

# Draft National Policy Statement for Hazardous Waste:

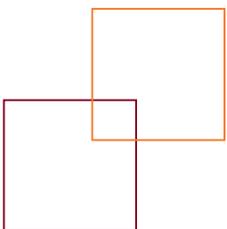
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## Equalities Impact Assessment Full Final Report

A document issued by the Department for Environment,  
Food and Rural Affairs.

Annex 6

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# National Policy Statement for Hazardous Waste

## 1. Introduction and Context

1.1 This Report is the full Equalities Impact Assessment (EqIA) for the Appraisal of Sustainability of the draft National Policy Statement for Hazardous Waste. The purpose of the report is to assess whether the National Policy Statement for Hazardous Waste has the potential to affect adversely or positively equalities groups.

1.2 The Planning Act 2008 provides for an independent Infrastructure Planning Commission (IPC) which will take decisions on planning approvals for nationally significant infrastructure projects in the light of statements on Government policy for each infrastructure type – the National Policy Statements (NPS).

1.3 The NPS for Hazardous Waste (hereafter, 'the NPS-HW') is one of a series of National Policy Statements that have been published or are under development. The NPS-HW is the responsibility of the Department for Environment, Food and Rural Affairs (Defra).

1.4 The NPS-HW is currently available in draft form only. This EqIA report therefore is itself necessarily a draft report, which will be updated as the NPS-HW is completed.

1.5 The process of developing the EqIA for the NPS-HW is part of a wider appraisal of the potential impact of the NPS-HW. In particular, the EqIA is incorporated into the Assessment of Sustainability (AoS) of the policy. The overall AoS for the NPS-HW was being developed in parallel with the draft NPSs so that any findings from the AoS that might result in modifications to the draft NPS-HW could be taken into account before the public consultation phase is reached.

### Methodology

1.6 This Equalities Impact Assessment is undertaken to fulfil Defra's statutory obligations to promote equal treatment and to address discrimination.

1.7 The methodology used in this full assessment has focused on a desk-based assessment of the draft NPS-HW, together with a wider document review, in particular documents that are referred to in the draft NPS-HW.

1.8 At this stage there has as yet been no external consultation on the draft NPS-HW with respect to its potential impact on equalities. It is assumed that the public consultation on the finalised NPS-HW will include consultation on equalities issues alongside a range of other matters.

### The Policy to be Analysed: the National Policy Statement on Hazardous Waste

1.9 The NPS-HW sets out a national policy on hazardous waste infrastructure. The NPS-HW will influence the decision making of Government on individual planning applications that propose development of hazardous waste infrastructure. The Government will examine applications and make decisions on proposed new or altered facilities that deal with final disposal or recovery of hazardous waste, where:

- the capacity for new facilities is expected to be more than 100,000 tonnes per annum in the case of landfill or deep storage, or 30,000 tonnes per year for other types of facilities.
- the capacity for altered facilities is expected to lead to an increase in volumes of waste handled by at least 100,000 tonnes per annum in the case of landfill or deep storage, or 30,000 tonnes per year for other types of facilities.

## Government's Policy Objectives

1.10 Hazardous waste is waste that can cause harm to human health or the environment. The main objectives of government policy on hazardous waste<sup>1</sup> are:

- to protect human health and the environment.
- to reduce the amount of hazardous waste that is produced, using it as a resource where possible and disposing it only as a last resort.

1.11 Government intends to satisfy these objectives by encouraging the development of infrastructure capable of managing hazardous waste in a manner that protects both human health and the environment.

## Trends in Hazardous Waste

1.12 The Waste Directive (2008/98/EC) sets out a revised waste hierarchy with five steps:

- prevention
- preparation for re-use
- recycling
- other recovery, such as production of energy
- disposal

1.13 This hierarchy acknowledges that, while it should be the objective to minimise the volume of hazardous waste arisings that must be disposed of, there will always be hazardous waste materials that will require disposal.

1.14 Hazardous waste arises from a wide range of sources, including households, businesses and the delivery of public services. However, the largest sources are produced by the chemical and oil industries, and through construction and demolition work.

