

York Residents Against Incineration

www.no-burner.org.uk
noburner@yahoo.co.uk

5th October 2014

Re: Financial Close for the Long Term Waste Management Service Contract

Dear Councillors,

This Thursday you will be asked to approve the spending of £254 million on a deeply unpopular and hugely oversized waste incinerator for York and North Yorkshire.

We probably don't need to tell you quite how significant an amount of money this is. Spread over the lifespan of the project this is roughly the same per year as the cuts currently planned to be made to the Council budget¹. Why would you choose to cut youth centres and spending on the maintenance of roads and green spaces when you could save tens of millions with a sane waste strategy?

Before you make this decision we urge you to ask that your officers give you some straight answers -

- a) What are the costs of leaving the Allerton Waste Recovery Park (AWRP) project?
- b) How will we supply our Guaranteed Minimum Tonnage if residual waste volumes continue to fall - as indeed we should strive to achieve?
- c) Why is there no meaningful comparison for the scheme, just a 'landfill-only' option which officers admit is "unlikely to be adopted"² even without AWRP?

York does not need this incinerator. We have been hogtied to the agenda and needs of North Yorkshire County Council, whose current disposal contracts end in March 2015 with no option to extend³. In order to keep the project alive after the withdrawal of PFI credits some fairly nifty (and risky) financial mechanics appear to have been employed. **This project exposes the Council to huge unnecessary risks and will set back our efforts to reduce CO₂ and waste arisings.**

In more detail, there are four basic reasons why you should not agree to the Allerton Park project:

1. It is an enormous facility that is not needed

The decision to build an incinerator was made in 2006 based on predictions of increasing waste volumes, and a recycling target of 50%. Since then, waste arisings have fallen by around a sixth and we have already achieved a 46% recycling rate. Residual waste has decreased by 40%, for the most part thanks to the minor revolution taking place in recycling, composting and reduction of packaging. None of this was foreseen by the project officers, who continued - and still continue - to predict increases with every report. So not one tonne has been taken off the capacity. The operators, Amey Cespa, will demand the a level of Guaranteed Minimum Tonnage (GMT) from us set back in 2005 before waste volumes

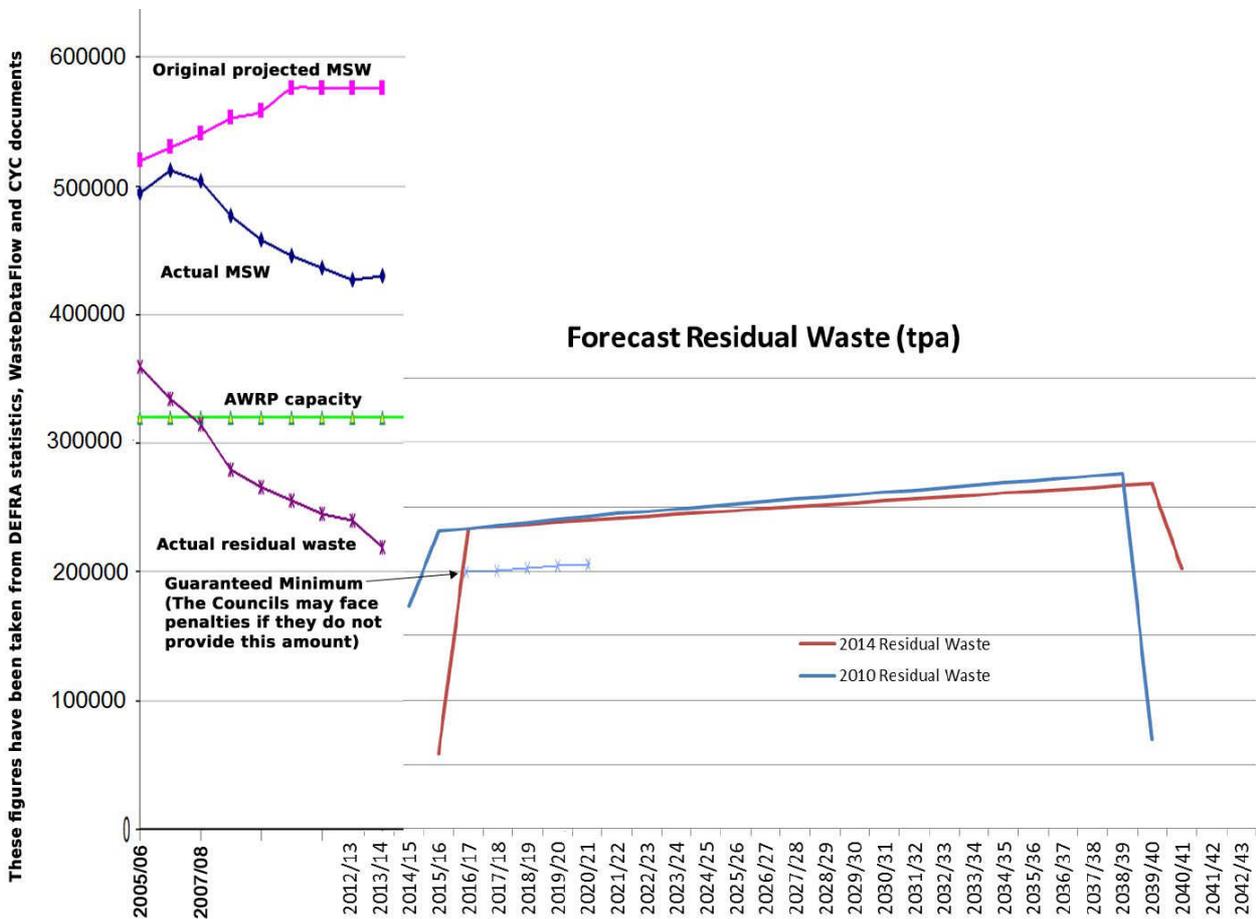
¹ £254 million over 25 years = £10.1m per year, compared to £11m cuts planned for 2014/15 budget

