



BROWNFIELD LAND SCOTLAND 2019 EDINBURGH – CONFERENCE REPORT BY JOHN BYNORTH

BROWNFIELD Land Scotland 2019 returned for its 12th year with a number of prestigious speakers attending the Edinburgh Training and Conference venue.

The event on February 6 saw delegates from across local authorities, other areas of the public sector and private consultancies and students find out more about the latest developments in dealing with planning, land contamination and the impact of upcoming landfill legislation on Scotland.

The range of speakers and time given over to a good exchange of viewpoints and Q&A's on the topics left delegates with a far better understanding of current land contamination issues and policy.

Here is a summary of some of the main presentations.



“The result is that you now have a three tier development plan system.”

Gordon Thomson - Lichfields

GORDON Thomson, Associate Director of [Lichfields](http://www.lichfields.co.uk), the Planning and development consultancy, discussed the review of the Planning Act, launched in 2015, and the potential impact that the Planning Bill could have on brownfield and contaminated land developments.



Gordon said the review was originally touted as a root and branch review of what was quite actually still a relatively youthful planning system.

It was launched by the then Cabinet Secretary for Social Justice, Alex Neil, and covered development planning, housing delivery, development infrastructure, development management, leadership resourcing skills and community engagement.

Gordon said in 2016 an independent panel made 40 recommendations including to controversially abolish strategic development plans (SDP), a set of documents created by local authorities or groups of councils to set planning policy for a set area. They are in place with the four city

regions in Scotland, although the recommendations left it to open for certain local authorities to work together on strategic cross-boundary issues, he added.

He said the National Planning Framework (NPF) would be elevated to development plan status and form part of Scottish policy.

Gordon said there would be a new tier of local place plans sitting outside of the development plan.

Main issue reports, the first major formal stage in a development plan, would be replaced by a planning evidence gateway where all of the authority's supporting evidence for a plan would be signed off by the Scottish Government and planners would then proceed towards preparing the plan, he added.

Gordon said housing development targets instead of being set at a regional level would be set nationally as part of the Scottish Government framework.

He said one of the most significant outcomes in the review was that there was that third party or equal rights of appeal were not recommended as an addition to the planning system.

He said: "During the panel's consultation, there was a lot of noise about whether developers should lose their right of appeal against the refusal of planning permission or whether third parties, community groups or objectors could appeal a planning refusal.

"The panel didn't feel that these were measures they wanted to support which in my view was the right decision. It would have slowed up delivery considerably."

The draft Bill was published in late 2017. It was then put before a cross-party local government and communities committee and the recommendations were published in May 2018.

He said the recommendations were presented to the Scottish Parliament, and the draft Bill had its second reading in late 2018.

However, Gordon said the Stage 2 reading led to some 248 amendments. He added that although some were in line with the committee's recommendations, others come from "out of left-field."

He said the latter amendments had "either dragged the Bill away from some of the original intentions and the spirit of the review or introduced a level of detail which is quite unusual in a piece of primary legislation."

He said the development plan, which currently consists of local development plans and SDPs for the regions, are currently prepared by local or national authorities.

Gordon continued: "The NPF is a document the other two documents have to have regard to. Alongside Scottish planning policy as another material consideration, these two documents represent policy guidance set at a national level.

"The proposal was to bring them into the development plan and lose the regionally prepared component of the SDP. It would result in the majority of the development plan being prepared by the Scottish Government, not the council's and national parks as the local planning authority.

"If Strategic Planning Policy (SPP) and housing targets were to be incorporated into the National Planning Framework, (NPF), that being part of the development plan – there's not that much for a local authority planner to say.

"It is removing much of the detailed policy and the contentious aspect of housing land supply from local authorities and setting that at a national level. I think in some ways that's not in the spirit of empowering local communities which were the original intentions of the review.

