

## JMWMS – Recommendations for amendment resulting from Second Consultation round

The second round of public consultation ended on 6<sup>th</sup> September 2007. This has resulted in a number of comments being received and recommendations being made to amend the Strategy documents and the Environmental Report. All comments received have been listed below. The response of GWP to these comments is also stated along with the rationale behind the response.

Where comments have resulted in changes to the strategy or Environmental Report, these have been built into an amended document. The amended documents are now available as adoption drafts and are being considered for adoption by each authority during autumn / winter 2007.

Source of Recommendation	Recommendation	Our Response	Our Rationale
SEA Report	<p><u>Core Objective 1 : Changing Behaviour.</u>            To make clearer that this objective applies to everyone in the county and that the change desired in behaviour is towards sustainability. Whilst this is implicit in the text they need to make it explicit. Although not required as part of the wording of the objective, it will be important that the education initiatives are specifically tailored to the diverse needs of stakeholders, including the public.</p>	No change to JMWMS proposed.	<p>The JMWMS explicitly applies to a wide 'society' as stated at various points throughout the supporting text. The desire to secure 'long term sustainability' is also explicitly stated in section 5 "Where do we want to be". Whilst we agree that these principles are central to the objective, in an effort to remain succinct and focussed it is not proposed to extend the wording of the objective further.</p>

SEA Report	<p><u>Core Objective 3 : Segregation at Source.</u> For this objective to gain greatest success, it will be important for the collection services provided to be convenient. Therefore it is recommended that wording be added to the objective to reflect this.</p>	No change to JMWMS proposed.	Whilst we would not disagree with the principle, this comment relates to the tactics we would need to employ rather than a high level objective.
SEA Report	<p><u>Core Objective 4 : Compost Hierarchy.</u> Strengthen the wording within the objective to ‘actively promote and encourage home composting’.</p>	No change to JMWMS proposed.	We do not believe this adds any further value to the objective since ‘actively’ is implicit within promotional activities and already reflects our intention to be active in this respect.
SEA Report	<p><u>Core Objective 5 : Residual Waste as a Resource.</u> It will be possible to further increase the benefits of this objective by reflecting a desire to continuously reduce residual waste. In considering this as part of the objective, the issue will be considered in determining waste treatment options. As a result, Gloucestershire is less likely to be locked into the construction of a treatment facility which does not allow flexibility.</p>	No change to JMWMS proposed.	Waste reduction is already explicit as a preferred option, as stated in objective 2 “Reduction First”. The issue of developing a flexibly sized treatment facility is one of tactics and we do not believe that this belongs as a high level objective.

SEA Report	<p><u>Core Objective 7 : Working in Partnership.</u> To improve efficiency and deliverability of initiatives, the wording could be amended to include alignment of financial and operational interests.</p>	Accepted	<p>It would be helpful to be clear about our intent here, which would potentially include alignment of these interests, even in part, as an objective. However, the work of the Joint Improvement Board may further inform a future approach to this and a response to JIB recommendations has been included in the detailed action plans.</p>
SEA Report	<p><u>Core Objective 9 : De-pollution of the waste stream.</u> This objective could go further to include encouraging the reduction of hazardous waste arisings e.g. avoiding the use of garden chemicals, promoting the use of rechargeable batteries etc. Also the re-use of hazardous materials should be promoted to the main text.</p>	Accepted.	<p>This would also fulfil the objective of waste reduction, and such issues could easily be incorporated into a waste minimisation programme. Objective 9 text to be amended to incorporate this recommendation.</p>

