A Review of the Yorkshire and Humber Regional Waste Strategy¹

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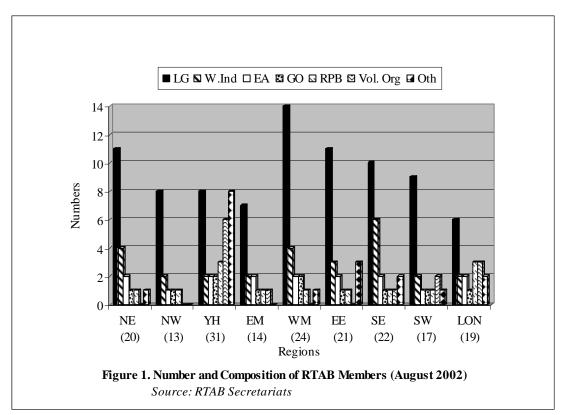
In 1999 the Government introduced a new layer to the institutional arrangement for waste management in England in the form of the Regional Technical Advisory Bodies (RTABs). The aim was to improve the strategic framework for regional waste by bringing together key stakeholders in waste management within a regional consultative body who would provide specialist and technical advice to the Regional Planning Bodies (RPBs) on waste issues. The most important task for the RTABs has been to assist the RPBs in the production of regional waste strategies (RWSs).

Within this article we examine the RWS produced for the Yorkshire and Humber (YH) Region. We focus upon the content of the Strategy, provide a brief history to its development and, make comments upon the implementation of the Strategy, by drawing upon the interim findings of an ongoing research project funded by the Economic and Social Research Council.

The Yorkshire and Humber 'RTAB' Process.

In a previous edition of *The Regional Review* we examined the emerging role of RTABs and commented on the progress of development of RWSs across England (see Davoudi & Evans, 2002). We noted that there was substantial variation in the composition and size of RTABs (see Figure 1. for illustration) due to the discretionary powers over membership given to RPBs within Planning Policy Guidance Note 10 (PPG10) (DETR, 1999). Indeed, in the YH region, Murfin (2002:24) argued that there was an early recognition of a disparity "between what is needed to achieve sustainable waste management and what role the Government saw for RTABs". As a result the YH region took an initial decision to engage a wide stakeholder group with a remit 'broader' than that of PPG10 (YHA, 2001). The group worked under the name of the Regional Integrated Waste Management Strategy Steering Group (RIWMSSG). Members, totalling 31 (the largest RTAB in England), included representatives from local government, the waste industry, environmental and voluntary groups, the Environment Agency, Government Office, the Yorkshire and Humber Assembly (YHA), and the Regional Development Agency- Yorkshire Forward. The group met for the first time in July 2001.

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Given the size of the Steering Group, it was considered essential to divide it into smaller task groups so that the process of developing the RWMS could be managed in a more efficient way. Hence, in September 2001, four 'Task and Finish Groups' (TFG) were set up to work on particular aspects of the Strategy (YHA, 2001): TFG1: Waste Minimisation and Segregation, TFG2: Markets for Recyclates/Substitution, TFG3: Waste Management Businesses, and TFG4: Planning and Land Use. In addition, consultants were commissioned, in August 2001, to undertake the background technical research and in particular the initial data gathering for the development of the Strategy.

Producing the Yorkshire and Humber Regional Waste Strategy

Figure 2 illustrates the stages in the production of the regional waste strategy (RWS). In October 2002 a final draft Option Report was issued, derived from material produced by the TFGs and the consultants, which focused on the objectives that the Strategy should be adopting in terms of waste reduction, recycling and composting, and treatment of residual waste. The three options presented included:

- 1. Meeting statutory and aspirational targets,
- 2. Exceeding statutory and aspirational targets, and
- 3. Maximising recycling.

Although consultation on the options over the following two months did not produce any clear consensus on a preferred option, option 2 received more backing than the other two. Concerns were also raised over issues such as the costs of service improvements, planning issues, markets for recyclates, influencing EU and UK policy and the level of community and political support. These were to be addressed by the Draft Regional Waste Strategy through its objectives.