² See the description of the "Market Proxy" in Appendix 1 to the Cabinet Report.

³ See paragraph 51 of the Cabinet Report.

began their precipitous fall.

The following graph augments the projections graph in Appendix 1 to the Cabinet report⁴. It's a little rough and ready but it provides significantly more context than you have otherwise been given.



With every year that has passed, the incinerator has become more clearly oversized. The graph illustrates how almost inevitable it is that we will not produce sufficient residual waste to meet the GMT requirements. Commercial waste may be brought in - but the amount of this currently collected by CoYC & NYCC is barely significant. AmeyCespa will also want to bring in waste commercially (at a profit) to bring the plant up to capacity, which it will do in competition with both the Councils and Yorwaste for declining amounts of commercial waste. The consequences could be hilarious.

CoYC officers also concede that York does not need this incinerator - thanks to the decline in waste volumes there is plenty of capacity at existing facilities and the potential to extend our existing disposal contracts for ten years⁵. **There is time to exit this absurd scheme and create a sustainable solution of an appropriate scale - and hence at a much reduced cost.**

2. It has no mandate and is deeply unpopular

This is one of the largest commitments of money to a single project any of you will approve

⁴ Available at <http://democracy.york.gov.uk/documents/s91504/Appendix 1 - Waste Tonnages.pdf>

⁵ See paragraph 51 of the Cabinet Report.

during your tenures on the Council. Yet it has had nothing like a corresponding level of democratic involvement. Consultation has been scant, and when it has happened, residents have taken every opportunity to object to these plans.

The main consultation on the emerging waste strategy took place in the Christmas period in 2005. The response rate was extremely low, and in any case, both options presented to residents involved building an incinerator. Campaigners called for a more meaningful consultation, and this was initially promised but did not materialise.

Under 'Consultation', the Cabinet report on the financial close merely says coyly "*The councils undertook significant consultation surrounding the award of the contract in 2010*"⁶ - it does not report on the outcomes. That consultation on the PFI contract confirmed the continuing unpopularity of the scheme, with 176 responses, none of which were in favour⁷.

Also omitted from the report is the petition against the incinerator presented in December 2010 by the North Yorkshire Waste Action Group (NYWAG) and York Residents Against Incineration (YRAIN) to both York and North Yorkshire councils. At just under 10,000 signatures (a number it has subsequently reached), this is the largest petition we are aware of ever having been presented to CoYC.

There have been several demonstrations against the Allerton project, taking place in Harrogate, Northallerton and York⁸. And it is worth noting that the process began after the election of the Liberal Democrats in 2003 on a manifesto which included the pledge "We will oppose proposals to build incinerators". **It is abundantly clear that this scheme does not have popular support, and the heavy financial burden will not be shouldered gladly by the people of York.**

3. It is poor financial value

Throughout the campaign for this incinerator, a figure of £320 million was repeatedly quoted as the saving that this project will bring - against a totally spurious 'landfill-only' alternative. This has now been revised down to about half of the original figure, but still does not consider the cost of a viable and more sustainable alternative strategy⁹. A scrutiny topic into an alternative strategy launched in 2012 appears to have been steered away from the subject.