"However, in doing so – by depoliticising that – I think that could potentially have the effect of speeding up housing

delivery.” He explained that this would be because local authorities would be given the figure for the number of houses expected to be built and would then have to simply concern themselves with where they would be situated.

He said a new tier of local place plans would sit below this in the overall framework, but that they would not form part of the local development plan.

He said community groups would be given the opportunity to prepare their own plans for their area that would have some influence on the planning decision making process.

Gordon said during the Stage 2 reading of the Bill last year provision that would have deleted Strategic Development Plans had been dropped.

He added: “In effect, SDPs, as the act currently refers to them, are still there. All of the other changes to development planning in relation to the national planning framework and the roles of local development plans, and local place plans, were all left in the Bill

“The result is that you now have three-tier development plan system which exists with SDPs as they were, but with much of what an SDP would do now being carried out by the NPF.”

Gordon added: “When the amendment was proposed to bring the development plan back in, there was not enough thought given to how this would all work in reality.”

He said the language used in the Bill describes how the plans will communicate with each other.

Gordon said that previously the development plan did not need to be consistent with the NPF as it existed outside of it, and just required to have regard to it.

He added: “Now the language used to describe how SDPs and the NPF interact is the same. The SDPs just have to have regard to the framework – they don’t need to be consistent with it, even though they would both have development plan status.”

Gordon said that best practice would assume the NPF would be prepared first, then the SDPs of the local authorities were also prepared.

He said that now the NPF is part of the development plan, he would have thought the SDP’s would be consistent with them.

However, Gordon said this was not the case. He added: “Effectively, NPF can say one thing and the other two plans can say something else. Just to muddy the waters further, there is an additional element to the Bill... which say local authorities can in preparing the evidence for local development plans explain why they are not having regard to cross-boundary issues.

“Effectively, local development plans will have to be consistent with the SDP. There is another point that says in the event of any incompatibility between a provision of a National Planning Framework and a provision of a local development plan, then whichever is the later in date has to prevail.

He said this meant the NPF could be prepared first; which the SDPs didn’t have to accord with; The LDP’s didn’t have to accord with the SDP’s and the LDP’s can be ‘inconsistent or incompatible’ with the NPF. He continued: “They can all say completely different things. The housing targets set by the national framework can be diluted as you work through the process. To me, it looks like a real mess.”

He said it didn’t look promising as a method of increasing the rate of delivery of housing in Scotland, but that there was still time for the Bill to be amended at the forthcoming Stage 3 hearing. He said: “At the moment, it’s a bit of a muddle.”

“The Coal Authority did some continuous monitoring ... and found there was almost 25% carbon dioxide in a house’s downstairs cupboard”

Simon Talbot on Scotland’s coal mining industry legacy and the Gorebridge incident

Simon Talbot, Managing Director of the ground gas monitoring consultancy [GGS](#), spoke about the hazards caused by disused mine workings on properties and discussed the Gorebridge incident.

Between 1951 and 1980, there were 186 coal mine explosions with 10,000 fatalities across the UK and since the demise of the coal industry there had been a number of mines-gas issues.

He said homes had been evacuated in Rotherham, a house destroyed elsewhere, and an entire village demolished and had to be moved in the Derbyshire village of Arkwright after incidents involving gas from disused coal underground workings.

He said the Gorebridge incident began when a teenager was overcome by gas and taken to hospital in 2013. A total of 26 people sought medical help after falling ill from carbon dioxide poisoning from mine workings and 64 properties had to be demolished. He said it would not be the last such incident in a former pit area.

Simon said “twice as many” such incidents had gone unreported leaving serious issues for investigators to deal with.

As a way of explaining the hazards of the coal mining industry, he identified two major tragedies.

Scotland’s worst mining disaster, following an explosion at Blantyre Colliery in October 1877, led to the deaths of 207 miners, including a boy of just 11-years-old and the Auchengeich Colliery disaster in Lanarkshire, when 47 men died in a fire, took place in 1957.

