



Our ref: MT/010317/NDFW
Date: 23rd February 2017

Planning Policy Branch
Planning Directorate
Welsh Government
Cathays Park
Cardiff
CF10 3NQ

Biffa Plc
Poplars Landfill Site
Lichfield Road
Cannock
Staffordshire
WS11 8NQ

Web www.biffa.co.uk

Dear Sir/Madam

***CALL FOR EVIDENCE – NATIONAL DEVELOPMENT FRAMEWORK FOR WALES
BIFFA EVIDENCE***

Thank you for providing us with an opportunity to contribute evidence as part of the production of a National Development Framework (NDF) for Wales.

Biffa is a leading UK-based integrated waste management business. The Group operates across the breadth of the waste management value chain, including the collection, treatment, processing and disposal of waste and recyclable materials, as well as related work in the production and sale of energy derived from waste and the sale of recovered commodities such as paper, glass, metals and plastic.

Biffa's customer base for these services includes local authorities (which includes the collection of waste from households), large corporates and SMEs, and purchasers of end-product commodities and energy. Across its operations, the Group managed approximately 6.7mT of waste in Fiscal Year 2016. The Group's services are organised across four operating divisions: Industrial & Commercial; Municipal; Resource Recovery & Treatment (RR&T); and Energy

Biffa has a significant presence in Wales. The Company operates at 11 different locations including Industrial and Commercial Waste Collection Depots, CA sites, a specialist Hazardous Waste Transfer Station in Cardiff that services Industrial and Commercial Customers across South Wales and a major strategic non-hazardous landfill site at Trecatti in Merthyr Tydfil. The Trecatti landfill site includes energy generation from landfill gas and has recently been granted planning consent for a treatment pad that will be used to recover materials from incoming waste streams.

Sustainable resource recovery, treatment and disposal is essential to underpin the economic social and environmental wellbeing of Wales and this should be recognised in the National Development Framework. Our contribution therefore provides evidence in respect of the following wellbeing goals:

- A prosperous Wales.
- A resilient Wales.

A sustainable resource recovery system will comprise all elements of the circular economy and

Delivering more

Biffa Waste Services Limited is incorporated and registered in England and Wales, Number 00946107
Registered Office: Coronation Road, Cressex, High Wycombe. Buckinghamshire HP12 3TZ

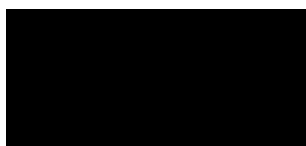
the waste hierarchy including facilities for the collection and recovery of recyclable materials, treatment facilities that include energy recovery for residual wastes and landfill site(s) for the disposal of those materials that cannot be recycled or recovered. The NDF should include statements that require Local Authorities to set out strategic policies in their Local Plans that deliver appropriate and sufficient waste management facilities in their area. They should also be required under the Duty to Co-operate to work with neighbouring authorities to deliver this on a regional scale.

Wales recycling performance is good but the published figures show what is collected and sorted in Wales for recycling rather than what is used for re-processing. The vast majority of the physical processing or recycling of collected materials into other products happens at re-processors in England, or in the case of paper and card specifically, mainly abroad (Chinese paper mills). In a post-Brexit world it will be important for a UK-side approach to recognise these aspects of domestic and international markets and also have as least regulatory and policy inconsistency as possible between devolved administrations in the UK. The NDF should include this fact and recognise that there will need to co-operation across the UK to ensure a vibrant economy for Wales and the other countries of the UK.

Finally, with the current drive to provide new housing many existing waste management facilities are being encroached by new development. Waste Management sites such as recycling facilities and energy recovery facilities, by their nature, are industrial facilities that are not necessarily suitable to be located close to residential areas. Landfill sites in particular, which have until recently been located on the urban fringe or in rural areas are being encroached upon by new housing. For example, at least three of Biffa's strategic landfill sites have recently seen new housing developments either proposed, granted or under construction close to their boundaries. It is important that the NDF includes a policy that recognises the importance of waste management facilities and seeks to safeguard existing facilities from encroachment by other development.

I trust that our comments are helpful. Should you need any further information then please do not hesitate to contact me.

Yours faithfully
For **Biffa Plc**



Mary Tappenden
Group Planning and Development Manager

Encs.