<p>County &amp; District Waste Officers Action Planning Workshop (11<sup>th</sup> July 2007)</p>	<p><u>Volume 1 Headline Strategy : Section 5.3 'Targets'</u>  Target T3 includes "All households in Gloucestershire will have convenient and easy-to-use collection services, enabling them to recycle and compost at least 70% of their rubbish by April 2010". This statement forms a core part of the LGA vision statement, but whilst strategically important, is impractical to measure and report upon as a target. It is recommended that this statement be removed from the targets box and placed in the main body of the strategy text in order to provide a context for specific actions and resulting targets.</p>	<p>Accepted.</p>	<p>We agree with this logic. We wish to reflect the strategic importance of this statement within the Headline Strategy, and will relocate it to Section 5 "Where do we want to be ?".</p>
<p>County &amp; District Waste Officers Action Planning Workshop (11<sup>th</sup> July 2007)</p>	<p><u>Volume 1 Headline Strategy : Objective 3 (Segregation at Source).</u>  Remove reference to 'quality and value' and emphasise the optimisation of collections.</p>	<p>Accepted in part.</p>	<p>Emphasise optimisation of collections, but keep this in balance with 'quality &amp; value' considerations in order to allow us to adapt to best technological and market developments over time.</p>
<p>County &amp; District Waste Officers Action Planning Workshop (11<sup>th</sup> July 2007)</p>	<p><u>Volume 1 Headline Strategy : Objective 8 (Closing the resource loop).</u>  Remove reference to 'high quality' materials in the first sentence of the supporting text box.</p>	<p>Accepted in part.</p>	<p>Following on from previous rationale with respect to collections of recyclable materials, but still aim to produce high quality products from these recyclables.</p>

<p>County &amp; District Waste Officers Action Planning Workshop (11<sup>th</sup> July 2007)</p>	<p><u>Volume 2 High Level Action Plan : Section 3 (Collection Systems).</u>  Reword the 3<sup>rd</sup> bullet point from “...once sufficient recycling and composting infrastructure is provided” to “...provided sufficient recycling and composting infrastructure is in place”.</p>	<p>Accepted.</p>	<p>This is a point of detail, but helps the sentence read as a joint county / district statement.</p>
<p>County &amp; District Waste Officers Action Planning Workshop (11<sup>th</sup> July 2007)</p>	<p><u>Volume 2 High Level Action Plan : Section 5.2.1 (Organisation).</u>  Review section to ensure it is consistent with JIB work, and amend date reference of April 2007.</p>	<p>Accepted.</p>	<p>Rewrite this section to reflect JIB actions, to remove reference to ‘reinvigoration’ of GWP and bring into present tense.</p>
<p>County Council Waste Projects Manager (8<sup>th</sup> August 2007) &amp; Waste Technical Manager (4<sup>th</sup> September 2007).</p>	<p><u>Volume 1 Headline Strategy : Section 5.1.4 (Public Expectations).</u>  This section references public engagement ‘to date’, but final document should bring this up to date and speak in present tense. Additional bullet point should be added to include final consultation phase. Reference to Waste Strategy 2000 review should be replaced with published Waste Strategy 2007. Reference to statistics throughout Volume 1 and Volume 2 should be brought up to date with 2006/07 data.</p>	<p>Accept.</p>	<p>Logical presentation. Extend this approach to updating the whole of the strategy.</p>

<p>Mrs Haigh, Parish Councillor, Bibury (9<sup>th</sup> August 2007)</p>	<p>Although I have not completed my reading of the document I would very much like to implore those responsible for this policy to reconsider <b>'direct mail'</b> as part of the 'Recycle for Gloucestershire Campaign', see Item 4.1.4. Given that, on the page prior to this, the "Average breakdown of Household Waste arising in Gloucestershire pie chart shows paper as being the highest proportion (23%) it is hard to imagine how a campaign could suggest pursuing a paper campaign in the area.</p>	<p>Accept in part</p>	<p>This reference is made within the 'what we are doing' section and reflects the current approach of using direct mail as one of several different communications tools. The public have indicated through roadshow and telephone surveys that direct mailouts and leaflets are a strongly preferred method of receiving information. However, an increasing number of people are indicating that they would be happy to receive information by email. We will therefore address this through the action plans when developing the communications approach, although it is likely that a direct mail approach will continue to be used in appropriate circumstances for the foreseeable future. All direct mailouts will continue to use recycled paper and will also be recyclable themselves in order to minimise their environmental impact.</p>
--	---	-----------------------	--

<p>Whiteshill &amp; Ruscombe Parish Council (20<sup>th</sup> August 2007)</p>	<p>In response to Gloucestershire's Joint Municipal Waste Management Strategy, Whiteshill &amp; Ruscombe Parish Council have two requests:</p> <ol style="list-style-type: none"> <li>1. Put pressure on manufacturers to reduce packaging waste and use recyclable materials where packaging is necessary.</li> <li>2. Weekly kerbside recycling collections to include cardboard and compostables.</li> </ol>	<p>Accept in part</p>	<ol style="list-style-type: none"> <li>1. Volume 2 section 2.2 states that 'we will lobby the private sector such as retailers and supermarkets, central government and public sector policy makers via the LGA and other organisations to try to reduce packaging waste'.</li> <li>2. Volume 2 section 3.2.1. states that district councils will consider developing collection schemes in line with the options identified. This includes collection of biowaste materials as one part of a drive to reduce reliance on landfill. The timing and actual design of service changes will be subject to assessment before final decisions are made in order to optimise performance and efficiency of any new scheme.</li> </ol>
---	---	-----------------------	---

