 of the Waste Core Strategy. Apart from a brief mention of the Great Crested Newts at Rookery South the issues discussed above are not mentioned. In order to give appropriate weight (PPS9) to the impact that these plans could have on biodiversity it is suggested that they are included in these paragraphs. The problems which are associated with including Rookery South as a Strategic Site are much more extensive than just the issues regarding Great Crested Newts that is mentioned and this should be recognised. For further details please see our response to Statements 8, 11 or 16.</p>
Mr & Mrs R Worthington-Ellis		N	<p>After the meeting on the proposed waste disposal plan - we feel that there are many problems for us the residents in the area, after many years living with the North Tip we were told that it would be capped and closed many years since, and the Transfer Station was to be temporary, that is still there and in use, the final cap was never put in place as the money ran out after the capping of the Sundon Tip, Capping the North Tip will involve an enormous amount of traffic (heavy lorries) also an ever greater amount of money, this would surely be a necessity if the lake was to be drained? Would the north Tip be stable enough to stand the lack of pressure when all the water was drained and would the leachate poison the surrounds if there was a collapse? With all the cost of this enormous undertaking we feel that the Council would inevitably be tempted to try and re-coup some of this money by selling space for landfill rubbish from other authorities, e.g. London?</p>
Mr Rio D'Souza	Highway Agency	N	<p>Land at Elstow North (WSD01):</p> <p>This site is a former non-hazardous waste landfill site located south of Bedford which would have direct access off the A6. Access to the A6 will not be an issue for the Highways Agency however consideration would need to be given to the impact that this development could have on the A421 / A6 junction Trunk Road junction. Local knowledge suggests that this could be a problem junction if there is a substantial increase in traffic using this junction. Further work would therefore have to be undertaken to determine</p>

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			<p>whether this would be the case and a Transport Assessment with potential mitigation proposals would need to be submitted to the Highways Agency as part of any Planning Application. The proximity of the railway line to this site highlights the potential for use of the railway for transporting waste. The Highways Agency would support this as it would reduce the traffic impact. Overall this site is located in an accessible area and close to existing population centres which would limit the distance that waste would need to travel. However, the Highways Agency is aware of several proposals in the area which could significantly increase traffic on the road network and a waste site may exacerbate the effects of these proposals.</p> <p>Land at former Brogborough Landfill (WSD13)</p> <p>This site is located between the former landfill site and access onto the A421. It is likely that the site will ultimately access the existing A421 which is to be de-trunked when the new A421 opens to traffic. This would then cease to be a Highways Agency issue. However, it is likely that any waste generated by residents in Luton Borough will be brought to the site via the M1, namely M1 junction 13 which is part of the Highways Agency Strategic Road Network. Therefore, the impact of the potential site would have to be considered. Local knowledge indicates that some queues form on the A421 approach and the M1 northbound exit to the western roundabout. However as part of the A421 improvement scheme, this junction will be upgraded and these issues are likely to be irrelevant. The M1 is also being widened between junctions 10 and 13 which is likely to have an effect on the operation of this junction. Provision of an upgraded motorway junction as part of the A421 works means that it is likely that the site could be developed with minimal impact on the Strategic Road Network.</p> <p>Land at Rookery Pit South (WSD34) - locally arising wastes only.</p> <p>The Highways Agency is aware that detailed proposals are being brought forward regarding an EfW development at the site and has been consulted regarding the impact of these proposals at the new A421 Marston Moretaine and A421 Marsh Leys junctions. Any development at this site will access the existing A421 (which will be de-trunked) via Green Lane. Ultimately though it is likely that the traffic will travel to the site via the new A421 unless it originates in Bedford itself in which case the local road network may be used. Consideration where possible should be given to the transport of waste by rail given the proximity of the railway line to the site. The Highways Agency is however aware that this has not been deemed feasible. As this waste site would be for locally arising wastes only, much of the waste may be transported</p>

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			<p>to the site using the local road network which would not be a concern for the Highways Agency. Additionally, the new A421 is likely to have been developed with spare capacity and therefore the potential waste site should not result in traffic problems on the Trunk Road network.</p> <p>Land at Thorn Turn (WSD02):</p> <p>The site at Thorn Turn is located on the northern side of the A5 / A505 junction to the northwest of Dunstable and is identified as a reserve strategic site. Traffic generated by this site would impact on the A5 Trunk Road. However, the Plan implies that this site, if developed, would serve the Luton, Dunstable and Houghton Regis areas which are close by. This would have the impact of limiting traffic travelling long distances and the overall impact on the roadnetwork. Nevertheless, the A5 Trunk Road would see an increase in traffic and the capacity of any key junctions would need to be taken into consideration. A thorough assessment would need to be undertaken to determine the potential impact of a reserve waste site located here and whether mitigation may be needed at key junctions to accommodate the traffic generated. Based on knowledge of the A5 / A505, this roundabout generally operates within capacity during the peak period. It is however sensitive to any incidents that occur on the M1 with traffic diverting to the A5 should the M1 be affected. Each lane on each arm of the roundabout serves a different movement and this may impact on the capacity of the junction. Thorn Road itself is used a rat run for those travelling Houghton Regis, the Woodside Industrial Estate and Luton and this reduces congestion at the A5 / A505 roundabout during peak times. However, it may as a result increase congestion at the A5 / Thorn Road junction. This issue will need to be addressed in any Transport Assessment produced for the site and if necessary, mitigation will need to be brought forwards. "Question 7 Do you agree or disagree with the sites we have identified as Strategic sites? Please state your reasons."</p> <p>The Highways Agency agrees in principle with the sites identified as strategic sites. All four sites are in accessible locations but have the potential to impact on the Strategic Road Network. No information has been provided at this stage as to the size of these waste facilities and whether some will be bigger than others. The sites are largely located close to the population centres in the Plan area, although it is noted that no facility is being envisaged for the eastern side of the Plan area. As noted before, further information will need to be provided as part of detailed assessments for any of the sites before the Highways Agency will be able to accept that the sites will have a negligible impact.</p>

Name	Organisation	A/ D/ N	Representation
James Paynter	John Drake & Co	D	<p>1. The Local Inquiry for the A5/M1 Link (Dunstable Northern By Pass) has been postponed by the Government Office for the East of England as confirmed in a letter dated 10 June 2010.</p> <p>2. The abolition of Regional Strategies and the return of decision making powers on housing and planning to local councils. The reaction to point 2 generally by LPA's in relation to their emerging LDF's has been either to halt or slow down preparation of the Core Strategies and other DPD. Consequently the weight of these two drivers as per paragraph 4.18 and 4.24 of the Waste Core Strategy Preferred Options Consultation Document have been significantly reduced and therefore we do not consider this a suitable site if this altered situation remains. Any alteration of the green belt boundary is also brought into doubt which in isolation is a significant enough reason for not supporting this site if it remains within that area.</p> <p>In the event of points 1 and 2 above proceeding then we still do not consider this site as suitable due to the clear conflict of potential uses between a residential area and a waste management facility.</p>
Mr Alan Bulpin	Planning & Estates Manager Waste Recycling Group	N	<p>Statement 13 - Question 7</p> <p>WRG supports the inclusion of the site at the former Brogborough landfill but for the avoidance of doubt would object to the exclusion of an Energy from Waste incinerator from the list of "Type of Facility Proposed" as identified in Chapter 8 WSD13 of the Evidence Base. WRG supports the inclusion of Rookery Pit South for locally arising waste only WRG is ambivalent about the inclusion of Elstow North as a Preferred Strategic Recovery Site but objects to the exclusion of Elstow South. Elstow South has greater potential than Elstow North as it has excellent road access and a larger area of undisturbed ground</p>
Mrs Sharon Threlfall	County Development Unit Hertfordshire County Council	N	<p>The Waste Core Strategy Preferred Options Consultation document, identifies ten potential strategic sites, three of which are preferred and one a reserve. None of these sites are located near to the Hertfordshire County boundary and as such do not warrant further comment. Should any of these sites be reconsidered as suitable, and a review is carried out into the suitability of other sites listed in the Issues and Options Waste Allocations document, the County Council would therefore wish to be kept informed on any progress relating to Etonbury Farm (WSD25) and the Old British Goods Yard, East Hyde (WSD19), as these sites are deemed closest to the Hertfordshire County boundary. The Transportation Planning and Policy unit have confirmed that they do not have any separate comment to make.</p>

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Ms Lizzie Barnicoat	Bedford Borough Access Forum	N	<p>Of the potential recovery sites listed within the document it is noted that those which potentially would have the greatest impact on the countryside and rights of way are: Thorn Turn WSD 01 and Chelveston Airfield WSD 33.</p> <p>Thorn Turn WSD 02 has one public bridleway (BW49) which crosses this site and two public footpaths (FP56 and FP57) are adjacent to it. The bridleway provides a valuable off-road link for horse riders and therefore must not be lost.</p> <p>The Chelveston Airfield WSD 33 site contains quite a number of footpaths and bridleways linking Bedfordshire and Northamptonshire.</p> <p>Again in the document no reference is included regarding access for either of these sites.</p>
Mrs Clare Evans	Houghton Regis Town Council	N	<p>Waste Core Strategy Preferred Options Consultation Document:</p> <p>In relation to the above consultation the Town Council would like to make the following comments: Due to the technical and specialised nature of the Waste Core Strategy the Town Council feel unable to comment on Strategic aspects of the Strategy, however specially in relation to the Proposed Reserve Strategic Site at Thorn Turn the following comments are made:</p> <ol style="list-style-type: none"> 1) Currently the site is considered to be unsuitable as a Reserve Strategic Recovery Site due to its location within the Greenbelt and the restricted access to the strategic highway network (at present only the A5). 2) The suitability of this site relies on the Greenbelt being rolled back and on the Dunstable Northern Bypass being constructed. These are major issues and there is no certainty over them actually taking place. The plan should acknowledge this uncertainty. 3) Should the Greenbelt be rolled back to exclude this site the plan should ensure that any subsequent application for development provides for suitable measures to reduce its visual impact on the local environment.

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			<p>4) Should the Dunstable Northern Bypass be constructed it is felt that the highway network would be sufficient for this type of development. However should it not be constructed it is felt that this site would not be suitable. The A5 only provides north/south access to the M1 and in a southerly direction this means that travel through Dunstable. Without the Dunstable Northern Bypass there is no suitable east west access to the M1, access would be through Houghton Regis, Dunstable or Toddington.</p> <p>5) The Strategy should be more realistic and acknowledge the possibility that the Greenbelt may not be rolled back and the Dunstable Northern Bypass may not be constructed and as such should identify the Thorn Turn as a potential site only if these 2 events materialise.</p> <p>6) Concern is expressed that the Strategy makes no reference to the BEaR Project, it is felt that the two are intrinsically linked. The Strategy should incorporate the BEaR project. In relation to the BEaR project the Town Councilis advised that the Thorn Turn is a possible site for an energy processing plant. While it is appreciated that the evaluation process for the various technologies has some way to go, the Town Council would wish to point out at this stage that it is strongly opposed in principle to an incinerator.</p>
Mr Keith Owen	SLR Consulting Ltd (on behalf of Biogen Power Ltd)	N	<p>Although Biogen considers that the threshold of what constitutes a Strategic site has been set far too low (at 75,000 tpa throughput instead of 150,000 tpa- see response to Question 5 above) if it is intended to maintain the threshold at 75,000 tpa then Biogen considers that the Twinwoods site (site WSD54) has the attributes to be allocated as a Strategic site.</p> <p>The site is a brownfield location that previously used to house the central boiler house for the former MoD facility. The adjacent land is being developed as an industrial park and is allocated as employment land. This provides the ideal opportunity to develop a Combined Heat and Power (CHP) scheme, with the adjacent operations utilising the heat generated by the facility. The site is a consented B1,B2 and B8 business park albeit that this only consents the B1,B2,B8 floor area available at the time of the consent - any additions to the consented floor area must be the subject of further applications in order to control landscape and traffic impacts.</p> <p>The CHP potential is demonstrable at Twinwoods with the infrastructure, in the form of pipes and trenches, already in place. Importantly there is landowner support for the CHP network, and a heat user in the data centre and the Twinwoods estate.</p>

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			<p>A planning application has been submitted for the proposed gasification plant, accompanied by an Environmental Statement, which, although the application was refused, demonstrated the environmental suitability of the facility in the suggested location. The environmental impact assessment (EIA) process identified no significant or overriding environmental Biogen Power Waste Core Strategy Preferred Options Consultation Response 100712 Waste Core Strategy reps Final.doc 10 impacts and none of the reasons for refusal relate to environmental impacts of the development.</p> <p>Technical Evidence Paper 4 sets out the planning and sustainability criteria that were used to rank the shortlist of strategic sites. It would appear that no attempt was made to provide any form of weighting of the various criteria used and as a result the end result is considered unbalanced. However, paragraph 4.21 of the WCSPO document indicates that the key issue behind the selection of Brogborough and Rookery Pit as Strategic sites "is that they are located centrally within the Plan area, and consequently would be able to receive wastes from nearly all of the Plan area".</p> <p>Given the scale of the need for additional recovery and treatment facilities (see responses to Questions 4 & 5), the centralisation of the preferred Strategic sites along the A 421 corridor is considered unwise in terms of traffic generation and also less sustainable than a more dispersed approach which the Twinwoods site would provide.</p> <p>National Guidance, in the form of PPS 10 does not appear to have been given sufficient weight. As an example, PPS 10 states that priority should be given to the reuse of previously developed land. Whilst one of the planning criteria seeks to locate sites on areas of despoiled, contaminated or derelict land, there is no preference afforded over minerals, or waste sites, or existing or allocated industrial land. In this context it needs to be borne in mind that minerals and waste sites are not brownfield or previously developed land. It is considered that a separate criterion should be introduced for this important consideration. It is notable that none of the preferred sites are actually brownfield land. Although some have been disturbed by mineral extraction or waste disposal operations these are temporary uses of the land and that these site will be restored on completion of operations. Indeed one of the Strategic sites is greenfield land that is currently in active agricultural use and allocated as greenbelt. The selection of the Strategic sites therefore does not appear to have given priority to the re-use of previously developed land as required by national guidance which is still a material consideration in the preparation of Development Documents.</p>

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			<p>Similarly, there is no assessment in the scoring system as to the potential benefits of having a potential user(s) for the Combined Heat and Power(CHP) that could be generated from an energy recovery facility. The existence of a user for the heat, such as exists at Twinwoods, significantly improves the efficiency of the process, and this factor should be reflected in the scoring system. Twinwoods is owned by a single landowner who supports the scheme - land assembly in terms of easements etc will be one of the most difficult barriers to the development of extensive CHP networks - this barrier is removed at Twinwoods. Whilst sustainability criteria 16 refers to co-location with other industries, it is not clear whether this included a specific consideration of the benefits of CHP.</p> <p>The preferred strategic sites are all clustered in a small area to the south of Bedford and there are considered to be environmental advantages in providing a better spread of strategic facilities across the plan area.</p> <p>Looking in detail at the scoring for each of the sites contained in Technical Evidence Paper 4 there appear to be a number of areas where the scoring allocated to the Twinwoods site is not consistent with the site conditions and the findings of the recent EIA process, which has been the subject of extensive consultation and verification. Based on the findings set out in the environmental statement and other factors we would make the following observations:</p> <p>Planning Criteria</p> <p>2. <i>Is the intended proposal proximate to the sources of waste to be managed?</i> The site is located well within the Plan area, and is particularly well placed to receive waste from Bedford and the whole of the Bedford Borough. The proposed development would be limited at a capacity of 120,000 tpa and therefore there is no intention to develop a strategic facility. It is therefore considered to be proximate and a score of '7' is considered more appropriate.</p> <p>3. <i>Would the use of the site involve the importation of wastes from outside the plan region?</i> The planning application indicated that 85% of the waste would come from within the Plan area, with only 15% imported. Given these figures a score of '3' appears inconsistent and a score of '7' more appropriate. We disagree with the inclusion of this question - the sustainable movement of waste is what is important not whether it crosses an administrative boundary.</p>

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			<p><i>5. Would the site be able to include a range of waste facilities together on the site?</i> Whilst the proposed site itself would only be able to accommodate the proposed gasification plant, there would be potential to incorporate other related waste uses on the adjacent allocated industrial land. The potential for adjacent operations to utilise the heat and electricity generated by the development should also be recognised. A score of '7' is again considered more appropriate.</p> <p>Sustainability Criteria</p> <p><i>1. Would development of the site for a waste use affect/enhance the qualities of designated areas for biodiversity?</i> The proposed allocation contains no biodiversity related designations, and the nearest designated areas are located several hundred metres from the site. The EIA considered the impact of the development (operation and construction) both quantitatively and qualitatively, on designated sites within 2km of the proposed development. The impacts were assessed as not significant, a conclusion that Natural England accepted. The site is a brownfield site that has been shown to contain little of ecological interest. By contrast other proposed Strategic Sites contain extensive areas of wetland, substantial populations of greater crested newts (eg Rookery Pit which is a County Wildlife Site), and agricultural fields (eg Thorn Turn which is also in the Green belt and within 400m of a SSI). Accordingly, a score of '10' is considered appropriate.</p> <p><i>2. Would development of the site for waste use affect/enhance wider biodiversity.</i> The impacts of the site on biodiversity would be broadly positive, and therefore the selected score of '5' may be considered inappropriate. It is also noted that the proposed Strategic Sites contain extensive areas of wetland, substantial populations of greater crested newts, and agricultural fields and yet have a similar or identical score. Photographs of two of the proposed strategic sites are included at the end of these representations.</p> <p>A landscaping master plan has been developed and approved for the whole Twinwoods site, which provides green corridors across the site and would enhance wider biodiversity. In addition biodiversity improvements were incorporated into the scheme in the form of additional planting and water features. In light of the above a score of '8' is considered more appropriate.</p>

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			<p>3. <i>Would development of the site affect the qualities of designated areas or areas valued for their archaeology or historic character?</i> There are no designated archaeological sites in the immediate vicinity of the proposed allocation, and the site comprises brownfield land that has been heavily disturbed. There were no archaeological or cultural heritage objections to the planning objection, although there was a requirement to record the existing derelict structures on site, and to carry out trial trenching. A score of at least '7' is therefore considered appropriate.</p> <p>4. <i>Would development of the site for waste use affect the qualities of designated or sensitive areas (by themselves or in combination with other sites /processes)?</i> There are no designated or sensitive sites in the immediate vicinity of the site and therefore the score of '5' is considered inappropriate. A score of '10' is considered suitable.</p> <p>6. <i>Would the development of the site for waste use cause an effect (positive or negative) in itself or have a cumulative effect on quality of life, human health or social inclusion?</i> The site is remote from residential property and located centrally within an industrial estate on a brownfield site. Accordingly a score of at least 7 is considered appropriate.</p> <p>7. <i>Would development of the site for waste use impact upon the groundwater or surface water networks, especially those that are sensitive to pollution?</i> The site is underlain by a non-aquifer, and is already partly hard surfaced producing existing levels of run-off. The impact on hydrogeology from the proposed gasification plant was assessed in the EIA as 'not significant'. Accordingly a score of at least 8 is considered appropriate.</p> <p>8. <i>Would development of the site for a waste use be vulnerable to flooding because of its location?</i> The proposed allocation is located in Flood Zone 1 and as such is not identified as being at risk of river flooding for events up to the 1in1,000 year event. The site is therefore at a low risk of flooding and a score of at least 8 is considered appropriate.</p> <p>9. <i>Would the development of the site for waste use be well located in terms of proximity to local communities and reduce mileage travelled by waste?</i> The site is located in the north of the plan area, but is close to Bedford, and is centrally located within Bedford Borough. Therefore as one of several facilities the site</p>

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			<p>is well located, but it would not be well located if only a single facility were proposed for the Plan area. Given the capacity of the proposed facility is only 120,000tpa it is clear that several facilities will be required. Therefore a score of '6' is considered more appropriate than '3'.</p> <p><i>11. Would the development of the site cause impacts on unsuitable local roads.</i> The site is located on a large industrial area, which benefits from a good standard access to the A6. There is a 7.5 tonne weight limit preventing traffic turning left out of the industrial estate. There were no highways objections to the development. The proposed development site is already covered by a planning permission for B1, B2 and B8 uses and as such only a proportion of the traffic generated by the facility could be considered as new. Accordingly a score of at least 8 is considered appropriate.</p> <p><i>12. Would the development of the site for waste use help reduce the amount of waste requiring management and disposal?</i> Biogen Power Waste Core Strategy Preferred Options Consultation Response 100712 Waste Core Strategy reps Final.doc 13 It is notable that theTwinwoods site scores only 5 compared to 10 for some of the selected strategic sites. The reason for this is unclear. The score for the Twinwoods site should be increased to 10.</p> <p><i>15. Would development of the site for a waste management use avoid damage to sensitive/valuable soils or conflict with Minerals Consultation Areas?</i> The site consists of previously developed land, with several standing buildings on site and is the subject of an extant planning permission for B1, B2 and B8 development. There would therefore be no impact on sensitive /valuable soils, or geology, or conflict with Minerals Consultation Areas. It is notable that the Twinwoods site currently has a score of 5 which is the same as the greenfield allocation at Thorn Turn which is currently in arable use. A score of 10 is considered appropriate.</p> <p>Based on the above scores the revised totals for the Twinwoods site would be as follows</p> <p>Planning Criteria Score 61</p> <p>Sustainability Criteria Score 132</p> <p>TOTAL 193</p>

