

From: [Julie Searle](#)
To: [Strategy](#)
Subject: Somerset Waste Partnership - Response to SWT Local Plan Consultation
Date: 16 March 2020 14:03:34
Attachments: [image001.png](#)
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Good afternoon,

Please find attached Somerset Waste Partnership's response to the Local Plan consultation.

If you have any queries, please contact me.

Kind regards,
Julie

Julie Searle

Strategy Officer

Somerset Waste Partnership

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We manage waste and recycling services for all local authorities in Somerset.

For information on our services and lots more visit: www.somersetwaste.gov.uk

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Somerset Waste Partnership (SWP) welcomes the ambition in the Local Plan to make Somerset West and Taunton (SWT) a low carbon, clean, green and prosperous district with a target of 2030 for carbon neutrality. To ensure these ambitions are achieved, SWP would like to see the Local Plan incorporate circular economy and zero waste principles from the design and construction phase, and while buildings are in use.

Good waste and resource management is key to achieving these ambitions and moving towards a low carbon economy. It will also help SWT achieve their objectives for the Local Plan, particularly objective 1, but also contributing to objectives 2, 3, 4, 7, and 9.

In 2018/19 the carbon emissions from our household waste sent to landfill was around 54,000 tonnes of CO₂ equivalent. Our waste composition analysis has found that half of the average refuse bin comprises materials that could be recycled at the kerbside with 26% of the bin comprising food waste – the material with the single largest carbon impact of our waste. Reducing waste and maximising high-quality recycling are key means of reducing our carbon emissions in Somerset and moving towards net zero.

All too often, new homes and developments are built with minimal consideration of managing waste and recycling. This leaves residents with limited storage space for containers, which means they cannot fully participate in the recycling collections or it forces them to store containers outside, reducing visual amenity of developments and increasing potential for vermin, anti-social behaviour and wind-blown litter.

Many developments over the last few years (from new accommodation created above shops, new apartment blocks, and larger new developments) have not been designed with waste in mind, and Somerset will pay the environmental and financial cost of this for many years to come.

Recycling and waste collections are essential services for all households and storage and accessibility must be included in any design for a new development or conversion of an existing property (in line with Part H6 of Building Regulations).

To support this, SWP has produced guidance for developers which details our collection services and the requirements to maximise efficiency, reliability and convenience of recycling, allow access for collection vehicles and ensure good design within and outside the property to allow for clear separation of recyclables. This guidance is available on our website (updated guidance under development) at <https://www.somersetwaste.gov.uk/developer-guidance/>. SWP requests that this guidance is referenced throughout the local plan and that the guidance is a mandatory requirement for developers to follow throughout the planning process.

Policy 1c/7 should specifically reference the SWP Guidance for Developers. It should also be a requirement for policies 9a/5, 10b/1, 10b/2, 10b/6, 10b/7.

Adequate provision of storage for recycling and refuse within the property must be provided, as well as sufficient space outside for waste collection and access for collection vehicles.

The best way to influence behaviour change is for residents and businesses to have a personal connection with their waste. In this sense, we favour a move away from communal waste facilities where possible, and for each household or flat to have suitable storage space for individual containers. Accordingly, each communal block should have the ability for residents to utilise the kerbside service (including food waste), rather than deposit their waste into larger communal recycling receptacles. This helps to increase efficiency, reduce contamination and improve SWT's environmental impact. Poorly designed recycling and waste storage makes it difficult for residents to use and reduces the visual amenity of developments. Existing communal bin areas are often poorly managed, with low recycling rates, increased levels of fly-tipping and the recycling that is presented is often contaminated.

The NHBC Foundation has produced a document ([Avoiding Rubbish Design](#)) giving examples of how waste and recycling storage can be effectively integrated.

Whilst SWP's guidance is designed for household waste collections, the principles in it apply equally to commercial premises. It will be essential to make use of the document if there is increasing development of mixed-use buildings in the town centres as proposed. If the guidance is not followed, there will likely be significant issues around storage of waste and recycling, with increased numbers of sacks and containers being left out inappropriately with associated problems including litter, vermin and anti-social behaviour.

SWP's Guidance for developers not only considers storage of containers but also access for collection vehicles. Developments with poor access (including inappropriate parking) experience higher levels of service issues including missed collections. There may be multiple attempts to access properties over several days, increasing vehicle movements and associated emissions. This leads to inefficient collections, increased emissions and costs, and in the worst-case scenarios requires an entirely separate collection using a different vehicle.

SWP has the powers under Section 46 (Receptacles for household waste) and Section 47 (Receptacles for commercial or industrial waste) of the Environmental Protection Act 1990 to specify the type and number of containers to be used, and the location where the waste should be placed for collection. Under this legislation, SWP is not obliged to collect household waste that contravenes these requirements.

We are going through a significant period of policy change regarding waste and resources. Members of the public are also highly engaged with waste due to the fact that it is a high-profile service provided by the council and due to large scale

campaigns on waste and recycling, particularly plastics, as a result of programmes such as 'The Blue Planet'.

Future policies planned by the Government include (but are not limited to):

- Recycling target of 65% by 2035
- Zero food waste to landfill by 2030
- Zero avoidable waste by 2050
- Consistent collections with all LAs being required to collect the same core set of materials for recycling
- Mandatory separate collections of food waste for both households and businesses
- Mandatory source-separated collections of recyclables for both households and businesses
- Consideration of free garden waste collections for all households.
- Deposit return scheme for drinks containers
- Extended producer responsibility – meaning that producers will be required to cover the costs of collection/disposal of certain products.

These policy changes and any further ones introduced, will significantly change the profile of our waste and may require adjustments to collection schemes. SWP's Guidance for Developers will always be the most up to date source of information and so should be specifically referenced in the local plan to ensure that it is considered by all developers in the future, taking into account local requirements and changes in national policy.

The Local Plan should make reference to SWP's Developer Guidance and incorporate it into the requirements as a minimum. This needs to then flow through into planning requirements and be considered at the earliest possible stage in planning new developments. It should emphasise opportunities to address environmental issues and sustainable development. New and existing housing should be well-designed, safe, good quality and environmentally sustainable. Designs should take into account resident's lifestyles and how the design will function practically in the real world.

This consultation response is from Somerset Waste Partnership who manage waste and recycling services on behalf of

- Mendip District Council
- Sedgemoor District Council
- Somerset County Council
- Somerset West & Taunton Council
- South Somerset District Council

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