1.15 In 2008, around 3% of all waste arisings in England and Wales were classified as being hazardous, amounting to some 4.8 million tonnes<sup>2</sup>. Despite measures to prevent and minimize arisings of hazardous waste, there has been no notable decline in arisings.<sup>3</sup> The draft NPS-HW considers that the upwards trend in hazardous waste arisings is likely to continue, as more producer responsibility schemes are established and more household hazardous waste streams are collected and separated by municipal authorities. Moreover, the Waste Directive (2008/98/EC) is considered likely to increase the types (and therefore the amounts) of waste that is defined as hazardous<sup>4</sup>.

## Need for Infrastructure

1.16 The draft NPS-HW suggests that there are a number of hazardous waste streams that may require new or altered facilities to allow their disposal. These are set out in the following table.

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1 The text in this sub-section has been prepared based on an analysis of Parts 2 & 3 of the Draft NPS-HW

2 Draft NPS-HW, para 2.2.2.

3 Draft NPS para 3.2.2

4 Draft NPS-paras 3.2.5 – 3.2.7

Types of facility	Trends and Drivers of Change
<b>Waste Electrical and Electronic Treatment</b>	The WEEE Directive encourages the reuse, recovery and recycling of waste electronic and electrical equipment. Capacity for treatment of WEEE in the UK is thought to be sufficient, but a need has been identified for a special facility to treat flat panel displays, which contain mercury. Arisings are expected to increase significantly in future years. The envisaged treatment process would require a large investment, therefore only a small number of facilities are envisaged, perhaps located adjacent to one of the existing WEEE treatment facilities. <sup>5</sup>
<b>Oil Regeneration Plant</b>	Around 160,000 tonnes of waste oil arise in the UK annually that is suitable for regeneration, but there is currently a shortfall in the capacity to recycle lubricants to a high level. The Draft NPS-HW suggests that there may be a need for at least one oil regeneration plant (handling at least 70,000 tonnes p.a.) <sup>6</sup> .
<b>Air Pollution Control Residues</b>	Residues arise from the treatment of flue gases from municipal waste incinerators and energy from waste plant. Volumes of such arisings are expected to increase substantially as the number of energy from waste (EfW) plants in the UK increases. The current volumes of APD residues are understood to amount to some 120,000 tonnes per annum, with additional volumes from plants that are either under construction or are permitted adding a further 170,00 tonnes per annum <sup>7</sup> . These volumes will increase still further as new EfW plants are approved and constructed, in line with the National Policy Statement on Renewable Energy. Therefore, there is a clear need for additional facilities that can recycle these residues. <sup>8</sup>
<b>Thermal Desorption Residues</b>	Thermal desorption is a process used to clean up contaminated soil. The draft NPS-HW suggests that additional capacity of 60,000-120,000 tonnes per annum could be needed <sup>8</sup> .
<b>Bioremediation of Polluted Soil</b>	Soil is classified as a hazardous waste when it is contaminated by dangerous substances. Large volumes of waste soils and sludges from construction and demolition (as well as other industries) are suited to treatment techniques such as bioremediation and/or soil washing. The Draft NPS-HW suggests that facilities will be needed to treat a greater proportion of the over 300,000 tonnes of contaminated soils estimated to be currently sent to landfill each year <sup>9</sup> .

5 Draft NPS para 3.4.2

6 Draft NPS-HW, para 3.4.4

7 Draft NPS-HW, para 3.4.4

8 Draft NPS-HW, para 3.4.6

9 Draft NPS-HW, para 3.4.7

<b>Ship Recycling</b>	The UK Ship Recycling Strategy has encouraged the development of a number of facilities in the UK designed to increase national self-sufficiency in ship recycling. The Draft NPS-HW suggests that new facilities to manage waste arising from the dismantling of large and small ships and offshore oil and gas structures will be needed <sup>10</sup> .
<b>Hazardous Waste Landfill</b>	Landfill is at the bottom of the waste hierarchy, and over time the volumes sent to landfill are expected to decrease as more potential waste is prevented, reused, recycled or recovered. However, temporary increases may arise due to large construction projects. However, the Draft NPS-HW suggests that further landfill facilities may be needed if capacity falls below demand <sup>11</sup> .

## The Remit and Role of the IPC in Relation to Hazardous Waste

1.17 The introduction to Part 4 of the draft NPS-HW sets out a number of key principles to which the Infrastructure Planning Commission is expected to adhere when examining and determining applications for hazardous waste infrastructure. These principles can be summarised as follows:

- If proposed development contributes to meeting the need for hazardous waste infrastructure and is in accordance with the NPS then the IPC should operate on the basis that consent should be given.
- The IPC should take into account the potential for national, regional and local benefits including environmental, social and economic consequences.
- The IPC should take into account the potential for adverse impacts in environmental, social and economic terms.