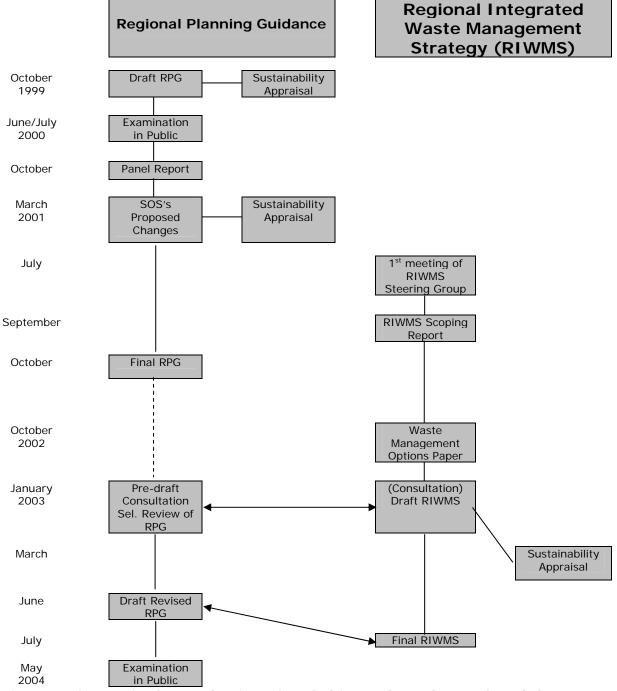


Figure 2: Stages in the production of Yorkshire and Humber RPG and the RWS

Following the completion of the consultant's work and the first phase of consultation, the consultation draft of the RWS was issued in early January 2003, with an 8-week consultation period running from January to March.

In parallel to the work undertaken on the RWS a selective review of Regional Planning Guidance (RPG), in which waste is one of the topics for review, was also underway. Therefore, the draft revised RPG 12, issued in June 2003 (see figure 2), could take into account the policies that were set out in the RWS.

"Let's take it from the tip": Yorkshire and Humber RWS

Following comments received during the consultation process, the final version of the RWS, entitled "Let's take it from the tip", was published by the YHA in July 2003 (YHA, 2003c). This final Strategy contained a number of significant changes from the draft, which we discuss below because they have fundamental repercussions for the whole of the final Strategy.

The Strategy has seven main sections, including introductory comments; an overview of the region's waste; a review of waste legislation and policy impacting upon the region; the objectives of the RWS; a regional action plan to achieve the objectives; draft RPG for Yorkshire and Humber; and an outline of monitoring and review processes.

In the introduction to the Strategy it is noted that a new RTAB has been formed in response to comments received on the draft version of the Strategy. This RTAB will report to the Steering Group and comprise both planners and waste management officers.

The primary aim of the Strategy is *"to help develop sustainable waste management systems in the region"* which include *"the waste hierarchy, proximity principle, self-sufficiency and so on"* (YHA, 2003c: 12 & 27). In order to achieve this, four objectives, together with associated targets, are provided (Figure 3).

Objective 1: Gain community support and involvement in the delivery of the strategy **Target:** Implement and (sic) region-wide awareness campaign by end 2004, evaluate and report on effectiveness by March 2005

Objective 2: Reduce waste production and increase re-use, recycling and composting **Targets:** Reduce the annual increase in waste production per household to 2% by 2008/9 Achieve statutory targets for recycling and composting household waste and diverting BMW from landfill

Objective 3: Manage residual waste in a sustainable way **Target:** Municipal waste management strategies and new waste disposal contracts should be evaluated using Best Practicable Environmental Option, sustainability appraisal and health impact assessment

Objective 4: Provide technical support and advice **Target:** Establish networks of contacts from local authorities, waste companies, environmental groups, community organisations and individuals:

- disseminate good practice on waste management
- provide updates and interpretation on new legislation
- facilitate discussions to inform consultation responses to UK and EU Governments

Figure 3: Final Regional Waste Strategy Objectives

The Strategy notes that priority should be given to reducing waste. Yet there was a distinct watering down of the initial aspirations of the Draft RWS with regard to achieving a lower rate of household waste production. Whilst the Draft Strategy stated that, *"it has been assumed that with concerted and intense efforts it will be possible to stem the increase in arisings per household to <u>0%</u> by 2008/9. It is acknowledged that this is a very challenging target" (YHA, 2003a: 16 emphasis added), the final Strategy recommends reducing <i>"waste per household to <u>2%</u>"* (YHA, 2003c: 19 emphasis added). The reason for this is explained in the Analysis of Responses to Draft RIWMS, viz. *"There is support in principle for the target to reduce waste but many respondents were unconvinced that the Strategy could achieve this with the action plan in the draft version"* (YHA 2003b: 4).

In addition, whilst the Strategy suggests that the next priority after reduction should be to re-use, recycle and compost waste the targets for recycling and composting in Objective 2 (see figure 3) have been reduced from the draft, from 33% to 30% for 2010/11 and from 50% to 33.3% for 2015/16. In fact, this is a change from the Option 2 targets in the earlier consultation exercise to the Option 1 targets. This is perhaps surprising given one of the main outcomes from the consultation on the Draft Strategy, viz. *"Responses from many members of the public and environmental organisations propose that the Strategy should have higher targets and aspire to 'Zero Waste"* (YHA, 2003b:4).