No significant benefit from this scheme is anticipated for 14 years¹⁰. Before this time it will be a burden on York citizens that we can ill afford. Much beyond five years the projections are only informed guesswork. The suggested benefit is only dependant on predictions of exchange rates, interest rates & waste volumes. This is not infrastructure we need, it's a speculative investment that we are being misled.

⁶ Paragraph 101 of the Cabinet report.

⁷ See http://democracy.york.gov.uk/documents/s45275/Award_of_Waste_Management_Contract.pdf (para 139 onwards)

⁸ In York on October 24, 2007, April 12, 2007 and December 12, 2010; in Harrogate on September 22, 2010; and in Northallerton on Dec 15, 2010, 21 July 2010, 30 October 2012 and most recently 25 September 2014.

⁹ Such as the 'Plan B' proposed by the North Yorkshire Waste Action Group (NYWAG) at http://www.nywag.org/?page_id=560

¹⁰ See the 'Value for Money' graphs in Appendix 4 to the report

http://democracy.york.gov.uk/documents/s91507/Appendix_4_VFM_and_Affordability_Graphs.pdf

Sustainable waste strategies based on high levels of recycling without incineration cost less and create more jobs¹¹.

4. It will damage our efforts to recycle and to tackle climate change

Incineration involves the release of high levels of CO₂, the main climate warming gas, as well as a number of other noxious gases (which under ideal conditions will almost entirely be caught by the 'scrubbers'). Electricity-only incinerators, like the Allerton project, are so inefficient that from a climate change perspective, incineration is worse than gas- or coal-fired power stations¹². And that's before you take into account all the lorry journeys needed to take our waste to Allerton. All this goes against the principles of York's Climate Change Framework and Action Plan, and our efforts to cut CO₂ emissions in the city.

York and North Yorkshire are not the only councils blundering ahead with plans to build incinerators in the face of falling waste volumes; so many are in the pipeline nationally that the UK is on course for huge overcapacity. DEFRA itself concluded that the project was not necessary given waste capacity nationally, and withdrew PFI funding for the scheme. Other EU countries have now begun decommissioning incinerators¹³, having struggled to fuel them. Countries such as Sweden and Germany have had to import waste to meet the needs of their incinerators¹⁴ (as indeed did Sheffield City Council¹⁵!) we will find ourselves in a position where incinerator overcapacity and the combined GMT of dozens of Councils, will put an upper limit on our ability to recycle¹⁶.

When this plan was composed ten years ago, 50% recycling rates were seen (by project officers) as a distant dream, yet here we are close to achieving it already. Plenty of places around the world and even in this country have already achieved 70% and more. In 2010 South Oxfordshire District Council achieved an astonishing rise in recycling rates from around 44% to just under 70% within just one year¹⁷. At one point, this council was committed to the principles of Zero Waste but this plan goes directly against those. Its approval will be a hapless attempt at managing a problem which needs to be sorted and eliminated instead. With good leadership, York residents will play their part – will you provide it by rejecting the proposed Long Term Waste Management service contract?

Yours faithfully,

Richard Lane, Ivana Jakubková, Catherine Heinemeyer, Dr. Candida Spillard,
Guy Wallbanks and Kate Lock
for York Residents Against Incineration.

¹¹ See http://www.foe.co.uk/resource/reports/jobs_recycling.pdf - after construction, the AWRP will employ 'around 70'

¹² Friends of the Earth "Dirty Truths: Incineration and Climate Change" report based on research by Eunomia Research and Consulting Ltd. http://www.foe.co.uk/sites/default/files/downloads/dirty_truths.pdf

¹³ See <http://www.zerowasteurope.eu/2014/05/the-ageofdecommissioning-incinerators/>

¹⁴ <http://www.reuters.com/article/2012/11/26/us-sweden-environment-garbage-idUSBRE8AP0MI20121126>

¹⁵ <http://www.no-burner.org.uk/news/sheffield-incinerator-getting-desperate>

¹⁶ Incinerator overcapacity of 10.1m tonnes in 2017/18 could limit our recycling rate to 60% nationally according to consultants Eunomia: <http://ukwin.org.uk/2013/12/12/report-reveals-incineration-overcapacity-constraint-to-recycling/>

¹⁷ <http://www.clickgreen.org.uk/analysis/general-analysis/121431-council-posts-73-recycling-rate-to-top-the-uk-green-league.html>