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30th November 2007
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via email planningcontrol@leics.gov.uk
Director of Community Services,
County Hall,
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Leicester,
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Dear Sir,

Leicestershire and Leicester Waste Development Framework

Preferred Options Additional Consultation

Please note our comments on the Waste Spatial Strategy, which are listed by Paragraph Number from the original document.

Paragraph Number 2.3

The population generally produces municipal waste and forecasting of future municipal waste should be based on population growth and not the growth in the number of households. In England the amount of household waste generated per head has been relatively constant over the past 8 years.

Kilogram per person per year

1999/00	2000/01	2001/02	2002/03	2003/04	2004/05	2005/06	2006/07
453	453	452	445	420	397	370	352
52	57	65	75	91	115	135	157
505	510	516	520	510	512	505	509

(source DEFRA Municipal Waste Statistics - tables for November 2007 Statistics Release)

Over this period there has been significant house building and a reduction in the size of the average household. It cannot be argued that household waste growth is growing faster than the growth in population because it is clear that waste per head is static.

Nationally the more rural authorities produce more than average due to larger gardens and greater incomes. In Leicestershire the city council has to handle 448Kg of household waste per head per year. The County Council has to deal with a greater 543Kg per head.

Three major components of the municipal waste stream are likely to decline over the next few years. Packaging waste producers are to face stronger pressure to reduce the tonnage of packaging produced, The Courtauld Commitment from all of the biggest supermarkets and may food producers should lead to a vast reduction in packaging. The third of the waste that is food should reduce as the price of food has risen rapidly and pressure mounts to end irresponsible marketing by supermarkets. Just the end of the bogof (buy one bin one) will help. The amount of garden waste should also be falling as more people compost at home and new homes are built with very little garden space. Some new homes will be built on the site of existing gardens and within built up areas the total amount of garden will fall.

Much of the apparent growth in household waste has been due to the free collection of garden waste. Around half this waste had not entered the district councils waste stream before the additional service.

The plans should be flexible and not assume that waste growth is inevitable.

Paragraph Number 2.4

The expansion of East Midlands Airport is far from certain. It would be strongly opposed. We are aware that airports are trying to appear greener by reducing the waste produced and head towards zero waste. Whatever happens it is certain that the airport will produce less residual waste going forwards.

The construction industry is also going to produce far less residual waste in future. The industry is likely to recycle over 85% of its waste very soon as site waste management plans (SWMP) become a legal requirement. A large amount of the waste will be recycled on site and never enter the main waste stream.

Major food producers are also likely to deal with the majority of the food waste on-site. The increase cost of food, landfill tax rises and energy cost rises makes in use of an onsite anaerobic digester viable for more firms.

Paragraph Number 2.8

The expansion of the National Forest provides an opportunity to use compost like materials. The use of the outputs from anaerobic digesters for growing energy crops should be part of the special strategy.

Paragraph Number 3.1

We would dispute that there is 4 million tonnes of waste that must be managed. The tonnage of Municipal solid waste MSW is known exactly as 525,435 tonnes in 2006/7. Ahead of (SWMP)

