

## Overall Comments on Devon Waste Plan

**This box is for comments relating to the Devon Waste Plan as a whole. If you have a comment on a specific section or paragraph please use the appropriate comment tab. Also, If you have any comments on the Sustainability Appraisal Report, Draft Habitats Regulations Assessment Report or any other evidence document, please provide them in the comment box below. Please identify the document(s) to which the comment(s) relate.**

These comments refer to the whole Waste Plan

**Do you consider the Waste Plan to be sound?**

No

**If you consider the Waste Plan to be unsound, please specify your reason: (Mark all boxes that apply)**

- It is not justified
- It is not effective
- It is not consistent with national policy
- It has not been positively prepared

**Do you consider the Waste Plan to be legally compliant?**

Yes

**Please give details of why you consider the Waste Plan unsound or why it is not legally compliant. Please be as precise as possible. If you wish to support compliance or soundness, please also use this box.**

### **Summary**

The Waste Plan is based on an over estimate of the amount of waste arising in Devon to the year 2031 and assumes a very unambitious recycling target of 64% by 2031. Whilst these may be "safe" planning targets it is a wholly negative view and does not take account of Devon as a county doing much better. Planning for such a negative outcome can lead to poor planning decisions such as planning for unnecessary energy from waste ( incineration) plants, and setting a mindset of failure rather than the positive mindset required to prevent and utilise as much of our waste as possible. DCC have set policies that all proposals for energy recovery facilities must demonstrate how they will achieve the extraction of reusable and recyclable materials prior to treatment. If DCC are serious in their intent with such policies, then energy from waste plants (incinerators) would have limited feedstock and existing capacity such as those being built at Exeter and Plymouth should be more than adequate.

### **Recycling Target 64%**

Although the Waste Plan references the DCC Climate Change strategy, the Waste Plan does not have a vision for the economic, financial and climatic conditions which may prevail in Devon in 2031. The only considerations we can find is the assumption of economic and

population growth and consequent increase in waste as a result of such growth. There is no consideration of the possible need in 2031 to conserve and reuse resources, possible UK and EU legislation to improve recycling rates overall and of commodities such as plastics, and no consideration that there will be improvements in packaging technology to reduce the weight or need for packaging or that goods will be designed for a longer life including designed to be repaired.

The Waste Plan also sets a very negative and defeatist tone when it talks about recycling. Once Devon was one of the top recycling counties and very proud of that position. Now it is setting a recycling rate of 64% in 2031 which is less than is being achieved now in some UK local authorities and some European countries are almost achieving that figure nationally.

### **Percentage of household waste sent for reuse, recycling or composting 2012/13**

67% Rochford

65% South Oxfordshire

65% Vale of White Horse

64% Surrey Heath Borough

62% Three Rivers

61% Stockport

61% Calderdale

60% Stratford-on-Avon

60% West Oxfordshire

60% Rutland

Austria as a nation has achieved 63% reference:

<http://www.eea.europa.eu/publications/managing-municipal-solid-waste/austria-country-paper-on-municipal>

There is so much that could be done to increase the recycling rates:

1. A single unified approach to doorstep recycling based on the best practice in Devon
2. Better still, a single unified approach to doorstep recycling based on best UK or European practice.

Such an approach might require revised collection processes, vehicles and other facilities.

3. DCC should set policies to incentivise people to recycle, preferably a "carrot" approach rather than the "stick" which may impact the amount of fly tipping.

There are well documented schemes in existence in Havering, Rother district council; the royal borough of Greenwich council; and Gloucester county council in partnership with Cheltenham borough council.

4. Implement a "Waste Busters" or "Rubbish Diet" scheme to educate the general public about recycling

<http://www.recycleforessex.co.uk/wastebuster.html>

Based on the LACW quantities documented in the Waste Plan, the average person in Devon produces over 320 kgs of waste per annum today and which according to the Plan's growth assumption over 330 kgs of waste in 2031. With a recycling rate of 54% today, that leaves 148kgs of "recovery" today and 119 kgs in 2031 after a recycling rate of 64% is taken into account.

Whilst not being representative of the whole of Devon today, we carried out a survey of people concerned about waste and asked them how much they put out for landfill "recovery" in a typical collection period and then extrapolated that to a collection year. There are many people in Devon who routinely maximise the use of doorstep recycling and their local household recycling centres. These people **today** are achieving recycling rates of 85 to 95% with the only items being put out are soiled plastic wrappings, coal ash, sanitary items etc. All paper, cardboard, glass, metal, plastic, wood, garden waste, food waste etc is being recycled or composted. These people are working towards a **zero waste target**. In a typical year they will put out for landfill between 10 and 35 kgs of rubbish that cannot currently be reused, repaired or recycled not the average figure of 148 kgs used in the Waste Plan.