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			Therefore, leaving aside the fact that the brownfield nature of the site is not reflected in the scoring system, and that the criteria are not weighted, the site can be seen to score significantly above all of the other sites once the results of the environmental impact assessment are incorporated into the scoring process. On this basis the Twinwoods site should be allocated as a strategic site if it is intended to maintain the 75,000 tpa threshold to the definition of a Significant site. It is also considered that deliverability should be one of the criteria, including the deliverability of the CHP potential. In addition considerations set out in PPS 22 should be addressed such as the access to a grid connection.
Mrs sue clark	chair planning committee cranfield parish council	N	In addition to the previous comments about spatial distribution, it will depend upon what type of activity will be proposed for each of these sites, and the potential impact upon the surrounding area.
Central Bedfordshire Council Waste Disposal Authority	Central Bedfordshire Council Waste Disposal Authority	N	<p>CBC is satisfied with the inclusion of the three sites identified as Preferred Strategic sites, but would also like to see the inclusion of Thorn Turn as a Preferred Strategic site for the reasons set out below. The response to this question has been split into two parts; site availability and planning considerations.</p> <p>Site availability: The Draft Waste Core Strategy has been produced on behalf of Bedford Borough Council, Central Bedfordshire Council and Luton Borough Council and therefore should ensure that the waste disposal needs for all three authorities are considered within the allocation of Preferred Strategic sites. The BEaR Project, working on behalf of CBC, has undertaken a number of studies looking at the sites available within the authority area which have the potential to locate a residual waste treatment facility to treat locally arising waste.</p> <p>Consequently, the three sites that have been allocated as Preferred Strategic sites have substantial deliverability issues when considering the requirements of Central Bedfordshire Council. These issues are identified below:</p> <ol style="list-style-type: none"> 1. Elstow North - this site is under ownership and full control of Bedford Borough Council and therefore, Central Bedfordshire does not have control over development at this site. A large portion of the site is currently promised under option to NIRAH for a 'Park and Ride' car park. Another portion of the site is currently being utilised for Waste Transfer operations under a long term contract to 2021. The site is a

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			<p>former non hazardous waste landfill site, which is yet to be fully reclaimed; consequently developing this site for a residual waste treatment plant would be financially very costly, due to the requirement to pile/dig out landfilled material.</p> <p>2. Land at the former Brogborough Landfill - Following its identification as a potential site for waste treatment use by the BEaR Project, negotiations with the landowner of the Brogborough site have failed to secure an acceptable option on the site. Negotiations with the land owner have now been concluded, with the option no longer being pursued.</p> <p>3. Rookery Pit South - Following its identification as a potential site for waste treatment use by the BEaR Project, a Title search was conducted as part of Land Option negotiations on this site. The search concluded that Rookery Pit was encumbered with a restrictive covenant precluding any development of the site for waste management, recycling and other waste related activities. Legal advice stated whilst the covenant could be removed, it was likely to incur significant costs to CBC and would potentially require a lengthy process to be undertaken. The covenant raised significant questions around the deliverability and potential cost of the site to the authority and was therefore deemed too high risk to pursue.</p> <p>Thorn Turn has been identified as having significant potential to deliver a residual waste treatment facility and to co-locate much needed waste infrastructure, such as a Household Waste Recycling Centre (HWRC), a Waste Transfer Station, a Highways/Transport depot and an organic waste treatment facility at a single strategic site. Previous investigations undertaken by the legacy authorities of Bedfordshire County Council and South Bedfordshire District Council have concluded there is sufficient space at the site to deliver a suite of waste management and similar facilities.</p> <p>Luton & South Bedfordshire Joint Committee Core Strategy Preferred Options document has identified a large urban extension to the north of Houghton Regis, which includes the Thorn Turn site. The A5-M1 link road is due to be constructed (subject to Public Inquiry) just to the north of the site, therefore it will benefit from high quality road links. This is in line with statement 5 of the spatial vision.</p> <p>Should any of the three Preferred Strategic Sites fail to deliver, there is a risk that there will be insufficient capacity to meet the waste disposal needs of the plan area for the next 15 years. By including Thorn Turn as a fourth Preferred Strategic site this risk is reduced substantially. We would therefore propose that the</p>

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			Thorn Turn site is allocated Preferred Strategic Site status and that the Waste Core Strategy list the four sites i.e. Land at Elstow North, Land at the former Brogborough Landfill, Land at Rookery Pit South and Land at Thorn Turn as Preferred Strategic sites.
Ms Lousie Treacy	ERM (on behalf of Covanta Rookery South Ltd)	N	<p>The preferred Strategic Recovery Sites are identified in statement 13 of the draft WCS as follows:</p> <ul style="list-style-type: none"> (i) Land at Elstow North (WSD01), (ii) Land at former Brogborough Landfill (WSD13), and (iii) Land at Rookery Pit South (WSD34) for locally arising waste ONLY. A reserve site is identified at Thorn Turn (WSD02). <p>Question 7 of the draft WCS asks for feedback in relation to the selected sites.</p> <p>It is submitted that the draft WCS would benefit from the inclusion of additional information regarding the selection of the Preferred Strategic Sites. It is stated in section 4.21 that the key issue in favour of Brogborough Landfill and Rookery Pit South is that they are centrally located in the Plan area and consequently would be able to receive wastes from 'nearly all of the Plan area'. It is submitted that clarification is required within the Strategy as to why these sites would not be capable of dealing with wastes from the entire Plan area rather than nearly all of it.</p> <p>As discussed previously in paragraphs 3.8 - 3.10 of this submission, there is no requirement for waste facilities to be located as close as possible to the source of waste arisings. What is explicitly required by PPS 10 and the Waste Strategy for England 2007, is a sustainable waste management infrastructure, with facilities provided in the right place and at the right time. Thus, it is submitted that we strongly disagree 13 with the restriction applied to Rookery Pit South to accept local wastes only.</p> <p>In discussing the Preferred Strategic Recovery Sites, it is stated in section 4.23 of the Strategy that 'land at Rookery Pit South (WSD34) is identified for consultation purposes as a site intended solely to receive locally arising wastes'. No further explanation is provided within the text of the WCS or the accompanying TEP to demonstrate why this restriction is necessary or how it delivers any greater restriction than that</p>

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			<p>set out in Policy 7/Waste Core Policy 1. There is no definition provided for 'locally arising wastes' within the WCS. At the Bedford Borough Executive meeting of 21 April 2010, locally arising wastes were orally confirmed to mean those arising within the Plan area.</p> <p>Notwithstanding the need for clarity and consistency identified above, Rookery Pit South is agreed to be a suitable site for the development of a strategically important recovery facility. This designation endorses the site assessment work which has been undertaken by Covanta in confirming the suitability of Rookery Pit South to accommodate a RRF. In addition, the transport statement contained in Appendix I of this submission confirms that the co-location of the RRF and landfill facility at Rookery Pit South will have no significant impact on the local highway network.</p>
mrs sue clark	chair planning committee cranfield parish council	N	In addition to the previous comments about spatial distribution, it will depend upon what type of activity will be proposed for each of these sites, and the potential impact upon the surrounding area.
Mr Tom Gilbert-Wooldridge	Territory Planner (East) English Heritage	N	<p>We have concerns regarding the future use of Rookery Pit South and any proposal needs to carefully consider the impact on the surrounding historic environment, demonstrating that the impact can be adequately mitigated. We have been involved in pre-application correspondence with regards to the Covanta Energy proposal as part of the Infrastructure Planning Commission process. The site is located in a significant historic landscape close to a number of designated heritage assets, which are not picked up in full by the Evidence Base document on page 401. This includes Stewartby Conservation Area to the north and the listed chimneys and brick kilns at the former brickworks, as well as the Grade II registered park and garden of Ampthill Park to the south, with the scheduled remains of Ampthill Castle and the Grade II* listed Ampthill Park House. To the south-east is the scheduled and Grade I listed remains of Houghton House, which is in the guardianship of English Heritage and open to the public. The Grade II listed South Pilling Farm is located within 100 metres of the site, with the Grade II listed Millbrook railway station a few hundred metres further west. The use of Rookery Pit South as a strategic recovery site will require careful design and adequate mitigation to avoid harming the surrounding historic environment. The cumulative impact with other proposed uses, namely landfilling and composting, needs to be taken into account. We note that land at Thorn Turn (WSD02) is proposed as a reserve strategic recovery site. We have some concerns regarding the impact of this site on the historic environment (as stated in our</p>

Name	Organisation	A/ D/ N	Representation
			previous letters dated 9 March and 29 November 2007), including the scheduled Thorn Spring Moated Site to the north-east. Our previous comments are not reflected in full by the Evidence Base document.

Question seven- Strategic Sites

Explanatory note:

- The Luton and south Central Bedfordshire Core Strategy was submitted to the Secretary of State on 8th March and is awaiting an Examination in Public. When adopted it will release land presently within the Green Belt.

Summary response:

- The potential for conflict with development in the northern Marston Vale is acknowledged.
- there is a need to integrate waste management into the fabric of sustainable communities. The use of land designated for industrial use for waste management is in accordance with PPS10.
- the scoring of the potential Strategic sites in TEP4 was not based upon the approach employed by agents acting for Biogen and Covanta in their representations, and was not comparable to a site and development specific Environmental Impact Assessment.
- the issue of the proximity of Strategic sites is consistent with European waste legislation, and Planning Policy Statement Ten.
- the reference to locally arising wastes only at Rookery Pit South is because of its significance as the primary potential site for Non-Hazardous waste to be landfilled, and for Recovery operations, and is consistent with Waste Core Policy 1.
- It is inappropriate for the Waste Core Strategy to consider the potential impacts of a waste development at any of the Preferred sites, since they would be matters for the determination of an application.
- land is identified which is suitable for waste management use. The ownership and operator is not an issue which affects whether it should be identified as a Strategic site in the Waste Core strategy.

Recommended changes:

1. Amend the list of Preferred Strategic Recovery sites to include Thorn Turn, with none as 'Reserve'.

Paragraph 4.17 (Elstow North)

Name	Organisation	A/ D/ N	Response
Mr Alan Bulpin	Planning & Estates Manager Waste Recycling Group	A	Paragraph 4.17 – Notwithstanding access to & from Elstow South is via the former A6, it nevertheless provides an excellent HGV route and would not cause local disturbance

Paragraph 4.17

<p>Explanatory note:</p> <p>- this is a factual statement.</p>
<p>Summary response:</p> <p>- this paragraph is believed to be accurate.</p>
<p>Recommended changes: None.</p>

Paragraphs 4.20 and 4.21 respectively (Rookery Pit South)

Name	Organisation	A/ D/ N	Representation
Mr Antony Mould	Natural England	D	<p>This paragraph does not adequately describe the ecological interest of Rookery Pit South. The recent ecological assessment undertaken in support of the LLR of Rookery Pit has identified the following important ecological interest features:</p> <ul style="list-style-type: none"> • Waterbodies and terrestrial habitat which support a large population of great crested newts, with the majority of the population located in Rookery South Pit. (this is recognised in the strategy document, although reference to the Wildlife and Countryside Act should be replaced with The Conservation of Habitats and Species Regulations 2010, which provides stricter protection for this European protected species). • Terrestrial habitat supporting a good population of common lizard and a low population of grass snake in Rookery Pit South, both of which receive partial protection under the Wildlife and Countryside Act. • Habitat mosaics supporting breeding and wintering bird assemblages of county importance • Waterbodies supporting a nationally important assemblage of aquatic plants, with the diversity of species being greatest in Rookery Pit South. • Invertebrate assemblages of at least county (if not regional) importance. In particular, the sparsely-vegetated slopes and seepages associated with the Rookery South Pit are highlighted as being important for beetles and nesting bees and wasps. • A commuting/foraging bat assemblage of district importance • Potential presence of a small population of water voles associated with the waterbodies of Rookery Pit South. Water voles receive full legal protection under the Wildlife and Countryside Act. Para 4.20 identifies that a submission for a modern scheme of conditions has been received, and Natural England accepts that if LLR is implemented, mitigation/compensation for this restoration will already have been undertaken, with the restored site containing fewer ecological constraints for any proposed landfilling scheme. However, it should be recognised that creation of a large attenuation pond, associated off-line ponds and terrestrial habitat are proposed within the restored south pit as part of the LLR mitigation strategy for great crested newts and reptiles. In addition, the important areas of the south-facing northern slope of the south pit are to be left undisturbed. Land-filling is

Name	Organisation	A/ D/ N	Representation
			<p>unlikely to be compatible with either of these elements of the LLR mitigation strategy, and certainly not without provision of like-for like compensatory habitat at a suitable off-site location. Furthermore, landfill after use at the restored south pit could have hydrological implications for waterbodies in the north pit. Enhancement of these waterbodies through long term water level management is again required as essential mitigation for impacts to the south pit resulting from the LLR. Any landfill proposal would have to ensure that the ecologically favourable management of water levels in the north pit were not compromised.</p>
Mrs Sue Clark	chair planning committee cranfield parish council	D	<p>Transport by rail should be considered, rather than the A421. The nuisance caused by the waste lorries traveling through the Vale should not be underestimated. Screening is a simplistic solution to hide unattractive large scale industrial plants, in what is a rural area. it may be useful at ground level, but the Vale is framed by the Greensand and Oxford Clay Ridges, which afford far reaching views across it. Screening would not offer any mitigation from these.</p>
Mr Michael Brooks		D	<p>The suggestion that "any new waste management developments involving structures and buildings [in the Marston Vale] will be increasingly screened and more able to be assimilated into the surrounding landscape" because of the planting of the Marston Vale Forest is an over-simplification. Even when trees and new woodland become mature, the screening only applies when viewed from lower ground levels. Built developments and other waste management operations are still very visible when viewed from higher ground.</p>

Paragraph 4.20 and 4.21

Explanatory note:

- Rookery Pit South is a former clay working, which has developed extensive ecological interest.
- The ecological interest present at the site is partly a result of the active drainage of the site.
- It is acknowledged that the protected species present will need to be relocated to suitable replacement habitat before the site could be developed for a waste use.

Summary response:

- paragraphs 4.20 and 4.21 are too brief in their references to the ecological interest of the Rookery Pit South site.

Recommended changes:

1. Amend paragraph 4.20 to refer to its extent of biological interest, including the protected species (Great Crested Newts) which will be relocated as a requirement of the Old Mineral Permission modern conditions for the site.
2. Amend paragraphs 4.20 and 4.21, so as to refer to the need for detailed appropriate mitigation for the Great Crested Newt population on the site, and its translocation to alternative habitat off site.
3. Amend paragraph 4.20 to refer to the diverse ecological interest present on the site.
4. Amend paragraph 4.21 to read: 'Because of the establishment of the Forest of Marston vale, and the reclamation of the mineral working and landfill sites present there, any new waste management developments involving structures and buildings will be better screened as time passes, and will be less intrusive in the surrounding landscape.'

Paragraph 4.22 (Elstow North)

Name	Organisation	A/ D/ N	Representation
Mrs Sue Clark	chair planning committee cranfield parish council	D	Disagree. The key issue is their availability, rather than their location, which does not support statement 5.

Paragraph 4.22

<p>Explanatory note:</p> <p>- the site was selected as a result of the process set out in Technical Evidence Paper 4.</p>
<p>Summary response:</p> <p>- Paragraph 4.22 does not refer to a Statement , and is factually correct.</p>
<p>Recommended change: None.</p>

Question eight (Waste Core Policy 1: The Provision of Recovery and Disposal Capacity)

Name	Organisation	A/ D/ N	Representation
Mr Adam Ireland	Planning Liaison Officer Environment Agency	A	We would be in agreement with Waste Core Policy 1. However, is the Strategy sufficiently capable of dealing with Construction and Demolition wastes that arise? Also, taking into consideration the Site Waste Management Plan Regulations 2008 and the requirement to halve waste to Landfill from construction activities, there will be an impact on the need for facilities to deal with the re-use and recycling of construction wastes.

Waste Core Strategy Preferred Options Representations and recommended responses

Name	Organisation	A/ D/ N	Representation
Ms D Sacks		A	It is in the interests of residents that the plan area ceases to be the waste disposal location of choice for London and other authorities in the Greater South East, as has been the case historically. This will encourage those areas outside the historic county of Bedfordshire to strive to become more self-sufficient in the management of their waste. While the revocation of the Regional Plan means that in theory the allocation of capacity for waste from London could be discarded, in practice cognisance must be taken of the needs of neighbouring authorities and some (decreasing) provision for waste from London would be an appropriate way to do this.
Ms Lizzie Barnicoat (Elstow PC)	Elstow Parish Council	A	Question 8: The Parish Council agree.
Mr Alan Bulpin	Planning & Estates Manager Waste Recycling Group	A	Policy 7 – Waste Core Policy 1 – Question 8 WRG supports Waste Core Policy 1 relating to the waste arising from the Plan area and an apportionment from London.
Mrs A Lowe	Wilshamstead Parish Council	A	Agree though the London waste should have set target reductions and should be treated prior to shipment to Bedfordshire for landfill. No waste recovery should be needed with the London waste as this should be undertaken in London. Who will decide on the London waste apportionment, the Regional Assembly with its Regional Spatial Strategy is scrapped?
mrs sue clark	chair planning committee cranfield parish council	A	Beds should be responsible for it's own waste arisings, and not import waste from the surrounding region. Importing some waste from London may be necessary, but the emphasis should be on reducing this further with time.
Central Bedfordshire Council	Central Bedfordshire Council	A	Agree - supports the objective to manage our own waste within the plan area. May need further explanation as to what mechanisms will be put in place to prevent waste from outside the plan area (other than London) taking up capacity.

Name	Organisation	A/ D/ N	Representation
Waste Disposal Authority			
Mrs Nicky Upton	Harlington Parish Council	D	Out of County eg London waste should only be shipped by rail. Aylesbury Vale District Council have done this for their Calvert site.
Mr Hugh Roberts	Marston Moretaine Action Group	D	MMAG disagrees that there should be future allowance for processing London waste.
Mr Dave Reavell (White Young Green Planning) on behalf of Mr Graham Jenkins	O & H Properties Ltd	D	Question 8 We disagree with Waste Core Policy 1, and its reference to providing solely for wastes arising within the Plan Area (and an apportionment of waste from London). Such a policy is inflexible, and would deny opportunities to develop facilities which might accommodate local waste arisings, but also a proportion of waste from authorities adjoining the Plan Area. The policy as drafted contrasts with more reasoned and realistic discussions of 'economies of scale' set out elsewhere in the evidence papers (discussed below), and in the Issues and Options Core Strategy (2007) – reference question 21, which we supported. The policy is also inconsistent with Policy WM3 of the East of England Plan, which expressly confirms that allowance can be made for waste facilities dealing primarily with waste from outside the region where there is a clear benefit, such as the provision of specialist processing or treatment facilities which would not be viable without a wider catchment and which would enable recovery of more locally arising wastes. The supporting text of the East of England Plan further notes that authorities should plan for imports in a pragmatic way, and the policy does not seek to preclude movements which would allow treatment at the most appropriate facility (reference Para. 11.3). We consider that the approach is also inconsistent with one of the stated elements of the spatial strategy which is to 'take advantage of economies of scale' (reference technical paper 4, page 85), and with the stated objective of the core strategy 'to provide greater capacity for the recovery of materials and energy' (Technical Paper 4, page 86), which itself might be secured through a large facility providing for both local arisings, and a proportion of waste from adjoining authorities. In these circumstances, we consider that it is inappropriate for the Core strategy to foreclose this potential, in particularly given the very challenging recovery requirements which have been identified. Waste Core Policy 1 should be revised to read: "Sufficient waste recovery and disposal capacity will be provided to cater for wastes arising within the Plan Area, together with an apportionment of waste from London as set out in the East of England RSS. Consideration will also be given to the provision of new non-landfill

Name	Organisation	A/ D/ N	Representation
			facilities dealing either primarily or partly with waste from outside the region, where such provision would assist with the recovery of more locally arising waste.”
Mr Shaun Askins	Strategic Waste Manager Luton Borough Council	D	Q8 , disagree, For the three unitary authorities, most if not all of the waste disposal and recovery capacity they utilise is provided by facilities outside the plan area e.g. Luton has a PPP with WRG and although this includes a MRF, all disposal, treatment and processing is provided outside the Borough and plan area. The remaining unitary authorities in Bedfordshire have similar operational contracts. As efficiencies and the requirement to deliver VfM become dominant features of the public sector this may not be a policy which can be met whilst fulfilling these requirements.
Mr Ian Pickering	Chairman Aspley Guise Parish Council	D	Response: Disagree - London should develop its own waste treatment facilities.
Mr Graham Gunby	Suffolk County Council	D	Because it does not accord with the agreed sub-regional apportionment that requires each Waste Planning Authority to provide capacity equivalent that arising within their area. This does not preclude the import and export of waste from and to the surrounding areas but refers to instead the net provision to be made.
Ms Louise Treacy	ERM (on behalf of Covanta Rookery South Ltd)	D	<p>Question 8 asks the reader whether they agree or disagree with draft Waste Core Policy 1. This policy is strongly disagreed with. As discussed previously (see paragraphs 3.8 to 3.10) in this submission, this policy would be contrary to the requirements of the Waste Framework Directives, PPS10 and the Waste Strategy for England, 2007. Further, there is no evidence base presented that demonstrates why the position would be appropriate within the Plan area, or to explain what are the local circumstances necessary to seek such a restriction, particularly in relation to recovery capacity.</p> <p>Section 4.25 identifies that ‘according to RSS Policy WM5, landfilling in the Marston Vale after 2015, provision for the management of imported waste from London will be restricted to the landfill of residual waste that has been subject to the maximum practical level of recovery and treatment, for which landfill is the only option’. Having regard to the foregoing, paragraph 2.25 of the draft WCS contradicts RSS policy WM5 by stating that the restriction for the Marston Vale applies immediately. This inconsistency has also been highlighted at paragraphs 3.3 - 3.5 of this submission.</p>

Name	Organisation	A/ D/ N	Representation
			<p>Section 4.25 of the draft WCS also states that 'if more than one of the The evidence base and Preferred Strategic Non-Hazardous waste landfill sites were applied for to be operational at the same time, this would be resisted, in order to protect their capacity for the entirety of the Plan period'. consequent supporting text should demonstrate why this position is appropriate within the Plan area. Further, a policy is required to enable this restriction to be enforced, should it be the most appropriate option. 14 Currently, this intention is included in the supporting text only, it does not form part of the policy framework. PPS 12 advises clearly that the supporting text of DPD should not contain policy statements.</p> <p>Draft Policy 8/Waste Core Policy 2 sets out recovery capacity targets over the Plan period as follows:</p> <p>(i) recovery of 50% of Municipal Solid Wastes by 2010, and 70% by 2015, and</p> <p>(ii) recovery of 72% of Commercial and Industrial Waste by 2010, and 75% by 2015.</p>
Mr Keith Owen	SLR Consulting Limited (on behalf of Biogen Power Ltd)	D	<p>Whilst it is considered valid to provide sufficient recovery and disposal capacity for the waste arising in the Plan area, together with the London apportionment, it is not reasonable to have that capacity solely available for waste produced in the Plan area or London. Such an approach would be consistent with the key principles in PPS10, and the sustainable movement of waste. Para. 4.25 is incorrect - the East of England plan did not develop with a basis of self sufficiency for each 'county area' it was done on 'regional' self sufficiency. In any event the Plan has been abolished. As evidenced by the decisions to grant permissions for food processing capacity in the Plan area in excess of local requirements, cross boundary movements are inevitable, and can provide the most sustainable solution, as waste can be free to travel to the nearest appropriate installation which (as in the case of the major food waste processing facility at Goosey Lodge) sometimes require significant scale to justify major capital investment. What is important is that the Plan area should provide sufficient capacity to be self sufficient in the major waste streams that it generates after allowing for the London apportionment.</p>

Question eight and paragraph 4.25

Explanatory note:

- the Plan makes provision for handling waste arising from the Plan area, plus an element of pre-treated waste from London which is to be landfilled.