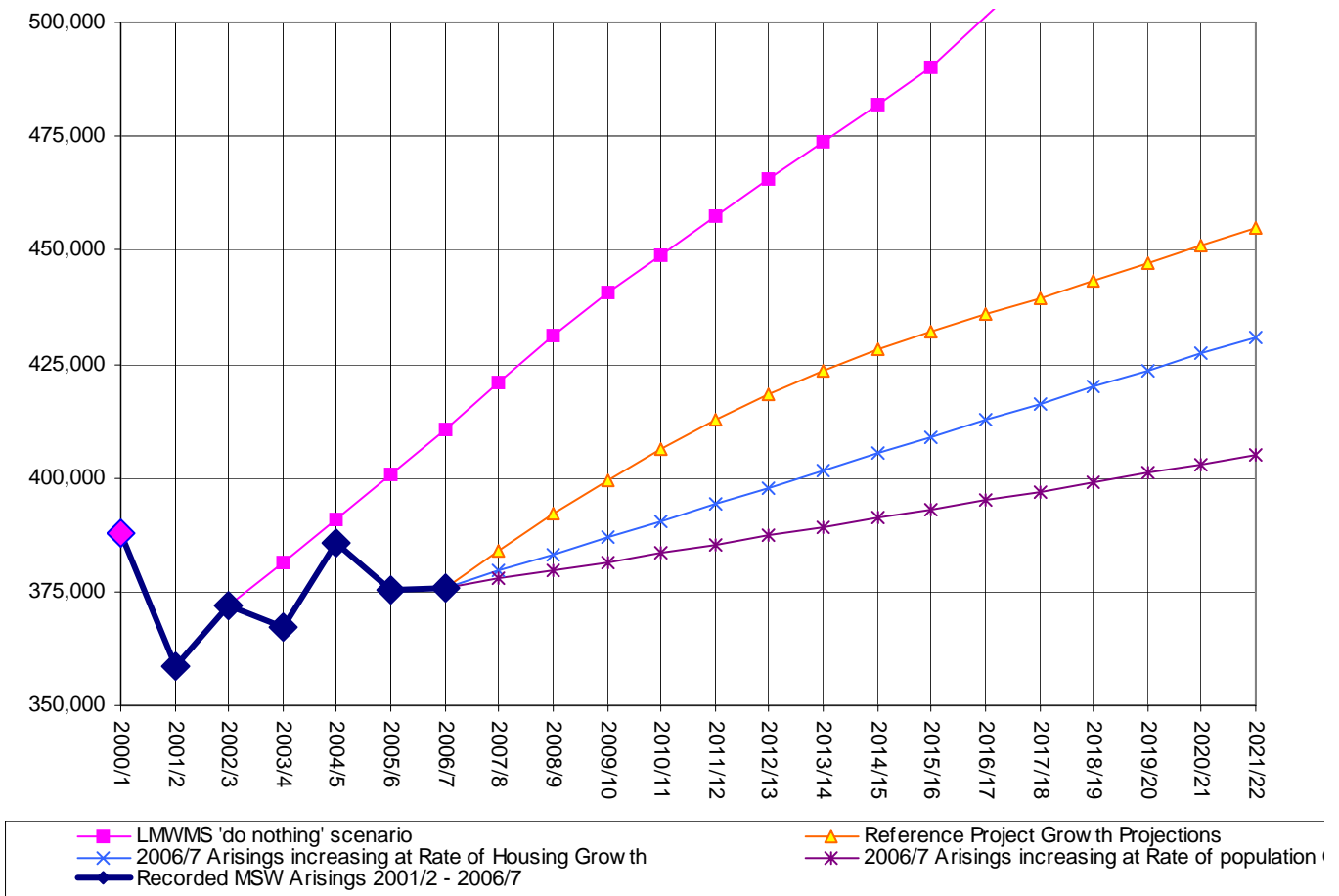
the consultation and demolition is already taking actions to reduce the amount of waste produced. The effect of major projects in the southeast like Terminal 5 and Olympics will also be reducing the amount of construction in the region. The only accurate data for waste other than MSW is from the Landfill tax returns. For the whole of the UK in the 12 months up to September 2007 the total amount landfilled at the standard rate was 39.77 million tonnes. (this ignores inert waste for which the lower rate is due and exempt waste). This is down from 50.03 million tonnes 5 years earlier. The reduction of waste to landfill is the result of greater recycling and an overall reduction in the amount of waste entering the controlled waste stream.

Paragraph Number 3.2

There is a total lack detailed waste statistics on which to base the need.

Paragraph Number 3.3

The projections in the Leicestershire Municipal Waste Management Strategy are wildly inaccurate. The growth in MSW over the last few years is around zero with a rise of MSW in 2006/7 of just ONE tonne. The year before that the amount of MSW decreased. The following graph shows the LMWMS waste projection, other projections produced by the council and real waste data.



The dark blue line show the real waste tonnage and the pink is the projected growth in waste. The projection is rubbish and should not be used for creation of waste plans or strategies. The best-fit projection is that MSW has been increasing with population growth.

Paragraph Number 3.5

We would dispute the need for further 114,000 tonnes of additional capacity for MSW & C&I. It is clear that MSW is not growing as forecast and C&I waste could be falling but the data is not available. It is clear that many commercial and industrial operators are moving towards “zero waste policies”. Most additional capacity must be for additional recycling, composting and reuse of waste. Food and garden waste should all be processed by composting processed, IVC and AD. Significant capacity is unused at the Ball mill in Leicester. Energy recovery should only be used where real and valuable use of the majority heat can happen for most of the year. That means that the scale of an energy recovery plant must be matched to the size of the energy requirement.

