Matter C (Waste)

Hearing Statement on behalf of ABCA – Revised Appendix

This is a revised version of the Appendix to the Hearing Statement by Walsall Council (741594) on behalf of ABCA on Matter C (Waste).

Since the original Hearing Statement was prepared, it has come to light that there is an error in Table 14 of Evidence Document ES6, on which the figures in Tables 1 and 2 of the Appendix were based. We have therefore prepared a revised version of the Appendix which corrects this error.

The Revised Appendix also provides a breakdown between Treatment/ Recovery capacity and Transfer capacity, to illustrate the difference this makes to the City Council's estimates of waste capacity, in the light of the Inspector's Clarification & Supplementary Question 9 on this Matter.

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Appendix:

Estimated Total Waste Management Capacity in Birmingham

Table 1: Estimate based on Permitted Capacity at Permitted Facilities in 2012

Infrastructure Type	Estimated Annual Throughput Capacity (TPA)	Source
Permitted Facilities (2012 Permitted Tonnage)	3,249,670	Waste Study Update (2014) (ES6) – Table 14
Exempt Facilities	855,250	Waste Study Update (2014) (ES6) – Table 15
Accredited Reprocessors	266,000	Waste Study (2010) (ES5) – Table 28
TOTAL CAPACITY	**4,370,920**	

Notes on Table 1:

1. The Executive Summaries of the Waste Study (2010) (ES5) and the Waste Study Update (2014) (ES6) both estimate that total waste management capacity in Birmingham is between 4 and 4.5 million tonnes.

2. Neither study provides an actual breakdown of how this total estimated figure was worked out, although it is clearly stated that it is based on estimated capacity at permitted and exempt facilities and accredited reprocessors, hence the above information has been extracted from the relevant tables in the reports.

Table 2 (Revised): Estimate based on Actual Throughput at Permitted Facilities in 2012

Infrastructure Type	Estimated Annual Throughput Capacity (TPA)	Source
Permitted Facilities (2012 Throughput)	1,929,955	Waste Study Update (2014) (ES6) – Table 14
Exempt Facilities	855,250	Waste Study Update (2014) (ES6) – Table 15
Accredited Reprocessors	266,000	Waste Study (2010) (ES5) – Table 28
TOTAL CAPACITY	**3,051,205**	

Notes on Table 2:

1. The table shows the difference in the estimated capacity of permitted sites, and of total capacity, when throughput data at permitted facilities is used, instead of the theoretical permitted capacity of those facilities, which in some cases is likely to be significantly higher than the actual operational capacity.

2. This is a Revised version of Table 2 – the Permitted Facilities (2012 Throughput) figure (in red) differs from that in the original Appendix, and therefore, so does the Total Capacity figure (also in red). These figures have been revised to reflect an error in Table 14 of Evidence Document ES6, which did not come to light until after the original Appendix to the ABCA Hearing Statement was prepared. To explain the background to this and to show how the error is likely to have occurred, below we have provided a corrected breakdown of Actual Throughput by Facility Type, based on the information in Table 14 (Table 3).

3. Section 4.1 of the Update report (ES6) states that actual throughput in 2012 was only around 50% of the theoretical permitted capacity, whereas in 2007 it was 67% of the theoretical permitted capacity. This suggests that there may be some annual variation in the extent to which facilities are operating to full capacity.

4. For the above reason, it would be more appropriate for the estimated annual throughput capacity at permitted sites to be based on average (mean) total throughput 2007 – 2012 as the 2012 data only covers a single year and may not be typical. Use of average (mean) throughput data as an estimate of operational capacity is now generally regarded as good practice.

5. The issue of whether transfer capacity should be included has also been raised by the Inspector in his Clarification & Supplementary Question 9 on Matter C. Tables 4 and 5 show how this could affect the City Council's estimate of total current waste management capacity.

Table 3: Amendment to Table 14 of ES6 – Actual Throughput of Permitted Facilities in Birmingham in 2012 by Facility Type (tonnes)

Permit Site Type	Actual Throughput – Total Throughput by Facility Type (tonnes)
A9: Haz Waste Transfer Station	94,305
A11: Household, Commercial & Industrial Waste T Stn	781,921
A12: Clinical Waste Transfer Station	2,801
A14: Transfer Station taking Non-Biodegradable Wastes	9,139
A15: Material Recycling Treatment Facility	6,172
A16: Physical Treatment Facility	14,676
A17 : Physico-Chemical Treatment Facility	4,544
A19 : Metal Recycling Site (Vehicle Dismantler)	99
A19a: ELV Facility	7,423
A20: Metal Recycling Site (Mixed MRSs)	281,699
A21: Chemical Treatment Facility	8,589
A22: Composting Facility	459
A23: Biological Treatment Facility	297,583
S0809 : Asbestos Waste Transfer Station	23
S0813 : Non-Hazardous & Hazardous HWA Site	8,791
S0820: Vehicle Depollution facility	22,593
S0821: Metal Recycling Site	2,528
S0823: WEEE Treatment Facility	1,158
S0824 : Clinical Waste Transfer Station	18
SR2011 No3: Vehicle Depollution Facility <5000 tps	286
SR2011 No4: Treatment of Waste Wood <75000 tps	22,222
Incinerator	362,926
TOTAL	**1,929,955**

Source: Waste Study Update (2014) (ES6) – Table 14.