<p>Mr Riley (23<sup>rd</sup> August 2007)</p>	<p>I was recently disappointed that I could not recycle packaging that the supplier had clearly stamped with recycling symbols.</p> <p>I looked in the reports detailed in the subject line and could not find any reference to how this situation would improve.</p> <p>Recycling is inconsistent throughout the county. In Quedgeley I had plastic bottles recycled at the kerbside. In Cheltenham this service is not provided. This does not make recycling easy.</p> <p>I do not understand why I cannot recycle plastic food trays at county council recycling sites, where the trays are marked with a recycle symbol, when I can recycle bottles marked with the same recycle symbol.</p> <p>-----</p> <p>I bought an AEG Electrolux Tumble Dryer packaged in Cardboard, Polystyrene, Wood and Plastic wrap. The packaging was marked with recycle symbols and the instructions (printed by AEG in Germany, which is significant as they have a better re-cycling record) said all the packaging materials could be re-cycled.</p> <p>I happened to be passing Stoke Orchard tip so</p>	<p>Noted, as per our comments on the right.</p>	<p>GWP have stated in the strategy (Vol 2 section 3.2) that we will strive to increase the range of materials collected for recycling and (Vol 2 section 3.3) that we will collectively explore implementing common standards. However, the ability to recycle some materials is currently constrained by the availability and viability of reprocessing routes for these materials. This is a particular problem for some types of plastic.</p> <p>Additionally, we will explore (Volume 2 section 3.6) supporting the development of local reprocessors, waste based businesses, social enterprises and/or community groups throughout Gloucestershire.</p>
---	---	---	---

took the packaging with me. I could recycle the cardboard and wood. I could not recycle the plastic which was marked with a re-cycle symbol. I could not recycle the Polystyrene.

I recently received a sticker on my main bin to encourage me to re-cycle. Presumably this had been applied because I forgot to put out my green bin on the allotted day. Disappointing it was applied even though the main bin contained no recyclables.

It is annoying to be encouraged to re-cycle when the facilities are not available for re-cycling.

The recent guide received with my council tax bill suggested plastic bottles could be recycled at the kerbside. Unfortunately this only covers Gloucester and not Cheltenham. I realise I can re-cycle at the supermarkets but it is not as convenient. What does confuse me is that I am only allowed to re-cycle plastic bottles and not food trays that are marked with a recycling symbol (the same symbol on the bottles). I would like to see some consistency in your approach.

I am very happy to recycle but need the council to provide facilities and consistency in approach.

<p>County Council Waste Technical Manager (4<sup>th</sup> September 2007)</p>	<p>Volume 1 Page 13 reference to LAA's should include agreed targets.</p>	<p>Accept</p>	<p>Targets to be added.</p>
<p>County Council Waste Technical Manager (4<sup>th</sup> September 2007)</p>	<p>Objective 5 "Residual Waste as a Resource" states that the 'preferred treatment processes will maximise recovery of recyclables.....'. The theme throughout the strategy is one of maximising recycling <i>prior</i> to treatment, as not all of the technologies on the shortlist of treatment process will recover recyclables to the same degree. The emphasis throughout the strategy is to optimise recovery of recyclables and gain further value from residual waste, but this must be in balance with other considerations. It is recommended that the wording be changed to 'optimising recovery of recyclables' to clarify this.</p>	<p>Accept</p>	<p>Amend wording as stated for clarity.</p>
<p>County Council Waste Technical Manager (4<sup>th</sup> September 2007)</p>	<p>Volume 1 Page 13 "Mixed municipal waste is not an eligible source. However if the waste is purely biogenic with a maximum content of 2% accidental contamination it then becomes eligible. For example biogas generated from food waste using an anaerobic digester would be eligible and could demand a higher premium. " Since 2007, the Renewable Obligation changed and now municipal waste's biogenic element can gain ROCs if combusted to generate heat and power.</p>	<p>Accept</p>	<p>Paragraph to be updated to reflect this.</p>