He said public records showed there were more than 170 disused coal fields in existence, with seven million properties based within those areas across the UK. He said there were 130,000 properties situated within 20 metres of at least one mine opening.

Simon said records of 360,000 abandoned mine plans were held by the Coal Authority. The Coal Mines Regulation Act 1887 had made it a legal requirement for mine owners to identify where their shafts were located.

Simon said prior to this, records had been ‘sketchy’ and early mining had been a perilous business and that the industry had evolved to more systematic mining systems before technology eventually caught up with the industry and machines were used for long bore mining.

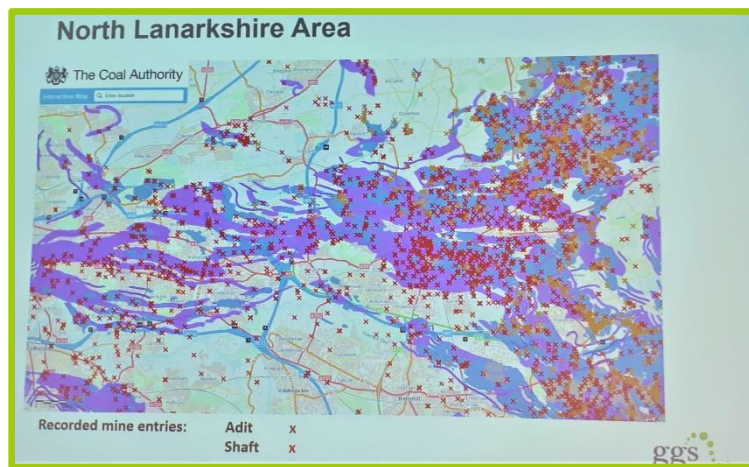
He produced a map at the conference which showed numerous abandoned shallow mine workings and open-shaft coal mines across Lanarkshire and the outskirts of Glasgow based on Coal Authority records.



He said there were likely to be the same number of unrecorded mines or mine shafts because there had been no requirement to keep records of them before 1887.

Coal production peaked in 1913, and in 1937 there were 237 coal mines in Scotland.

The dangers of building over or close to these sites came from long-term settlement of materials from open-cast mines



which caused subsidence, where shafts had collapsed. "The risks associated with mines is that they are potentially open voids which can contain large accumulations of hazardous gas," Simon added.

He said engineers such as himself can reprofile a site or recompact material that is close to the surface. Tools available experts include dynamic impaction, drilling or the use of pile or rough foundations as well as other engineering solutions. He said "If all else failed" there was the opportunity to carry out sector monitoring of sites.

Simon said the lack of previous incidents involving ground gas affecting homes was because of older properties were 'built differently' to prevent gases from abandoned mine shafts entering a home.

He stressed the importance of getting the 'detail right' right in modern dwellings and the need to install a central ventilated void and the construction of proper membranes to ensure ventilation to prevent carbon dioxide entering properties.

The affected homes in Gorebridge had been built without gas membranes underneath them.

Simon added: "Building gas protection is based on investigating the risk, assessing that risk, designing further protection. Closing that circle is so important."

Although the Gorebridge properties were pulled down in 2016, there are on-going legal cases and a review is currently being carried out by a consultancy for the Scottish Government.

He produced a map based on Coal Authority records showing a number of coal seams and an area of shallow mine workings beneath the Midlothian town.

He said a consultant was identified to do a desk study prior to the construction of the homes in order to identify any possible mine gas. Ground monitoring was carried out in five areas, but did not find any gas, he added.

He said a consultant recommended that no gas protection measures were required and in 2009, the 64 homes were built by a private developer.

Because the mine workings were quite shallow, grout work was carried out across the housing estate. The Coal Authority were included in the incident management team.

Simon said: "They (the Coal Authority) did some monitoring inside the first houses to be affected. They found there was 8% (levels of) carbon dioxide in the downstairs toilet; 12% Carbon Dioxide in the lounge where the son had been sleeping; 19% carbon dioxide within the kitchen flooring; 21% from a hole drilled under the house; 23% carbon dioxide in the wall cavity to the property."