Summary response:

- It is consistent with national (PPS10) and European Policy that communities should take responsibility for their own waste. Consequently, the Waste Core Strategy makes provision for the needs for recovery and disposal capacity for waste arising from within the Plan area, as well as an apportionment of post treatment residual waste from London, according to agreement reached between the former East of England Regional Assembly and the Mayor of London, and set out in numerical terms in the 2008 East of England Plan.

- the capacity available for waste management at Goosey Lodge is justified by a statement agreed between the Councils and Ancillary Components Ltd as a result of extensive communication between the two parties.

Recommended changes:

1. Amend paragraph 4.25 to read "The East of England Plan (2008) waste policies were developed with the assumption that each constituent Waste Planning Authority would develop waste recovery and disposal capacity sufficient for its area, and with the expectation that each Waste Planning Authority would landfill a decreasing amount of waste from London. According to RSS Policy WM3 "After 2015 provision for the management of imported waste from London should be restricted to the landfill of residual waste that has been subject to the maximum practical level of recovery and treatment, for which landfill is the only practical option". Then continue with the line "It is understood and accepted..."

Question nine (a) (Waste Core Policy 2: Recovery Capacity to achieve targets) and paragraph 4.46

Name	Organisation	A/ D/ N	Representation
Central Bedfordshire Council Waste Disposal Authority	Central Bedfordshire Council Waste Disposal Authority	A	Agree with the proposed targets. However, this Policy needs clarity that these targets are for reuse, recycling, composting and energy recovery rather than just stating 'recovery'. Also needs stating under 'the current definition' of Municipal Waste.
Mr Hugh Roberts	Marston Moretaine Action Group	A	MMAG agrees that landfilling of untreated municipal and commercial waste should be eliminated by 2021 and preferably long before.
Ms Carmelle Bell	Thames Water	A	Waste Core Policies There does not appear to be any specific reference to Sewage Treatment Works within the proposed Waste Core Policies. TWUL does not have any existing major STWs within Central Bedfordshire, Bedford Borough or Luton Borough, however our East Hyde STW is located to the south of Luton, within South Bedfordshire District. Due to the uncertainty of the scale and location of development over the Plan period it is very difficult for TWUL to identify whether upgrades to existing sewage facilities or the provision of new infrastructure are required at this stage. For this reason it is essential that there is adequate support for the provision of sewerage infrastructure within LDF Documents and Waste Core Strategies. TWUL recommends that the following Policy be included within the Waste Core Strategy: "PROPOSED NEW POLICY – Waste Water Treatment Development: The development or expansion of waste water facilities will normally be permitted, either where needed to serve existing or proposed development in accordance with the provisions of the Development Plan, or in the interests of long term waste water management, provided that the need for such facilities outweighs any adverse land use or environmental impact that any such adverse impact is minimised."
Ms Sacks		A	These targets were developed over a period of time in consultation with a wide range of parties and are challenging but realistic.
Mrs A Lowe	Wilshamstead Parish Council	A	Agree though the target reduction of 3% for commercial waste over the period 2010-2015 seems small. The PC would like confirmation that the County is on target to meet the 2010 targets set in the Strategy. If not then this isn't a sound basis to move forward with.

Name	Organisation	A/ D/ N	Representation
mrs sue clark	chair planning committee cranfield parish council	A	Support efforts to reduce landfill, but the capacity for materials and energy from waste should be sufficient for Bedfordshire's needs, and not greater.
Mrs Nicky Upton	Harlington Parish Council	D	Central Bedfordshire has no responsibility for commercial waste and therefore its inclusion in this policy seems irrelevant.
Ms Lizzie Barnicoat (Elstow PC)	Elstow Parish Council	D	Question 9a: page 40 Elstow Parish Council disagree with the policy as there is not enough evidence provided to substantiate the policy, and the figures used are unrealistic.
Ms Louise Treacy	ERM (on behalf of Covanta Rookery South Ltd)	D	<p>Question 9a of the WCS asks the reader whether they agree or disagree with this policy.</p> <p>While it is noted that these targets reflect those contained in the East of England Plan (Policy WM2), two concerns are raised in response to it within this submission. Firstly, that the target years presented do not sit comfortably within the WCS lifetime. The first target date is 2010, i.e. prior to adoption of the WCS. The second target year is 2015, which will be very early in the WCS lifetime; later targets should be expressed that foresee even greater levels of total recovery.</p> <p>Second, it is submitted that this policy infers that a cap has been placed on the recovery of waste within the Plan area over the period of the draft WCS. It is submitted that the figures quoted above should not be viewed as a limit on the level of recovery that can be achieved, but as a minima, and that recovery rates in excess of those identified should be promoted in order to encourage the movement of waste up the waste hierarchy.</p> <p>In addition, it is noted from a review of TEP 2 that the RSS forecasts only extend to 2021 and that for the remainder of the WCS period (i.e. to 2027/2028) the RSS targets have been continued. While it is acknowledged that some landfill capacity will be required over the Plan period, it is submitted that this approach does not serve to promote increased recovery rates.</p>

Name	Organisation	A/ D/ N	Representation
Mr Shaun Askins	Strategic Waste Manager Luton Borough Council	A/D	Q9a , both agree & disagree Currently the MSW elements is achievable and authorities are focussed on this , however C&I capacity is wholly market led and probable changes to definition of MSW , potential planning policy changes and recently announced review of UK waste policy by the Government mean that this is an area where local authorities may little influence.

Question 9a:

Explanatory note:

- the targets for recovery are set out in the East of England Plan (Regional Spatial Strategy for the East of England) published in 2008.

Summary response:

- definitions of terms used are set out in the Glossary.
- a Policy on sewage treatment works will be developed within the General and Environmental Policies DPD.
- The Waste Core Strategy is a planning policy document for all waste streams arising in the Plan area, including commercial waste.
- the recovery targets are derived from the 2008 East of England Regional Spatial Strategy waste planning policies. To deviate from these targets which are being applied in developing waste planning policy in other Waste Planning Authorities in the east of England, would create tensions and differences between authorities. No local information is available which justifies deviating from the targets set out in the former RSS Policy.
- Waste Core Policy 2 does not refer to waste water or sewage.

Recommended changes:

1. None.

Question nine (b) (Waste Core Policy 3: Design Layout of New Waste Facilities)

Name	Organisation	A/ D/ N	Representation
Mrs Margaret Pedley		A	I was encouraged by this policy concerning the idea of using colours and materials compatible with the locality.
Mr Keith Owen	SLR Consulting Limited (on behalf of Biogen Power Ltd)	A	Biogen support the thrust of this policy, although Waste Core Policy 2 will need to be reviewed due to the abolition of RSS. In any event the Government is committed to reducing the amount of waste going to landfill, and it has a legal obligation to ensure waste is driven up the hierarchy as quickly as possible. It will be important therefore for any future policy to express targets as minima, rather than a ceiling.
Mrs Nicky Upton	Harlington Parish Council	A	But, the main building design is only one part. Equal care needs to be taken with the design location of the ancillary items installed after site construction eg fencing, security systems, equipment noise etc.
Mr Adam Ireland	Planning Liaison Officer Environment Agency	A	We support the Policy concerning the Design and Layout of New Waste Facilities.
Ms Lizzie Barnicoat (Elstow PC)	Elstow Parish Council	A	Question 9b: page 41 Elstow Parish Council agrees with the policy.
Ms D Sacks		A	The importance of good design in the development of waste management facilities cannot be overstated. If a facility is well designed it will be much easier to gain acceptance for it from the local community. Given that the historic design of waste management facilities is generally very unattractive, there is no option but for future designs to be innovative.
Mr Martin Tett		A	Design and layout of New Waste Facilities We take the view that Policy 9 should be reinforced to list what physical forms and design elements for waste management facilities are being referred to, to avoid any detrimental effects upon environmental designations and surrounding authorities.

Name	Organisation	A/ D/ N	Representation
Mr Tom Gilbert-Wooldridge	Territory Planner (East) English Heritage	A	We broadly support Waste Core Policy 3 provided that the historic environment is taken into account as part of the policy's application.
Mrs A Lowe	Wilshamstead Parish Council	A	Agree though it will be difficult for any Energy from Waste facility to have 'little impact on adjacent occupiers and surrounding locality'.
Mr Shaun Askins	Strategic Waste Manager Luton Borough Council	A	
mrs sue clark	chair planning committee cranfield parish council	A	Agree, but the photo in 4.1 is not an example of good design fitting into the landscape. It is awful! It would be entirely inappropriate in the Marston Vale, for example.
Mr Graham Gunby	Suffolk County Council	A	
Central Bedfordshire Council Waste Disposal Authority	Central Bedfordshire Council Waste Disposal Authority	A	
Mr John Shephard (Partner J & J Design)	Acorn Transport & Plant Hire Ltd	A	The positive approach to the future design of New Waste Facilities is welcomed. The Submitted Plan should include additional bibliography to assist with design issues and the use of SUDS techniques in handling surface water should be encouraged.

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Name	Organisation	A/ D/ N	Representation
Ian Pickering	Aspley Guise Parish Council	A	
Mrs Caroline Romans	Secretary Central Bedfordshire and Luton Joint Local Access Forum	D	WCP3 takes no account of the potential negative impact on public Rights of Way of new or extended waste management facilities.
Mr Hugh Roberts	Marston Moretaine Action Group	D	MMAG believes that it is highly misleading to suggest that modern waste management facilities can be designed so as to be sympathetic to the area in which they are sited. To date consultation with Covanta have proven otherwise. Context and landscape are key. Rookery Pit South is a rural landscape and abuts a country park. There will be an immediate negative visual impact, loss of wildlife habitat in an area that has naturally regenerated over many years, predictably increased traffic levels with associated noise and dust pollution and an ugly building to boot. Waste plants are never attractive buildings and there is little real scope to alter the basic structure of the building because of the machinery within. They are essentially industrial structures more suited to an urban landscape.
Ms Louise Treacy	ERM (on behalf of Covanta Rookery South Ltd)	D	<p>Draft Policy 9/Waste Core Policy 3: relates to the design and layout of new waste facilities. It states that 'new or extended waste management on page facilities will be designed in their physical form and layout so as to give rise to as little negative impact as possible on adjacent occupiers and the surrounding locality. Innovative designs for waste management facilities which use colours and materials compatible with the locality, will be encouraged, in order to promote sympathetic designs and local distinctiveness'. Question 9 41 of the Strategy asks the reader whether they agree with draft Waste Core Policy 3.</p> <p>The thrust of Policy 9/Waste Core Policy 3 is agreed with, but it is weak as a policy and does not appear to be clear about what it is seeking to achieve. The meaning of the statement 'as little negative impact as possible' is unclear and it is submitted that details should be provided on how the impacts of waste management facilities would be assessed. In any event, the phrase is perhaps the incorrect one to use, as the smallest negative impact could alternatively be either unacceptable in terms of actual impact on the environment/amenity, or, overly onerous on the applicant, in the situation where a higher level of impact would still be acceptable. It is</p>

Name	Organisation	A/ D/ N	Representation
			<p>also considered that the phrases 'surrounding locality' and 'local distinctiveness' would benefit from additional consideration within the text of the document. The description of the Plan area provided at the start of the WCS is not sufficient to demonstrate the local distinctiveness of the Plan area.</p> <p>Figure 4.1 provides an example of a waste facility at Richmond Hill on the Isle of Man to illustrate best practice in the design and layout of new facilities as advocated under Policy 9/Waste Core Policy 3. It is considered that this photograph is a poor example of best practice, not least that the picture is of poor quality and the facility is largely obscured. Further, there is no interpretation within the draft WCS of why this is considered to demonstrate a high standard of design or how those principles (should they have been identified) would be expected to be delivered in waste facilities located in the Plan area.</p>
Mr Alan Bulpin	Planning & Estates Manager Waste Recycling Group	N	<p>Policy 9 – Waste Core Policy 3 – Question 9b WRG supports the assertion that new or extended waste management facilities should be designed so as to give rise to as little negative impact as possible. WRG remains unconvinced that innovative designs should be encouraged in all situations. This is an inappropriate objective. Policy should be sufficiently flexible so that development proposals are considered on their relative merits in recognition of local circumstances. It is not always necessary to design iconic structures; in certain locations a discreet or more uniform design may achieve local support.</p>
Mr Martin Tett	Buckinghamshire County Council	N	<p>Design and layout of New Waste Facilities: We take the view that Policy 9 should be reinforced to list what physical forms and design elements for waste management facilities are being referred to, to avoid any detrimental effects upon environmental designations and surrounding authorities.</p>

Question 9b

Explanatory note:

- Non-landfill waste management facilities involve buildings and structures. Waste management facilities should be well-designed, so that they contribute positively to the character and quality of the area in which they are located. This is consistent with PPS10.

Summary response:

- Design has an important part to play in the impact on adjacent occupiers including the users of rights of way. Facilities should be designed to be as sympathetic as possible.

- Rights of Way are not directly referred to, but reference is made to "adjacent occupiers and the wider locality" which includes users of Rights of Way.

- Innovative designs are not sought by the Policy for all circumstances.

Recommended changes: None.

Question ten (Waste Core Policy 4: Catchment Area Restrictions)

Name	Organisation	A/ D/ N	Representation
Ms D Sacks		A	Legally binding catchment restrictions are essential to deliver the above policies successfully. Operators should disclose the original source of the waste arising so that simply using transfer facilities within the plan area is not permitted to become a way of avoiding these restrictions. This again supports the approach of communities being responsible for the management of their own waste.
Mr Hugh Roberts	Marston Moretaine Action Group	A	MMAG agrees that there should be a rigorous enforcement regime although further clarification is required as to how legally binding arrangements are to be policed and enforced. In the event of infringements what would become of the delinquent waste - returned to its place of origin ?

Name	Organisation	A/ D/ N	Representation
Mrs A Lowe	Wilshamstead Parish Council	A	Question 10. Do you agree or disagree with Waste Core Policy 4 ie legally binding agreements to restrict origins of waste? Agree.
mrs sue clark	chair planning committee cranfield parish council	A	Agree. We should be responsible for dealing with our own waste arisings, and not a convenient deposit for the wider region. The drive should be to reduce the London apportionment.
Central Bedfordshire Council Waste Disposal Authority	Central Bedfordshire Council Waste Disposal Authority	A	The statement needs to be more specific as to what the restrictions are. Will the waste need to originate from within the plan area or within a particular radius, supporting Objective 1 or from within a certain distance of any facility?
Mr Ian Pickering	Chairman Aspley Guise Parish Council	A	
Mrs Nicky Upton	Harlington Parish Council	D	Out of county waste should be restricted to rail.
Mr Alan Bulpin	Planning & Estates Manager Waste Recycling Group	D	Policy 10 – Waste Core Policy 4 – Question 10 WRG objects to the Catchment Area Restrictions for the following reasons: Imposition of his Catchment conditions are overly restrictive and conflicts with the Inspector’s decision in the Ince Marches appeal decision issued in 2009. Catchment restrictions impact on commercial contracts and should be decision for the industry and the market; operators will not transport waste further than necessary due to the high cost of haulage. Catchment Area Restrictions on landfill waste importation impact upon an operator’s ability to source the supply of suitable waste used for daily cover resulting in potential adverse consequences ability to maintain adequate environmental standards to control nuisance impacts such as odour, litter, and pests such as flies and birds. Imposition conditions across the Region must not be arbitrary. They can be subject to abuse by the rogue

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Name	Organisation	A/ D/ N	Representation
			operator who is thus able to undercut the market. Catchment Area Restrictions must reflect the Regional requirement to meet its apportionment of London's waste. As a compromise WRG could be amenable to catchment area restrictions of say 33% waste sources from outside the Plan Area.
Mr Shaun Askins	Strategic Waste Manager Luton Borough Council	D	However it should be noted that currently only smaller recovery sites eg 2k Manufacturing in Luton (25,00tpa) have been successfully planned and more importantly implemented and that large strategic facilities face an uncertain future in terms of the uncertainty of planning policy changes and the fiscal constraints all infrastructure projects are facing and it maybe that adjacent authorities strategic facilities will be utilised to provide materials recovery or energy recovery. Taking into account the sites put forward in statement 10, the proffered sites in statement 13 are acceptable, and although the limitations placed solely on Rookery South which is a large 95h site as opposed to the other three sites may raise some concerns.
Mr Keith Owen	SLR Consulting Limited (on behalf of Biogen Power Ltd)	D	Whilst catchment area restrictions may be applicable it is important that they are determined on grounds of proximity to the facility and not to exclude waste from adjacent local authority areas. The aim should be to prevent the haulage of waste over long distances. Cross boundary movements are inevitable, and provide the most sustainable solution, as waste can be free to travel to the nearest appropriate installation. With the abolition of the RSS the content of PPS 10 becomes even more important. The imposition of restrictive catchment areas is not supported by national policy and can seriously harm commercial viability. Para 4.28 is also objected to as there is no policy basis for protecting strategic sites to ensure they "serve primarily the plan area".
Mr Spencer Warren (Heaton Planning) on behalf of Tim Deal	Lafarge Aggregates Ltd	D	Waste Core Policy 4: seeks to ensure that waste management capacity, is used by the waste for which it is intended, new facilities (including materials and energy recovery facilities with a capacity above 75,000 tonnes per annum) will be required to enter into legally binding arrangements so as to restrict the origin of waste that they receive. We believe that this policy is overly restrictive and not entirely in accordance with the supporting text, paragraph 4.28 states that new capacity for disposal and recovery arising from permissions for strategic facilities will need to be protected so as to serve primarily the Plan area. We disagree with Waste Core Policy 4. We have to query whether the industry as a whole and adjoining waste planning authorities will agree with this approach and whether it is deliverable. It has the potential of placing economic restrictions on the industry, particularly for sites near to the Plan area boundary. It is recognised within the Core Strategy document that the Plan area is narrow and easily accessible from neighbouring authorities so it seems logical that there will be a degree of cross boundary movement of waste. Paragraph 4.17 of PPS12 states that many issues critical to spatial planning do not respect local planning authority boundaries. This is clearly the position with waste

Name	Organisation	A/ D/ N	Representation
			with cross boundary movements commonplace. It does not seem appropriate for Bedfordshire to treat its non hazardous waste in isolation, particularly when it may be reliant on exports of more specialist 'hazardous' waste streams. We are not clear from the Core Strategy how this approach conforms with neighbouring authorities? It would be helpful for the core strategy to show known cross boundary movements and what the implications may be if this preferred policy is enforced.
Mr Graham Gunby	Suffolk County Council	D	This could be controlled by a planning condition.
Ms Lizzie Barnicoat (Elstow PC)	Elstow Parish Council	D	Question 10: The Parish Council disagree with the policy as feel that Bedfordshire should not be managing London's waste as well as their own. Again there is no evidence provided to substantiate the policy.
Mr Martin Tett	Buckinghamshire County Council	D	However we do not support the aims of Policy 10 to provide materials and energy recovery capacity only for waste arising within the plan area (and apportioned waste from London) through the use of catchment area restrictions. This ignores the realities of local waste management catchments, and the fact that national waste policy allows for the cross-boundary movement of waste. We also note that Statement 13, although identifying the three Preferred Strategic Recovery sites, shows the Rookery South site "for locally arising wastes only". The reasons for the wording are understood, but Policy 7 indicates that each of the sites would be restricted to wastes arising within the plan area (and the apportionment of London's waste, if maintained).
Mr Graham Jenkins (Director White and Green Planning) on behalf of Mr David Reavell	O & H Properties Ltd	D	Question 10 We do not agree with Waste Core Policy 4. For the reasons explained in response to Question 8, we consider that it would be inappropriate for the Authorities to foreclose their options for waste management by placing stringent restrictions on waste origins. This is a matter which should be considered at the development control stage, on a case by case basis, when the merits of a particular development can be considered, together with the potential contribution which can be made to the recovery of local waste arisings. A rigid and inflexible policy seeking to deal with such issues is inappropriate and inconsistent with the East of England Plan. The policy should thus be deleted.