County Council Waste Technical Manager (4 <sup>th</sup> September 2007)	Volume 1 page 22 para 4 & Volume 2 section 4.5 para 2, alter residual waste dates to reflect current timeline of 2014/15.	Accept	Dates to be amended in line with current timeline.
County Council Waste Technical Manager (4 <sup>th</sup> September 2007)	Volume 2 Table 2: How are you linking these performance targets to the 60% set in the Strategy? You need to make the link and I see no link	Accept	Link to be explained in additional supporting text for purpose of clarity.
County Council Waste Technical Manager (4 <sup>th</sup> September 2007)	Volume 2 section 4.3 quotes a need for 80,000 tonnes capacity. The current estimate is now 60,000 and should be reflected in the text.	Accept	Text to be amended to 60,000 tonnes.
County Council Waste Technical Manager (4 <sup>th</sup> September 2007)	Volume 2 section 4.5 first para. If 60% recycling is achieved and waste min measures succeed, the residual waste arising may be reduced to 130,000 tonnes/annum.	Accept	Text to be amended to reflect the most accurate figure.
County Council Waste Technical Manager (4 <sup>th</sup> September 2007)	Volume 2 section 4.5, 4 <sup>th</sup> para: Can we add that EfW producing heat and power now qualifies for ROCs???	Accept	Text to be amended to reflect this.

<p>County Council Waste Technical Manager (4<sup>th</sup> September 2007)</p>	<p>Volume 2 page 11, para 2, reword the text to reflect the current approach to developing a procurement strategy.</p>	<p>Accept</p>	<p>Text to be amended to reflect this.</p>
<p>County Council Waste Technical Manager (4<sup>th</sup> September 2007)</p>	<p>P11 Risks “Public expectations – the public demands waste facilities that are safe, economical and environmentally sound. Full consultation is needed to hear the public’s view on our plans”. This statement was written before the JMWMS consultation and GGD therefore it can be argued that we have fully consulted has taken place. I would like this to say that we will engage with the community during procurement and planning process.</p>	<p>Accept</p>	<p>Bring the text up to date by removing a need for further ‘full’ consultation, but maintaining a commitment to consult as appropriate to need.</p>
<p>County Council Waste Projects Manager (4<sup>th</sup> September 2007)</p>	<p>Volume 2 section 5.5 para 3 commits us to consult widely during the ongoing development and revision of the strategy. The strategy has now been widely consulted upon and it is not anticipated that further consultation will take place on an ongoing basis unless specifically defined within particular actions or during fundamental periodic review.</p>	<p>Accept</p>	<p>Amend strategy to bring up to date and reflect position moving forward.</p>

<p>County Council Waste Projects Manager (4<sup>th</sup> September 2007)</p>	<p>The strategy reflects the forecast of a growing population in Gloucestershire, but does not reflect that this population is predicted to be increasingly aged. This may have implications for participation in services and therefore service design. The strategy should reflect this as a risk to future performance and should position us to deal with this challenge.</p>	<p>Accept</p>	<p>Amend Volume 1 section 4 to outline the context of this, and amend Volume 2 section 3.7 to identify this risk for mitigation.</p>
<p>Waste Planning Authority (5<sup>th</sup> September 2007)</p>	<p><u>Comments on JMWMS Volume 1</u></p> <p>On page 5 reference to the planning Waste Core Strategy should just be to the <i>Waste Core Strategy</i>.</p> <p>6<sup>th</sup> line from bottom of page 5 should be Waste Development <i>Plan</i> Documents to determine where these facilities should be <i>located</i>.</p> <p>The footnote at the bottom of page 5 may be more informative if it reads:  <i>The proposed Waste Development Plan Documents include the Waste Core Strategy (due for adoption in December 2009), a Waste Site Allocations DPD (due for adoption in March 2012), a Development Control Policies DPD (also due for adoption in March 2012) and a Proposals Map (ongoing).</i></p>	<p>Accept</p>	<p>Amendments to be made as stated.</p>

