

## Waste Consultation Comments

### Consultation Questions 1:

Do you think that the estimates regarding the amount of waste currently being generated are robust?

We have no reason to doubt the MSW, CIW and HW figures. However as you admit that the amount of CDEW is only an estimate, this may not be robust. Also as there are around 14000 farms in Devon (ref 2001 Census) the estimate of 12000 tonnes of AW included in the CIW figures seems rather low.

Do you think that the estimates regarding the amount of waste currently being recycled are robust?

We have no reason to doubt the figures.

If you would like to provide any further explanation for your answers please do so.

Please note that the total in column 5 of Table 4 is incorrect. The total comes to 666,000 tonnes going to landfill, a percentage of 24%.

### Consultation Questions 2 :

Do you agree that the total current permitted waste management capacity calculated for Devon is accurate?

We have no reason to doubt the figures.

We believe that there is no need for future increase in incineration capacity if reuse and recycling rates can be increased.

If you would like to provide any further explanation for your answer please do so.

We disagree with the approach briefly outlined in section 4:10:2 in which municipal waste left over after recycling generated in south west Devon, Plymouth and Torbay will be incinerated at a Plymouth (Devonport) energy from waste facility.

Undoubtably, large amounts of recyclables will be burned at this facility because there is no sorting and segregation of waste before incineration (ref Plymouth City Council planning paperwork). The carbon dioxide and other pollutants emitted from such facilities will not help the DCC meet its carbon reduction targets whereas reuse and recycling will.

### Consultation Questions 3 :

Do you think that the total amount of waste which is estimated to be generated in the future is reasonable?

There is an assumption of growth. There have been no estimates with an assumption of zero growth or negative growth, both of which are realistic scenarios under current and future economic, environmental and climatic conditions. Estimates assuming zero or negative growth would produce much lower levels of waste across all categories. It is likely that under a negative growth scenario, the re-use and recycling of materials will increase due perhaps to resource limitations.

It is important to add these further two scenarios so that DCC can have a more flexible approach. It is possible that under these two scenarios that no additional facilities will need to be built, thereby saving the council taxpayer considerable sums of capital expenditure.

If you would like to provide any further explanation for your answer please do so.

In the timeframe of this plan the supply of many resources such as oil, gas, some common metals will have peaked leading to price increases and strains on economic growth. (this is already happening). It will not be a case of business as usual as your plan is predicting.

#### Consultation Questions 4:

Do you agree with the content of the draft vision and strategic objectives?

The draft vision is not ambitious enough. In section 7 of the strategy DCC is aiming for a 60 to 65% recycling rate in 2031. This level of recycling is already being achieved today in some parts of the UK eg South Oxfordshire is at 70% and this level of recycling is routine in some parts of Europe today eg Belgium and Germany. We wonder whether the low aspiration for recycling is set to allow the use of incinerators which will end up burning many useful recyclables.

If DCC is serious about changing people's attitudes and behaviours then higher recycling targets are definitely achievable.

If residual waste is really considered by DCC to be a resource to help Devon play a part in meeting the UK's renewable energy targets and support more competitive manufacturing industries locally then DCC would not be so keen on burning it. DCC should be encouraging new businesses to set up to reuse, repair and generally innovate in the area of waste.

Sustainable waste management and carbon neutrality as aspirations in the vision are not consistent with the burning of waste which destroys useful resources, creates carbon dioxide emissions and other toxic pollutants.

If you would like to provide an explanation for your answer, or make any suggestions to improve the draft vision and strategic objectives, please do so.

#### Consultation Questions 5:

Do you think that all stages of the waste hierarchy will have a role in addressing future waste management requirements?

Definitely yes

If you would like to provide any further explanation for your answer please do so.

In the first instance, greater use of Prevention by DCC somehow encouraging industry perhaps by lobbying the central Government strongly to reduce packaging of all types, particularly plastics which might not be readily recyclable, although steps must be taken to recycle all plastics in the future. Similarly DCC should lobby central Government for improvement in the design of goods such that they can be easily repaired and dismantled for the recycling/reuse of their component parts.

Recovery of energy via incineration should NOT be a consideration as explained in previous answers. Recovery of energy from landfill gas and digestion of waste are acceptable means of recovery.

Are there any other options which should be considered?

Yes

If yes, please outline details of the other options which you think should be considered.

Materials Reclamation Facilities (MRF) will become increasingly important in the future to recover valuable resources from waste. MRFs could be embellished to provide repair and resale of useful equipment. This may be a fruitful area for new SME business creation.

Has DCC considered the potential of mining landfill sites (other than for landfill gas) for valuable resources, thus freeing up landfill space for the inevitable inert material landfill ?

#### Consultation Questions 6:

Do you agree with need for a range of assumptions for future recycling and recovery rates for municipal waste and commercial and industrial waste?

Yes

If you would like to provide any further explanation for your answer please do so.

The details in figure 10 stem from the growth scenarios earlier in the strategy document. The figures ought to be revised to show the effect of zero or negative growth.

Further the recycling targets are not ambitious. DCC have admitted that CIW targets are already being met and have raised them to the same level as MSW for 2031, that is 60 to 65%. As explained earlier in our comments this level of recycling is already being achieved in part of the UK and routinely in Europe. An ambitious target of 80% could be set.

If 80% recycling was achieved by 2031, between 840,000 and 1,000,000 tonnes pa would be recycled based on the DCC growth figures. This would realistically leave little or no combustible materials for recovery via incineration. Under zero or negative growth there would be even less materials for incineration.

Clearly incineration is unnecessary if ambitious recycling rates are achieved.

Do you agree that the assumptions for future recycling, recovery and landfill rates are both challenging and realistic?