Waste Core Strategy Preferred Options Representations and recommended responses

Name	Organisation	A/ D/ N	Representation
Mr John Phillips (Phillips Planning Services) on behalf of Mr Dave Watson	F & R Cawley Ltd	D	We disagree with this draft policy. Its purpose, implications and application are unclear. To enshrine restrictions relating to the origins of waste is inflexible, does not take account of the geographic location of facilities, particularly where because of the small size of the County they may be located adjacent to County boundaries, nor does it take into account the nature of individual facilities and businesses particularly where they deal with special wastes and provide specialist services.
Mr John Shephard (Partner J & J Design)	Acorn Transport & Plant Hire Ltd	D	Commercial handling of waste arisings does not respect prescriptive boundaries and the proposed legally binding arrangements are unlikely to meet the national guidelines for legal agreements and are unlikely to be enforceable or proportionate, especially for facilities located closer to the boundaries of the plan area.
Ms Louise Treacy	ERM (on behalf of Covanta Rookery South Ltd)	D	<p>Draft Policy 10/ Waste Core Policy 4 refers to catchment area restrictions for new waste management facilities as follows:</p> <p><i>‘Waste disposal and recovery capacity will be provided for waste arising from within the Plan areas, as well as for the disposal for an apportionment of posttreatment residual waste from London, as agreed in the Regional Spatial Strategy. In order to ensure that waste management capacity, is used by the waste for which it is intended, new facilities (including materials and energy recovery facilities with a capacity above 75,000 tonnes per annum) will be required to enter into legally binding arrangements so as to restrict the origin of waste that they receive’.</i></p> <p>The rationale for draft Policy 10/Waste Core Policy 4 is set out in section 4.28 of the Strategy as follows:</p> <p><i>‘The Plan area is relatively narrow, and easily accessed from neighbouring areas and the adjoining Regions. New capacity for disposal and recovery arising from permissions for Strategic facilities will need to be protected so as to serve primarily the Plan area. Consequently legally binding arrangements will be required to require that waste to be accepted at these new recovery and disposal facilities, originates primarily from the Plan area’.</i></p>

Name	Organisation	A/ D/ N	Representation
			<p>On page 42 asks the reader whether they agree or disagree Question 10 with draft Waste Core Policy 4. This policy is an extension of draft Waste Core Policy 1, simply setting out the mechanism by which the desired restriction would be achieved. As such, this policy is strongly disagreed with as it is repetitive and unnecessary as well as being contrary to European and national waste management policy objectives, which have been set out previously within this submission.</p> <p>In any event, the policy does not appear to be capable of handling a situation where a first application is made for a less than 75,000 tonne facility that is later, under a separate consent, to take the total capacity of 16 the plant to over 75,000 tonnes per annum. If it was a technology that was modular in design, with the plant accommodated in different buildings, a capacity of more than 75,000 tonnes per year could be easily realised, but this policy would not be effective.</p> <p>The draft WCS does not provide a suitable evidence base to demonstrate why 75,000 tonnes per year is an appropriate threshold to use. It is considered that the discussion in relation to this policy set out in section 4.28 is somewhat contradictory and is insufficient given the significance of this policy to the WCS. This text identifies that the Plan area is easily accessible from neighbouring areas yet the policy seeks to restrict the importation of waste from these areas. It is submitted that this restriction contradicts the principles of sustainable development. It is also stated that new waste management facilities will 'need to be protected so as to As previously identified in this submission, primarily serve the Plan area'. no evidence has been provided to justify such protection of waste facilities with reference to national waste planning policy, or to define ' primarily '. In assessing the benefits of economies of scale, a WRATE assessment has been undertaken by Covanta for the proposed RRF at Rookery Pit South. It found that the larger, more efficient RRF proposed has a better environmental performance than several smaller plants (a 'local' waste management scenario), despite the increased transport that a single larger plant requires. In fact, for the modelling undertaken using WRATE, even if transport for each tonne of waste was increased by a further 169 km for the Project, the calculated impact for global warming potential would only just match that of the 'local' waste management scenario.</p>
Mr Adam Ireland	Planning Liaison Officer Environment Agency	N	Waste Core Policy 4: needs careful consideration and further explanation would be welcomed as to the reasons behind this policy.

Waste Core Strategy Preferred Options Representations and recommended responses

Name	Organisation	A/ D/ N	Representation
Mrs Sharon Threlfall	County Development Unit Hertfordshire County Council	N	Whilst the intention of Policy 10 is supported, as far as to be self sufficient to addressing waste arising, it is unclear how enforceable the policy will be in seeking to restrict waste catchments.
Mr Mark Chant	Northampton County Council	N	Although the direction of this proposed approach is supported, the Core Strategy should be clearer as to what this means in practice. The adopted Northamptonshire Minerals and Waste Core Strategy sets out (in Box CS3) the hierarchy of catchments to be utilised for facilities in the county, whilst the Proposed Submission Control and Management of Development DPD describes these in more detail in paragraphs 3.6 to 3.23. This authority places catchment areas on permissions by distance from facilities rather than by administrative boundaries. As such, depending on where they are located within Northamptonshire, facilities with a sub-regional catchment would be allowed to take waste from the whole of your plan area. In setting out more detail about catchments in your proposed submission document, this authority would object if catchments were to be set out in a manner that excludes waste generated from outside the plan area.

Question Ten

Explanatory note:

- PPS10 advises that Local Development Documents 'provide a framework in which communities take more responsibility for their own waste, and enable sufficient and timely provision of waste management facilities to meet the needs of their communities.'

Summary response:

- it is appropriate to protect the use of new waste recovery capacity for waste arising from the Plan area. The only means to achieve this is to enforce a restriction on how much waste can come from outside of the Plan area. This is entirely consistent with the Proximity Principle set out in the Waste Framework Directive 2008 by which waste is to be recovered in one of the nearest appropriate installations.

- Since the determinations of individual applications is required to be primarily with reference to the development plan, then a Policy on the need to protect recovery capacity for waste arising from the Plan area is appropriate.

Recommended change:

1. Change the wording to: "... as set out in in the East of England Regional Spatial Strategy 2008".

Question eleven (Waste Core Policy 5: Including waste Management in new built developments)

Name	Organisation	A/ D/ N	Representation
Mr Hugh Roberts	Marston Moretaine Action Group	A	MMAG agrees that all new development should include sufficient waste storage and recovery facilities.
Ms Lizzie Barnicoat (Elstow PC)	Elstow Parish Council	A	Question 11: Parish Council agree
Ms D Sacks		A	The existing SPG on this matter has been very useful and innovative and should continue to be used and developed further. The local planning authorities within the plan area should be encouraged to carry forward this policy vigorously.
Mr Adam Ireland	Planning Liaison Officer Environment Agency	A	The Environment Agency agrees with this Waste Core Policy.
Mrs A Lowe	Wilshamstead Parish Council	A	Agree, but what are 'sufficient and appropriate waste storage and recovery facilities in new developments'. Rather an imprecise policy. A policy that cannot be measured or monitored.
Mr Shaun Askins	Strategic Waste Manager Luton Borough Council	A	
mrs sue clark	chair planning committee cranfield parish council	A	We agree with this policy.

Name	Organisation	A/ D/ N	Representation
Mr Ian Pickering	Chairman Aspley Guise Parish Council	A	
Mr Graham Gunby	Suffolk County Council	A	
Mrs Nicky Upton	Harlington Parish Council	D	There is no need for extensive waste storage. Central Bedfordshire's collection system which includes collecting over bank holidays requires a maximum storage capacity of 2 days.
Central Bedfordshire Council Waste Disposal Authority	Central Bedfordshire Council Waste Disposal Authority	N	It is not clear as to whether this statement refers to business premises, households or both. Business premises should include provision for at least waste collection and separation and preferably recovery. Householders should be given provision for waste collection and separation.
Ms Louise Treacy	ERM (on behalf of Covanta Rookery South Ltd)	N	<p>Draft Policy 11/Waste Core Policy 5: states that <i>'all new development will be designed and planned so as to include sufficient and appropriate waste storage and recovery facilities'</i>.</p> <p>Question 11 on page 42 of the Strategy requests feedback in relation to draft Policy 11/Waste Core Policy 5. The sentiment of this policy is agreed with as it is in accordance with the principles of sustainable design and the creation of sustainable neighbourhoods. However, it is noted that section 4.29 of the draft WCS states that the inclusion of waste storage and recovery facilities into the design of new developments <i>'will reduce the volume of waste arisings'</i>. This statement is incorrect. The inclusion of such facilities within developments will not, necessarily, reduce waste arisings, but it does provide the appropriate infrastructure for the management of those wastes arising.</p>

Question eleven

Explanatory note:

- PPS10 advises that:'Good design and layout in new development can help to secure opportunities for sustainable waste management, including for kerbside collection and community recycling as well as for larger waste facilities. Planning authorities should ensure that new development makes sufficient provision for waste management and promote designs and layouts that secure the integration of waste management facilities without adverse impact on the street scene or, in less developed areas, the local landscape.'

Summary response:

- The incorporation of waste storage, separation, and recovery facilities within all forms of new development is part of the shift to a materials reusing economy. The adopted Supplementary Planning Document 'Managing Waste in New Developments' provides advice on this matter.
- the inclusion of these facilities within new developments will increase the rate of diversion and recovery, but are unlikely to reduce the volume of waste arisings.
- The Policy refers to all forms of development, housing, industry, offices, etc.
- The specific monitoring and implementation of this policy are set out in Chapter 5: Monitoring and Implementation.

Recommended change:

1. Delete the reference to reducing the volumes of wastes that may arise in paragraph 4.29.

Question twelve (Waste Core Policy 6: Clinical and Hazardous Waste transfer facilities)

Name	Organisation	A/ D/ N	Representation
Mrs Margaret Pedley		A	Absolutely vital for the protection of the general public.
mrs sue clark	chair planning committee cranfield parish council	A	We agree with the policy. Special care should be given to the transport of this waste.
Mr Hugh Roberts	Marston Moretaine Action Group	A	MMAG agrees that public safety must be paramount in the transportation of specialist waste and preferably dealt with at source.
Ms Lizzie Barnicoat (Elstow PC)	Elstow Parish Council	A	Question 12: The Parish Council agrees, however, recommend that inclusion within the policy needs to made to include proximity to populous and clear reference to and definition regarding monitoring of waste, as both are vitally important aspects not covered presently in the policy.
Mr Adam Ireland	Planning Liaison Officer Environment Agency	A	The Environment Agency agrees with this Waste Core Policy.
Mrs A Lowe	Wilshamstead Parish Council	A	Agree but what 'ancillary and sufficiently related operations'? Another imprecise policy.
Mr Shaun Askins	Strategic Waste Manager Luton Borough Council	A	

Waste Core Strategy Preferred Options Representations and recommended responses

Name	Organisation	A/ D/ N	Representation
Mr Ian Pickering	Chairman Aspley Guise Parish Council	A	
Mr Graham Gunby	Suffolk County Council	A	
Central Bedfordshire Council Waste Disposal Authority	Central Bedfordshire Council Waste Disposal Authority	A	Agree - however, a reference to proximity to source would be useful.
Mr Mark Chant	Northamptonshire County Council	D	Hazardous Waste: The reference in paragraph 4.48 to disposal being a national issue and beyond the scope of the Core Strategy now needs to be amended in view of the planned abolition of the Infrastructure Planning Commission. However even if this abolition was not planned to come forward, and noting that the three councils do not necessarily have to provide for a hazardous waste facility (disposal and/or management) within their boundaries, the Core Strategy should nevertheless be clear as to how hazardous waste generated within the plan area should be dealt with. For information the hazardous waste facility within Northamptonshire is planned to close in 2013. Low Level Nuclear Waste Even though there are no such key generators within the plan area, the Core Strategy should nevertheless address this matter within policy, even if the policy approach ultimately chosen is not to make an allowance for such provision within the plan area.
Mrs Nicky Upton	Harlington Parish Council	D	Air pollution control residues and bulk hazardous wastes should travel by rail.
Ms D Sacks		D	It might be possible for clinical and hazardous waste facilities to be successfully developed in locations that are not ancillary to a related operation. Given the continuing need for such facilities throughout the plan area, this policy could be widened to encourage the development of such facilities.

Name	Organisation	A/ D/ N	Representation
Ms Louise Treacy	ERM (on behalf of Covanta Rookery South Ltd)	D	<p>Draft Policy 12/Waste Core Policy 6:</p> <p>relates to clinical and hazardous waste transfer facilities and states that <i>'proposals for facilities to handle and transfer specialist wastes, (such as Hazardous or Clinical wastes), will be accommodated only where the amenity and highway safety of the area can be adequately safeguarded, and where they form part of an ancillary and sufficiently related operation'</i>.</p> <p>Question 12 asks the reader to provide feedback in relation to draft Policy 12/Waste Core Policy 6 . This policy is disagreed with. The policy is unclear in terms of the wastes that it relates to. No explanation has been provided to justify why such waste management facilities will only be permitted where they form part of an ancillary and significantly related operation. It is submitted that this approach does not provide a clear policy framework and will restrict the provision of such facilities that might be necessary over the period of the WCS. In addition, it is noted that the supporting text (section 4.30 of the WCS) is relevant to clinical waste only. No consideration has been given to hazardous wastes or other specialist wastes. Neither is any indication given of the forecast need for such facilities, or how these might be phased over the Plan period.</p> <p>The options for the spatial distribution of new non-strategic facilities are discussed in sections 4.31 - 4.35 of the draft Strategy. The paragraphs refer to 'small to medium scale facilities' but do not define what is meant by this term. Section 4.32 states that larger scale waste facilities have begun to emerge within two corridors - along the A6 and the A421. It is stated that the A6 corridor is peripheral to the Plan area as a whole and is not proximate to the sources of waste arising in Central Bedfordshire and Luton. As such it is stated that it is not desirable for facilities to develop in this area. It is submitted however that the A6 corridor has good transport links and is proximate to sources of waste arising within north Bedford. Thus given that non-strategic facilities are being considered in this instance, it is submitted that such facilities would be appropriate in the A6 corridor to cater for the northern parts of the Plan area.</p>
Mrs Sharon Threlfall	County Development Unit Hertfordshire County Council	N	It is recommended that each Policy has only one title and number to assist identifying the policies. For example, Policy 12 is also referred to as Waste Core Policy 6.

Waste Core Strategy Preferred Options Representations and recommended responses

Name	Organisation	A/ D/ N	Representation
Mr John Phillips (Phillips Planning Services) on behalf of Mr Dave Watson	F & R Cawley Ltd	N	Clarification is required as to what wastes this policy is concerned with. Is it only concerned with clinical waste as implied by para 4.30? If its scope is intended to be wider, clarification is also sought as to what is meant by “where the amenity and highway safety of the area can be adequately safeguarded, and where they form part of an ancillary and sufficiently related operation.”

Question twelve

Explanatory note:

- Hospitals, doctors surgeries, and veterinary clinics produce clinical waste which may need treatment (such as incineration, or autoclaving) before the waste they produce are landfilled. Traditionally hospitals incinerated these wastes on their premises, but this is not a universal practise.

Summary response:

- various forms of hazardous wastes are produced which can generally only be managed either by incineration, or landfilling in specialist dedicated sites, or within dedicated hazardous waste cells (mono-cell). Bulking up these wastes together prior to onward dispatch for final disposal is acceptable, so long as the facility is located away from sensitive occupiers.

- applications for facilities for the disposal of Hazardous waste would be likely to be a matter for determination by the Major Infrastructure Planning Unit of the Planning Inspectorate.

- facilities which accept specialist wastes, and are located within industrial land or adjacent to other waste management uses, are also appropriate locations.

Recommended changes:

1. Amend wording of Policy to say "...(including Hazardous and Clinical wastes)"
2. Amend paragraph to refer to the known volumes of hazardous wastes arising, which are 37,000 tonnes in the financial year 2004/5.
3. Delete end of sentence from 'and where they form part of an ancillary and....'

Paragraph 4.34 and 4.35 respectively (Re-designation of the Green Belt and smaller transfer and recovery facilities).

Name	Organisation	A/ D/ N	Representation
Councillor Lorraine Mawer		D	Do not agree green belt should be reduced. Neither do I agree with further housing on this land.
Mr John Shephard (Partner J & J Design)	Acorn Transport & Plant Hire Ltd	A	We welcome the recognition that there will continue to be a need for smaller scale non-strategic transfer and recovery facilities.

Paragraph 4.34 and 4.35

Explanatory note:

- These paragraphs are a statement of fact and summarise aspects of the Joint Core Strategy for Luton and south Central Bedfordshire.

Summary response:

- The Joint Core Strategy for Luton and (south) Central Bedfordshire is proposing to reduce the area of the Green Belt by releasing Urban Extension Areas, and not the Waste Core Strategy.

Recommended Change: None.

Question thirteen (Waste Core Policy 7: The Preferred Spatial Distribution of Non-Strategic Facilities)

Name	Organisation	A/ D/ N	Representation
Mr Antony Mould	Natural England	A	But see comments for paragraph 2.10 regarding the Chilterns AONB.
Mr Hugh Roberts	Marston Moretaine Action Group	A	MMAG agrees that consistent with the proximity principle non strategic sites should be distributed through localities with an emphasis on anaerobic digestion and that material recovery should be located in urban areas.
Mr Spencer Warren (Heaton Planning) on behalf of Mr Tim Deal	Lafarge Aggregates Ltd	A	Question 13 – Do you agree with Waste Core Policy 7? Waste Core Policy 7 sets out the criteria for the preferred spatial distribution of non strategic facilities. For aggregate recycling facilities the preferred spatial distribution is with inert waste landfill sites, which we support.
Ms D Sacks		A	This is an appropriate and well thought out approach.
Mr Adam Ireland	Planning Liaison Officer Environment Agency	A	The Environment Agency agrees with this Waste Core Policy.
Mrs A Lowe	Wilshamstead Parish Council	A	Agree with small to medium facilities evenly distributed across the County including material recovery and waste transfer located in urban fringe location.

Waste Core Strategy Preferred Options Representations and recommended responses

Name	Organisation	A/ D/ N	Representation
Mr Shaun Askins	Strategic Waste Manager Luton Borough Council	A	
mrs sue clark	chair planning committee cranfield parish council	A	These facilities should be located where there is the greatest need, and not concentrated in the Marston Vale!
Mr Ian Pickering	Chairman Aspley Guise Parish Council	A	
Mr Keith Owen	SLR Consulting Limited (on behalf of Biogen Power Ltd)	A	Based on Biogen's suggested classification of waste facilities, it is agreed that there should be an "even distribution" of small and medium scale facilities (ie those with capacity up to 150 ktpa) across the Plan area. The reference to anaerobic digestion plants on industrial land in rural locations should be extended to include gasification and pyrolysis plants which comply with the small and medium scale definitions advanced in response to Question 5.
Central Bedfordshire Council Waste Disposal Authority	Central Bedfordshire Council Waste Disposal Authority	A	In-Vessel Composting facilities lend themselves not only to rural industrial locations but also rural agricultural locations due to both the type of waste going into the process and the outputs. Anaerobic Digestion (AD) facilities could also be coupled with agricultural sites, as demonstrated at Milton Ernest, however less so due to the production of power that would ideally be utilised as close to the site of production as possible. It is sensible to locate materials recovery/ waste transfer and bulking facilities on urban fringes but should also be central to the plan area. The final bullet point is covered under Core Policy 5. An indicative distance from residential properties should be included.
Mrs Nicky Upton	Harlington Parish Council	D	There should be a limited number of central facilities allowing economies of scale: not in every farmyard or field outside every large village.

