

A Reassessment of Landfill Requirement in Lancashire

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Introduction

The Planning, Industrial Development and Tourism Committee are being asked to approve a modification to the policies of the draft Waste Local Plan because of the impact of 'new' information. In fact this 'new' information from the Environment Agency on waste site inputs is not that new - it has been available since last September (new data is due in July).

The figures that are being presented to the councillors on the Planning, Industrial Development and Tourism Committee are identical in their conclusions to the disputed figures presented to the 'Round Table' session of the Minerals and Waste Local Plan Inquiry. However, the officers are seeking to take a different *policy interpretation* of these figures without first correcting the fundamental flaws in the calculation process.

On behalf of ARROW I have pulled part the figures to see how they are calculated, and make changes to the modelling procedures to give a fairer picture of landfill need in the County.

Why are our figures different?

The totals for waste inputs to sites and the total capacity of sites are agreed by both ourselves and the officers of the Council (the industry side does disagree with some of these figures). The dispute arises over how these baseline figures are manipulated to produce the final totals in Table 11 of the report.

Many discrepancies arise between the figures because of rounding errors - for example the figures in the first column of Table 11 are rounded up to the nearest 1,000 - hence ours are slightly lower. But if we take the same starting point it is easy to see where the dispute arises:

Double counting:

The capacity figures are based on returns to the end of March 1997. Rolling forward to April 2006 gives 9 full years of landfilling. However the officers' figure - in column 3 - multiplies the annual average figure by 12 years. Part of a year is taken off in column 5 when the "*waste already deposited in 1996/7*" is deducted from the final totals. However this still means that the final total is being massively over estimated by about

2¹/₃ years. This difference represents about 92% of the difference (about 6 million cubic metres) between our figures and the officers figures. The procedure was correct when the officers were using 1994 data as the baseline - the error has occurred because we've shifted to a 1997 baseline for site capacity.

Population growth:

Column 2 of Table 11 gives the annual average site input total for each waste type multiplied by 4% to take account of population growth. But the 4% population growth takes place over the course of the plan - not every year. Hence the 'total' figure in the officers calculations is much higher - in fact it equates to a population growth of 8% over the plan period, not 4%. This represents about an 8% difference between our figures and the officers figures (about half a million cubic metres).

There are some further small discrepancies - for example the "25%" reduction in landfill quoted in column 4 is in fact only 23.3%.

So what are the final totals?

The following figures ignore 'captive sites' - this is because they don't really interact in the wider scheme of things, and in any case these figure are only about 7-8% of the total.

The following comparison considers the actual figures that result from the officers method of calculation, and our method taking account of the errors highlighted above. For this reason these figures do not precisely tie up with the rounded figures in Table 11. Taking the figures with no reduction ("0%") in landfill assumed (all figures are in cubic metres):

Waste type	Officers' figure	Our figure	Difference
Household	18,945,000	14,880,780	4,064,300
Non-household	7,055,760	5,618,160	1,437,600
Inert	5,155,320	3,984,120	1,171,200
Total	31,156,160	24,483,060	6,673,100

The main reason for this difference is because our method calculates just the waste needed between 1997 and 2006, and does not double count in the years 1994-1997.

If we add in the 'captive' sites ignored above, our total comes to just over 26.1 Mm³ (Mm³ = millions of cubic metres). The officers figure is higher at 33.1 Mm³ - that's a difference of 7 Mm³.

Some of the waste industry people have criticised the County Council because of the density 'conversion factors' (Table 10, column 5) because those for biodegradable waste are too high. The effect of lowering density figures is to increase the amount of landfill space taken up by the waste. If we lower the 'household' density factor from 1 to 0.8, and the 'non-household' density factor from 0.8 to 0.7 (very roughly what the industry side were asking), that requires an extra 4.5 Mm³ of landfill space. There are many arguments about how valid this issue is in calculating requirements given that many site will surcharge as part of restoration operations.

So What Are You Being Asked to Chose Between?

This is the range of figures that are currently 'on the table':

- The officers '*no reduction*' figure of 33.1 million cubic metres;
- The officers '*25% reduction*' figure of 29 million cubic metres;
- Our '*no reduction*' figure of 26.1 million cubic metres;
- Our '*25% reduction*' figure of 22.8 million cubic metres;
- Plus, don't forget the extra 4 to 5 million cubic metres that the industry side want.

The effect of which figure you chose is very important. This is demonstrated in the last two columns of Table 10. These give:

- the 'licensed' figure - i.e., you could dump this waste tomorrow; and
- the 'total' figure - i.e., this includes space which doesn't have a license from the Environment Agency yet.

On the basis of the officers erroneous calculations, there is enough landfill void space for household biodegradable waste with only a 15% reduction in volumes going to landfill. On the basis of our calculations there only needs to be a 5% decrease. However this is not a very sound basis on which to calculate the actual need in the county.

Subregional need:

In their report the officers have at last broken the County down into subregions, roughly following the guide we gave to the public inquiry. But the figures

they give are still inaccurate, and it does not appear that they have properly calculated the sub-regional totals fully.

Taking our corrected method, the dates to which current permitted capacity for biodegradable waste will run to are:

Subregion:	0% reduction	25% reduction
'North' - Lancaster, Ribble Valley	2012	2014
'West' - Blackpool, Fylde, Preston, Wyre	2007	2009
'South' - Chorley, South Ribble, West Lancashire	2009	2011
'East' - Blackburn, Burnley, Hyndburn, Pendle, Rossendale	<u>2004</u>	<u>2005</u>

This clearly shows that the area which needs effort put into solving the waste problem is in fact East Lancashire. The decisions taken to reserve sites elsewhere in the County cannot be justified on the basis of need over the period of the plan.

In Conclusion

There are still errors in the officers calculation of landfill need in the County. Hence the deductions made in the report regarding the total figure to put in Policy 77 are wrong and a much lower figure should be inserted - to be reasonable, 25 million cubic metres.

The way in which the officers have assessed sub-regional need is very vague, and is not based on a realistic appraisal of what the figures state. The largest allocation - Round O Quarry - cannot be justified and should be removed from the plan.

It is not plausible to state that we should have a huge over-capacity in the plan on the basis that we '*might*' need it in the future. The whole purpose of a 'plan' is to eliminate the '*might*' scenario from local provision. This is the effect of Policy 78 and 79. We should plan for the necessary capacity during the plan period, with perhaps a small additional margin running up to 2008 in case there are problems at sites. To do otherwise will blight large areas of the County. On this basis the only area that needs extra capacity (not necessarily landfill - more recycling will work just as well) is East Lancashire.

Also, Policies 79 effectively allow landfills to be built ANYWHERE in the County. This is not an acceptable planning policy. It should be deleted, and instead, while basing our 'need' figures on subregional totals, we should actually allocate specific sites.