The explanation for this fundamental switch is not made clear in the Strategy (or in the Analysis of Responses), but it is almost certainly a result of the less ambitious targets for slowing the growth in waste arisings. With a faster rate of growth in waste arisings expected, the same recycling targets will be that much more challenging. Such a change in the waste reduction target has fundamental repercussions for the whole Strategy, a point that is insufficiently highlighted.

The Strategy's approach to the management of what is called 'residual' waste (see Objective 3 in figure 3) has been strengthened since the draft and subsequent consultation process. The draft only considered two possible ways of handling the 'residual' waste, landfill and energy from waste incineration (EfW). The final Strategy includes a paragraph (and appendix) on emerging technologies such as gasification, pyrolysis and mechanical biological treatment (MBT), where it states, *"Over the next 5-15 years.... [t]hese treatments could offer more sustainable options than incineration and landfill for dealing with residual waste"* (YHA, 2003c:31). However, whilst various concerns over the advantages and disadvantages of each are rehearsed, no clear conclusion on what would be the Best Practicable Environmental Option (BPEO) for the region is reached. Similarly, no sub-regional breakdown is provided for the indicative landfill or MBT facility requirements given.

The RWS also addresses the translation of the Strategy into RPG advice. It is noted that *"significant change will be required to move towards the vision of sustainable waste management"* set out in the RWS (YHA, 2003c:38). The Draft RPG policies are listed in Figure 4.

Policy R5A Waste Management Strategic Principles
Policy R5B Sub Regional Targets For Municipal Waste
Policy R5C Criteria For The Location Of Waste Facilities
Policy R5D Waste Related Business
Policy R5E Residual Waste Treatment Capacity
Policy R5F Density Of Public Recycling Bring Facility Provision
Policy S6C Sustainable Use Of Physical Resources
Policy S6D Sustainable Use Of Physical Resources

Figure 4: Draft RPG Policies for Yorkshire and Humber.

Just Another Strategy?

Murfin (2003:26) suggested that RWSs "should be blueprints for ongoing regional work to promote sustainable waste management; they need not be 'just another Strategy". We can make some preliminary comments on the implementation of the Strategy from our ongoing research. Indeed, it would seem

that, at the time of writing, Murfin's comments remain somewhat optimistic. Discussions with local practitioners have highlighted a number of barriers and weaknesses to the implementation of the Strategy.

The Strategy has been persistently criticised for concentrating solely on municipal waste arisings and not addressing any other waste streams. Practitioners have noted that this has been particularly unhelpful to them. Some have suggested that the RWS lacks clarity with regard to dealing with residual waste, and that it might be more helpful in apportioning sub-regional landfill, for instance. Others pointed to the lack of direction on EfW. Indeed, the recent Panel report from the Examination in Public of Draft RPG suggests that Policy R5E (see Fig 4) be renamed "Management and Treatment at the Lower Levels of the Waste Hierarchy", and be split into two policies: "EfW" and "Disposal by Landfill" (YHA, 2004:87). Overall and despite Policy R5C (see Fig 4) there is little-to-no guidance on the number of facilities needed and their potential location.

Many noted that the RWS was not particularly ambitious, and that it perhaps represented a compromise, due to the wide membership of the Steering Group There has been praise, however, for getting stakeholders together and providing a useful basis for action. Some practitioners commented that they have found the RWS a useful 'lever' to justify plans and actions at the local level. Many, however, suggested that they looked to the RWS to establish 'need' when developing local level plans and strategies, but that there still needs to be democratic accountability and flexibility at the local level. It is argued that local authorities ultimately hold the purse strings and will not look at providing a regional facility if council tax payers might be financially disadvantaged. In addition, some regionally set targets may not prove to be the BPEO for the local level. For instance, setting targets for recycling bring-sites at 1 per 750 households (Draft RPG Policy R5F YHA, 2003c: 43) says very little about location- an authority might meet this target by having all the sites in one area, and this is hardly in accordance with the thrust of sustainable waste management. The Panel report suggests that the Policy should refer *only* to urban areas (YHA, 2004:88).

There are indications that the Strategy will find a clearer purpose when new Regional Spatial Strategies come into play. Some practitioners suggested that it was perhaps too early to comment on how the Strategy, and indeed the new RTAB, was performing. Many were keen to see the region take a stronger stance on issues such as EfW. Given the speed with which waste, as an issue, is rising up the political agenda, at all levels, it may be that a "re-envisioned" Yorkshire and Humber RWS comes to play a greater part, and is not 'just another Strategy'.

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