Name	Organisation	A/ D/ N	Representation
Ms Lizzie Barnicoat (Elstow PC)	Elstow Parish Council	D	<p>Question 13: The policy is full of jargon and is very difficult to understand. The Parish Council note that in relation to Elstow, sites are unsuitable for this policy for the following reasons:</p> <ul style="list-style-type: none"> • The sites would require vast amounts of dewatering and preparation before the site could be used, as highlighted during the Public Enquiry in 2003. • There is no traffic management plan in place to deal with the increased vehicular movements, the types of vehicles accessing the site would be heavy goods vehicles, at present the Borough of Bedford does not have an up to date Local Transport Plan or an up to date Freight Strategy. The infrastructure is not sufficient either to deal with vehicles accessing the site from the site along the A6 as this is predominately a single carriage road. • The sites are in very close proximity to a carp fishing lake; this would be affected by the proposal, and is one of the top 5 in the country. • Within the consultation document there is reference to proximity of the site not being close to new developments, this site will be, due to the proposed Wixams extension as detailed in the Bedford Borough Allocations and Designations Plan (AD4) document. • The Elstow sites must also be removed for the reasons listed in the Inspector's report during the Public Inquiry in 2003 as all the points still stand and the conclusion was the site is not suitable. Elstow Parish Council strongly oppose the use of either site and will challenge very strongly as previously they have to ensure they are not used.
Mr Al Morrow (Phillips Planning Services)	Chelveston Renewable Energy Ltd	D	<p>The overall thinking behind this policy appears to be rather flawed in that the assumption in paragraph 4.32 is that Bedfordshire operates in isolation of the rest of the country without any regard being had to what is going on within adjoining counties. Paragraph 4.32 is dismissive of the A6 corridor north of Bedford and pays no regard to the important fact that the central spine of the Northamptonshire growth area lies immediately north of the county boundary along the A6. The Beds Waste Core Strategy can not act in isolation like this but must be able to “join up” effectively with neighbouring policy documents such as the Adopted Northants Waste Core Strategy and the adopted North Northants Core Strategy.</p>

Name	Organisation	A/ D/ N	Representation
			<p>This flawed approach is clearly evident in the site assessment of Chelveston airfield contained in Technical Evidence Paper 4. The scoring of many of the questions is based on the site's location within Bedfordshire (which is at the very northern tip) and pays no regard at all to the growth area settlements located just a few miles north within Northamptonshire. The weighting given is also heavily influenced by the desire espoused in policy 6 to locate all strategic waste sites centrally within the Marston Vale. Finally, many of the scores given in relation to technical site specific issues are incorrect – for example, the site has no archaeology remaining (this was all destroyed when it was developed as a military airfield in World War Two), is not vulnerable to flooding due to its elevated location, affects no designated areas, has no sensitive groundwater or soil constraints and is located close to local communities.</p> <p>Waste Core Policy 7 also fails to mesh properly with other national government and development plan policies dealing with rural employment land. Planning Policy Statement 4 : Planning for Sustainable Economic Growth and all the Local Plans and Core Strategies approved by Bedford Borough Council, Central Bedfordshire Council and Luton Borough Council seek to protect rural employment land from other types of development because the stimulation of the rural economy is considered to be a major policy objective. WCP 7 appears to focus in-vessel composting and AD plants on to land already in use or allocated for rural employment uses. These are non-employment uses which would contrary to the employment protection policies referred to.</p> <p>Furthermore, it is highly unlikely that these types of waste treatment uses would be able to successfully locate on to rural industrial land. Such sites are relatively rare and they also tend to be quite small made up of former farm buildings which may have been converted to employment use. They will generally not be large enough to accommodate commercial in-vessel composting or AD operations as both require significant land takes for operational reasons. Restricting the location of small and medium sized in-vessel composting and AD facilities to rural industrial sites is unrealistic and restrictive. It will not encourage the development of a sustainable network of small to medium sized waste treatment facilities within Bedfordshire.</p>
Mr Graham Gunby	Suffolk County Council	D	<p>Disagree because the list could be expanded to include:</p> <ul style="list-style-type: none"> -land in existing waste management use; -land in existing general industrial (B2 use class) and land in existing storage or distribution use (B8 use class) (excluding open air composting);

Name	Organisation	A/ D/ N	Representation
			<ul style="list-style-type: none"> -land allocated for B2 or B8 use in Development Plan Documents (excluding open air composting); - land within or adjacent to agricultural and forestry buildings; agricultural and forestry land (open air composting only); - brownfield land (excluding open air composting); unallocated former airfields (open air composting only); - waste water treatment facilities (composting and anaerobic digestion only); - and, current and former mineral workings (open air composting and construction, demolition and excavation waste recycling only).
Mr John Phillips (Phillips Planning Services) on behalf of Mr Dave Watson	F & R Cawley Ltd	D	<p>Our comments under this heading are subject to our concerns about the adoption of an arbitrary limitation of 75,000 tonnes throughput for the classification of strategic and non strategic facilities. Para 4.35 identifies a continuing requirement for non strategic commercial/industrial waste transfer facilities, but is silent in relation to any larger facilities (i.e. over 75,000 tonnes). It is considered that the whole classification of facilities into strategic and non-strategic should be reconsidered so that a more comprehensive but flexible policy advice can be given. In addition Statement 14 states that “Options for the location of non-strategic facilities: Materials Recovery/Waste Transfer/Bulking Facilities – either urban fringe, or general industrial locations.” (sic) Para 4.36 also refers to such facilities being located “on employment land, either existing or new” But draft policy 13 states that such facilities shall only be located on the ‘urban fringe’ and does not refer to either general industrial locations or employment land. Draft policy 13 should be modified to include general industrial locations as referred to in statement 14 para 4.35.</p>
Mr Rio D'Souza	Planning Officer Highways Agency	N	<p>Spatial Distribution of Non-Strategic Facilities: Non-strategic facilities are of a small scale and therefore will generate less traffic than strategic facilities. Based on such existing facilities, these are generally of a small to medium scale. The Plan also refers to the possibility of these facilities to be developed in conjunction with the development of new settlements. This would be the case in the urban extensions to:</p> <ul style="list-style-type: none"> -the north of Luton; -north of Dunstable and Houghton Regis;

Name	Organisation	A/ D/ N	Representation
			<p>-and east of Leighton Buzzard.</p> <p>The Highways Agency would support the provision of these facilities as part of new settlements as it would mean that the facilities are provided where they are most needed and hence the amount of traffic generated by the facilities will be limited. The Plan states that large scale waste facilities are currently being developed along the A6 (between Bedford and Northamptonshire) and along the A421 (west of Bedford). It is not clear therefore whether there is scope to expand these facilities to accommodate any further population growth or whether new facilities need to be provided. Statement 14 details the options regarding the location of non-strategic facilities. The Highways Agency would support provision of these facilities either where there is the greatest need, so close to existing population centres, or as part of other facilities where possible.</p> <p><u>"Statement 14 Options for the location of Non-Strategic Facilities:</u></p> <ul style="list-style-type: none"> - Aggregates recycling facilities: either co-locate them with inert waste landfill sites, mineral working sites, or on lower quality industrial land. - Windrow composting facilities: either on rural agricultural land with good quality highways access, or concentrated with other waste management facilities in rural locations. - In Vessel composting facilities: either located adjacent to Non-Hazardous waste landfill sites, or in rural industrial locations. - Anaerobic Digestion plants: on industrial land, in either urban or rural locations. - Material Recovery/Waste Transfer/Bulking Facilities: either urban fringe, or general industrial locations." Waste Core Policy 7 details the preferred spatial distribution of non-strategic facilities. The relevant part of this Policy is repeated below. "Policy 13 Waste Core Policy 7: The Preferred Spatial Distribution of Non-Strategic Facilities: - Small to medium scale facilities to be evenly distributed within Bedford Borough, Luton Borough, and Central Bedfordshire (outside of the area designated as either Green Belt or Area of Outstanding Natural Beauty); including any land taken out the Green Belt in the future and within areas designated for new housing and industrial development... <p><u>"Question 13 Do you agree or disagree with Waste Core Policy 7? Please state your reasons."</u></p>

Name	Organisation	A/ D/ N	Representation
			The Highways Agency agrees with Waste Core Policy 7 because it sets out to provide facilities throughout the Plan area thereby meaning that access to all settlements from these facilities would not require a significant amount of travel. Additionally it is proposed to provide facilities as part of new housing and industrial developments which would further support this.
Mr Martin Tett	Buckinghamshire County Council	N	Spatial Distribution: We note that Statement 14 and Policy 13 refer to the locations of non-strategic facilities, we feel it would be beneficial to add a criteria based policy for determining planning applications.
Mr John Shephard (Partner J & J Design)	Acorn Transport & Plant Hire Ltd	N	Whilst the draft policy is broadly welcomed, particularly with regard to the proposed spatial distribution of non-strategic sites, it is submitted that Materials Recovery/Waste Transfer/Bulking Facilities can be appropriately sited in or close to active or previously developed minerals sites and also rural p.d.l. sites which are well related to the highway network, including redundant farmsteads and other rural brownfield sites. We would welcome a Development Management section to this policy to assist with individual planning applications. We would question whether an emerging Core Strategy can 'adopt' an earlier SPD.
Ms Louise Treacy	ERM (on behalf of Covanta Rookery South Ltd)	N	In response to Question 13 it is submitted that the policy is weak, poorly executed and misses opportunities for the sustainable development of new waste management capacity. There is very little supporting text or evidence to demonstrate how the policy would deliver the most appropriate option for the delivery of non-strategic waste facilities. Within the supporting text, the word "treatment" is provided in inverted commas but no explanation is provided for why, or how this word is defined in terms of delivering draft Waste Core Policy 7.

Question Thirteen: Preferred Spatial Distribution of Non-Strategic Facilities.

Explanatory note:

- There are a variety of waste management activities, and this Policy considers the distribution of those not crucial to the implementation of the Plan (i.e. Non-Strategic facilities).

Summary response:

- The scale of these facilities is relatively small, and most forms of waste management referred to in this Policy are most suited to being widely distributed throughout the Plan area. However, we expect that the economies of scale mean that these will not be needed in every village.

-The facilities would be subject to WCP4 (Catchment Area Restrictions)

- the Supplementary Planning Document 'Managing Waste in New Developments' was adopted in April 2006.

- Suffolk: the level of detail which is suggested is not appropriate to the WCS.

Recommended changes:

1. Amend reference to In Vessel Composting and Anaerobic Digestion Plants to " industrial land in rural locations which would not detrimentally encroach upon the open countryside".

Paragraph 4.36 Smaller scale waste management facilities.

Name	Organisation	A/ D/ N	Representation
Mr John Shephard (Partner	Acorn Transport & Plant Hire Ltd	A	This paragraph is welcomed, subject to our earlier comments on the range of alternative sites which should not be ruled out.

Name	Organisation	A/ D/ N	Representation
J & J Design)			

Paragraph 4.36

Explanatory note:

- This paragraph explains the importance of these kinds of facilities.

Summary response:

- a slight amendment for clarity.

Recommended changes:

1. In paragraph 4.36 line three add the words "various forms of ..." before "treatment" of wastes.

Question fourteen (Waste Core Policy 8: Green waste windrow composting sites)

Name	Organisation	A/ D/ N	Representations
Mr Chris Evans	Ministry of Defence	A	<p>Policy 14- Waste Core Policy 8- Green Waste Windrow Composting Sites. Location</p> <p>MOD Interests:</p> <p>WSD01 Elstow North: Cardington</p> <p>WSD02 Thorn Turn: No Safeguarding interests</p> <p>WSD13 Brogborough: No Safeguarding interests</p> <p>WSD14 Stewartby: Cardington</p> <p>WSD15 Arlesey: RAF Henlow</p> <p>WSD16 Elstow: Cardington WSD17</p> <p>Land off Woburn Rd: No Safeguarding interests</p> <p>WSD24 Herne Grange Farm: No Safeguarding interests</p> <p>WSD25 Etonbury Farm: RAF Henlow</p> <p>WSD28 Twinwoods Airfield: No Safeguarding interests</p> <p>WSD29 Land opposite Wigney Wood: No Safeguarding interests</p> <p>WSD31 Stewartby Sidings and adjacent land: Cardington</p> <p>WSD33 Chelveston Airfield: No Safeguarding interests</p> <p>WSD34 Rookery South: Cardington</p> <p>WSD40 Arlesey Road, Henlow: RAF Henlow</p>

Name	Organisation	A/ D/ N	Representations
			<p>WSD41 Haynes Composting Site: Cardington</p> <p>WSD50 Goswell Yard, Stanbridge: No Safeguarding interests</p> <p>WSD55 Faldo Farm: No Safeguarding interests</p> <p>It is not clear from the consultation document as to the type of composting facilities being proposed. Therefore Defence Estates safeguarding should be consulted on any composting facility situated within the safeguarding height and birdstrike zones as listed in the table above to ensure MOD assets are not compromised.</p>
Mr Hugh Roberts	Marston Moretaine Action Group	A	MMAG agrees that consistent with the proximity principle non strategic sites should be distributed through localities with an emphasis on anaerobic digestion and that material recovery should be located in urban areas.
Ms Lizzie Barnicoat (Elstow PC)	Elstow Parish Council	A	<p>Question 14:</p> <p>The Parish Council agree with policy, and would like to highlight and therefore insist on the removal of the two Elstow sites listed as they do not fit the brief the policy set for potential composting sites. WSD01 Elstow North is not located on rural agricultural land, neither is WSD16 Elstow, this site is underwater as presently is a lake. Elstow Parish Council strongly oppose the use of either site and will challenge very strongly as previously they have to ensure they are not used.</p>
Al Morrow (Phillips Planning Services)	Chelveston Renewable Energy Ltd	A	Chelveston Renewable Energy Ltd. consider the Chelveston airfield site as being suitable for green waste composting and supports the policy approach proposed.
Mr Adam Ireland	Planning Liaison Officer Environment Agency	A	We are in general agreement with Waste Core Policy 8, however it should be noted that the Environment Agency is currently reviewing its position on open Windrow composting that may impact on future permitting of these sites and therefore influence this policy.

Waste Core Strategy Preferred Options Representations and recommended responses

Name	Organisation	A/ D/ N	Representations
Mr Shaun Askins	Strategic Waste Manager Luton Borough Council	A	
Mr Ian Pickering	Chairman Aspley Guise Parish Council	A	
Central Bedfordshire Council Waste Disposal Authority	Central Bedfordshire Council Waste Disposal Authority	A	The stipulation that they are sited on agricultural land discounts other options. Although this activity is commonplace on agricultural land it should not be restricted as such and Brownfield sites or co-location with other waste facilities should be included. Why are Faldo Farm and Goswell Yard listed only as supplementary sites?
Mrs Caroline Romans	Secretary Central Bedfordshire and Luton Joint Local Access Forum	D	WCP8 should be amended to read 'Green waste windrow composting facilities will be located on rural agricultural land with good quality highways access, at least 300 metres from any residential property or work place, so as to prevent the potential for detrimental impact on amenity including public Rights of Way and public green spaces'.
Mrs Nicky Upton	Harlington Parish Council	D	In vessel composting only not open windrows.
Mrs A Lowe	Wilshamstead Parish Council	D	Disagree. These sites should be more than 250 metres from residential property and need to take account of varying wind direction and speed. Note. If these are meant to be on rural agricultural land why are Elstow North & South identified as potential sites.

Name	Organisation	A/ D/ N	Representations
Mr Graham Gunby	Suffolk County Council	D	<p>Disagree because the list could be expanded to include:</p> <ul style="list-style-type: none"> land in existing waste management use; land in existing general industrial (B2 use class) and land in existing storage or distribution use (B8 use class) (excluding open air composting); -land allocated for B2 or B8 use in Development Plan Documents (excluding open air composting); -within or adjacent to agricultural and forestry buildings; agricultural and forestry land (open air composting only); -brownfield land (excluding open air composting); -unallocated former airfields (open air composting only); -waste water treatment facilities (composting and anaerobic digestion only); <p>and, current and former mineral workings (open air composting and construction, demolition and excavation waste recycling only).</p>
Mr Rio D'Souza	Planning Officer Highways Agency	N	<p>Waste Core Policy 8 focuses on green windrow composting sites and is not of much interest to the Highways Agency. The scale of these sites is likely to be insignificant and not have much of an impact on the Trunk Road network. "Policy 13 Waste Core Policy 8: Green waste windrow composting sites. Green waste windrow composting facilities will be located on rural agricultural land with good quality highways access, at least 250 metres from any residential property or work place, so as to prevent the potential for detrimental impact on amenity." "Question 14 Do you agree or disagree with Waste Core Policy 8? Please state your reasons." 5.8 Table 1 lists the potential composting sites. Currently, composting sites are spread throughout the Plan area and there is a surplus of sites. However, a shortfall may result in those areas where there is a high rate of growth and therefore additional composting sites may be required. It is not clear in the document whether the sites identified in Table 1 are those which make up Waste Core Policy 8. If this is the case, the sites are unlikely to have a significant impact on the Trunk Road network or will be accounted for in the proposals for the larger strategic sites as part of their application process.</p>

Waste Core Strategy Preferred Options Representations and recommended responses

Name	Organisation	A/ D/ N	Representations
Mrs Ann-Marie Cleghorn		N	<p>1. Henlow Grange is one of the few II Star Listed Buildings in the County and its protection has been recognised in two appeal decisions by the Secretary of State for the Environment, 1999 [APP/J0215/C98/1010291/3 and A/988888/193651] and 2002 [APP/X0225/A/99/1021608 and E1/M0200/2/3/08]. This proposal, while 500 metres from the Listed Building itself, would affect its setting and its use as a health farm. The operations themselves would affect the setting of the Listed Building by reason of noise.</p> <p>2. It is noted that the only accesses to the site are from a track to the north and to the south along the drive itself and the wooded avenue to the north leading from Henlow Grange. Both routes are inappropriate for heavy moving traffic and that from the south by the introduction of heavy waste lorries would have a detrimental effect on the setting of the Grange and its use. The driveways and track to Poppy Hill Farm would introduce the noise of persistent regular traffic and threaten the amenity and safety of cyclists and pedestrians on these routes, which are used heavily by local residents and visitors to the Grange. The latter come to enjoy the countryside and the use of the Poppy Hill Lakes for waste deposit would affect seriously their enjoyment. This is not an isolated site but one situated where there is active public usage.</p> <p>3. The use would be contrary to Mid-Bedfordshire Local Plan Policy for improving and enhancing the Ivel Valley. This stretch of the Valley since mineral working has been the subject of regeneration and it would be retrograde to embark now on a use inconsistent with the Project. Henlow Grange strongly supports the nature conservation objections to the use of the land for tipping. It supports the views of the Environment Agency that the proposal is unrealistic and those of your Council – Heritage and Environment</p>
Ms Lizzie Barnicoat	Bedford Borough Access Forum	N	At the potential composting site opposite Wigney Wood WSD 29, there is a bridleway which runs inside the southern boundary of this site and forms an important link with other rights of way; such use of the site would cause problems with riders and walkers which should be referenced within the consultation document.

Question Fourteen: Waste Core Policy 8.

Explanatory note:

- there is national guidance on the potential harmful effects of bioaerosols from com-posting operations, including advice on appropriate separation distances.

Summary response:

- Green waste windrow composting has the potential to affect adjacent occupiers, and is inappropriate in other kinds of locations.

Recommended change: Delete list of potential compost sites - detailed matters will be considered at the planning application stage.

Paragraph 4.37 (Potential need for additional composting facilities)

Name	Organisation	A/ D/ N	Representation
Councillor Lorraine Mawer		D	Do not think there should be a supplementary site at WSD50 Goswell Yard Stanbridge. Too many trucks passing through small village already. Residents don't need any more. This comments is a revised comment to one made previously
Mr Antony Mould	Natural England	N	While Natural England acknowledges that the sites listed in table 1 are not preferred sites, we note that there identification as potential composting sites has only been based on consideration of highways access and proximity to residential occupiers. Again we would highlight that several of the identified sites (WSD16 Elstow, WSD17 Land off Woburn Road and WSD34 Rookery South) are designated as CWS.

Paragraph 4.37

<p>Explanatory note:</p> <ul style="list-style-type: none"> - Green waste from any source can be managed by windrow or in-vessel composting.
<p>Summary response:</p> <ul style="list-style-type: none"> - Substantial green waste windrow composting capacity already exists within the Plan area. -The Low Growth Scenario for waste arisings is Preferred, and consequently it is expected that there will be a surplus of Green Waste Treatment capacity throughout the Plan period. - The distance criteria is intended to protect the health of adjacent occupiers.
<p>Recommended change:</p> <ol style="list-style-type: none"> 1. Delete the list of Potential Composting sites shown on Map 4.6, and Table 1 at pages 46 to 47. 2. Extend potential locations to similar ones also remote from sensitive receptors, by deleting reference to '...On rural agricultural land'.

Question fifteen (Waste Core Policy 9- New waste management facilities and freight strategies)

Name	Organisation	A/ D/ N	Representation
Mr Hugh Roberts	Marston Moretaine Action Group	A	MMAG agrees that waste should be freighted in accordance with Council requirements.

Name	Organisation	A/ D/ N	Representation
Mr Rio D'Souza	Planning Officer Highways Agency	A	<p>The Plan notes that waste management facilities will result in increased traffic movements and that this could impact on the Freight Strategies developed by the Councils in question. This has resulted in Policy 15. <i>"Policy 15 Waste Core Policy 9: New waste facilities and Freight Strategies. All waste facilities will be encouraged to conform with the Freight Strategies of the Council in whose area they are sited."</i></p> <p>"Question 15 Do you agree or disagree with Waste Core Policy 9? Please state your reasons."</p> <p>The Highways Agency agrees with Waste Core Policy 9 and the need for waste facilities to match any relevant Freight Strategies. This should also result in a reduction in the amount of freight traffic on key routes.</p>
Mr Adam Ireland	Planning Liaison Officer Environment Agency	A	We would agree with Waste Core Policy 9 as it has the potential to contribute to reducing the carbon footprint of transporting waste throughout the Plan Area .
Mrs A Lowe	Wilshamstead Parish Council	A	Agree in principle but the PC understand that these strategies are not yet finalised so it is to difficult to comment in any detail.
mrs sue clark	chair planning committee cranfield parish council	A	The freight should be carried in accordance with the Council's requirements.
Mr Ian Pickering	Chairman Aspley Guise Parish Council	A	
Mr Graham Gunby	Suffolk County Council	A	Agree that traffic should be managed in accordance with freight strategies.

Waste Core Strategy Preferred Options Representations and recommended responses

Name	Organisation	A/ D/ N	Representation
Central Bedfordshire Council Waste Disposal Authority	Central Bedfordshire Council Waste Disposal Authority	A	Agree - however, in all areas this strategy should consider and support other strategies from all three authorities, in particular the evolving Communities Strategy and individual Carbon Strategies.
Mr John Shephard (Partner J & J Design)	Acorn Transport & Plant Hire Ltd	A	This draft policy is welcomed in principle but the Submitted Plan should identify and list the relevant freight strategies to which reference is made. If such strategies do not exist we would question the 'soundness' of this policy.
Mr Paul Maison	British Waterways	D	<p>Policy 15 covers new waste strategies and freight strategies. It states, "all freight facilities will be encouraged to conform with the freight strategies of the Council in whose area they are sited." This appears to be a compromise rather than a definitive policy for the plan area. It should be more forceful, following joint agreement.</p> <p>The section on Policy implementation and monitoring (matrix) WCP 9 is weak and non-specific on monitoring progress of alternatives to road transport of waste. Surely more progressive transport policies for the movement of waste by sustainable means (rail and water) should be pursued.</p>
Mrs Nicky Upton	Harlington Parish Council	D	Central Bedfordshire has no freight strategy.
Ms Lizzie Barnicoat (Elstow PC)	Elstow Parish Council	D	<p>Question 15:</p> <p>The Parish Council disagree with the policy wording, waste facilities should not be 'encouraged to conform with the Freight Strategies of the Council in whose area they are sited', and the waste facility must legally be required to conform. Also as mentioned previously Bedford Borough do have a current Freight Strategy so therefore the policy is void.</p>

Name	Organisation	A/ D/ N	Representation
Ms Louise Treacy	ERM (on behalf of Covanta Rookery South Ltd)	D	Draft Policy 15/Waste Core Policy 9 is concerned with new waste facilities and freight strategies and states that 'all waste facilities will be encouraged to conform with the Freight Strategies of the Council in whose area they are sited'. Question 15 requests feedback in relation to this policy. 3.71 Draft Policy 15/Waste Core Policy 9 is weak and fails to provide a spatial strategy for the development of such facilities. This policy takes no account of traffic movements arising from sites which straddle Local Authority boundaries. In addition, this policy does not consider waste vehicle movements which may originate in a different Local Authority area to the one in which their destination facility is located.
Mr Keith Owen	SLR Consulting Limited (on behalf of Biogen Power Ltd)	N	There is no opportunity to fully comment on this as the freight strategies are not available and it is not possible therefore to assess the potential implications of the policy.

Question fifteen

Explanatory note:

- the impact of transport movements can be one of the most significant on communities near to or adjacent to waste management sites.

