

Mr Brian Freeland  
ODPM Minerals and Waste Planning Division  
Zone 4/B2  
Eland House  
Bressenden Place  
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3 March 2005

Dear Mr Freeland

### **Sea and Water response to ODPM consultation on PPG10/PPS10**

I refer to the consultation documents and my telephone conversation with your office. We agreed by telephone that Sea and Water would not respond to the detailed questions given in the consultation document but that you would welcome our views on the revised PPS and particularly the transportation of waste.

### **Sea and Water**

Sea and Water is an umbrella organisation comprising representatives from all sectors of the UK water freight industry. Its members include ports and terminal operators, ship and barge operators, navigation authorities, brokers, agents, maritime lawyers and others with an interest in moving freight by water. Our core aim is to encourage freight off the roads and onto the UK's inland waterways, coastal and short-sea routes. We are funded partly by central government grant (DfT) and through industry sponsorship.

### **General observations**

The current PPG10 contains some guidance relating to the transport of waste by environmentally friendly and sustainable modes (specifically, paragraphs A10, A14, A16, A51 and A59). It is disappointing to see a revised PPS10 that is much

weaker in this area. Transport of waste by modes other than road is highlighted in one paragraph only (para 22).

Government has adopted a much more positive approach to water transport since the current PPG was published (eg the Dunwoody Report (2001), the Freight Study Report and Response (2002), the creation of Sea and Water in 2003 and the best practice guide *Planning for Freight on Inland Waterways* in 2004) and we believe this should be reflected in the new PPS.

We would strongly suggest that all mention of sustainable transport in the original PPG be carried forward into the revision and strengthened. For example paragraph A16:

*“Opportunities for using forms of transportation other than road haulage should be considered actively....”*

could be amended to read:

*“Opportunities for using forms of transportation other than road haulage should be made a priority”*

PPS10 para 22 should be strengthened to make sustainability and minimisation of environmental impact the main considerations.

In addition, we feel there is scope to highlight the advantages of water (or other sustainable transport modes) in other sections of the PPS, notably paragraphs 3, 4 and 21.

### **Best Practicable Environmental Option**

Best Available Techniques (BAT) are required to be considered (under EC Directive 96/61) in order to avoid or reduce emissions resulting from certain installations and to reduce the impact on the environment as a whole.

Best Practicable Environmental Option (BPEO) has been defined by the Royal Commission on Environmental Pollution as *“the outcome of a systematic consultative and decision making procedure which emphasises the protection and conservation of the environment across land, air and water. The BPEO procedure establishes for a given set of objectives, the option that provides the most benefits or the least damage to the environment, as a whole, at acceptable cost, in the long term as well as in the short term”*.

There appears to be a lack of familiarity in the formulation of the PPS with the concept of the Environment Agency’s BPEO which are well known by Councils

throughout the UK. As we understand it, the Environment Agency's objective is to encourage Councils to use the BPEO wherever possible, thereby obligating them to meet many of the objectives stated in the PPS. If that is the case then we suggest that the PPS be more explicit.

### **More emphasis is needed on the transport of waste.**

We strongly suggest that much more emphasis should be given to the movement of waste in the revised PPS.

Increasing road congestion coupled with the current shortage of lorry drivers and the impact of the Working Time Directive is forcing the UK to look at other modes of transport. Water-borne freight is sometimes cheaper and more flexible than road and is the most environmentally friendly and sustainable method of transport. Encouraging the movement of waste by water is vital if the UK is serious about tackling road congestion and reducing environmental damage.

Recent EC figures show that at least 10% of all commercial traffic on our roads is waste or recycle related and this is likely to be higher in urban areas where traffic congestion is at its worst. Waste is a highly suitable cargo for water- it is moved in bulk, non-time sensitive and not fragile.

Given that the sustainability of a waste management strategy is, to a considerable degree, determined by the question of transport (cost, environmental impact etc), PPS 10 should give much greater emphasis to the role of transport.

### **A holistic approach**

It is disappointing that the revised PPS appears to be taking a "business as usual" approach in terms of the transport of waste rather than seeking a strategic and holistic solution to the management and transport of waste as a whole. This is particularly worrying in light of the UK generating much more waste than ever before which is likely to be transported over greater distances in the future.

The days of collecting waste, driving it to a transfer station, sorting it for reload onto bulk vehicles and roading it to landfill, incinerators, or recycling plants are numbered. It is becoming clear that future waste disposal facilities may not be local and that longer distances will have to be travelled. New initiatives such as waste that is containerised from collection through to disposal (as used in mainland Europe) will help lessen the impact and should be considered.

Much is made of the "proximity principle" but this is based on the dominance of road haulage. Recycling plants are likely to become larger and more specialised

making it less attractive to treat waste in the area in which it was generated. Using water to move waste in an environmentally friendly and sustainable way will allow the proximity principle to be relaxed. It is conceivable, for example, that given a holistic approach, waste and recyclables could be hauled coastwise as return cargo on vessels exporting from more distant areas. An example might be waste as a back haul cargo on coastal vessels bringing crushed rock to the southeast from the western seaboard.

A further example relates to authorities sited along a waterway corridor which could provide a rational, regional and integrated (rather than small scale and local) pattern of waste management. There is logic in the strategic location of a waste treatment plant at the seaward end of a waterway corridor (such as the River Severn) with water transport providing the link. Water could provide a basis for the rationalisation of flows and the development of a small number of high capacity waste treatment plants.

To allow a change in the way we handle the transport of waste we need to combine the spatial planning issues with the environment and transport arguments. When developing and considering plans for waste treatment sites authorities should, wherever possible, identify, safeguard and grant permission for sites which naturally encourage sustainable modes of transport such as those which are water or rail connected.

Without a strategic and joined-up approach to the handling, management and transport of waste (which will include a much closer co-operation between ODPM, DEFRA and DfT) it is unlikely we will be able to contain or lessen the increasing environmental impact caused by the UK generating significantly greater quantities of waste into the future.

## **Conclusion**

In conclusion, Sea and Water is disappointed that the revised PPS focuses much less heavily on the movement of waste and does not appear to encourage sustainable and environmentally friendly modes of transport.

A strategic and “joined up” approach needs to be taken if Government is serious about reducing the overall environmental impact of the UK generating increasing amounts of waste.

Authorities should be required, wherever practicable, to use water and rail for the movement of waste over road haulage.

When developing and/or considering plans for waste treatment sites, authorities should, wherever possible, identify, safeguard and grant permission for sites

which naturally encourage sustainable modes of transport such as those which are water or rail connected.

I would be pleased to discuss any of these points with you as necessary.

Yours sincerely

Mike Elsom  
Managing Director