Notes on Table 3:

1. The table provides a breakdown of throughput of the permitted facilities in Birmingham in 2012 in tonnes by Permit Site Type, using the information provided in Table 14 of document ES6. However, the total figure differs from that in the published table (1,567,029), because inputs into the Incinerator (362,926) were omitted in error. When these are added, the sum of total inputs is 1,929,955.

2. This error is likely to have arisen because of the way the data is recorded in the primary sources (the Environment Agency Waste Data Interrogator and schedule of Operational Incinerators). The total figure in Table 14 appears to have been generated directly from the 2012 Waste Data Interrogator, which doesn't include the inputs into the Incinerator. The same mistake does not appear to have been made with regard to permitted tonnage – the total permitted tonnage figure in Table 14 is correct.

Table 4: Estimated Capacity at Permitted Facilities in 2012 by Infrastructure Type

Infrastructure Type	Actual Throughput by Infrastructure Type (tonnes)	Permitted Tonnage by Infrastructure Type (TPA)
Permitted Facilities – Treatment and Recovery (Total 2012 Throughput)	1,032,957	1,945,916
Permitted Facilities – Transfer (Total 2012 Throughput)	896,998	1,303,754
TOTAL	**1,929,955**	**3,249,670**

Source: Waste Study Update (2014) (ES6) – Table 14, Tables 5A and 5B below.

Notes on Table 4:

1. The table provides a summary of actual throughput of permitted facilities in Birmingham in 2012, and for comparison, maximum permitted tonnage in tonnes per annum (TPA), broken down by broad infrastructure type (Treatment and Recovery facilities and Transfer facilities).

2. The figures are based on the information provided in Table 14 of document ES6. A detailed breakdown of the capacity estimates for each infrastructure type is provided in Tables 5A and 5B below.

Table 5A: Estimated Capacity at Permitted Treatment & Recovery Facilities in 2012 – Actual Throughput and Permitted Capacity

Permit Site Type	Actual Throughput 2012 (tonnes)	Permitted Tonnage (TPA)
A15: Material Recycling Treatment Facility	6,172	19,997
A16: Physical Treatment Facility	14,676	19,999
A17 : Physico-Chemical Treatment Facility	4,544	10,000
A19 : Metal Recycling Site (Vehicle Dismantler)	99	9,998
A19a: ELV Facility	7,423	50,232
S0820: Vehicle Depollution facility	22,593	97,698
SR2011 No3: Vehicle Depollution Facility <5000 tps	286	6,099
A20: Metal Recycling Site (Mixed MRSs)	281,699	514,997
S0821: Metal Recycling Site	2,528	5,000
A21: Chemical Treatment Facility	8,589	29,998
A22: Composting Facility	459	4,999
A23: Biological Treatment Facility	297,583	714,400
S0823: WEEE Treatment Facility	1,158	24,999
SR2011 No4: Treatment of Waste Wood <75000 tps	22,222	37,500
Incinerator	362,926	400,000
TOTAL	**1,032,957**	**1,945,916**

Source: Waste Study Update (2014) (ES6) – Table 14.

Table 5B: Estimated Capacity at Permitted Transfer Facilities in 2012 – Actual Throughput and Permitted Capacity

Permit Site Type	Actual Throughput 2012 (tonnes)	Permitted Tonnage (TPA)
A9: Haz Waste Transfer Station	94,305	261,173
S0809 : Asbestos Waste Transfer Station	23	50
S0824 : Clinical Waste Transfer Station	18	50
A11: Household, Commercial & Industrial Waste T Stn	781,921	904,986
A12: Clinical Waste Transfer Station	2,801	32,498
S0813 : Non-Hazardous & Hazardous HWA Site	8,791	24,999
A14: Transfer Station taking Non-Biodegradable Wastes	9,139	79,998
TOTAL	**896,998**	**1,303,754**

Source: Waste Study Update (2014) (ES6) – Table 14.

Notes on Tables 5A and 5B:

1. These tables provide a breakdown of actual throughput in 2012 by facility type, compared to the maximum permitted tonnage in tonnes per annum (TPA), broken down into the broad categories of Treatment & Recovery facilities and Transfer facilities.

Table 6: Revised Estimates of Waste Management Capacity in Birmingham - excluding Waste Transfer Capacity

Infrastructure Type	Actual Throughput 2012 (tonnes)	Permitted Tonnage (TPA)
Permitted Facilities – Treatment & Recovery Only	1,032,957	1,945,916
Exempt Facilities	855,250	855,250
Accredited Reprocessors	266,000	266,000
TOTAL CAPACITY	**2,154,207**	**3,067,166**

Source: Waste Study Update (2014) (ES6) – Tables 14, 15 and 28, Tables 4, 5A and 5B above.

Notes on Table 5:

1. The table should be compared with Tables 1 and 2 above – it shows the difference in the estimates of current waste management capacity in Birmingham indicated in these tables, when the throughput/ permitted tonnage of transfer facilities is excluded.

2. Tables 4, 5A and 5B show how the underlying permitted facility figures have been worked out, using the information provided in Table 14 of document ES6.