1.18 The Draft NPS-HW also recognises the requirement of the Planning Act that the IPC takes due regard to any local impact reports submitted by a relevant local authority.

1.19 The draft NPS-HW also sets out specific guidance as to how the IPC should take into consideration a number of themes and issues that are likely to arise in respect to the potential consequences – whether adverse or beneficial – with respect to the environmental, social and economic effects of proposed new or altered hazardous waste infrastructure. Some of these themes and issues have the potential to generate effects that might impact disproportionately on equalities groups, for reasons that were identified in the EqlA Screening Report that was undertaken as the first stage of the EqlA process during the last quarter of 2009.

1.20 Before examining these themes and issues it is worth summarising the findings of the EqlA Screening Report to explain why some of the issues in the NPS-HW might be of relevance to equalities groups.

<sup>10</sup> Draft NPS-HW, para 3.4.9

<sup>11</sup> Draft NPS-HW, para 3.4.13

## 2. The EqlA Screening Report

### Purpose of the Screening Report

2.1 The EqlA screening process was undertaken late in 2009 in order to assess whether *prima facie* there is a possibility that the NPS on Hazardous Waste has the potential to result in less favourable outcomes for equalities groups.

2.2 The basis upon which the potential for differential impact was appraised was to assess whether there was the possibility of either/or:

- geographically disproportionate effects that had the potential to disproportionately affect equalities groups
- the possibility that there may be greater sensitivity of an equality group to the effects compared to the general population

### Methodology Used in the Screening Process

2.3 The EqlA screening process involved a four-step methodology:

- identification of the types of hazardous waste infrastructure that might be affected by the draft NPS-HW compared to an appropriate base case
- identification of the vectors that could be influenced by the draft NPS-HW that might in turn affect equalities groups
- identification of the geographical areas that might be potentially affected by the draft NPS-HW and whether any equality groups are disproportionately represented in those areas that might be affected as a result of the draft NPS-HW
- the reporting of results

2.4 The categories of equalities groups considered in the screening assessment were as follows.

Equality strand	Equality Group and Aspects Considered
Age	Children (0-16), young people (17-25) and older people (60+)
Gender	Women
Ethnicity	Black, Asian and Minority Ethnic (BAME) people
Disability	Disabled people with a physical or mental impairment
Faith	People belonging to faith and belief groups
Sexual orientation	Lesbians, gay men, bisexual people and transgender people

## Identification of the Vectors that could Affect Equalities Groups

2.5 The Preliminary Report for the Appraisal of Sustainability identified a series of topic headings that are relevant to consideration of the potential impact of the NPS-HW. Of these headings, a sub-set was considered by the Screening Report to have potential implications for equalities groups.

This sub-set of headings that is considered relevant is as follows:

- air quality
- health
- traffic and transportation
- economy

2.6 An explanation of the choice of these vectors is provided in the table below.

Vector	Potential for Adverse Impact on Equalities Groups
<b>Air quality</b>	Waste is a potential source of air pollution, particularly as one important disposal technique is incineration. Atmospheric pollution has the potential to have a negative impact on human health, life expectancy and quality of life. Above average concentration of equalities groups near to waste treatment or disposal facilities could impact disproportionately on those populations. In addition, some sub-sets (e.g. children, older people and/or people with certain types of disabilities) might be particularly sensitive to some aspects of air pollution.
<b>Health</b>	<p>Concerns about the potential impacts on health derive from both the types of hazardous waste with which the NPS-HW is concerned, and the treatment and/or disposal techniques that might be used to address those wastes.</p> <p>The potential impact of equalities groups derives from the potential for the spatial concentration of arisings and treatment of wastes proximate to above average concentrations of equalities groups, and the above average propensity of some types of equalities groups (e.g. the young, the old, pregnant women, the disabled) to be adversely affected by the consequences of such waste.</p>
<b>Traffic and transport</b>	<p>The NPS-HW has the potential to have an impact on the volumes of waste that are transported. This impact could be to reduce volumes for some types of waste (e.g. by promoting the waste hierarchy or the encouragement of treatment facilities located nearer to where waste arises).</p> <p>On the other hand in some instances the NPS-HW could increase road-miles for transported waste, if it encourages transportation to more specialist facilities. The congestion and pollution impact could have a disproportionate effect on population centres with above average representation of equalities groups.</p>
<b>Economy</b>	The spatial distribution of the impact of the NPS-HW has the potential to generate in turn business, employment and training opportunities that will also be spatially distributed. These implications have the potential to affect disproportionately population centres with above average representation of equalities groups.

