

Matter 7B/South East England Regional Assembly



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Matter 7B: Minerals

7B.1: Is the proposed apportionment of secondary and recycled materials fair and appropriate? (Policy M2)

1. Yes, the South East England Regional Assembly considers the proposed apportionment of secondary and recycled materials in Policy M2 of the draft South East Plan to be fair and appropriate as it uses the best available data and the apportionment methodology employed is robust.

Policy context

2. The Regional Minerals Strategy (RMS) identifies the important contribution to aggregate supply from recycled and secondary aggregates. The purpose of Policy M2 is to encourage the greater use of recycled and secondary aggregates so as to reduce the need for primary aggregates extraction. It is estimated that in 2001 recycled and secondary aggregates amounted to some 6.6 million tonnes (mt)¹, making almost 50% of total Construction and Demolition waste (C&D) generated in the South East region.
3. The Assembly published the *Proposed Alterations to the Regional Planning Guidance South East Regional Minerals Strategy* in March 2004 which sought to increase the regional target for recycled and secondary aggregate use to at least 8.8mt per annum by 2016. The Examination in Public (EiP) was held in October 2004 and the EiP Panel report *RPG9 Review of Waste and Minerals, Examination in Public* was issued in December 2004.
4. The EiP Panel report recommended a lower regional target figure of at least 7.7mt per annum by 2016. This recommendation was accepted by the Assembly and is confirmed in Policy M2 of the draft South East Plan. The regional target for recycled and secondary aggregates is therefore consistent with the *Adopted Alterations to the Regional Planning Guidance for the South East (RPG9) – Waste and Minerals* published by Government Office for the South East (GOSE) in June 2006.
5. The EiP Panel report also recognised that the principle of sub-regional apportionment of regional targets will serve as a powerful driver in stimulating progress towards achieving higher recycling rates in the South East region. In principle, EiP participants from both the public and private sectors, with the exception of the Campaign to Protect Rural England (CPRE), supported the view for increased use of recycled and secondary aggregates.
6. As a result, the EiP Panel report (in recommendation R9.10) recommended that the Assembly should task the South East England Regional Aggregate Working Party (SEERAWP) with leading work to identify a methodology on which to base a sub-regional apportionment of recycled and secondary aggregates with the aim of including its results in the South East Plan. The apportionment carried out in

¹ *Survey of Arisings and Use of Construction, Demolition and Excavation Waste as Aggregate in England in 2001*, Prepared for ODPM by Symonds Group, in association with WRc.

Policy M2 of the draft South East Plan is therefore in line with the EiP Panel's recommendations.

Evidence base and apportionment methodology

7. In May 2005, Land Use Consultants (LUC) was commissioned to devise a methodology for local apportionment of the regional target for use of recycled and secondary aggregates, and to quantify the tonnage apportioned to each MPA. The planning unit for the apportionment, as advised by the 2004 EiP Panel report, comprised of the ten sub-regions of the South East region. Nearer the end of the study, it was agreed by SEERAWP to separate Kent and Medway, thus making eleven sub-regions in total.
8. LUC developed an apportionment methodology and agreed it with the Steering Group² for the project during a series of meetings from May to July 2005. Under the agreed methodology, the apportionment figure was derived from projected population growth for each sub-region, the amount of C&D materials arising/managed in the sub-region, and the area of the sub-region covered by environmental/landscape designations and Green Belt. The inclusion of population projections (as a proxy for demand) and the best available data on C&D waste arisings suggests the final tonnages are robust. Additionally, environmental constraints (including Green Belt) were included in the criteria to reflect the difficulty in securing suitable sites for recycling facilities. This methodology provides a fair and transparent means for identifying the contribution each MPA should make to the regional target set out in Policy M2.
9. The apportionment figure was quantified for each sub-region under three scenarios all applying 25% weighting each for population and C&D wastes managed, but three different weightings for environmental/landscape designations and Green Belt (named Scenarios A, B and C). The development of the methodology and quantification of Scenarios A, B and C is described in a separate report prepared for the Assembly by LUC³.
10. The three scenarios were presented to a meeting of SEERAWP/South East Regional Technical Advisory Body (SERTAB) on 5 September 2005. The SEERAWP/SERTAB agreed that the Steering Group should meet again to decide the preferred scenario and for the apportionment figures to be recommended to the Assembly for inclusion in the South East Plan. The Steering Group in its final meeting on 27 October 2005 recommended that the weightings in Scenario B be used for the apportionment of the regional target of recycled and secondary aggregates. The agreed apportionment in Policy M2 of the draft South East Plan therefore represents the collective advice of SEERAWP/SERTAB and as a result carries considerable weight. The resulting apportionment is set out in Table 1 below.