The amount of all non-inert waste going to landfill is falling 5% every year. In 2004 the standard landfill tax was paid on 46.788 million tonnes of waste. By 2010 this is likely to have fallen by 30%. We do not need a large energy from waste plants. Reducing the amount of waste produced is the most effective method of reducing the amount of waste going to landfill. Producing waste is bad for business. Predict and provide only makes the waste problems get bigger. The increase in Landfill tax to £48/tonne will drive industrial and commercial activates to produce less waste. The vast majority of C&I waste can be recycled. Industries that are producing large amounts of un-recyclable waste should not be provided with an excess of waste incinerators desperate for waste.

Paragraph Number 3.6

To move waste up the waste hierarchy greatest encouragement should be given to facilities for reuse. Next should come encouragement for recycling and composting. Recovery facilities should only be encouraged as a last resort for waste that cannot be re-used, recycled or composted and only then were it is done efficiently. The best energy from waste efficiency is around 78% for a plant on Shetland. Many mass-burn incinerators only obtain around 20% thermal efficiency. It would be better to have less recovery capacity if it was of a far higher quality. Due to the long expected operational live of mass-burn waste incinerators it is important that the climate change impact is considered. Recovery operations must have as low a global warming potential as possible. The strategy must have reducing the climate change effect of waste management at it heart, which goes past the simple requirement to divert waste from landfill.

Paragraph Number 3.7

The policy should send waste more then one step up the waste hierarch when possible. Energy recovery increases the need to landfill the fly ash and produces significant amounts of CO2. Fiscal tools should be used to remove the need for landfill by making re-use, recycling and composting the cheapest options.

Paragraph Number 3.8

C&D waste should be recycled on-site where possible. SWMPs which become a legal requirement in 2008 will reduce the amount of C&D that needs to be landfilled. The long-term aim is that all C&D waste should be re-used or recycled. We believe the projected need for C&D landfill to be excessive.

Paragraph Number 4.2

The authorities seem to ignore the option of having a few medium size facilities. Having 1 or 2 big sites requires excessive transporting of waste. Having 10 to 20 small sites is not always commercially viable. When considering large waste facilities it should be studied if the impact of two or three medium sized facilities would be less.

Paragraph Number 4.9

The ball mill in Leicester is under used and has capacity to take some waste from outside the city. In addition large waste incinerators operate in Coventry and Nottingham. This capacity has been ignored in the modelling. The biggest factor determining the location of energy from waste facilities is the location of thermal requirements. Details obtained from the County Council's expression of interest show that having two smaller waste facilities instead of one large plant reduces transport distances by around a quarter. We believe that the optimal number of residual waste treatment plants for MSW and similar waste would be between 3 and 5. The modelling should also consider opportunities to develop small facilities that take waste from both sides of county borders with its neighbours.

Paragraph Number 4.17

Excessive transporting of waste by lorry should be avoided. Energy from waste plants should only be built where there exists an all year round demand for waste heat.