## Identification of Geographical Areas that might be Affected

2.7 Although the draft NPS-HW does not specify site-specific detail, it is recognised that it is likely to influence spatial planning in terms of the future need for and location of various types of waste management facilities. The differential location of such facilities has the potential to generate differential outcomes for the equalities groups that are being considered in this screening report.

2.8 The spatial implications of the draft NPS-HW (and hence the potential for impact of human populations, including equality groups) is driven in part by the siting of existing and potential new hazardous waste treatment facilities, landfill sites and other facilities. It is also driven by the spatial distribution of the transport systems that link locations that originate waste with facilities that treat and/or dispose of this waste.

2.9 At the EqIA screening stage it was necessary to establish whether, prima facie, there is any

evidence of co-location of establishments that are involved in handling or treating hazardous waste and locations with above average concentrations of equality groups. The two most straightforward tests are for two equality groups:

- areas with above average BAME populations
- areas with above average concentrations of residents in receipt of incapacity benefits.

2.10 Data on these aspects was obtained from the ONS. Data was also collected for employment in industries that are involved with (a) the collection of hazardous waste (SIC38.12) and (b) the treatment of hazardous waste (SIC38.22). Data on the spatial distribution of disability was obtained from the 2001 Census. Data of deprivation was obtained from the Department of Communities and Local Government (CLG) Index of Deprivation.

## Results of the Screening Report

2.11 The results of the initial screening are set out in the table below.

Equality Group and Members of Group	Potential Impact
<b>Age – children and older people</b>	<p>Activities relating to hazardous waste management have the potential to affect air quality through emissions during transport, emissions and discharges during routine treatment and operational practices; and accidental emissions and discharges as a result of mishaps.</p> <p>NPS-HW could generate either positive or negative impacts through changes to the nature, scale and spatial distribution of such emissions and discharges.</p> <p>These changes could have a negative or a positive influence on the health of children and older people – who are more vulnerable to some types of atmospheric pollution – compared to the baseline situation.</p>
<b>Gender – pregnant women</b>	<p>Under certain circumstances these changes could also have influence on the health of pregnant women and their unborn children, compared to the baseline situation.</p>

<b>Disability – people with chronic lung conditions</b>	International research <sup>12</sup> indicates that there could be greater susceptibility to acute changes in lung function, airway responses and respiratory symptoms due to increased levels of certain atmospheric pollutants associated with some kinds of hazardous waste. People suffering disabilities due to impaired lung and respiratory functions may therefore be particularly affected by changes in levels of atmospheric pollutants that may be brought about by the NPS-HW.
<b>Race – BAME populations</b>	<p>Of the 10 English local authority areas that have the greatest specialisation of employment in hazardous waste industries, four have more than 50% of resident population that is non-white</p> <p>The data collected for this screening report exercise suggests, therefore, that there may be a relationship between ethnicity and the relative concentration of hazardous waste related industries (where the latter is proxied by employment in industries calling under the SIC categories 38.12 and 38.22).</p> <p>Greater concentration of waste treatment facilities close to areas with a higher proportion of black and minority ethnic populations could lead to positive impacts on employment and training opportunities benefiting those populations.</p>
<b>Economy – people living in the most deprived communities</b>	There could be impacts on the quality of life of low income groups as a result of changes in the levels of atmospheric pollution. However, the existing spatial concentration of hazardous waste related industries in the UK does not appear to be co-related to communities that are highly ranked in terms of socio-economic deprivation (based on the ranking of CLG’s Index of Multiple Deprivation).
<b>Sexual orientation</b>	It is considered unlikely that there will be an impact on the following groups: lesbians, gay men, bisexual people and transgender people
<b>Faith</b>	It is considered unlikely that there will be an impact on minority faith groups

## Conclusions of the Screening report

2.12 The 2009 screening report concluded that there was no identifiable basis upon which the NPS-HW could have the potential to create differential impacts on the grounds of sexual orientation and faith.