Summary response:

- The Preferred sites will be reviewed against the three Councils adopted Freight Strategies to ensure that we are consistent, and that sites are well located to the primary freight routes.
- the linkages with Sustainable Community Strategies are referred to in Technical Evidence Paper Three.

Recommended changes: Amend policy wording to say "All waste facilities will be legally accountable to conform with the Freight Strategies of the Council in whose area they are sited".

Paragraph 4.45 (Elstow Pit South)

Name	Organisation	A/ D/ N	Representation
Mrs Katharine Banham	Conservation Officer (Bedfordshire) The Wildlife Trust BCNP	D	Although this paragraph mentions some issues which need to be address at Elstow Pit is does not include that it is a County Wildlife Site. In order to be in accordance with local and national planning policy this would also need to be addressed in a suitable way. It also fails to mention that there are considerable issues to tackle at Rookery South including the need comply with the Low Level Restoration Scheme which is soon to be agreed.
Mr Antony Mould	Natural England	D	This paragraph again highlights that the biodiversity interest of both preferred landfill sites has been given little consideration within the strategy. Biodiversity should be included as an issue to be addressed in relation to Elstow Pit South. In addition, potential conflicts with the emerging LLR Mitigation Strategy for Rookery Pit South should be recognised (see comments on Para 4.20)

Paragraph 4.45

Explanatory note:

- Ecology and biodiversity is an important issue in relation the identification of Strategic sites.

Summary response:

- County Wildlife Site is a local designation, and flags up the presence of biodiversity interest. A national designation (i.e. Site of Special Scientific Interest), or the presence of a protected species, or designation of the site as a European wildlife site, would constitute a stronger issue in respect of the process of the selection of sites. Neither of these matters described above apply to Elstow South.
- The available mineral voids suitable for landfilling Non-Hazardous wastes are limited only to the sites proposed at Rookery Pit South and Elstow Pit South.
- The Evidence Base documents will be amended to include any designations such as County Wildlife Site.

Recommended changes:

1. Amend text to refer to the biodiversity interest of the site.

Paragraph 4.46 (Inert waste from construction and demolition activities)

Name	Organisation	A/ D/ N	Representation
Mr John Shephard (Partner J & J Design)	Acorn Transport & Plant Hire Ltd	D	The Councils appear to underestimate the functions of a sustainable Waste Transfer/Materials Recovery Facility which would separate the various components of demolition, construction and excavation arisings (including arisings from resurfacing of highways) and maximising recycling of materials rather than moving materials to landfill. We submit that the Councils should be encouraging this type of activity rather than seeking additional void space to accommodate such waste flows.
Mr Michael Brooks		N	Insufficient attention has been paid to the adequate separation of materials from construction wastes. (Soil, timber, brick and aggregate are commonly all thrown into the same skip.) Also, high quality topsoil is commonly mixed with lower quality subsoil, which is a waste of a resource.

Paragraph 4.46

Explanatory note:

- Large amounts of waste arise from the redevelopment of previously developed land, or maintenance of utilities, in the form of excavated materials, hardcore and rubble. Much of this material can be reused as a constructional fill.

Summary response:

- Paragraph 4.46 sets out a robust strategy for promoting the reuse of construction and demolition wastes.

Recommended change: None

Paragraph 4.47 and 4.48 respectively (Hazardous waste)

Name	Organisation	A/ D/ N	Representation
Mr Martin Tett	Buckinghamshire County Council	N	Hazardous wastes: Paragraphs 4.47 and 4.48 identify the tonnages of hazardous waste arisings but does not come to a view as to whether strategic hazardous waste facilities need to be provided in the plan period. The disposal of this waste would need the plan to address whether there is a need for strategic sites and the plan should not expect these to be dealt with by the IPC.
Mr Adam Ireland	Planning Liaison Officer Environment Agency	N	Again, the IPC is mentioned in this paragraph. This will need to be amended to relate to whatever form / organisation the IPC is to be converted to.

Paragraph 4.47 and 4.48

Explanatory note:

- Hazardous wastes arises from a limited number of circumstances, and is limited in occurrence within the Plan area.

Summary response:

- No additional hazardous waste disposal or incineration capacity is required during the Plan period.

Recommended changes:

1. Amend the wording of these paragraphs to make clear that additional provision for hazardous wastes is not required.
2. Insert hazardous waste arisings and fates of that waste (i.e. where it is managed) from TEP2.

Explanatory note:

- Hazardous wastes arises from a limited number of circumstances, and is limited in occurrence within the Plan area.

Summary response:

- No additional hazardous waste disposal or incineration capacity is required during the Plan period.

3.The Infrastructure Planning Commission is expected to be replaced with a Major Planning Infrastructure Unit in 2012. Any planning applications for new hazardous waste facilities would be handled by the IPC or the Secretary of State.

Question Eighteen (Possible contingencies and actions to be taken)

Name	Organisation	A/ D/ N	Representation
Mrs A Lowe	Wilshamstead Parish Council	A	
mrs sue clark	chair planning committee cranfield parish council	A	Cranfield PC is opposed to the proposal to build a very large scale energy from waste plant the would take most of it's waste from outside the plan area. The PC therefore supports any proposal which aims to limit the amount of waste arisings that can be received from outside the plan area.
Mr Ian Pickering	Chairman Aspley Guise Parish Council	A	
Mr Graham Gunby	Suffolk County Council	A	Agree because they are practical reactions to possible scenarios.

Name	Organisation	A/ D/ N	Representation
Mr Hugh Roberts	Marston Moretaine Action Group	A	MMAG disagrees that this is a complete list of the possible contingencies. The suggestion that one contingency would a single large scale materials recovery facility and which would source the majority of its waste from outside the Plan area is code presumably for the Covanta proposal and totally unacceptable to residents. A further contingency would be the waste from the local authorities being transported out of the plan area to a more suitable site. A zero limit should be placed on receipt of waste beyond the Plan area. The people of Bedfordshire have done enough dealing with waste from elsewhere. Its surely someone else's turn?
Mr Keith Owen	SLR Consulting Limited (on behalf of Biogen Power Ltd)	D	Question 18 Biogen disagrees with the thrust of statement 19.2. Whilst it is considered valid to provide sufficient recovery and disposal capacity equivalent to the volume of waste arising in the Plan area together with the London apportionment, it is not reasonable to have that capacity solely available for waste produced in the plan area or London, or to impose excessive or unreasonable restrictions on waste imports from adjacent areas. Cross boundary movements are inevitable, and provide the most sustainable solution, as waste can be free to travel to the nearest appropriate installation. What is important is that the plan area should provide sufficient capacity to be self sufficient after allowing for the London apportionment.
Ms Louise Treacy	ERM (on behalf of Covanta Rookery South Ltd)	D	Paragraph 4.48 presents an expectation that the management of hazardous waste is a national issue. Further, that the provision for hazardous waste management within the Plan area will be limited to monocells within disposal facilities. Whilst it is difficult to prepare strategic policy for hazardous wastes at the local level, not least due to the variety of materials that are covered by this description, it is not acceptable to only refer to disposal facilities. This misses providing a framework to enable the recycling and recovery from wastes such as fluorescent light tubes and electrical circuits. Statement 18 of the draft WCS identifies possible contingencies to be addressed over the Plan period. These include the following: (i) <i>'That and (iii) That each 20 Council develops small to medium scale facilities for its collected municipal wastes, located within its own area'</i> . It is submitted that an additional contingency should be included here as follows: (iv) <i>That recovery facilities are not provided at the preferred sites.</i> Question 18 requests feedback in relation to the proposed actions set out in section 3.78 above. It is considered that the content of statement 19 is poorly conceived. The overall objective of undertaking item no. 1 is unclear. No course of action is identified that would be taken in the scenario that neither Rookery Pit or Elstow South were not delivered for the disposal of non-hazardous wastes. Item no. 2 seeks to restrict the acceptance of waste to local arisings only. As identified elsewhere in this submission, there is no policy context to support this

Name	Organisation	A/ D/ N	Representation
			<p>contingency response. In any event, the contingency set out at Statement 18 does not identify what the problem would be should this situation occur. Item no. 3 suggests that the location of new municipal waste management facilities will be controlled. It is submitted that this is not the case in reality as the sites to be used will be taken forward through the procurement process. The draft WCS can, and should, provide the policy framework to drive those developments to appropriate locations, but that is the limit of the WCS's ability to influence the location of new development. If the market presents an alternative proposal which is acceptable on environmental and planning grounds, then planning permission should be granted.</p>
<p>Ms Lizzie Barnicoat (Elstow PC)</p>	<p>Elstow Parish Council</p>	<p>D</p>	<p>Question 18: The Parish Council strongly disagree,</p> <ul style="list-style-type: none"> • The site would require vast amounts of capping and preparation before the site could be used, during the Public Enquiry in 2003 into the Minerals and Waste Local Plan the Inspector quoted £10 million for such work. Within the current financial climate and with government funding not available it makes this sites inclusion as a Reserve site unrealistic. Also the capacity of the site as detailed within the consultation document is not sufficient to meet the demands of the Low Growth Scenario in the short or long term, therefore it adds to the fact that this site must be totally removed and an alterative included. • The two sites identified are both within the Borough of Bedford, it seems illogical and unfair that the Borough provide both an identified and a reserve site when none have been considered or included from Central Bedfordshire or Luton. • There is no traffic management plan in place to deal with the increased vehicular movements, the types of vehicles accessing the site would be heavy goods vehicles, at present the Borough of Bedford does not have an up to date Local Transport Plan or an up to date Freight Strategy. The infrastructure is not sufficient either to deal with vehicles accessing the site from the site along the A6 as this is predominately a single carriage road. • The site is in very close proximity to a carp fishing lake; this would be affected by the proposal, and is one of the top 5 in the country.

Name	Organisation	A/ D/ N	Representation
			<ul style="list-style-type: none"> • Within the consultation document Statement 6 references 'protect the cultural, social and environmental heritage of the Plan area', Elstow South is a designated County Wildlife site as listed in the Bedford Borough Allocations and Designations Plan (map 2) document so this site contradicts the statement totally and is strong reason to remove the site. • Within the consultation document there is reference to proximity of the site not being close to new developments, the Elstow South site will be within 100 yards of the proposed Wixams extension as detailed in the Bedford Borough Allocations and Designations Plan (AD4) document. • The Elstow South site must also be removed for the reasons listed in the Inspector's report during the Public Inquiry in 2003 as all the points still stand and the conclusion was the site is not suitable. Elstow Parish Council strongly oppose the use of this site and will challenge very strongly as previously they have to ensure this site is not used.
Ms D Sacks			This is a pragmatic approach, although the prospect of small local facilities being developed by each council could be welcomed as part of a dispersed and flexible pattern of facilities.
Mrs Nicky Upton	Harlington Parish Council	D	If expected growth does not take place out of county waste should not be imported.
Mr Graham Jenkins (White Young Green Planning) on behalf of Mr David Reavell	O & H Properties Ltd	N	<p>Question 18</p> <p>The contingencies set out in 'Statement 18' are noted, but given:</p> <p>(i) the support from the landowners to the principle of waste management at Rookery South which has been consistently expressed for many years;</p> <p>(ii) the acknowledged technical suitability of the site for landfill; and</p>

Waste Core Strategy Preferred Options Representations and recommended responses

Name	Organisation	A/ D/ N	Representation
			<p>(iii) our confidence that environmental and amenity issues can be addressed at the planning application stage, we consider that there is no underlying reason to express concern regarding the availability of Rookery South as a non-hazardous waste landfill site during the plan period. In addition, whilst we note the contingency that a large scale recovery facility might be developed which would source the majority of its waste from outside the Plan Area, this should not preclude such a facility from also accommodating local waste arisings.</p> <p>However, this opportunity is frustrated by 'Statement 19', item 2, which refers to placing 'clear and definite limits on the amount of waste that can be received from outside the plan area.' This statement is reinforced by proposed Waste Core Policy 4. The statement is arbitrary, imprecise and inappropriate, and for the similar reasons expressed in response to Question 10, we do not agree with Statement 19, item 2.</p>
Mr Shaun Askins	Strategic Waste Manager Luton Borough Council	N	However in s 4.52 to 4.57, surely the infrastructure requirements for the 'preferred sites' are essentially a matter for the wider strategic development plans and as such these should be referenced here.
Central Bedfordshire Council Waste Disposal Authority	Central Bedfordshire Council Waste Disposal Authority	N	Should this state sites rather than facilities? CBC will not identify a facility using these policies. The requirements of the authority will be based on the local municipal waste management strategy, not the minerals and waste local plan.

Question eighteen

Explanatory note:

- Hazardous waste is managed by disposal to dedicated sites or monocells, or by incineration. No such facilities exist within the Plan area at present.
- The Plan area is adjacent to several areas of high population density which produce large volumes of waste.
- In developing planning applications for new MSW facilities, the Councils will need to consider the appropriate planning policies relevant to them.

Summary response:

- The Plan does not identify sites for a specific proposal.
- The Plan acknowledges that cross boundary flows will occur, but seeks to limit the degree to which the capacity of Strategic facilities will provide capacity for waste other than that arising from the Plan area.
- The former mineral working site at Elstow South is only identified as a potential Non-Hazardous waste landfill site. The specific issues about the development of the site will be set out in appropriate detail in paragraph 4.56.
- Infrastructure requirements for identified Strategic sites are a relevant matter to be addressed in the combined Minerals and Waste Core Strategy. These are set out at paragraphs 4.52 to 4.57.

Recommended changes:

- Proposed Action 3 concerning Contingencies will be amended to refer to "sites".

Paragraph 4.55

Name	Organisation	A/ D/ N	Representation
Mrs Katharine Banham	Conservation Officer (Bedfordshire) The Wildlife Trust BCNP	D	This paragraph should also mention that the site is a County Wildlife Site and therefore biodiversity is an additional constraint.
Mr Antony Mould	Natural England	D	Biodiversity should be recognised as a constraint to the deliverability of the Elstow Pit South site.

Paragraph 4.55

Paragraph 4.56

Name	Organisation	A/ D/ N	Representation
Mr Antony Mould	Natural England		The potential for impacts to Houghton Regis Marl Lakes SSSI should also be recognised (see comments for Q7).
Mrs Katharine Banham	Conservation Officer (Bedfordshire) The Wildlife Trust BCNP		The Site at Thorn Turn is located less than 300m from the Houghton Regis Marl Lakes SSSI/Houghton Regis Chalk Pit CWS complex. Marl lakes are one of the rarest forms of standing water in Britain and as only a few sites exist in southern England it is vital that their future is secured. The lakes are particularly susceptible to water quality issues and any waste activities at Thorn Turn would need to demonstrate that there would be no adverse affect on this nationally important site. We recommend that recognition of this is included in the Waste Core Strategy.

Paragraph 4.56

Explanatory note:

- This site is presently in agricultural use, and within the designated Green Belt, but lies within the area of a proposed Strategic Site Specific Allocation (SSSA) area in the Luton and South Bedfordshire Core Strategy. This document has been submitted, and is awaiting Examination in Public. The site will be released from its current status on adoption of the Luton and South Bedfordshire Core Strategy.
- There is as yet no statement from the Government concerning the funding of the A5-M1 Link Road.

Summary response:

-This paragraph refers to infrastructure constraints, and not site selection issues, and therefore the issues raised are not relevant.

Recommended change:- No change.

6 Consultation representations to Chapter five

Paragraph 5.9

Name	Organisation	A/ D/ N	Representation
Mr Anthony Mould	Natural England	D	As a number of the preferred option policies have implications for County Wildlife Sites, it would be useful to have a quantitative indicator to measure the success of achieving the objective for protecting (and enhancing) biodiversity. For example, the area/quality of habitats lost compared to area/quality of habitat secured and manage

Paragraph 5.9

<p>Explanatory note:</p> <ul style="list-style-type: none"> - The protection and enhancement of biodiversity is an Objective of the Plan.
<p>Summary response:</p> <ul style="list-style-type: none"> - The protection of ecological interest present in County Wildlife Sites would be achieved through implementation of Policies in the later General and Environmental Policies DPD, and the Saved Policies in the Minerals and Waste Local Plan. - Need to show linkages between the Waste Core Strategy (WCS) and the Sustainable Communities Strategy
<p>Recommended change:</p> <ul style="list-style-type: none"> - A quantitative indicator for biodiversity will be developed as part of the pre-submission draft.. - Table 2, Chapter 5: Policy Implementation and monitoring matrix - add column to show linkages between the WCS and the Sustainable Communities Strategy (see Technical Evidence Paper 3).

7 General Comments

General comments

Name	Organisation	A/ D/N	Representation
Mr Adam Ireland	Planning Liaison Officer Environment Agency	A	We would like to make the following comment on the Core Strategy Preferred Options Paper. The Waste Core Strategy Preferred Options has addressed the many issues of waste management for the Planned Area of Central Bedfordshire, Bedford Borough and Luton Borough. The Strategy has accessed the available data and has produced reasonable assumptions to calculate the capacities required for waste management within the Planned Area. Our preference would encourage the sustainable treatment of waste and creation of a range of treatment facilities rather than waste from any source to be deposited in landfill. Notwithstanding that, we strongly support the reduction in waste arisings and the adherence to the Waste Hierarchy as stated in Chapter 2. We also support the Strategy's recognition that any future Growth changes would require a review on the associated Technical Papers. In summary the Central Bedfordshire Council, Bedford Borough Council and Luton Borough Council Waste Core Strategy Preferred Options focuses on future provision of various type of waste facilities and is proactive in encouraging the use of waste as a resource. The aims will contribute towards reducing the effects of climate change and promote a more sustainable future for the three authorities.
Mr John Shephard	Partner J & J Design	N	It is submitted as a general comment that the Waste Core Strategy Preferred Options document appears to focus heavily on municipal waste streams and on landfill and Waste Transfer/ Materials Recover/Bulking Facilities with little guidance for future developments in the Metals Recovery Sector. These are recognised in paragraph 5.5 within the Implementation section and in the Glossary. However, this practice has been involved in the past with several Metals Recovery Facilities both strategic and non-strategic. The industry may well wish to respond to economic changes and changes in technology resulting in relocation and/or rationalisation or redevelopment on existing sites within the plan period. We would therefore welcome Development Management Policy for such a scenario. In particular, we consider that some larger metal recovery flows could well become rail freight customers in the future and both existing and potential sites with proximity to or access to rail should be safeguarded (e.g. Biggleswade railway yard, Cauldwell Walk Bedford and Ampthill former goods yard).

Adam Ireland and John Shephard

Explanatory note:

- The Waste Core Strategy considers all kinds of wastes arisings.

Summary response:

- Metal recovery is part of the Commercial and Industrial waste sector. No separate provision is appropriate or necessary.

- Railway yards are beyond the scope of the Waste Core Strategy.

Recommended changes: None.

The Coal Authority (Miss R Bust)

Thank you for consulting The Coal Authority on the above. Having reviewed your document, I confirm that we have no specific comments to make on this document at this stage. We look forward to receiving your emerging planning policy related documents; preferably in an electronic format. For your information, we can receive documents via our generic email address planningconsultation@coal.gov.uk, on a CD/DVD, or a simple hyperlink which is emailed to our generic email address and links to the document on your website. Alternatively, please mark all paper consultation documents and correspondence for the attention of the Planning and Local Authority Liaison Department.

The Coal Authority

Explanatory note:

-This is a planning policy document, and is not concerned with operational matters.

Summary response:

- Emergency planning is beyond the scope of the document.

Recommended change: None.

Simon Dodd (European Metal Recycling Ltd)

I was very surprised that the "Evidence Base" report makes very little mention of the importance of Metal Recycling and indeed in your listing of "Existing Waste sites within the Plan area" our site at Cauldwell Walk Bedford and that of our main competitor Ampthill Scrap at Station Road Industrial Estate Ampthill are completely omitted. (As is our smaller but still significant site at Station Road Biggleswade!) These sites are both of strategic importance for Bedfordshire. We feel it is essential that such sites (which we believe are the two largest Metal recycling facility in Bedfordshire (including Luton)) needs to be recognised and protected. Our site at Bedford has the ability to process around 100000 tonnes of scrap per annum.

Indeed it achieved over 93000 tonnes during 2007 and even though it has seen a slight reduction in throughput during the last two years (with the decline in the economy) it is still recycling around 80000 tonnes of Ferrous and Non Ferrous metals per annum. I detail below a summary of the nature of the materials we deal with, how they are processed and the benefits of recycling. I would be happy to provide any clarification. I also highlight a major concern nationally but particularly at our Bedford site. This is the potential for conflict to arise between the operators of a waste facility and occupiers of proposed adjoining new residential developments. Without adequate protection measures the long term operation of the waste facility may be compromised. We have made successful objections to date against various residential led planning applications on the former Camford Works, Ampthill Road and Hazlewood Foods, Dallas Road sites both of which were submitted without adequate (if any) screening. Both applications were subsequent to our objections withdrawn or rejected. However we had to employ a noise consultant to point out the inadequacy of the noise reports and the mitigation proposed but strongly believe that the issue will not go away particularly when the housing market improves.

In the light of the EU and Government Directives setting targets for the reduction of landfill and an increase in recycling the importance of the sites will increase. If our facilities are not available the objectives set by these directives will not be achieved. There is an increasing problem in finding suitable sites for Waste Uses and this will continue to be a problem. They also need for reasons of Regional self sufficiency and sustainable transport to be near the

sources of waste which inevitably means near to built up areas. I am sure you will appreciate that this search for possible new sites can be very problematic and controversial. This is why in many Waste Authorities across the UK have recognised the need to protect existing waste sites from inappropriate adjoining developments. We strongly feel that there is a need in your Local Plan for policies which:

- a) Promote Industrial Land for waste facilities
- b) Identify and safeguard key sites (usually existing ones)
- c) Make clear links to the National Waste Strategy and Area Waste Plans
- d) Provide Positive support for waste management Location of sites We have found that we need to have depots to service the needs of each local market and therefore in this part of the East Midlands / East Anglia we also have sites in Biggleswade, Northampton, Newmarket and Kettering.