² The Steering Group consisted of representatives from the South East MPAs, SEERA, and the SEERAWP.

³ *Methodology for apportionment of recycled and secondary aggregates in the South East Region*. Prepared for SEERA by Land Use Consultants, November 2005.

Table I: Application of apportionment methodology

| Waste Planning Authority area | Recommended apportionment % | Million tonnes per annum (rounded) by 2016 |
|---|-----------------------------|--|
| Berkshire Unitaries | 9.0 | 0.7 |
| Buckinghamshire | 7.3 | 0.6 |
| East Sussex, Brighton & Hove | 6.8 | 0.5 |
| Hampshire/Portsmouth/Southampton/New Forest | 21.7 | 1.7 |
| Isle of Wight | 1.7 | 0.1 |
| Kent | 18.5 | 1.4 |
| Medway | 2.2 | 0.2 |
| Milton Keynes | 2.0 | 0.2 |
| Oxfordshire | 11.1 | 0.9 |
| Surrey | 10.1 | 0.8 |
| West Sussex | 9.8 | 0.8 |
| Total | 100 | 7.7 |

Source: Methodology for apportionment of recycled and secondary aggregates in the South East region, Prepared for SEERA by Land Use Consultants, November 2005. (p. 24). Numbers may not sum due to rounding.

Sustainability appraisal

11. A Sustainability Appraisal (SA) incorporating a Strategic Environmental Assessment of the South East Plan was undertaken by Environmental Resource Management Ltd (ERM) and submitted to the Secretary of State along with the draft South East Plan on 31 March 2006. This appraisal included consideration of the changes made to policies that are included in the *Adopted Alterations to the Regional Planning Guidance for the South East (RPG9) – Waste and Minerals (2006)*, notably Policy M2.
12. Given the spatial nature of Policy M2 (with sub-regional apportionment of recycled and secondary aggregates) a more detailed appraisal was required and justified. The Assembly therefore commissioned ERM to undertake an SA on Policy M2. This work was undertaken to provide evidence for the EiP Panel. The SA report⁴ indicates a positive overall effect on the environment as a result of implementing Policy M2.

Public consultation submissions

13. Public consultation on the draft South East Plan ran from 31 March until 23 June 2006. A limited number of submissions received on Policy M2 indicated some concern regarding the appropriateness of data used in the apportionment exercise and the anticipated difficulty in delivering apportioned targets for some Local Authorities (LA) in the region. The Environment Agency (EA) in its submission

⁴ *Supplementary Sustainability Appraisal*. Prepared for SEERA by ERM, September 2006.

expressed concern over the apportionment methodology employed and the need to consider land availability for C&D waste that is not recycled or re-used.

14. Policy W13 of the draft South East Plan confirms that Waste Development Documents (WDDs) should provide for continuing but declining landfill capacity for both non-hazardous and C&D waste. The policy sets out landfill requirement targets for C&D waste in the South East region. The targets set out are broadly consistent with the current rate of C&D waste being landfilled in the South East Region⁵.
15. Table 2 of Section D6⁶, based on targets set out in Policy W13, illustrates available landfill void space for inert (C&D) waste in the South East region till 2015. With the exception of West Sussex, all sub-regions demonstrate a surplus landfill void capacity for C&D waste till 2015. Overall, the South East region has a surplus landfill void capacity of over 32 million tonnes for C&D waste till 2015. This figure is confirmed in the *Adopted Alterations to the Regional Planning Guidance for the South East (RPG9) – Waste and Minerals (2006)*.
16. Considering the focus of Policy M2 is to increase the use of recycled and secondary aggregates, land is not specifically apportioned for the disposal of C&D waste. Policy W13 and Table 2 of Section D6 (Waste and Minerals) however addresses issues regarding available landfill requirements and void capacity for C&D waste.
17. It is also important to note that the methodology employed in the apportionment exercise carried out by LUC can be adjusted to incorporate changes in data and assumptions should new and or better quality information be made available. Specific data for each MPA can be revised if necessary, and the weightings for each criterion considered can be adjusted.

Conclusion

18. Overall, the Assembly considers that the proposed apportionment of secondary and recycled materials in Policy M2 of the draft South East Plan is fair and appropriate. This is based on the robustness of the apportionment work carried out, the technical advice given by SEERAWP/SERTAB and the practical steps taken to agree the apportionment figures.

⁵Survey of Arisings and Use of Construction, Demolition and Excavation Waste as Aggregate in England in 2003, Prepared for ODPM by Symonds Group, in association with WRC.

⁶ Errata note shows correct location of Table 2 in Section D6 of the draft South East Plan http://www.southeast-ra.gov.uk/southeastplan/plan/view_plan.html#errata.