



REPORT REFERENCE: **3.1**

LINCOLNSHIRE WASTE PARTNERSHIP

23 SEPTEMBER 2010

SUBJECT : **Review of Waste Policies – Call for evidence**

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BACKGROUND INFORMATION

On 15 June 2010 the Secretary of State for DEFRA announced a review of waste policy in England. On 29 July a document entitled 'Review of Waste Policies – Call for Evidence' was published. The Deadline for inputting views through the Call for Evidence is 07 October 2010.

The paper (see Appendix 1) outlines in the Terms of Reference 6 reasons for the review:

1. A commitment to moving towards a zero waste economy;
2. Ensuring value for money
3. Protecting the environment (including climate change impacts of waste);
4. Decentralisation of decision making;
5. Economic benefits arising from resource efficiency;
6. Contributing to renewable energy targets through energy from biodegradable waste.

The review also states that all waste policies will be looked at including:

'How government can work with Local Councils to increase the frequency and quality of rubbish collections and make it easier to recycle, to tackle measures which encourage councils specifically to cut the scope of collections; and to address public concerns over the civil liberty aspects of inappropriate enforcement practices associated with household collections' (My emphases)

The Call for Evidence presents a series of 25 questions, under a range of headings: General and then, reflecting the waste hierarchy, Waste Prevention, Preparing for

Reuse, Recycling, Energy Recovery and Disposal. The questions can be seen in full in Appendix 1.

DISCUSSION

Whilst there are some detailed points that can be made in response to specific questions there are some fundamental points that need to be made about the strategic direction which it would appear that the Government is proposing, specifically in relation to:

1. Frequency of waste collection;
2. Proposals for increasing the use of anaerobic digestion, with consequent implications for separate collection of food waste;
3. Recognition of the effect of the current status of waste infrastructure proposals on decisions regarding future waste policy.

Frequency of waste collection

The desire to see an increase in frequency of (residual) waste collection would appear to underlie the Government's proposed approach, albeit that this would seem to contradict the statement that 'one of the Government's key priorities is to decentralise decision making powers on matters that affect local communities to local authorities...'

The position in Lincolnshire, where most authorities operate an alternate weekly collection for residual waste, is that there is generally high satisfaction with waste services with few complaints (for example 3 in North Kesteven in 2009/10) regarding the frequency of residual waste collection. It is considered that the limiting of capacity in the black bins by way of the alternate weekly collection is a driver to encourage recycling and Lincolnshire is one of the highest performing counties in the country in terms of the percentage of waste recycled and composted. The costs of reverting to a weekly collection would be high and this would be extremely difficult to fund in a climate of anticipated budget reductions.

Anaerobic digestion/food waste collection and effect on waste infrastructure

The Government are committed to a 'huge increase in generation [of energy] from anaerobic digestion.' Anaerobic digestion (AD) can be used to derive energy from any organic waste, including garden waste, paper and card; however in essence the process would require a food waste collection.

Current Lincolnshire waste disposal policy is based on the provision of an Energy from Waste plant, and the provision of this facility is predicated on the inclusion in the residual waste stream of food waste, which will contribute a significant proportion of the calorific value required for the waste to be burned. The contract for the EfW plant is due to be let within the next month, following a lengthy and costly process including options appraisal, public consultation, obtaining of planning permission, tendering and contract negotiations. Any change of policy that would undermine the viability of this costly capital project, which forms the cornerstone of Lincolnshire's Waste Policy for the next 25 years plus, would be extremely damaging.

It is important for Government to realise that waste policy decisions need to take into account the current waste infrastructure position and the long term nature of waste

disposal planning. Whilst there may be good environmental and financial arguments for increasing AD if starting from a 'clean sheet' the same arguments do not necessarily apply when existing circumstances are taken into account.

In addition to the effect on waste infrastructure planning the costs of introducing a food waste collection service would also be high. Enquiries of one authority in Norfolk reveal a cost of around £13 per property for a weekly collection. Whilst this could only be a guideline cost this would equate to over £4 million for a County the size of Lincolnshire.

OPTIONS

In light of the significant implications of the apparent direction of Government policy for waste collection and disposal officers consider that it is important that any response to the Call for Evidence does not just respond to the specific questions asked but rather focuses on the fundamental points of concern addressed above.

A proposed draft response is attached as appendix 2 to the report.

RECOMMENDATIONS

That the Lincolnshire Waste Partnership responds to the Call for Evidence in the terms given in the letter in Appendix 2.