Future recycling rates are unambitious. DCC should be aiming for 80% at least by 2031 as 60-65% recycling rates are already being achieved elsewhere.

Recovery by incineration is unrealistic and unnecessary as explained above. It will be a waste of taxpayers money, will add to carbon emissions, increase pollution, waste valuable resources and the plants will be white elephants in the long term.

Have the hazardous wastes figures included the volumes of toxic ash produced by proposed incineration?

If you would like to provide any further explanation for your answer, or suggest how the assumptions could be improved, please do so.

Consultation Questions 7:

Which option of the two do you prefer?

Option 1

Why do you prefer this option?

There would be reduced transportation and greater self sufficiency for local areas. Also the waste facilities will be “in our own back yard” and so will encourage residents and businesses to prevent, reduce and recycle waste.

There does need to be some joined up thinking between Plymouth City, Torbay and Devon on strategic issues such as targets for recycling (all should be ambitious) and agreement that there should be no incineration (see previous arguments). Also an agreement that to minimise transport that there can be “cross- authority” use of facilities.

Are there any other reasonable alternatives which should be considered?

To minimise transport of waste in the South West Region there could be some overlap of regions eg waste from Wellington might flow to an East Devon MRF

If you would like to provide any further explanation for your answer please do so.

Please clarify section 7.5.5 which states “This does not include the residual from recovery which will go to inert landfill.”

Our understanding is that some residual from incinerators can be used as aggregate and that there is some residual toxic ash which must go to HW landfill.

### Consultation Questions 8:

Are there any technology related issues which you would like to raise?

Yes

If yes, please describe them.

1. To not consider Prevention and Preparing for Reuse (section 7.7.2) is a lost opportunity. As part of DCC's vision to change attitudes and behaviours, why would DCC not want to promote the use of less packaging and the redesign of goods and equipment to facilitate repair and dismantling both in Devon for Devon businesses and wider nationally by lobbying national Government strongly on these matters?
2. Objections to incineration:-
  - a. Incinerators cause air pollution no matter how effective the filtration systems. There will be releases of toxins to the atmosphere and CO<sub>2</sub>, the green house gas the excess of which is causing global warming.
  - b. Incinerators don't eliminate the need for landfills. Some of the ash may well be turned into aggregate, but the most toxic, heavy metal containing ash will go to HW landfill.
  - c. The proposed incinerators in Plymouth and Exeter are located in a heavily populated areas which will be subject to the air pollution, noise pollution and inevitable increase in heavy goods vehicles carrying the waste to the plants.
  - d. The energy produced at the incinerator is dirty energy producing 1355grams of CO<sub>2</sub> per KW, dirtier than burning coal. Will the plants be fitted with carbon capture and storage technology. The energy recovered is only a tiny fraction of the energy expended in producing the waste in the first place. Surely it is better to try to reuse and recycle the waste in the first place.
  - e. Incinerators create far fewer jobs than recycling, repairing, reusing generates.
  - f. Incinerators are very costly and will burden the council tax payer for years to come. They are not a cheap option.
  - g. Incinerators encourage waste. They need a constant supply of high energy waste like paper, cardboard and plastic. The incinerator staff will not separate these types of materials from the waste stream before the waste gets burned. If recycling rates do increase and the amount of waste coming to the incinerator falls to below what it requires, what happens then? Does the plant close? Or does other recycled material get burned?.
  - h. Incinerators undermine creative solutions to this problem. It is the easy fix . Preventing waste in the first place is a much better solution.
  - i. What if you have your planning forecasts wrong? What if there is no economic growth in the future? What if recycling rates are better. What if this plant is a white elephant. What a waste of tax payers money !
3. Materials Reclamation Facilities must come before incineration in the waste management process. All recyclables must be stripped out of the waste stream before any residual waste goes to incineration. Therefore IF incinerators get approved, then a MRF should be built on site to strip out all recyclables from the waste stream.

4. Before any technological solutions are implemented an Energy Input versus Energy Output calculation should take place. Highly energy intensive technologies such as incinerators and plasma arc may not actually efficiently create energy from waste, especially if high calorific waste such as paper, cardboard and plastics are not present in the waste stream.

Consultation Questions 9:

Which broad spatial approach for addressing future waste management requirements do you prefer?

**The Local Approach**

Why is this? Are there any other options which should be considered?

**This is a flexible approach to reflect local needs and will minimise transport requirements.**

If yes, please describe them.

Are the areas of search for these facilities defined appropriately?

**Yes**

If you would like to provide any further explanation for your answers please do so.

Consultation Questions 10:

Which option for identifying the appropriateness of future waste management sites do you prefer?

**Option 2**

Why is this?

**This option allows more flexibility should DCC's assumptions about the future be incorrect.**

Are there any other options which should be considered?

Consultation Questions 11:

Do you agree that the broad approach and criteria to be used for assessing whether potential future waste management sites are appropriate? If you would like to provide any further explanation for your answers please do so.

**Yes**

If there are there any other criteria which should be used to assess site suitability please describe them.

Consultation Question 12:

If there are any further comments which you would like to make on the Waste Core Strategy, please provide them.

**1. There has been no mention of the recent change of policy regarding charging Devon residents to use recycling facilities for certain materials. This policy may have a negative effect on recycling volumes and push extra costs into clearing up fly tipping.**

**2. Why is there not a common recycling collection regime across the whole of Devon? There are 8 Waste Collection Authorities (WCA) all with different recycling requirements? When all WCAs are operating at the same best practice level, high levels of recycling will be achieved. It is not best practice for one WCA to landfill or incinerate recyclables when another collects the same items for recycling/reuse.**

**3. A much more concerted effort should be made to encourage businesses such as retail food outlets and pubs to recycle where masses of food and glass have been land filled.**