"The Coal Authority then went out and drilled a shallow bore hole into the back garden down to the nearest coal seam. They took some gas monitoring from there and found there was 25% carbon dioxide in that coal seam. They didn't find grout in that location."

“They also did some continuous monitoring in a downstairs cupboard, a small confined space. (There) they found the carbon dioxide concentrations spiking from close to zero (to) up to almost 25% carbon dioxide.”

Simon said the published conclusions of an incident management report by NHS Lothian confirmed that the source was the coal seam; they suspect that the grouted walls beneath the house were possibly not sealed. The site investigation bore holes outside the houses had not been sealed or some of the foundations, he added that the report found.

He said there had been significant improvements in building design and standards since the Gorebridge properties were built towards the end of the last decade.

He said the focus is now on proper insulation and that he hoped they were moving towards measures that were hopefully gas proof.

Simon added: “Since then there has been a raft of detailed ground gas guidance. There has been a raft of experience across all authorities working in this sector on good practice. This may not necessarily be an endemic problem which will happen again. A series of problems came together in an unfortunate way (in Gorebridge).

“I would say there’s a lot of good experience and good practice out there (as a result of Gorebridge and these other incidents).”

“What does the asbestos look like? Is it damp, degraded or falling to pieces?”

Steve Edgar of Vertase FLI on dealing with asbestos in soils on brownfield sites

Steve Edgar, Director of [Vertase FLI](#), discussed the safety aspects of dealing with asbestos during land development projects.

Among the important issues when dealing with the substance, when it was found underneath the ground, Steve listed risk communication, protecting public health, understanding the problem and knowledge of the legal requirements, he said.

He said there were widely differing views held by people within the industry about risk in relation to asbestos.

Steve said some contractors were “wrongly concerned about very low levels of asbestos in their projects, while others are ‘blasé’ when they should be concerned about high levels.”

He said the Control of Asbestos Regulations (CAR) 2012 made it clear who was expected to be responsible for dealing with the hazardous substance.



Steve said the situation was far more complicated than simply putting a tent over an area of land which is suspected of containing asbestos.

He said determining whether a licensed contractor's asbestos work was 'sporadic' had led to practical guidelines being introduced on this, as required by the EU Directive, in CAR 2012

Steve added: "When you are trying to make decisions about whether something is sporadic, you've got to decide in what context. Is it sporadic in the sample; (or) the area you are remediating or on the site? You've got to put boundary parameters on how you are making an assessment."

He said he frequently came across the use of words 'trace' and 'negligible' risk when dealing with asbestos. He said the latter word was not appropriate to describe a particular site, but could be used to define the risk from the substance.

In the case of 'trace,' Steve said some sites were allowing a contractor or consultant to collect fragments of asbestos from the land before they were sent to a laboratory and careful thought was often required in how this process takes place.

He asked the audience: "Why is 'trace' so important?" He responded: "If you can define 'trace' properly and satisfy yourself that the material you are dealing with has 'trace' levels of asbestos, then you are actually outside of the regulations. It offers you no more than that."

"If you have 'trace' levels, you are not needing to follow the recommendations within CAR soil, and you are not required to undertake further protection. There may still be risks. Those risks may not be negligible, and you need to try and work out the difference between the two."

He said a lot of earthworks, site remediation management and materials management had yet to appreciate that a plan of work was required if they have reason to suspect asbestos is present to address those risks.

He said: "That plan of work needs to be kept on site; it needs to be communicated to all staff present, followed and updated. Most importantly, it needs to be supported by an asbestos risk assessment. That assessment has to be able to demonstrate that the works on site ensure people are not exposed to asbestos. You have to be able to prove that."

Steve said a 'lot of people were omitting that' risk assessment which ensured that the data about asbestos is collated and reported.