Appendices

Appendix 1- Review of Waste Policies. Call for Evidence. July 2010. DEFRA

Appendix 2 – Draft response to call for evidence

Appendix 2

Review of Waste Policies
DEFRA
Area 6C, Ergon House
Horseferry Road
London
SW1P 2AL

23 September 2010.

Dear Sir

Review of Waste Policies – Call for Evidence

The Call for Evidence has been considered by the Lincolnshire Waste Partnership (LWP), which comprises the following partners:

- Lincolnshire County Council
- Boston Borough Council
- City of Lincoln Council
- East Lindsey District Council
- North Kesteven District Council
- South Holland District Council
- South Kesteven District Council
- West Lindsey District Council.

Context

Lincolnshire has a good track record of performance and innovation in waste management. Two of the waste collection authorities have topped the recycling 'league table' in the last 5 years, and as a County Lincolnshire is one of only 4 in the country with recycling rates in excess of 50% (2008/9 figures).

The LWP has been working closely together for a number of years to develop a Joint Municipal Waste Management Strategy, and has successfully developed plans for meeting landfill diversion targets. Planning permission was obtained in 2009 for the construction of an Energy from Waste plant to enable targets to be met from 2013 onwards. A contract at a value of around £145 million for the building and operation of the plant is to be let within the next month, and the facility will form the cornerstone of Waste Policy for the county for at least the next 25 years. The partnership has cooperated in coordinating its waste collection arrangements and plans in light of the disposal option that has been chosen, following extensive consultation with residents.

Response to Call for Evidence

The LWP is pleased to read in the Terms of Reference that ‘One of the Government’s key priorities is to decentralise decision making powers on matters that affect local communities to local authorities and to communities themselves, and for them to be accountable for those decisions.’ We consider that Lincolnshire represents a good example of how such a policy of decentralisation works, and can lead to high performance and high levels of customer satisfaction.

However the LWP is concerned with some of the statements in the call for evidence and the potential implications that they could have for waste policy and infrastructure provision in the County.

Firstly the question is asked ‘How Government can work with local Councils to increase the frequency ... of rubbish collections.’

6 of the 7 waste collection Authorities in the Partnership operate ‘alternate weekly’ (fortnightly) collections of residual waste and have been doing so successfully for a number of years. Customer satisfaction with collection services is high, and the number of complaints regarding frequency of waste collection are very low. There is no local campaigning for a return to weekly waste collections. The money which has been saved by introducing fortnightly collections has allowed several authorities to introduce free or low cost garden waste collections, which has resulted in increased recycling and reductions in waste to landfill. The reduction in frequency of residual waste collection has also acted as a driver to recycle, by virtue of the limits on disposal capacity that results.

To increase the frequency of collection would have the following consequences:

- An increase in total waste collection costs, or a reduction in other valued waste collection services;
- A removal of the incentive to recycle which is provided by limiting residual waste collection capacity (The costs in reducing residual waste container size to compensate for the increased collection frequency would be prohibitive.)

Whilst the LWP does not argue that, in a world where constrained financial resources was not an issue, a weekly collection would not be welcomed by a proportion of our residents it is our view that, particularly in the current economic climate the use of additional resources to increase collection frequency is not justified, that there is not widespread public demand for such a move and that the consequences of re-introducing the weekly collection service would act in a contrary direction to the aim of a ‘zero waste’ economy.

Secondly the desire for a ‘huge increase in waste from anaerobic digestion’.

As has already been stated Lincolnshire has been through an extensive and protracted process of determining its strategy for waste disposal in order to meet landfill diversion targets. Anaerobic digestion was considered and assessed during the decision making process, which was subject to public consultation and scrutiny. A large contract for an EfW (combustion) plant is about to be let, and the design of the plant is predicated on assumptions on waste volume forecasts and, most significantly, waste compositional analysis.

Any move to require local authorities to move to anaerobic digestion, and associated separate collection of food waste would have severe consequences to this county’s plans

for waste disposal over the next 25 years. The EfW will recover energy from the food waste in the residual waste stream. Any move to require removal of food waste from this waste stream for anaerobic digestion would significantly undermine the viability of our chosen waste disposal option. We would strongly urge the Government to recognise and take into account the current waste infrastructure position and the long term nature of waste disposal planning when determining future waste policy. Whilst there may be good environmental and financial arguments for increasing AD if starting from a 'clean sheet' the same arguments do not necessarily apply when existing circumstances are taken into account.

In addition the waste collection costs required to introduce a separate food waste collection service for Lincolnshire are estimated at around £4 million per annum.

The LWP would ask that Government abides by its expressed wish to devolve decision making powers on these matters to local authorities, in consultation with the communities they serve.

Yours faithfully

Chair of Lincolnshire Waste Partnership