You will be aware that:

- a) Local authorities have targets set for recycling and EMR's operation helps to fulfil these targets.
- b) The acquisition of scrap metals ensures that efficient recycling is achieved and is a helpful source of income for local businesses.
- c) By providing waste recycling facilities the fly tipping of cars, fridges and redundant items can be avoided.

Our business by its very nature generates noise, traffic movements and vibrations. We appreciate that whilst our yards tend not to be popular neighbours and are not pretty they are necessary if the country is to achieve their recycling targets. EMR Cauldwell Walk Bedford. The EMR yard is a long established and significant waste processing and recycling site.

Our site handles scrap brought in or collected from local firms, councils and individuals. There are many small loads which people will not transport far. Examples of ferrous and non-ferrous metal streams accepted at the site include

- * Manufacturing off cuts and processing scrap from local businesses.
- * Local Authority civic amenity scrap.
- * End of Life Vehicles (ELVs).
- * Waste electrical and electronic equipment (WEEE).

* Packaging materials.

* Demolition scrap such as girders and cable arising as a result of re-development.

* Cables and tanks from local electricians and plumbers. The majority of the scrap which arrives on site does so in an untreated or partly treated state. Therefore a number of processes have to take place on site before the metal can be effectively reused.

There are 4 main operations carried out here. These activities include:

a) Shear:- This is a large guillotine that bales up and then (after first compressing it using a number of hydraulic rams) cuts the Ferrous Scrap metal to standard sizes or specific customer requirements as a furnace ready product. The processed scrap is then dispatched as 'furnace feed' to either steel works or foundries in the UK or abroad.

b) Baler:- The site also has a baling machine which consolidates "off cuts" of production material to form furnace ready bales. c) End of Life Vehicles :- Under the End of Life Vehicle Directive EMR must have facilities on site to receive and process scrap cars. The annex to the Directive sets new standards for the storage of ELVs prior to treatment, detailing depollution operations, recycling and the storage of components and spare parts. It requires that storage and treatment should occur on fully impermeable surfaces with adequate rainwater controls with appropriate safeguards for hazardous components and materials. It also outlines which components and materials are to be removed in depollution procedures before recycling can be carried out. Depollution activities are similar to those within a service garage. All fluids (oils, brake fluids, windscreen washes etc) drained off from the vehicles are collected in external storage tanks and reclaimed through a licensed processor of waste hydro carbons. The Shear is then used to densify the end of live vehicles for transporting to other regional sites for further processing. In this case to our shredder sites at Willesden in North London or Birmingham.

d) Non-ferrous Scrap - This is typically aluminium, brass and copper and will be purchased from local businesses sorted processed and hand cleaned. E.g. insulation may be removed from tanks, cables sorted into different categories and metals compressed into bales. Once sufficient quantities are bought it is then baled / loaded into containers for transport to the customer who will reuse the metal. There is a substantial investment (into the millions of pounds) in plant and equipment, The whole of the yard is concreted and drained via a full retention interceptor into an adjacent foul water sewer under a specific discharge consent. An up to 8 metre screening fence was built by us along one side facing the railway and a small industrial and housing estate at the insistence of Bedford Council and following the instillation of a replacement shear. The Camford Works and Hazlewood Foods site are on other sides of the site which do not benefit from this screening.

The threat to existing waste sites from Residential schemes We are finding nationally that residential developers are increasingly applying for residential planning permission for schemes which often includes / or immediately adjoins our depots without making specific provision to provide for the need for:

a) alternative facilities or

b) adequate mitigation measures to minimise any potential conflict that can arise when residential occupiers adjoin a waste site.

We feel that it is important that your local planning policy should make the protection of any waste site from inappropriate development a priority or if the redevelopment scheme is considered to be essential put the onus on the developer or local authority to find a suitable alternative site. In the light of the EU and Government Directives setting targets for the reduction of landfill and an increase in recycling the importance of the sites will increase. If our facilities are not available the objectives set by these directives will not be achieved. Unless the importance of these sites are recognised in the local plan this problem will continue and essential waste recycling capacity within an area will be lost. We have seen nothing in local plan which identifies suitable alternative sites to which our operation could move. Allowing the building of houses without full and proper mitigation will place an unreasonable restriction on the EMR recycling business (in terms of noise related complaints, restrictions and injunctions) in the manner advised against by paragraph 1 of PPG 24; Benefits of Metal Recycling.

The image of metal recycling is rapidly changing in the UK as the government begin to recognise their environmental and recycling commitments. EMR is a world leader in recycling technology and as stated above we handle in excess of 10 million tonnes of metal globally each year, for which our recycling rates are around 95%. Recycling metals means that we do not further deplete natural resources which would otherwise be needed to make new metal – such as iron ore in steelmaking, nickel in stainless steel; or alumina and bauxite in aluminium smelting. There are also considerable savings in energy and reduced CO2 emissions in using recycled materials:

Indeed compared to the production of material from virgin ores the recycling that EMR carries out saves 15 million tonnes of CO2 which is equivalent to 2.52% of the annual CO2 generated by the UK. There are also other environmental benefits, for example, using recycled steel to make new steel enables reductions such as: 86% in air pollution 40% in water use 76% in water pollution We also have a site at Biggleswade and I will send you a separate email about how the construction of housing adjoining has led to significant issues. I will also send you a separate email commenting on the specific points raised in your consultation. We trust that this information helps. Simon Dodd (European Metal Recycling Limited)

European Metal Recycling

Explanatory note:

- Metal recovery and reuse is a valuable component of the waste management sector.

Summary response:

- The provision for and distribution of non-strategic facilities is dealt with in Waste Core Policy 7: Preferred spatial distribution of non-strategic facilities. Metal recovery is part of the Commercial and Industrial waste sector. No separate provision is appropriate or necessary.

Recommended change: None.

Cllr Nunn (Central Bedfordshire Council)

Helpful data and staff on waste recovery/transfer but would like to know a) the transport effects (train and lorry) and b) what options exist for import/export of waste into Central Bedfordshire Council and (out to consignious counties/authorities- synergy. Janet Nunn

Cllr Nunn

Explanatory note:

- The impact of the transport of waste is a major planning consideration.

Summary response:

- The Waste Core Strategy does not promote the transport of waste by rail, except for the residual waste from London. This is because the transport by rail over short distances is not economical, so encourages the importation of waste.

- The expected means of transport is primarily by road, since the high cost of creating rail infrastructure makes rail transport unlikely using new infrastructure.

Recommended change: None.

Professor George Huxley

I wish to re-emphasize a previous contention: it is that landfill sites and land for recovery of materials should be sited so as to be railed served. A good example of the environmentally virtuous practise can be inspected at Calvert to the north of Aylesbury. Your sincerely, (Professor) G.L. Huxley

Professor Huxley

Explanatory note:

- The impact of the transport of waste is a major planning consideration.

Summary response:

- The Waste Core Strategy does not promote the transport of waste by rail, except for the residual waste from London. This is because the transport by rail over short distances is not economical, so encourages the importation of waste.

- The expected means of transport is primarily by road, as the high cost of creating rail infrastructure makes rail transport unlikely.

Recommended change: None.

Ms Carmelle Bell (Thames Water)

Thank you for consulting Thames Water Utilities Ltd. (TWUL) on the above. TWUL is the statutory sewerage undertaker for a small part of south Bedfordshire, mainly covering Luton and the area to the south of Dunstable and the following comments are made in this context and further to those made on the Issues and Options version of the Core Strategy in 2007.

General comments: The importance of considering water and sewerage infrastructure provision in the new LDF documents is highlighted by paragraph 4.9 of the new PPS12, which states that in preparing Local Development Documents: *“LPAs should ensure that delivery of housing & other strategic and regional requirements is not compromised by unrealistic expectations about the future availability of infrastructure, transportation and resources. Annex B sets out further guidance on resources, utilities and infrastructure provision.”*

Paragraphs B3 to B8 of PPS12 also place specific emphasis on the need to take account of infrastructure such as sewerage early on in preparing Development Framework Documents. Paragraph B3 in particular states: *“The provision of infrastructure is important in all major new developments. The capacity of existing infrastructure and the need for additional facilities should be taken into account in the preparation of all local development documents.”*

It will be essential to ensure that the introduction of a portfolio of Local Development Documents (LDDs) does not prejudice adequate planning for water and sewerage infrastructure provision as this is an essential pre-requisite for development.

Consultation with TWUL

When carrying out the necessary early consultations with TWUL regarding the capacity of water and sewerage systems, adequate time should be allowed to consider development options and proposals so that an informed response can be formulated. It is not always possible to provide detailed responses within a matter of weeks; for example, the modelling of water and sewerage infrastructure systems will be important to many consultation responses and this can take a long time to carry out (e.g. modelling of sewerage systems can be dependant on waiting for storm periods when the sewers are at peak flows).

We also have to consult with the Environment Agency (EA) to obtain a clear picture as to possible water abstraction and waste water discharge consent limits prior to undertaking modeling from a treatment perspective. This process itself can take a considerable period of time, especially if it depends on the EA undertaking its own evaluation exercise. Therefore, realistic consultation periods with water and sewerage undertakers will need to be taken account of in the preparation of the LDDs.

We trust the above is satisfactory, but please do not hesitate to contact me if you have any queries.

Thames Water

Explanatory note:

- There are substantial areas identified for substantial housing growth in the Local Development documents for non-minerals and waste development of each of the three Councils.

Summary note:

- There is no known requirement for additional sewage treatment facilities in the Plan area.

Recommended change:

1. Amend paragraph 4.35 to read: "There will be a need for new Non-Strategic Recovery facilities. These include waste water treatment works, aggregates recycling, food/agricultural/green waste Anaerobic Digestion plants, MSW and Commercial/Industrial materials recovery sites and bulking up facilities."

Ms Lizzie Barnicoat (Bedford Borough Access Forum)

Members of the Local Access Forum have reviewed the Waste Core Strategy Preferred Options Consultation Document and have the following comments to make –

The Forum wish to highlight that currently this document does not take into account the importance of needing to recognise and promote any site used in the future for waste management must have a standard clause regarding implementation of enhancement of rights of way and leisure activities.

Members feel very strongly that the access network presently is very poor to the south of the Borough, so the sites detailed in the document which are located in this vicinity the Local Access Forum feel that if these sites are used it is important that a required outcome be the network must be developed further.

In addition due to the specific knowledge of areas included within the document the Forum wish the following is noted:

Finally, the Forum wishes to acknowledge and note appreciation of the Council's efforts to unite the various documents for waste together into a simpler process for the future. Yours sincerely Borough of Bedford Local Access Forum

Bedford Borough Access Forum

Explanatory note:

- Rights of Way are an important element of provision for access to non-urban areas of the local environment.

Summary response:

- Rights of Way are protected by saved policy, GE21 (Public Rights of Way), and are an issue which is more appropriate in the determination of for consideration of individual applications.

Recommended change:

1. The issue of enhancing rights of way around waste facilities will be addressed in the General and Environmental Policies DPD.

Mr Spencer Warren (Heaten Planning) on behalf of Tim Deal Lafarge Aggregates Ltd

Our response is confined to those questions which are of relevance to Lafarge. Further to our response to the Bedfordshire and Luton Waste Core Strategy and Site Allocations Plan: Issues and Options in November 2007 we wish to continue to promote the following sites for waste management uses:

- WSD05 Dairy Farm, Renhold – restoration with inert materials
- WSD07 Black Cat – restoration with inert material, inert waste recycling
- WSD08 Sand House Quarry – inert waste recycling
- WSD09 Elstow Rail Depot – inert waste recycling
- WSD10 Willington Quarry (Plant Site) – inert waste recycling. As a general point we feel it would be useful for the core strategy to identify all the existing operational sites with some indication on their capacity and anticipated timescales for operation.

Lafarge Aggregates Ltd

Explanatory note:

- **The Waste core Strategy identifies only Strategic sites.**

Summary response:

- **Inert waste recycling is not a Strategic waste use (see paragraph 4.46, Waste Core Strategy Preferred Options Consultation Document), and none of the sites mentioned have therefore been considered or identified. NB. Willington Quarry already has a permission for inert waste recycling.**

Recommended change: None.

Lyn Lyman Parish Clerk Roxton Parish Council

Waste Core Strategy Proposal. Roxton Parish Council wish to advise you that they agree with all the conclusions mentioned in the Consultation Document.

Roxton Parish Council

Explanatory note:

- The Plan considers all relevant waste planning issues.

Summary response:

- Accepted.

Recommended Change: None.

Mrs Ann-Marie Cleghorn (Group manager Champneys)

Dear Sirs, Please find below comments and objections on behalf of Champneys Health Resorts concerning Site WSD40 (Arlesey Road Henlow) referred to in the Waste Core Strategy Preferred options document.

Local Development Framework Waste Core Strategy Preferred Options Policy WCP 8 and Table 1 Potential Preferred Sites for Composting Site WSD40 (Arlesey Road Henlow)

1. Champneys Henlow Grange strongly object to the proposal to include Site WSD40 (Arlesey Road Henlow) as a potential preferred site in Policy 8 and Table 1. The site is adjacent to the Henlow Grange Health Farm a Grade II (star) Listed Building. The proposed use would therefore be one within 50 metres of a building in the top 10% of Listed Buildings in the country.

2. The site has been the subject of a protracted planning history during the course of which the owners' endeavoured to establish industrial, retail and waste disposal uses on the site. The approach of the Mid Bedfordshire District Council (which has supported the site for composting) was of such concern that the Secretary of State for the Environment issued an Article 14 Direction on the site calling all applications in for his consideration. The proposed site is fully within the setting of the Listed Building The Strategy Supporting Documents
3. The Objectors note that in the Sustainability Appraisal Preliminary Assessment that in relation to Biodiversity, Cultural Heritage, Landscape, Human Health and Amenity the site had a "*Potential significant negative effect*". No other site in the potential preferred list is subject to a similar degree of constraint.
4. The Site Appraisal Matrices (Appendix 2) of the Sustainability Appraisal Preliminary Assessment notes that any waste management development is likely to cause an impact on the setting of the heritage assets and requires mitigation measures "to ensure that it does not impact upon the assets" the site is adjacent to Henlow Grange and historic parkland and in a rural gap important for recreation with several public footpaths in terms of human health and amenity it is recognised that the Health Farm, local residents and the footpaths around the site could be affected the desirability of the access to the A507 needs study if used for large volumes of HGV traffic a biodiversity assessment is required in relation to the effect of a waste disposal use locally. The Report suggests in all cases a mitigation analysis before the negative impacts could be disregarded.
5. The Objectors are concerned to find that in Table 96 of the Technical Evidence at page 478 no mention is made of the proximity of Henlow Grange Health Farm within 50 metres of the proposed site. Of even greater concern is that the recorded responses in Table 123 at page 548 do not include a reference to the objections made by Henlow Grange, which was given a receipt at the time of its submission. The failure to take account of the objections which refers to the history and a planning background, not otherwise mentioned, makes the choice of WSD40 as a potential preferred site unsound. There is no evidence that the objection was ever given consideration.
6. As has been pointed out, Henlow Grange is one of the few Grade II Star Listed Buildings in the country and the proposed potential composting site falls fully within the setting of the Listed Building as found by decisions of the Secretary of State for the Environment in 1999 [App/J0215/C98/1010291/3 and A/98888/193651] and 2002 [App/X0225/A/99/1021608 and E1/M0200/2/3/08]. It follows that the use proposed and the activities of treating waste composting affect the setting of the Listed Building and need to be considered against national and local policies for the protection of such buildings. The use proposed would be contrary to Local Development Framework Policy CS15.
7. The proposal for the site submitted to Mid Bedfordshire District Council described the proposed use as an "extension to an existing site". The site has no lawful use for handling of waste: the only possible consent provides for use by 'sand and gravel processing'. There is no consent for fixed processing equipment on site. It is the position of the objector that the use for sand and gravel processing has properly in law lapsed. There is no consent for any present handling of inert waste or demolition rubble and insofar as that use goes on it is questionable. Inquiries have been made of the Environment Agency and the Objectors in 2007 were given to understand that no waste handling licences existed for the site. The 2002 decisions involved applications to extend the use "*to include controlled Inert Recycling*" accompanied by the erection of 1190m² of floor space for commercial activities. The Secretary of State in

paragraph 14 of his decision concluded “that the proposals conflict with national and development plan policies on the protection of the open countryside and setting of historic buildings. There has been no change in that position justifying any change of policy. The Sustainability Appraisal referred to in paragraph 3 and 4 makes the position clear.

8. The various detrimental effects of the proposal would include erection of buildings harmful to the visual amenities of the Listed Building and the footpaths, excessive activity by heavy goods vehicles, machinery and moving equipment leading to noise in the immediate vicinity. There would also likely to be odours from the composting affecting the Health Farm building and the grounds where residents rest in the Summer sunshine. The various impacts are the subject of comment by the Environment Agency at pages 548 to 550 of the Technical Evidence. The advice given clearly shows that the site does not comply with the Agency’s Standards. The Agency stresses a particular concern in relation to odour to Henlow Grange 50 metres from the site and in the direction of the prevailing wind.

9. While the existing site is an intrusion in the countryside and should have been restored under the 1948 Mineral Planning Consents, a significant activity like the composting of 50,000 tons of waste per year with the traffic generated and noise would degrade the countryside further and help to sustain a use which should have been removed. If the proposer of this site continues to press to have it included as a site for the handling of 250,000 tons of demolition waste and a transfer station the effect would be significantly increased and be even more objectionable than the composting proposal.

10. In terms of accessibility apart from the use of the access on the A507, the Inspector and the Secretary of State in the decision of 2001 found that the site did not represent the best practical options for disposing of inert waste. The site would be no different in relation to composting since it is removed from the areas of greatest generation. Its use would be inconsistent with a main principle of sustainable development. It is not proximate to the sources of waste arising within PPS.10

11. Harm to the setting of the Listed Building and to its’ parkland grounds by way of visual intrusion noise and odour would be likely to jeopardise the Health Farm Business by deterring clients. The visitors come to enjoy the historic buildings and quiet and attraction of the local countryside using the footpaths and bridleways around the Grange for some activities. The use of the proposed site would jeopardise the future of the Health Farm employing, as it does, 250 people. The effect on the Health Farm could be such as to result in a loss of local jobs. Conclusion The site should be excluded from the list of potential preferred sites for composting. Of the sites proposed it is subject to the worst negative impact of sites in the Sustainability Appraisal. It does not comply with the Environment Agency’s criteria for a composting site. It gives rise to visual and amenity harm to an important national Listed Building. To permit the use would be contrary to the policy pursued by the Department of the Environment in issuing an Article 14 Direction to prevent the Mid Bedfordshire Council from permitting any development affecting the Listed Building and its setting and to the decisions of the Secretary of State in 1999 and 2002. In any hearing by a Government Inspector this history will be relied on by the Objector, if the site remains as a proposed preferred site. The Proposal is contrary to policy CS15 in the Local Development Framework. The proposed use would also have detrimental effects on the neighbouring footpaths and the countryside lessening the enjoyment of them in the Ivel Valley project area, where the planning objective is to enhance the environment, not to degrade it. The Objectors

do not believe that mitigation measures are practicable to reduce the effects of noise, visual intrusion and odours to Henlow Grange. The Objectors ask that this site be deleted from the list of potential preferred sites for composting. Please acknowledge safe receipt and confirm the above comments have been taken into consideration.

Champneys

Explanatory note:

- One method of managing green waste is open windrow composting, for which there are several existing permitted sites.

Summary response:

- No specific sites for open windrow composting will be identified in the Minerals and Waste Core Strategy.

Recommended changes:

1. Table 1, Potential Composting Sites, and Map 4.6 to be removed.
2. Amend paragraph 4.37 to read: "According to the Low Growth Scenario which is Preferred, there is a surplus of green waste composting capacity in the Plan area. Consequently no new sites are identified for green waste composting."

Mr Martin Tett Buckinghamshire County Council

Waste Core Strategy Preferred Options Consultation Document – Bedford Borough, Central Bedfordshire and Luton Borough Councils Thank you for consulting the County Council upon your Waste Core Strategy Preferred Options consultation report.

I note that you are asking for comments by 12th July 2010, and hope that this response will be helpful in progressing the Waste Core Strategy to publication.

The Council, as a neighbouring Authority, is pleased that you are seeking to provide a comprehensive strategic waste plan for your area. We welcome your expressed intention to meet your future waste management needs within the plan area. You will know that the Coalition Government has now implemented its' commitment to *"rapidly abolish Regional Spatial Strategies and return decision-making powers on housing and planning to local councils"*. We expect that the Preferred Options will be reviewed before publication of the submission document as many of the policies and underlying principles of the plan are linked to the figures of the East of England Plan (EEP).

Buckinghamshire Parish Council

Explanatory note:

- **The Localism Bill contains provision to abolish Regional Spatial Strategies. Until those provisions are enacted the RSS remains part of the development plan.**

Summary response:

- **The progress of the Localism Bill and its provisions for the abolition of Regional Spatial Strategies will be monitored in respect of timing.**

Recommended changes: None.

Mr Tom Gilbert-Wooldridge Planner English Heritage.

Bedford Borough, Central Bedfordshire & Luton Borough Waste Core Strategy: Preferred Options I refer to your letter dated 27 May 2010 consulting English Heritage on the above document.

We would like to make the following comments:

General Issues

English Heritage's principal interest in the Core Strategy is whether there are sound policies for the location, or expansion, of waste sites and facilities which include criteria for protection of the historic environment. National guidance contained in PPS10 advises that Waste Plans should help secure the recovery or disposal of waste without harming the environment. This includes the historic environment. Annex E, dealing with location criteria for waste developments, states that consideration should be given to adverse effects on designated heritage assets (scheduled monuments, conservation areas, listed buildings and registered parks and gardens). The setting of historic sites, and the need for good design, are also to be considered.

As you will be aware, on 23 March 2010 the Government published *Planning Policy Statement 5 "Planning for the Historic Environment"*, and an accompanying Practice Guide. At the same time the Government's vision for the historic environment was published. PPS5 supersedes guidance for the historic environment contained in PPGs 15 and 16. The comments on the current consultation document are provided within the context of the new national guidance.