He said experience had taught him it could be reasonable to expect to find asbestos on brownfield sites.

Steve added: "Just because you've got trace levels in your material doesn't mean you are outside the regulations from a health and safety perspective. There are still complications around the re-use of materials, particularly the Reach Enforcement Regulations and we are expecting some further guidance around transport, re-use, etc in the next 12 months. It's a complicated area."

Steve said one of the most difficult aspects of dealing with asbestos as a contractor was to decide what risk precautions or risk assessments were required.

Steve advised consultants to take an image of the exposed piece of asbestos and to write a description of the state in which it is found. He added: "We need to know what it looks like? what condition it is in? ...how it is exhibiting itself? Is it damp, degraded or falling to pieces?"

He provided images to the audience of examples whereby Vertase FLI employees had created an enclosure with a tarpaulin over it (usually the company uses orange tarpaulins to denote suspected asbestos) around material buried in the ground in order to remove it.

He urged companies to ensure staff working close or over suspected asbestos areas to wear the right protective clothing and equipment.

“We can run anything between a single well and a couple of ignition wells to multiple configurations and multiple wells”

Dr Christine Switzer on how smouldering is cleaning up contaminated soil

Dr Christine Switzer, a lecturer in civil and environmental engineering at the University of Strathclyde, spoke about her work with a project which smoulders coal-tar and other toxic substances to remove it from contaminated soil.

The method works by smouldering a contaminated liquid (such as coal tar and creosote) at high temperatures in a powerful and long-lasting process.



Dr Switzer said heat is released from a contaminant in the soil, which pre-heats the next area bringing it up to temperature bringing oxygen in the form of air into the process to support combustion

She said: “The smouldering progresses into the next area, which pre-heats the next area, and when there is sufficient oxygen content it arrives to that area and contains the processes.”

Dr Switzer said a few seconds after the initial ignition event, they turn off the igniter and the process support's itself as long as there is enough fuel and air to continue the process.

He said: “It's very controllable, self-sustaining, self-targeting and allows very quick interventions and that by turning the air supply off or running out of fuel causes the process to end.”

They are carried out both in-situ and on location.

An in-situ example, known as STAR (Self-sustaining Treatment for Active Remediation), took place at a 15-hectare site former sea container yard, an on-going remediation site close to a river near Newark Liberty Airport in New York.

Dr Switzer said the site presented the team with a ‘number of interesting challenges’ as it had previously been the site of a creosote manufacturer and there was coal-tar like contamination which she said required remediation in order for the site to be redeveloped for a new commercial purpose.

She said they had a few trailers in which the STAR process takes place on site and coal tar to be destroyed at the rate of one tonne per day.

Dr Switzer added: “We deliver heat and air through purpose-built ignition heaters and then outward into the contaminated area.

“Logistically, we can run anything between a single well and a couple of ignition wells to multiple configurations and multiple wells.”

Dr Switzer said in New York they had gas capture and vacuum extraction; a thermal oxidiser for treating the emissions and a number of hoses coming in and out of the trailers where the smouldering process took place. She added: “It's a very complicated logistical challenge and I have nothing but admiration for the engineers who've developed this system.”

She said visually it was relatively easy to confirm that the soils had been decontaminated. She added: “It’s very obvious to see the difference between before (contamination) and after soils. Before they were black and contaminated and now they’re clean.”

Turning to the ex-situ approach, Dr Switzer described a project that uses a full-scale STARx Hottpad system at an oil and gas terminal in Asia.

It was used to treat oil-water separator sludge on site, rather than having it be taken away elsewhere to be disposed of.

It has six modular Hottpad units which are equipped with elements for the ignition and distribution of air to support the smouldering combustion reaction.

To find out more about the processes discussed visit <https://pubs.acs.org/doi/pdf/10.1021/acs.est.5b03177>

“Sighthill is something we are quite proud of. The way we behaved illustrates that we tapped into the circular economy.