2.13 However, the screening report concluded that there may be potential for the NPS-HW to adversely affect other equality groups. In particular, the report identified that there may be potential for adverse impacts on:

- age groups: in particular children and older people
- the disabled: in particular people with lung and respiratory disabilities
- pregnant women
- areas with a high proportion of BAME residents

<sup>12</sup> Lagorio et al, Air pollution and lung function among susceptible adult subjects: a panel study, *Environmental Health*, 2006

## 3. The Full Equalities Impact Assessment

3.1 The previous Section stated the reasons why a full EqIA report was considered justified in relation to the draft NPS-HW. The next step is to examine the draft NPS-HW in terms of the guidance it provides in respect of the consideration of hazardous waste infrastructure that may have the potential to affect the equalities groups identified in Section 2.

3.2 The draft NPS-HW provides guidance on how a range of themes and issues should be considered and dealt with in relation to the examination and determination of applications for new or altered nationally significant hazardous waste infrastructure. Some of this guidance appears to have the potential to influence the extent to which equalities groups may be potentially affected by proposals for new or altered hazardous waste infrastructure. The relevant aspects are discussed in turn below.

### Key NPS-HW themes and topics

#### Consideration of alternatives

3.3 The draft NPS-HW makes clear (in sub-section 4.4) that the IPC is not obliged – either under the Planning Act 2008 or by the NPS-HW itself – to establish whether any proposed scheme for new or altered nationally significant Hazardous Waste infrastructure is the “best” option among potentially available alternatives. However, the draft NPS-HW does suggest that in most cases the IPC will want to give some consideration to whether the proposal could be ‘better’ in terms of: site, scale, design, layout, approach to construction, approach to operation, etc.

3.4 However, the draft NPS-HW does not explicitly require the IPC to take into consideration whether alternative approaches to the design, layout etc. of the application project might achieve betterment in terms of the reduced potential for impact on equalities groups.

**Recommendation:** it is recommended that consideration be given to adjusting the text of Section 4.4 of the draft NPS-HW. That is, that the IPC be guided that it should take account of potential impacts of alternative project options in respect of any adverse effects on equalities groups in its assessment of applications for hazardous waste infrastructure.

#### Pollution control

3.5 The draft NPS-HW acknowledges (sub-section 4.7) that many of the projects that it covers will be subject to the Environmental Permitting (EP) scheme. This implies that application projects that will be considered by the IPC will be required to demonstrate that all relevant EP requirements for pollution control will be met.

3.6 In order to provide consents, the IPC must therefore be satisfied that application projects will meet all required pollution control standards. This will necessitate close working with a range of statutory bodies including the Environment Agency, marine management organisations, the pollution control authorities, etc. This will include consideration of existing sources of pollution in and around the application site so that the cumulative impacts of the proposed development do not threaten statutory environmental quality limits and provide protection against deterioration of environmental quality.

3.7 It is acknowledged that the implementation of the Policy should result in net benefits to equalities groups as a result of more efficient and sustainable management of pollutants associated with hazardous waste. The potential remains, however, for localised adverse impacts on equalities groups associated with individual project applications.

3.8 Given the findings of the EqlA Screening Report with respect to the potential particular vulnerability of certain equalities groups to pollutants. Therefore, consideration should be given to amending the text of the draft NPS-HW to make it clear that in its decision-making the IPC should be especially mindful of potential impacts on those groups.

**Recommendation:** it is recommended that consideration be given to adjusting the text of the draft NPS-HW so that when applications for hazardous waste infrastructure are being assessed proper account is taken of potential adverse impacts of pollution with respect to equalities groups.

## Health

3.9 The draft NPS-HW acknowledges (sub-section 4.10) that hazardous waste management has the potential to affect the health and well-being of the human population. Whereas hazardous waste management has the potential to be beneficial to the health of society as a whole, the transport of hazardous waste to specific treatment sites and its treatment there has the potential to adversely affect populations along the transport route and in the vicinity of the facility.

3.10 Direct impacts on health might include air pollution, dust, odour, polluted water and noise.

3.11 As was discussed above in relation to pollutants, the implementation of the Policy should result in net benefits to equalities groups as a result of more efficient and sustainable management of pollutants associated with waste that may pose hazards to human health.