The new PPS states in Policy HE3.1 that "*local development frameworks should set out a positive proactive strategy for the conservation and enjoyment of the historic environment.*" Policy HE3.4 advises that LDFs should "consider the qualities and local distinctiveness of the historic environment and how these can contribute to the development of the spatial vision in the ...core strategy. Heritage assets can be used to ensure continued sustainability of an area and promote a sense of place.

Plans at a local level are likely to consider investment in and enhancement of historic places...They should include consideration of how best to conserve ...heritage assets that are most at risk of loss through neglect, decay or other threats."

The Waste Core Strategy will need to demonstrate that it is consistent with the new PPS5 and provides a positive, proactive and locally distinctive strategy for the historic environment.

We hope that the above comments are of use. Please do not hesitate to contact me if you have any queries.

English Heritage

Explanatory note:

-The Plan area contains a number of buildings of historic importance.

Summary response:

-The consideration of heritage issues will primarily take place in the determination of individual planning applications, where the existing Saved Local Plan Policies will continue to be applied until they are replaced by those in a General and Environmental Policies DPD.

Recommended change: None.

Mr Hunter (Chelveston Cum Parish Council)

AGREE: Bedfordshire MWDF- Waste Core Strategy Preferred Options consultation. With regards to the above consultation, this council considered it at a recent meeting and I am instructed to respond accordingly. This Council notes that tables 44 and 45 of the Technical Evidence Papers shows that Chelveston Renewable Energy (CRE) site (wsd33) had the lowest combined score against the planning and sustainability criteria, in particular scoring low on: -Proximity to waste arisings, -Importation of wastes from outside the plan area and -Impact on the local roads. These criteria scores support the view of this Council that the CRE site is unsuitable for the development of a waste facility and accordingly this Council supports the Waste Core Strategy Preferred Options.

Chelveston Cum Parish Council

Explanatory note:

- The identification of Preferred Recovery sites is discussed in Technical Evidence Paper 4 and paragraphs 4.17 to 4.24.

Summary response:

- Preferred Strategic sites were not chosen solely or entirely on the results of the scoring.

- The site at Chelveston is not identified as Preferred.

Recommended change: None.

Mr Jeremy Randall (Barnswood Ltd)

Waste Core Strategy Preferred Options Consultation Document We write on behalf of our client, Barnswood Ltd, which has now had an opportunity to review the Waste Core Strategy Preferred Options Consultation Document.

As an introduction to our client, it may be helpful to note that Barnswood Limited is the sole landowner of Houghton Regis quarry and the surrounding arable land to the north, which is located to the west of Houghton Regis and north of Dunstable. Their landholding comprises the former Houghton Regis quarry, arable land, and areas of scrub measuring approximately 75 hectares. The site consists of 50ha of environmentally designated areas and 25ha of arable land, currently designated as green belt. Barnswood Limited made representations to the Luton and South Bedfordshire Joint Committee Core Strategy Preferred Options Paper (2009), which in particular identified three Strategic Urban Extensions, of which one relates partly to Barnswood Limited's land holding.

We look forward to receiving confirmation that these representations have been received, and trust that they will be taken into account prior to finalisation of the Waste Core Strategy. We would welcome the opportunity of discussing these comments with you in further detail prior to the finalisation of the Core Strategy. If you have any queries or wish to discuss the comments, please contact Jeremy Randall.

Barnswood Ltd

Explanatory note:

- The Joint Core Strategy for Luton and south Central Bedfordshire identifies several areas for substantial housing growth known as Strategic Urban Extensions. A Pre-Submission stage draft of the Core Strategy was publicised in November 2010.

Summary response:

- No waste site is being proposed for the former Houghton Regis Quarry. Acknowledged.

Recommended change: None.

Mr Chris Evans (Ministry of Defence)

Waste Core Strategy Preferred Options Consultation Document:

Thank you for consulting Defence Estates Safeguarding on the above document. The document outlines the Joint Waste Core Strategy scheme between Central Bedfordshire Council, Bedford Borough Council and Luton Borough Council and will identify how much landfill and waste recovery capacity is required for the next 15years.

Ministry of Defence Safeguarding Interests.

The Principal concern of the Ministry of Defence (MOD) in relation to waste sites within the proposed areas is the potential to attract large and/or flocking bird species that are considered hazardous to air traffic. Military aerodromes are protected against developments that have the potential to attract large congregations of birds within the statutory safeguarding birdstrike zone. The safeguarding zone is identified by a circular area extending to a distance of 12.87km from the aerodrome and Defence Estates should be consulted on all developments that meet the associated safeguarding criteria. Additionally, there are a number of other statutorily safeguarding sites within the consultation area which seek to protect MOD assets against physical obstructions. It is unlikely that these sites will be affected by allocated waste sites however they have been included to represent all MOD safeguarding interests within the consultation area. MOD Safeguarding Zones Plan Type RAF Henlow Aerodrome/Birdstrike Cambridge Aerodrome Aerodrome/Birdstrike Cardington Technical/Meteorological Cheries Technical/Meteorological Chicksands Technical.

Having reviewed the consultation document, Defence Estates can now make the following comments.

It is acknowledged that the site at Rookery Pit is considered to be suitable for the construction of energy from waste facilities. The office should be consulted on such developments if they infringe the published safeguarding height criteria.

The MOD encourage the waste industry to engage with Defence Estates as early as possible to discuss proposed developments that fall within a statutorily safeguarding zone. Defence Estates safeguarding should therefore be consulted at each stage of the development plan to ensure that waste schemes are appropriately assessed against MOD aerodrome safeguarding interests.

Ministry of Defence

Explanatory note:

- The potential impact on military and civilian airfields and airports is an interest of acknowledged importance.

Summary response:

- Any issues concerning proposals for the Rookery Pit South site (including bird strike etc) will be considered in the determination of an application for waste uses at that site.

Recommended change: None.

Mrs A Lowe (Wilshamstead Parish Council)

Waste Core Strategy Plan - Options Consultation Document - July 2010 Wilshamstead Parish Council wish to make the following comments on the above document:- General The Parish Council (PC) feel it would have been useful if there had been a questionnaire, containing the questions in the Strategy, which could be electronically completed. This would have been especially useful to bodies such as the PC where views and comments are circulated in order to obtain a consensus. Whilst the PC supports the consultation opportunities the three exhibitions provided, they were disappointed with what was

shown at the exhibitions. As there is so much in the 77 page Strategy paper the amount of detail in the exhibitions was minimal. Please note that in the Strategy document the map for Elstow does not show the new alignment of the A6 nor the intended Wixams northern extension and that there are two different question 15s.

Wilshamstead Parish Council

Explanatory note:

- The former Bedfordshire County Council and Luton Borough Council adopted a Statement of Community involvement in October 2006 which broadly set out how the public will be involved in the consultation stages of the Local Development Documents.

Summary response:

- Alternative means of communication will be considered as part of preparations for any further public consultations to be held as part of the LDF preparation process.

Recommended change: None.

Mr Al Morrow (Phillips Planning Services- Chelveston Renewable Energy Ltd)

These submissions are made on behalf of Chelveston Renewable Energy Ltd. who are the owners of the former Chelveston airfield.

The former airfield was acquired by Chelveston Renewable Energy Ltd. from the MOD with the intention of developing it as an integrated renewable energy park where a range of technologies could be developed to produce renewable energy including energy from waste processes. Technical information on the background to the site has previously submitted to the Bedfordshire Waste Planning Authority. The site is large at over 300 Ha in area and is artificially bisected by the Beds / Northants border which runs through the site south west to north east following no topographical boundary.

To date the site has the benefit of a planning permission for an anaerobic digestion plant granted in 2008 by Northants County Council and a planning permission for a biofuel facility granted on appeal in 2009. Northants County Council are also proposing to allocate the airfield as a waste treatment site in their Site Allocations Development Plan Document which was submitted to the Secretary of State in March 2010. Two planning applications have also been submitted to Bedford Borough and East Northamptonshire District Councils for the construction of nine wind turbines on the site which are currently under consideration.

Chelveston Renewable Energy Ltd. also wish to secure similar status for the Bedfordshire “half” of the airfield site as the current county boundary is entirely artificial.

2) SUBMISSIONS.

On a more general point, the numbering of policies within the proposed document is rather confusing and could be simplified. For example, from page 39 onwards policies seem to have two different numbers and it is not at all clear which should be used.

This flawed approach is clearly evident in the site assessment of Chelveston airfield contained in Technical Evidence Paper 4. The scoring of many of the questions is based on the site’s location within Bedfordshire (which is at the very northern tip) and pays no regard at all to the growth area settlements located just a few miles north within Northamptonshire. The weighting given is also heavily influenced by the desire espoused in policy 6 to locate all strategic waste sites centrally within the Marston Vale.

Finally, many of the scores given in relation to technical site specific issues are incorrect – for example, the site has no archaeology remaining (this was all destroyed when it was developed as a military airfield in World War Two), is not vulnerable to flooding due to its elevated location, affects no designated areas, has no sensitive groundwater or soil constraints and is located close to local communities.

Furthermore, it is highly unlikely that these types of waste treatment uses would be able to successfully locate on to rural industrial land. Such sites are relatively rare and they also tend to be quite small made up of former farm buildings which may have been converted to employment use. They will generally not be large enough to accommodate commercial in-vessel composting or AD operations as both require significant land takes for operational reasons. Restricting the location of small and medium sized in-vessel composting and AD facilities to rural industrial sites is unrealistic and restrictive. It will not encourage the development of a sustainable network of small to medium sized waste treatment facilities within Bedfordshire.

Chelveston Renewable Energy Ltd

Explanatory note:

- The selection of the Preferred Strategic Recovery sites is set out in Technical Evidence Paper 4.

Summary response:

- The identified Preferred Strategic sites were not chosen solely as a result of the scoring set out in Technical Evidence Paper 4. At the time of the preparation of the writing of the Waste Core Strategy various factors were taken into consideration. These included the emerging Preferred Spatial Strategy (principal sites centrally located, and a reserve site towards centres of population); planning information concerning each potential site; and the imbalance between the locations of existing waste facilities (which are predominantly to the north of Bedford), and existing and future housing (such as the growth areas to the south of Bedford and north, and north-west of Luton and Dunstable). These factors informed the identification of three principal Preferred Strategic sites land adjacent to Brogborough landfill, Elstow North, and Rookery Pit South), and one Reserve Strategic site (land at Thorn Turn).

Recommended change: None.

Mr Keith Owen (SLR Consulting Ltd on behalf of Biogen Power Ltd)

It is noted that the Development Plan will, however, continue to treat the policies set out in PPS10: Planning for Sustainable Waste Management as a material consideration as confirmed in Section 4 of the Guidance for LPAs. It is of course critically important that the Waste Core Strategy is developed in accordance with the soundness guidance for Local Development Frameworks contained in the Planning Inspectorate document entitled 'Local Development Frameworks - Examining Development Plan Documents: Soundness Guidance.' This stresses, amongst other things, the need for a sound and demonstrable evidence base, and the need for clear evidence on the selection and assessment of alternative approaches. Responses to Questions Individual responses to most of the questions posed in the Consultation Draft of the Waste Core Strategy Preferred Options (referred to as the Plan) document are set out below. Where a question is not responded to it is because Biogen does not have any specific views on, or knowledge of, the topic involved.

Biogen Power Ltd

Explanatory note:

- **Substantial guidance is contained in PPS12 and on The Planning Advisory Service website concerning process of the production of Local Development Documents.**

Summary response:

- **A substantial Evidence Base has been produced and was available for inspection by the public as part of this consultation.**
- **The Councils have taken on board all available guidance from both PAS and PINS in drawing up the Minerals and Waste DPDs.**

Recommended change: None.

Mr Paul Maison (British Waterways)

British Waterways (BW) is a public corporation, which is sponsored by DEFRA. We manage and care for more than 2,200 miles (3,540 kms) of canals and rivers in England, Scotland and Wales on behalf of the British people. The Government charges us to: Maintain and develop Britain's inland waterways in a sustainable manner, so that they fulfil their full economic, social and environmental potential; Fulfil statutory navigation functions; Conserve waterway heritage and environment for the future; Promote and enable rural and urban regeneration; Maintain and enhance leisure, recreation, tourism and educational opportunities for the general public; facilitate waterway transport; and Play a lead role in co-ordinating with other UK navigation authorities.

Our main area of interest with this waste plan is to protect the amenities and future environment of the proposed Bedford -MK waterway and, where relevant, to protect the environment of the Grand Union canal which runs through the Leighton Buzzard area for 6 km. We have also been involved with the Infrastructure Planning Commission's stakeholder event of 12 March 2010 for the Rookery South proposed "resource recovery facility". The developer was Covanta Rookery South Limited. We had replied to the IPC on 02 February 2010, expressing concerns about the bulk, design and visibility of such a proposal. In addition, we endorsed the comments made by the Bedford -MK Trust. The IPC will be abolished in November 2011.

British Waterways

Explanatory notes:

- The visual impact of waste management facilities is an important consideration.

Summary response:

- The Plan will identify the Bedford to Milton Keynes Waterway.

- the details of the Covanta application to the Infrastructure Planning Commission are beyond the scope of this Core Strategy.

Recommended change: None.

Central Bedfordshire Council Waste Disposal Authority

It may be useful to state the predicted amounts/proportion of capacity required for waste being accepted from London into the plan area and also that this is a statutory requirement. Also, care must be taken with the definition of Municipal Waste as the UK approach is changing to include more Commercial & Industrial (C&I) waste. The UK's existing approach to landfill reduction via the Landfill Allowance Trading Scheme (LAT's) is focused too narrowly on waste collected by local authorities. This is consistent with the increased focus the Government wish to place on commercial waste and to bring greater convergence between the management of household and commercial waste so that the environmental impacts are addressed regardless of its source. The new approach to municipal waste is based on the EU list of wastes or 'European Waste Catalogue'. It will include all biodegradable waste landfilled that is coded under Chapter 20 - which is entitled "Municipal Waste (household waste and similar commercial, industrial and institutional wastes). It will also include some waste coded under chapter 19 which covers waste landfilled that has been through some form of treatment process (for example material that has been through an Mechanical Biological Treatment plant that ends up in landfill). It remains to be seen whether further incentives/disincentives will be applied to the additional C&I waste along the line of LATS or whether Landfill Tax will continue to be the key driver. There is currently no indication that the new coalition will reverse this thinking. An explanation as to why waste transfer by rail has been discounted as a possibility for the plan areas waste would be useful.

Other minor feedback as follows: - Statement 11 duplicates text already covered in Statement 8 - 2.19 - change word reuse to recycled to avoid confusion - 2.20 - change word reuse for recycling to avoid confusion - 2.31 - duplicated information - 2.41 - these policies are taken from the 2001 waste strategy for Bedfordshire and Luton. Although they are referenced in the Bedfordshire Authorities Municipal Waste Management Strategy (BAMWMS) they are not included as new policies.

Reference should be made to BAMWMS Policy 1 (Home Composting), 2&3 (Waste minimisation), 4,5,6,7,8,9 (waste collection infrastructure), and 12 (Bedfordshire Energy and Recycling BEaR Project) - 2.42 - remove EfW reference. Central Bedfordshire Council (CBC) is technology neutral - 2.47, 48 & 49 - duplicate information with 2.37, 38, 39 - 2.50 - Change wording as this implies that CBC are unsure what we are currently doing which is not the case - 2.59 - Include that the future of LATS is unclear but that Landfill Tax will continue to be a key driver.

Central Bedfordshire Waste Disposal Authority

Explanatory note:

- The UK Government utilises a number of incentives and penalties to encourage higher levels of recovery, especially of MSW.
- The Apportionment of post-treated residual waste from London to be accepted for landfilling is a result of the agreement between the East of England Regional Assembly and the Mayor of London during the development of the 2008 East of England Plan. Precise figures are set out in Technical Evidence Paper 2.
- With reference to the possible change in definition of MSW to include some C&I waste, for the purpose of the the Waste Core Strategy, both MSW and C&I are assessed as part of non-hazardous waste arisings. Therefore any change in definition would not affect the forecasts of arisings utilised in this plan.

Summary response:

- Relevant Policies from BAWMS 2006 are quoted. These will form part of the Evidence Base of background information.
- Relevant and accurate terminology has been used throughout the Core Strategy. A Glossary has been provided to avoid misinterpretation and confusion.

Recommended change:

1. Delete last sentence of paragraph 2.42.

Mr John Phillips Planning Service on behalf of Mr Dave Watson F &R Cawley Ltd

What is recovery (Technical Evidence Paper 2)

8. The definition of 'recovery facilities' adopted, is too narrowly drawn and should not exclude facilities such as waste transfer stations and materials recovery facilities which are key links in the recovery and recycling chain. The definition does not conform with the definition of recovery contained in EU Directive 2008/98/EC which is more widely drawn. As a consequence the draft strategy deals inadequately (and indeed ignores) the need and provision for, and role of, waste transfer and recovery facilities.

9. The accompanying paragraph following the definition of 'recovery' also refers to WTS's and MRF's as 'merely' separating recoverable wastes. This would appear to indicate at best a misunderstanding of the role and importance of these facilities and should be removed or at least clarified. The spatial distribution on non-strategic facilities Statement 14, Policy 13 and Question 13

Numbering of draft policies

18. The numbering of draft policies by two systems e.g. Policy 13 and Waste Core Policy 7 is confusing and should be rationalised to refer to one policy number only.

F&R Cawley Ltd

Explanatory note:

- A range of waste management facilities have developed in the Plan area, which carry out a range of different waste management activities.

Summary response:

- The role of a broader range of waste facilities will be addressed in respect of their role for the diversion of waste from landfill in finalising the Pre-Submission draft of the Minerals and Waste Core Strategy.

Recommended change:

- Policy numbering will be amended to refer to one policy number only.

- Definition of recovery: amend definition of recovery in TEP2 to reflect the full range of operations set out in annex 2 to Directive 2008/98/EC. However, the operations most important to the Plan are those facilities within steps 'C' (recycling) and 'D' (other recovery, e.g. Energy recovery) in Article 4, Waste Hierarchy.

Ms Louise Treacy ERM (on behalf of Covanta Rookery South Ltd)

The comments which are set out hereunder in relation to the WCS are clearly identified in terms of the specific pages, paragraph numbers, and/or questions within the Strategy to which they relate.

1.5 The submission context and feedback in relation to the WCS are set out in sections 2.0 and 3.0 respectively.

Appendix I

sets out the results of an assessment undertaken by Waterman Boreham Ltd. to determine the traffic implications arising from the co-location of a RRF (as proposed by Covanta) and a landfill facility (as proposed under the WCS) at Rookery South.

Appendix II contains the Need Assessment which has been undertaken by Covanta in preparing the DCO application for the RRF. The findings of this report have informed our assessment of the WCS preferred growth scenario.

Appendix III contains an assessment which was undertaken for Cornwall County Council of the costs and 2 environmental impacts of single and multiple facilities for residual waste treatment. The findings of this assessment support the preferred option for the spatial distribution of strategic recovery sites as identified in the WCS.

2.0 SUBMISSION CONTEXT

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2.1 The group of companies of which Covanta Rookery South Ltd ("Covanta") forms part is (by tonnage) the world's largest operator of energy from waste facilities, with 45 plants worldwide, mostly in the United States. Covanta entered the UK market in 2005 and offers high quality, safe and efficient solutions for treating residual wastes. It will achieve this through investing in larger scale plants so as to maximise the economic and environmental benefits, passing on these benefits to clients, including local authorities and their residents. It should be noted that Covanta has received a wide range of safety and environmental awards in recent years from US environmental and government bodies.

2.2 Covanta is currently preparing an application for a Development Consent Order (DCO) to the Infrastructure Planning Commission (IPC) for the construction and operation of a Resource Recovery Facility (RRF) at Rookery South, near Stewartby. It is due to be submitted this summer. The main components of the RRF comprise an Energy from Waste (EfW) facility with an average gross electrical output of 65 mega watts and a post-treatment Materials Recovery Facility (MRF) to recover bottom ash and co-mingled metals.

2.3 This project is proposed as an important source of renewable energy, contributing to the diverse, secure and decentralised energy supply urgently sought by Government, and as an integrated part of the sustainable waste management infrastructure required by policy. It will complement high levels of recycling and composting and divert waste from landfill. Sufficient electricity would be exported from the EfW Facility to serve the needs of 82,500 homes which is broadly equivalent to the housing energy needs of Bedford and the Marston Vale.

2.4 In addition, the EfW Facility will be fitted with the equipment necessary to provide combined heat and power (CHP) to nearby developments. The opportunity also exists to co-locate a purpose-built, post-treatment MRF alongside the EfW Facility. The MRF will reduce the transport burden associated with transporting unprocessed incinerator bottom ash off-site, reduce the need to use land resources elsewhere and will enable value to be recovered from 96% of the waste treated on site.

2.5 As such, it is anticipated that Covanta will become a key player in the delivery of waste management infrastructure within the Plan area over the period of the WCS. The purpose of this submission is to undertake a comprehensive review of the WCS to ensure that the policies contained therein are consistent with European, national and regional waste policy 3 and that the preferred Strategy options will facilitate the delivery of high quality waste management facilities within the Plan area.

3.0 GENERAL FEEDBACK ON WASTE CORE STRATEGY

Document Structure/Layout

3.1 It is stated in Chapter 1 of the WCS that seven Technical Evidence Papers (TEP) accompany the consultation document. These papers provide a substantial evidence base of background information but do not form part of the consultation document. Having completed a review of the Strategy it is submitted that key supporting information from the TEP should be included within the main consultation document in order that the justification for the Strategy approach can be readily understood and presented. This matter is discussed further in relation to each specific chapter as appropriate.

Covanta Rookery South

Explanatory note:

- Covanta Energy have made an application to the Infrastructure Planning commission for an energy from waste facility which would accept upto 585,000 tonnes of waste per annum.

Summary response:

- the determination of the application by Covanta Energy will be made by either the Infrastructure Planning Commission or the Secretary of State for Energy and Climate Change.

- the decision on the application by Covanta Energy and other major waste managements will be monitored for its impact on the Plan.

Recommended Change: None.