Surely a more positive basis for this Waste Plan is to make an assumption that the average person in Devon through the implementation of best practice outlined above by 2031 only created say 25 kgs of landfill waste per annum (equivalent to what some concerned individuals are achieving today). On that basis with a population of 1.33 million, only 33,000 tonnes of landfill type waste will be collected and this could be processed through existing energy from waste plants.

The same considerations as outlined here can be applied to the CIW waste resulting is a similarly vastly reduced amount of landfill waste to be processed.

### **Growth Assumption**

The Waste Plan with respect to LACW waste uses a range of growth assumptions in its baseline, pessimistic and optimistic scenarios ranging from 0 to 1.5% for household waste growth and -0.15% to +0.15% in the waste collected at household recycling centres. There is no explanation or reasoning to justify the use of these figures. In fact over the past few years the volume of waste has actually fallen, which the Plan puts down to the recession. Perhaps the reduction is more to do with waste prevention in times of economic hardness? The Plan couples waste growth to economic growth. However the Government in its Waste Policy Review 2011 seeks to decouple waste growth from economic growth. How is DCC demonstrating or recognising this in the Waste Plan?

This report reference below from WRAP demonstrates that it is possible to decouple economic growth from resource use through resource efficiency by "doing more with less". Decoupling implies using less resources and generating less waste per unit of economic activity.

<http://www.wrap.org.uk/sites/files/wrap/Decoupling%20of%20Waste%20and%20Economic%20Indicators.pdf>

Further the Plan makes the assumption that there will be economic growth, yet we have just experienced several years of negative growth. What factors are there in the current economic, financial, material and energy resources and climate conditions which give DCC the assurance that economic growth will continue to 2031. A thorough Waste Plan would at least look at one or more scenarios where there is negative economic growth at least as serious as the last few years. Such a scenario may include frugality as a benefit and see waste being minimised to a high degree and what waste there is reused, repaired and recycled.

### **Energy Recovery Policy W6**

DCC have set policies that all proposals for energy recovery facilities must demonstrate how they will achieve the extraction of reusable and recyclable materials prior to treatment. If DCC are serious in their intent with such policies, then energy from waste plants (incinerators) would have limited feedstock and existing capacity such as those being built at Exeter and Plymouth should be more than adequate.

The current Waste Plan predicts the need for 437,000 tonnes of residual waste to be treated by waste to energy techniques. 120,000 tonnes per annum capacity is about to come on line in Exeter and Plymouth, leaving a predicted requirement of 317,000 tonnes of further capacity. Clearly the preferred technique for recovery is incineration as five such new facilities are listed in the Waste Plan.

However Policy W6 requires the extraction of reuseable and recyclable materials before "energy recovery". This should in practice commit the county to sorting residual waste, and therefore increase the level of materials recovered and greatly reduce the amount going into energy recovery. Removing highly calorific combustible materials such as wood, paper, cardboard, plastic containers etc from the waste stream will reduce the capacity required and feasibly the types of materials remaining could be treated by composting or anaerobic digestion and by existing incineration capacity.

**Please set out what change(s) you consider necessary to ensure the Waste Plan is sound or legally compliant with regard to the reason set out in 3. Please say why this change will make the Waste Plan sound or legally compliant and any suggested revised wording of the policy or text. Please be as precise as possible.**

### **Recycling**

The Waste Plan should be redrawn based on very optimistic target recycling rates of 90% based on best practice. At a minimum a truly optimistic scenario should be inserted into the plan based on recycling best practice, optimising waste prevention, reclaiming all recyclables

from the waste stream. The Planning measures then should be based on the much reduced volumes of materials requiring "other recovery". The pessimistic scenarios can be left in place but monitoring of the plan based on the very optimistic scenario. Only if the very optimistic targets are unmet, should contingency plans such as building energy from waste plants be considered.

### **Growth Assumption**

The Waste Plan should include a scenario based on negative economic growth with waste quantities minimised due to waste minimisation by households and businesses.

All the other scenarios should be re-run with an assumption of waste decoupled from economic growth.

The Plan will be sounder as a result because there will be a wider range of scenarios to draw conclusions from and base contingency plans.

### **Energy From Waste**

The Waste Plan should be redrawn based on a serious intent to implement Policy W6. It will be a sounder plan because it will be based on more accurate figures for recycling and more accurate figures for energy from waste capacity requirements.

**If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?**

- Yes, I wish to participate at the oral examination

**If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:**

I am not sure that DCC will take my written submission into account, therefore I would like to present my views orally if necessary.

Written By Charles Mossman for Sustainable Crediton

Submitted : 18/2/14