Gordon Wilson on one of Scotland’s biggest remediation projects since the 1960s.

Gordon Wilson, Construction Director at [VHE Construction](#), discussed the company’s involvement in the remediation of the 50-hectare Sighthill Park in Glasgow.

The area was once the home to a number of firms which manufactured alkali creating a legacy of galligu, or sulphuric waste, is currently being transformed by Glasgow City Council with the creation of 700 homes and a new school.

The particular problems caused by galligu and other toxic materials required very careful removal of material.

Gordon said they devised a scheme which enabled material that had to be removed, to be placed in specific marked off sections of the site to ensure that contractors could correctly identify them and avoid them accidentally re-used in the ground.

He said: “We convinced Glasgow City Council that they would be better off looking at the wider scheme so that we could maximise the potential for all the materials we had. Otherwise we would be leaving materials to be stockpiled for somebody else to come in and re-use.


“We looked at different criteria for different locations depending on the end use. We had an area with a new campus building, and an area called Linear Park, which is an area for housing and infrastructure sited in between them.

“There were technical requirements we had to achieve, but it has had different layer thicknesses in terms of what we could use as cover materials.




“That gave us the top cover, and somewhere else, depending if it was in the galligu area, we did a different criterion for it to go in. We had three different locations where different criteria would apply, and then we got the water environment we had to deal with.

Sighthill TRA Contract 1



Slurry Wall

- Min 600mm wide
- 1800m length
- variable depth up to 18m determined by probing
- Cement/Bentonite/GGBS
- Specification for the Construction of Slurry Trench Cut off Walls
- Target permeability



“We had to effectively plan and categorise the site in order to work out where this material was going to go.

“We used an existing SI and supplemented it with another 400 trial pits initially. We cut material that we would generate in order to generate the master plan that would be a large part of the job.

“Even after we knew where everything was going, things changed on site. We had another 2,000 samples we had to take and

categorise. As with any exercise, until you dig the whole thing up you don't know exactly what you have got.

“We had to take samples from different depths and look at the areas we were responsible for. That all fitted into trying to match the material to different criteria, both chemically and geo-technically.”

He said the work at Sighthill involved four different teams generating material from four different locations, with the material sent to a processing area to be screened.

They developed a grid system which allowed staff to track where certain types of material had to be deposited.

However, he said in some respects the Sighthill area of redevelopment was so large and complex it was a “logistical nightmare.” For example, Gordon said there was “400,000 examples of cut and fill, with much of it moved repeatedly within the location.”

Gordon added: “They have had to be moved and moved and moved again. Materials management was about three times as big as the material that moved from one location to another.

“The reason for that is that some materials weren't suitable for re-use (at any location on the site)... so they would have gone for screening. It may have gone for chemical treatment. It was quite an exercise just to make sure we weren't going off in the wrong direction.”

He said the problems caused by galligu date back to the multitude of companies that existed in the area in the early 1900s onwards. He said two specific streets in Sighthill were once notorious for the ‘smell of rotten eggs’ emanating from the plants.

Gordon added: “There were a lot of problems created by the Galligu site itself. It was a very wasteful process. There were 26 different companies back in the early 1900s that were united together to try and create one big business, but they all had independent products they were trying to make.

“The processes all of the different companies went through were very different. They realised that they were dumping sulphur, but some also wanted it back (for re-use).

“We didn't just have to take it away from where it was, but that material had to go somewhere.

Gordon said they stuck to the Circular Economy principle to ensure re-use of the material. He said there were also various other toxic materials such as arsenic and lead found in the soil during the redevelopment work.

Sighthill has been described as the largest land construction project in Glasgow since the M74 was constructed in the 1960s.

He said: “Since we finished the job, we’ve realised that Sighthill is something we are quite proud of. The way we behaved illustrates that we tapped into the circular economy.