3.12 The potential remains, however, for localised adverse impacts on equalities groups associated with individual project applications. Moreover, the EqlA Screening Report identified that there are particular equalities groups that have the potential to be particularly adversely affected.

These included disabled people, particularly those suffering from respiratory conditions, and pregnant women.

3.13 The stance of the draft NPS-HW is that:

*modern, appropriately located, well-run and well-regulated [hazardous] waste management facilities operated in line with current pollution control techniques and standards should pose little risk to human health<sup>13</sup>*

3.14 It is not clear, however, whether this assessment has taken the additional risks that might potentially accrue to vulnerable populations – including the disabled and pregnant women – fully into account.

3.15 The draft NPS-HW states that the Environmental Statement that is required to accompany each project application to be considered by the IPC should assess the potential health impacts for each element of the project. Moreover, the applicant and the IPC should consider cumulative impacts on health. Where potential adverse impacts are identified, measures to avoid, reduce or mitigate such impacts should be set out in the Environmental Statement.

## Air emissions

3.16 The NPS-HW recognises (sub-section 5.2) that hazardous waste infrastructure can have adverse impacts on air quality. Where an application project has the potential to have adverse impacts on air quality, the Environmental Statement submitted by the applicant should describe the potential impact of the proposed facility on air quality for each stage of the project (construction, operation, decommissioning) including any cumulative effects.

13 Draft NPS, para 4.18.2

3.17 In determining applications, the IPC will take into account relevant statutory air quality limits, and if these are likely to be exceeded the IPC must refuse consent unless emissions can be mitigated so that statutory requirements continue to be met.

3.18 There may be equalities issues that arise from airborne emissions associated with the transport and treatment of hazardous waste. These issues are expected to be similar in nature to those points made previously (see above) in respect of Pollution Control and Health.

## Noise

3.19 The draft NPS-HW recognises (sub-section 5.11) that excessive noise can have adverse impacts on human health and quality of life. In assessing the potential for adverse impact from hazardous waste infrastructure related to noise, the NPS-HW stipulated that IPC will be required to assess:

- the inherent operational noise associated with the operation of an application project, and in addition noise that may be associated with the development and decommissioning phases
- the proximity of the proposed project to noise sensitive receptors, including residences, schools and hospitals
- the proximity of the proposed project to parks and outdoor amenity areas

3.20 The noise assessment should also consider noise associated with activities such as transportation of waste and vehicle movements to and from the proposed facility.

3.21 The NPS-HW further stipulates that the in determining applications the IPC should be satisfied that proposals for major new or altered hazardous waste infrastructure should:

- avoid significant adverse impacts on health and/or quality of life from noise

- mitigate and minimise adverse impacts on health and/or quality of life from noise

3.22 It also states that the IPC should not grant development consent unless it is satisfied that all reasonable steps have been taken to minimise noise impacts.

3.23 In certain situations – and only when all other forms of mitigation have been exhausted – it may be appropriate for the IPC to consider requiring noise mitigation through improved sound insulation to dwellings.

3.24 The draft NPS-HW does not explicitly require the IPC to take into consideration whether additional approaches to minimising noise impacts may be appropriate in terms of potential impacts on certain types of buildings that may accommodate particularly vulnerable communities of equalities groups. Although the draft policy specifies the need to take into account hospitals, it does not specify buildings such as retirement homes, residential care homes and hospices that might house groups of the elderly and/or disabled.

**Recommendation:** it is recommended that consideration be given to adjusting the text of Section 4.11 of the draft NPS-HW so that when the IPC is assessing applications for hazardous waste infrastructure it is guided to take account of potential adverse impacts of noise in respect of vulnerable equalities groups.

## Socio-economic impacts

3.25 The draft NPS-HW acknowledges (sub-section 4.12) that the construction, operation and decommissioning of hazardous waste infrastructure might have socio-economic consequences in terms of providing additional jobs and training opportunities. On the other hand, the draft policy also appears to acknowledge that there is scope for an adverse socio-economic impact in terms of the potential for a deterrent effect on other business investment and tourism activity.

3.26 In assessing individual application the draft policy requires the IPC to take into account potential economic impacts of proposals, and that – if appropriate – it should consider whether any mitigation measures might be appropriate to ameliorate potential adverse effects that might be associated with developments.