	<p>In Appendix 1: Glossary of Terms: Under Waste Local Plan, should read:  <i>...Its purpose is <u>to</u> set out detailed land use policies...</i></p>		
<p>Waste Planning Authority (5<sup>th</sup> September 2007)</p>	<p><u>Comments on JMWMS Volume 2 (Draft High Level Action Plan)</u></p> <p>Para 2.3 should read: <i>One <u>of</u> the biggest risks...</i></p> <p>Para 3.2 maybe there could be a footnote explaining what 'side waste' is. Unclear.</p> <p>Para 4.6 on Land could read: <i>Securing land for the siting of the waste treatment infrastructure is key. If the site or sites are not acquired by the County Council then clearly a willing landowner is necessary. Additionally a wide range of important environmental and land-use related criteria will have to be met. The facility will need to accord with the statutory 'Development Plan', including:  Policies in the Regional Spatial Strategy;  Saved policies and sites in the adopted Waste Local Plan; and  Waste Development Plan Documents – as they are adopted.</i></p>	<p>Accept in part</p>	<p>Amendments to be made as stated, apart from reference to 'willing landowner' in para 4.6 as this does not reflect the current position.</p>

<p>Waste Planning Authority (5<sup>th</sup> September 2007)</p>	<p><u>Comments on JMWMS Environmental Report</u></p> <p>The introduction to this Environmental Report states: <i>“Whilst there is no legal requirement for a Sustainability Appraisal to be conducted on this JMWMS, it is Gloucestershire’s intention that the strategy take into account and work towards the broader aims of sustainable development. As such the environmental appraisal required by the SEA Directive and transposed regulation has been widened to include appraisal of some economic and social issues deemed to be of relevance.”</i></p> <p>This is welcomed by the WPA who are undertaking SAs on their emerging Waste DPDs. It is the WPA’s intention to carefully consider and reference the results of this Environmental Report in terms of the scoring of the Waste Core Strategy Options that relate to the management of MSW.</p>	<p>Noted</p>	<p>No action.</p>
---	--	--------------	-------------------

<p>Natural England (5<sup>th</sup> September 2007)</p>	<p><u>Comment on JMWMS Environmental Report</u></p> <p>Table 4 (SEA objectives and sub-questions) refers to minimising global biodiversity impacts, a theme which recurs throughout the document. Natural England recognizes the value of this approach. However we are concerned that the revised document does not deal with the effects on local biodiversity. We would certainly agree that assessing impacts on local biodiversity is difficult until the location of waste management facilities has been established. However, that does not mean that impacts on local biodiversity should be completely ignored. Table 19 (Amendments made to the original objectives and sub-questions) now drops impacts on local biodiversity as an indicator. We would suggest that since there may be impacts from the strategy on local biodiversity, even if these cannot be quantified, some mitigation measures should be included in Table 17 e.g. 'where harm to local biodiversity may occur, measures will be taken to avoid harm if possible. Where harm cannot be avoided then it will be mitigated as fully as possible',</p>	<p>Accept</p>	<p>We accept this recommendation and will amend the Environment Report as necessary.</p>
--	--	---------------	--

<p>Environment Agency (6<sup>th</sup> September 2007)</p>	<p>We welcome the strategy set out in the Draft Headline Strategy. In particular, we are pleased that climate change and sustainability are central themes. The objectives and targets are all deemed appropriate. We also welcome the route map and would support the bullet points set out in section 6.2 for increased and enhanced recycling and composting.</p>	<p>Noted</p>	<p>No action.</p>
<p>Environment Agency (6<sup>th</sup> September 2007)</p>	<p>We note in section 5.1.4 that the Strategy does not currently cover the management of commercial waste. We would encourage this to be incorporated as sustainable management of <i>all</i> sources of waste is crucial for tackling climate change.</p>	<p>Noted</p>	<p>The paragraph quoted goes on to state that we aim to explore how we can assist the sustainable management of commercial wastes and that this is included in our action plans. High Level Action Plan section 3.2.1. states that in the long term we will explore the possibility of providing county wide commercial waste recycling schemes. In the short term, our current draft action plans include the implementation of a BREW funded waste minimisation programme for local businesses. We aim to seek further funding to maintain this programme.</p>