“The site is in the process of being developed, but hopefully the designers of the new buildings will be taking heed of the coming 75-100 years in the materials they use for the buildings.”

“What happens to the excess waste after the new landfill ban on BMW comes into effect in 2021?”

Laura Tainsh – waste management expert

Laura Tainsh, a partner at [Davidson Chalmers LLP](#), addressed concerns raised by the proposed ban on all Biodegradable Municipal Waste (BMW) going to landfill from January 1 2021.

She said it was ‘remarkable’ how few people were aware of the details of the ban was included in the Waste (Scotland) Regulations 2012.

Laura indicated that, in her view, there had been a lack of “any detailed discussion” about how the legislation would be complied with until the start of 2018. Guidance on the changes was only published by SEPA in April last year.



Laura said: “The Scottish Government and SEPA admit themselves that they are in the evidence gathering process, which two years out (from the introduction of the law) is a little bit concerning.”

She said SEPA was currently developing some of the guidance relating to the testing and sampling of BMW, which includes food and garden waste and waste which is similar in nature to that, such as from the retail or hospitality sectors.

Laura added: “Some materials which have been through a certain treatment process, and provided they then pass certain they pass certain tests, for their levels of organic content, will be excluded from the ban.”

The lawyer said she understood following a recent meeting with the Scottish Government that there are no plans to row back on the January 1 2021 date, and that there would be no transition period to allow further preparation for the changes.

She added: “However, there may have to be some flexibility... because there are a number of local authorities which don’t have any provision for what’s going to happen to the material, and how it’s going to work.”

“A good example is the Western Isles. They have a landfill on one of the islands which deals with all of their waste and the alternative for them, when they can’t deal with this kind of waste, would be to send one filled truck on a ship perhaps on a daily basis to the mainland – something which is a logistical issue for the local authority.

“There are lots of sound environmental reasons for having a ban of this nature, including the segregation of recycling, and extracting value BMW, which can be harnessed for energy and reduces the contribution of waste to climate change.”

However, Laura added that there were “also a number of consequences for introducing this ban in a blanket fashion in two years’ time, which is not very long away...”

“The current available data suggests there will be a gap of around one million tonnes of waste, which can no longer be landfilled. That’s because in Scotland there isn’t enough alternative infrastructure in place.

“There is a million tonnes that we can’t deal with. If we improve in recycling and waste minimisation measures, that might reduce that, but it’s not going to reduce it significantly within two years’ time without everybody recycling everything from now...”

The lawyer described the option of transporting landfill to England (Scotland already exports about 1.6 million tonnes of rubbish each year south of the Border), as ‘pretty limited.’

Laura added: “By 2021, it’s unlikely to be an option at all. If England goes down the route of a similar ban, the likelihood of there being capacity for us to just send our waste over the border is pretty unlikely as well.”

“Most of the industry says the export market for refuse derived fuel is not a solution to this problem and is likely to be further impacted by Brexit.

“So the question remains; what happens to that million tonnes of waste?”

Laura said the Scottish Government is shortly due to publish the results of the independent market research it commissioned last year into the options for implementing the ban and the associated, but that many important questions remain.

Laura warned that the legislation would impact on the land contamination sector because some landfill operators may be forced to close their sites in the short-term in the light of the new legislation if it results in their business operations no longer being viable.

And she added: “There will, inevitably, be an increase in fly-tipping as happens when there is any waste measure which restricts the ability to do things at lower costs.”

She explained that waste crime is already driving costs up for everyone across the industry, adding: “Who knows what this is going to do to the industry and how much it will cost?”

“She said there were opportunities (around the new legislation), which the waste sector was starting to wake up to, but there was also uncertainty about what would happen in practice.”

Laura said the waste regulatory regime was changing rapidly, but that there was also a ‘lot of change’ internally among staff with expertise in these issues at SEPA.

For more details of the legislation visit www.sepa.org.uk/environment/waste/zero-waste/

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