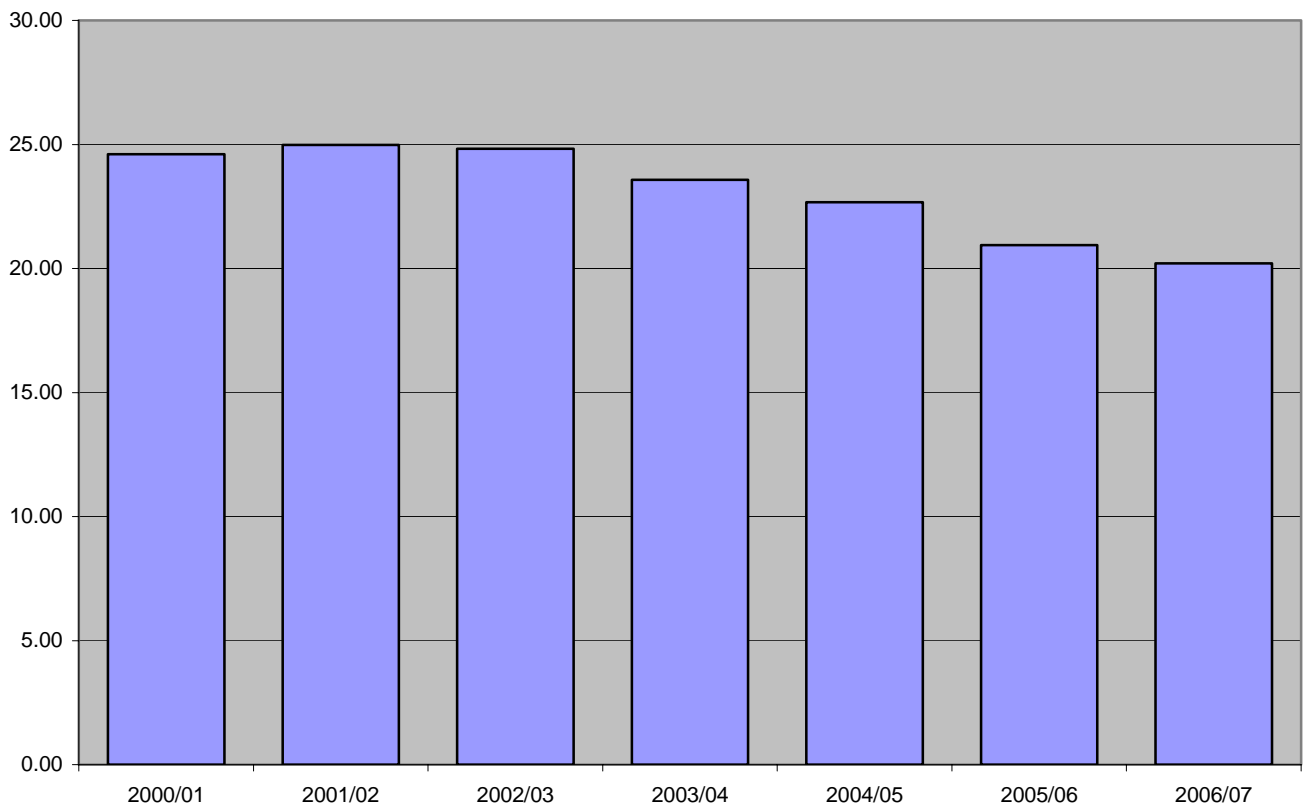
Paragraph Number 4.21

The long-term production of MSW with a high packaging and food content is not sustainable. Already the price of crude oil has quadrupled and world production of oil is around its all time peak. The high price of oil has rapidly increased the production of Bio-fuels, which in turn has led to a rise in food prices. The only sustainable solution is to reuse, recycle and compost all our waste. This is going to take many years of progress to get near to that point but it is inevitable that we will move in that direction. There is nothing sustainable about burning plastic. You can only burn it once and then it's gone. The only sustainable way to extract energy from waste is to sustainably manage the production, use and decomposition of the biodegradable fraction, extract energy from the process and return the nutrients to the soil.

In England the residual MSW after recycling and composting peaked in 2001/2 at 25 million tons. It is falling quickly and was 20.2 million tons in 2006/7. That is a drop of 19% over 5 years. We can achieve very high levels of waste reduction and recycling in Leicestershire to match the best in Europe. We should not let energy from waste obstruct the progress in waste production. Any energy from waste plant should be small scale and flexible to reducing waste production.

We have passed peak residual waste as shown by DEFRA recycling and recovery rates for England (9th November 2007).

residual MSW in England (million of tonnes)



Paragraph Number 4.22

The Municipal Waste Management Strategy is wrong. The waste growth projections have already overestimated MSW by over 10%. The procurement is based on a waste incinerator for 191,000 tonnes, that is for more than 50% of the waste to be burned. This goes against the council's own target of 58% recycling/composting. It has very little chance of being operational by 2015/6. They have over scaled the plant and selected the most controversial technology.

Paragraph Number 4.25

The big must for an energy from waste plant is there must be a local use for the waste heat. This use/need for waste heat must be for most of the year and of a size comparable to the heat output of the energy from waste plant. (otherwise it is a waste of energy plant).

General comments

The document fails to treat waste as a resource that needs its production to be reduced and the remainder used wisely. The greatest value in the waste is from the materials it was made from. There is money to be made from waste and great benefits to be obtained from reuse, recycling and composting it. Simply burning or burying it is very short sighted.

The area could be the recycling heart of the country and should see its central location as ideal to become regional recycling powerhouse. Unfortunately it looks like a strategy written by waste departments for solving their own problems only. We need in people with vision to close the loop and return waste to productive uses.

Keith Kondakor
Nuneaton and District Friends of the Earth