<p>Environment Agency (6<sup>th</sup> September 2007)</p>	<p>The Draft High Level Action Plan is also welcomed as it too has a good environmental ethos. We note the section on risks (4.6). The issue of resources is an important one. We consider that financial considerations should not be given greater emphasis than environmental ones. Sustainable waste management should encompass a balance between social, economic and environmental considerations, and it should be acknowledged and understood how these three criteria are interrelated.</p>	<p>Accept</p>	<p>It is accepted that a balance between social, financial and environmental considerations should be made. This approach is taken in options appraisals and is also reflected in the Environmental Report.</p>
<p>Environment Agency (6<sup>th</sup> September 2007)</p>	<p>The risk associated with planning permission is also noted. We recommend that developers and Planning Authorities make use of early pre-consultation working to attempt to identify and resolve problems before planning applications are submitted. We also recommend the same front-loading/pre-consultation approach at the strategic planning stage.</p>	<p>Noted</p>	<p>No further comment.</p>

<p>Environment Agency (6<sup>th</sup> September 2007)</p>	<p>With reference to the Environmental Report.</p> <p>In general, the report seems to be clear and comprehensive. We would point out a few matters:</p> <ol style="list-style-type: none"> <li>1. Objective ENV2 in Table 4 should reflect the 'protect and enhance' methodology</li> <li>2. Appendix 2 could include other planning policy statements, including the draft consultation on PPS 1 supplement on Climate Change.</li> <li>3. We note the mitigation proposals put forward for where there are negative impacts. There should also be proposals for maximising positive impacts.</li> </ol>	<p>Accept in part</p>	<p>In relation to point 1: The ENV2 objective relates to assessing impacts on global biodiversity. It is felt that the wording of the current objective i.e. to "minimise global biodiversity impacts" and the methodology undertaken for the appraisal is sufficiently robust for the purposes of the report and is broadly reflective of a 'protect and enhance' methodology. Given that the MWMS does not address any issues that are site specific in nature we are confident that the methodology used is the most appropriate for this Environmental Report and no changes are proposed.</p> <p>In relation to point 2: The comment is noted and other relevant Planning Policy Statements will be included within the Environment Report as appropriate.</p> <p>In relation to point 3: Whilst not a legal requirement, we acknowledge that there is merit</p>
---	---	-----------------------	---

			in this approach. The Environment Report will be amended to reflect a desire to maximise the positive impacts noted. This will be either in the form of general text, or specific measures as is deemed appropriate.
<p>Quedgeley Parish Council (4<sup>th</sup> September 2007)</p>	<p>Members of Quedgeley Parish Council considered the report and would respond as follows:</p> <ul style="list-style-type: none"> <li>• No allocation has been made for Cheltenham</li> <li>• Serious concerns were raised regarding the possibility of this eventually becoming a tip such as the one at Hempsted.</li> <li>• Javelin Park has obtained planning permission for a distribution centre but this is an inappropriate location and should be allocated for recycling only not final disposal.</li> </ul>	<p>No change to JMWMS</p>	<p>As presented, these concerns are outside the scope of the JMWMS as they refer to specific site planning issues.</p>

<p>Dean Community Compost (6<sup>th</sup> September 2007)</p>	<p><u>Draft Headline Strategy: 5.3 Targets</u>  Given that work at DEFRA is well advanced to include an allowance for home composting in recycling and composting performance figures, there is no reason not to include the provision of support for home and community composting in the opening bullet point. By this we mean advice, promotion, and provision of a wider range of subsidised equipment than currently available (eg, also subsidised womeries, “green cones” and Bokashi systems, which can deal with ALL home biowastes, and also the availability of a subsidised shredding service for coarser garden wastes.</p> <p>While we understand that home composting sits between “waste minimisation” and “recycling and composting”, the anticipated inclusion of home composting in the LATs figures means that measures to support it should be included where targets are discussed.</p> <p>We therefore suggest a new wording “<u>All households in Gloucestershire will have support to make home composting as attractive, easy and effective as possible, backed by convenient and easy to use....</u>”</p> <p>With home composting due to be included in targets this measure will improve performance against targets as well as “true” performance</p>	<p>Accept in part</p>	<p>The statement shown in 5.3 is a reproduction of the existing LGA vision statement. We also believe that this is not an appropriate ‘target’ but rather an aspiration. The statement has been removed from this section and relocated to the supporting text in section 5.1.1.</p> <p>The strategy aims to promote home composting as well as develop additional collection services. Current promotional schemes already provide subsidised equipment (including the Bokashi system) and we seek through this strategy to maintain and develop support to promoting home composting.</p> <p>We recognise that the government are looking at mechanisms for the inclusion of home composting within existing targets, and await guidance resulting from this. Our strategy does not exclude such a development.</p>
---	--	-----------------------	---