3.27 At a localised level, any proposed facilities that are located near to areas that contain above average populations of equalities groups (such as BAME populations) might generate potential for socio-economic benefits (such as jobs and/or training opportunities). Such benefits if they arise have potential to offset at least in part some of the adverse consequences that might arise from the location of the hazardous waste infrastructure in the vicinity of that community.

3.28 It is understood that the AoS for the NPS-HW will not include an assessment of the potential national economic effects that might be associated with the expected increase in the volumes of hazardous waste anticipated by the Policy. On that basis, it has not been possible to assess the potential scale of positive socio-economic effects that might potentially accrue to equalities groups as a consequence of the NPS-HW.

### **Traffic and transport**

3.29 The NPS-HW acknowledges (sub-section 4.13) that the construction, operation and decommissioning of hazardous waste infrastructure might generate adverse socio-economic and environmental effects as a result of the generation of additional traffic and transport demand. This might arise from the movement of materials or the movement of people.

3.30 In terms of potential impacts on equalities groups, the potential for adverse impacts on equalities groups appears to have already been accounted for in the consideration of the other issues and themes already discussed in this report (and in particular, the potential effects in terms of health, safety, air quality, noise, etc.).

### **Waste management**

3.31 The NPS-HW accepts (sub-section 4.14) that not all waste that is received at hazardous waste treatment facilities will be capable of being reused, recycled or otherwise recovered. Moreover, the construction, operation and decommissioning of hazardous waste facilities will in itself create a stream of hazardous waste. Applicants will need to demonstrate effective proposals for dealing with these aspects, and in making decisions the IPC will need to consider whether these proposals are robust and satisfactory.

3.32 Equalities issues that may arise in relation to hazardous waste management are likely to be similar in nature to the points that have already been made in this Section with respect to Pollution Control, Health and Air Emissions.

## 4. Recommendations

### Recommended Modifications to the Draft NPS-HW

4.1 This draft EqlA report has suggested that consideration be given to amending the draft NPS-HW in a number of respects.

4.2 The thrust of these recommendations, if accepted and acted upon, would be to provide clearer guidance to the IPC regarding the

consideration of potential adverse impacts on equalities groups with respect to proposals for nationally significant hazardous waste infrastructure.

4.3 For convenience the recommendations are repeated below.

Reference to Draft NPS-HW	Recommendation
<b>Section 4.4 Alternatives</b>	It is recommended that consideration be given to adjusting the text of Section 4.4 of the draft NPS-HW. That is, that the IPC be guided that it should take account of potential impacts of alternative project options in respect of any adverse effects on equalities groups in its assessment of applications for hazardous waste infrastructure
<b>Section 4.7 Pollution Control</b>	It is recommended that consideration be given to adjusting the text of Section 4.7 of the draft NPS-HW so that when applications for hazardous waste infrastructure are being assessed, proper account is taken of the potential impacts of pollution in respect of any adverse effects on equalities groups
<b>Section 4.11 Noise</b>	It is recommended that consideration be given to adjusting the text of Section 4.11 of the draft NPS-HW so that when the IPC is assessing applications for hazardous waste infrastructure it is guided to take account of potential adverse impacts of noise in respect of vulnerable equalities groups

4.4 The ownership of these recommended modifications lies with DEFRA.

### Monitoring

4.5 It is recommended that the implementation of the NPS-HW should be reviewed by Defra on an ongoing basis in order that potentially adverse impacts on equalities groups can be identified if and as they arise.

4.6 If and where adverse impacts do arise, the process of review should also assess whether any measures to avoid, reduce or compensate for these impacts are effective and appropriate.

# Annex A: Acronyms Used in this Report

<b>AoS</b>	Assessment of Sustainability
<b>BAME</b>	Black, Asian and Minority Ethnic
<b>CLG</b>	(Department for) Communities and Local Government
<b>DEFRA</b>	Department for Environment, Food and Rural Affairs
<b>EfW</b>	Energy from Waste
<b>EqIA</b>	Equalities Impact Assessment
<b>HSE</b>	Health and Safety Executive
<b>IPC</b>	Infrastructure Planning Commission
<b>NPS</b>	National Policy Statement
<b>NPS-HW</b>	National Policy Statement for Hazardous Waste
<b>ONS</b>	Office for National Statistics
<b>SIC</b>	Standard Industrial Classifications

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