	<p>(which as we know is not quite the same thing), and has the added advantage of being consistent with your own headline strategy (Objective 4, Composting Hierarchy).</p>		
<p>Dean Community Compost (6<sup>th</sup> September 2007)</p>	<p><u>Draft Headline Strategy Route Map 6.2</u>  The “route map” (ch 6) states:  “If each District introduces good quality three stream collection systems, (backed up by successful &amp; timely development of in-vessel composting infrastructure by Gloucestershire County Council) we estimate that each individual household could theoretically have the potential to recycle 70% of their rubbish. At an 80% public participation rate (supported by a partnership-driven communications campaign), this could result in excess of 50% recycling performance across Gloucestershire.”</p> <p>Once again you ignore your own strategy and fail to highlight the role of home and community composting. You have also failed to update this paragraph to reflect the improvement in the headline strategy objective 3 which now states (our emphasis):</p> <div style="border: 1px solid green; padding: 5px; margin: 10px auto; width: fit-content;"> <p><u>As a minimum</u>, collection services will be provided for these three basic streams.</p> </div>	<p>No Change to JMWMS</p>	<p>Objective 4 already promotes home composting explicitly. The ‘route-map’ diagram must be read in the context of the previous paragraph which relates to the development of collection and disposal services.</p> <p>Actual targets for recycling and composting stretch us to 60% by 2020, which is beyond the ‘in excess of 50%’ stated in the route map for collection and disposal services. This will drive performance higher, but any decision on whether and how to incorporate home composting in reporting these figures will be taken at a national level.</p>

We suggest rewording as follows:  
“If home and community composting support is intensified and extended, and each District introduces good quality three-stream-plus collection systems, (backed up by successful & timely development of in-vessel composting infrastructure by Gloucestershire County Council) we estimate that each individual household could theoretically have the potential to recycle 70% of their rubbish. At an 80% public participation rate (supported by a partnership-driven communications campaign), this could result in excess of 50% recycling performance across Gloucestershire.”

You could then increase your target percentages accordingly

Dean Community Compost (6 <sup>th</sup> September 2007)	<p><u>High Level Action Plan 3.5 (HRCs)</u>  We welcome the widening of facilities at the HRCs, eg to include WEE and “re-usables” collection. However, we might point out (as householders as much as anything) that five HRCs county-wide is an inadequate number, considering the soaring demand from householders for facilities for responsible waste disposal of all kinds. Futhermore, someone needs to ensure these centres and their services are properly advertised to the public. For example on the Forest of Dean website, only minimal information is provided about the site in Broadwell (and until very recently, it was still described as “the tip” on their site!).</p>	Noted	Continual improvement in our communications is an important facet of objective 1 : Changing Behaviour. In addition, HRC service provision in terms of sites themselves is under review and the range of materials they collect is continually improving. HRC’s remain an important service and contribute to our overall performance targets.
Dean Community Compost (6 <sup>th</sup> September 2007)	<p>Lastly, we hope that any decision on biowaste collection options will reflect the recent pronouncements from DEFRA in the England Waste Strategy 2007 that:  “9. There are strong arguments for encouraging more separate collection of food waste, especially since it can help achieve environmental gains more cost-effectively, including through the use of anaerobic digestion to provide energy (see Annex D for more detail on this). Separate collection of food waste has so</p>	Noted	Any service change will continue to consider different options on a range of merits. Volume 2 section 3.2.1 states that such service changes will be subject to further consultation and member approval.

<sup>1</sup> Eunomia for WRAP, *Dealing with Food Waste in the UK*, March 2007; available at [http://www.wrap.org.uk/local\\_authorities/biowaste.html](http://www.wrap.org.uk/local_authorities/biowaste.html)

far been introduced by a small number of authorities, all on a weekly basis and WRAP research suggests this can lead to higher tonnage and participation rates. The Government welcomes the fact that many local authorities are promoting home composting of organic waste.”  
From Ch 5 of new England Waste Strategy (2007)

And in more detail:  
(From Annexe D)  
“58. The Eunomia Report<sup>1</sup> investigated ‘the most cost effective and environmentally sustainable ways of diverting household food waste from landfill that leads to the production of a saleable product’. The report concluded that collecting food waste separately allows processing costs to be minimised but can also increase the amount of waste captured.”