

FINAL VERSION
SUPPLEMENTARY SCHEDULE

Summarised Comments received after 12/11/10			
Respondent Number	Correspondence Number	Issue	
			KEY
			Comments made by
Pub 001			Public
Com 001			Commercial organisations
PCo 001			Parish/ Town Councils
CGr 001			Campaign and Representative Groups
MPM EP 001			Member Parliament/Member of the European Parliament
PCo 015	PFI/ 283	01	Your letter of 18 October in connection with the above was considered by the Town Council at their meeting last night and I was asked to reiterate their previous comments made on 4 August.

PCo 041	PFI/ 284	01	<p>At our last meeting members asked me to contact you regarding Seamer Carr Re-cycling Plant on Dunslow Road in Scarborough. Members are concerned about the future and the knock on effect of Seamer Carr Recycling Plant if the proposals for the Allerton Incinerator go ahead.</p> <p>Members wish to invite a representative from North Yorkshire to a meeting ofParish Council to discuss the above. If this is not possible could you write a letter to me addressing the above points.</p>
Pub 107	PFI/ 285	01	The AmeyCespa proposal is for far too long 25 years & leaves too much waste 70-80% to go into the incinerator.
Pub 107	PFI/ 285	02	AmeyCespa's recent acquisition of Donarboon creates I feel an opportunity for NYCC to review the proposed contract & opt for a smaller, shorter term commitment along the lines of that in Cambridgeshire. When Cambridgeshire county council went out to tender for its long-term waste treatment contract, Donarboon proposed to extend its operations by developing a mechanical biological treatment (MBT) plant which would remove recyclable material from 179,000 tonnes of black bag waste a year and then compost it to produce a soil conditioner. This has recently opened & provides a more sustainable solution. I also feel residents can with support up their recycling to the 70% seen elsewhere in the UK & in other countries.
Pub 107	PFI/ 285	03	I still plan to send you the views of the young people in the climate change group the views above are my own as a Harrogate council tax payer. Can you please confirm where my views will be passed onto?
CGr 012	PFI/ 288	01	Although NYCC explained how they had arrived at their target figures for increasing recycling to 50% + it was not stated what participation rate they had factored into the model. Please provide the participation rates that were factored into the model.
CGr 012	PFI/ 288	02	NYCC stated that there were no financial penalties to Councils for failing to achieve their GMT. Rather that any shortfall would be taken up by Amey Cespa with Commercial & Industrial waste. Please explain. Will Councils be encouraged to meet their contractual obligations to provide GMT or will they suffer no penalty as in question 2?
CGr 012	PFI/ 288	03	Will the processing of Commercial & Industrial waste be charged at the same rate as municipal waste?
CGr 012	PFI/ 288	04	On the company schematic of the plant in operation and in the Scoping Document C&I waste is shown as going direct for incineration, by-passing the Mechanical treatment plant. Why is C&I waste not being pre treated to remove the recyclable and organic factor?
CGr 012	PFI/ 288	05	Does the contract exclude the sourcing of waste from outside of the County by either the contractor or the councils?

CGr 012	PFI/ 288	06	Why is there no mention of the use of the AD digestate for land reclamation?
CGr 012	PFI/ 288	07	Recyclates from a mechanical treatment plant tend to be of a poorer quality than those collected from the kerbside. What markets are available and are they in the UK?
CGr 012	PFI/ 288	08	Who takes the risk if there are legislative changes over the 25 years; i.e. landfill tax on bottom ash, incinerator tax, the banning of incinerating organics?
CGr 012	PFI/ 288	09	It was explained at the meeting how particles and dioxins will be removed from any emissions through the use of filters. Please confirm the minimum size of particles that will be removed.
CGr 012	PFI/ 288	10	With regard to the figures on electricity generated at 24 MW. I understand that the industry norm is that 1MW of electricity will power @1,000 homes however you are claiming that there will be sufficient power for 40,000 homes. Please explain.
Pub 002	PFI/ 289	01	Following the correspondence and interviews reported in the press, I have a couple of supplementary questions: Who made the decision and why that AmeyCespa should only be asked to tender for an Incinerator?
Pub 002	PFI/ 289	02	Were any of the requests for tender in relation to any other method of dealing with the waste than incineration?
Pub 002	PFI/ 289	03	Bearing in mind that a large amount of the total price of this contract relates to interest, is there any clause within the contract that permits AmeyCespa to increase the price to NYCC in the event of an interest rise?
Pub 122	PFI/ 290	01	I write to protest against the current NYCC waste strategy proposals They are based on unrealistic targets for recycling that overplay the financial case for a single 'super-facility' for the entire county. They are misleading because recycling rate will be much higher than predicted, with the result that landfill costs will drop significantly.
Pub 122	PFI/ 290	02	The strategy is based on old technologies, including incineration, which has one of the highest levels of CO2 emissions.
Pub 122	PFI/ 290	03	It ignores the new Government's commitments to a massive increase in recycling as well as its plans for an immediate review of all waste management strategies.
Pub 122	PFI/ 290	04	And it ignores the public's views of today, instead relying on consultations completed several years ago.

Pub 122	PFI/ 290	05	I understand that you will be asked to vote in favour of the Council's plans later this year. I urge you to oppose this plan and instead ask for a thorough review of the best way forward. In particular I ask that you push for a big increase in recycling, thus removing the need for such a colossally expensive and risky venture.
Pub 122	PFI/ 290	06	At a time of deep Government spending cuts it would be irresponsible to continue the current strategy without careful review.
Pub 122	PFI/ 290	07	For your information, please find enclosed photomontages of the proposed incinerator taken by ArneyCespa. These are the views which will affect the Clareton residents -the top picture being the view from our garden
Pub 123	PFI/ 291	01	We cannot continue to use landfill for reasons that are well known to all. Recycling needs to increase in this area and many other parts of the U.K. The proposed solution to take out a contract with ArneyCespa raises a number of concerns.
Pub 123	PFI/ 291	02	Health -Are emissions safe and will they be controlled"?
Pub 123	PFI/ 291	03	Environmental - The visual impact will be a massive blot on the rural landscape far more obvious from all points of the compass than first suggested. Traffic will Increase.
Pub 123	PFI/ 291	04	Financial - The cost of the project to the tax payer. PFI's are expensive. Large profits taken by the developers. This solution is on a scale much larger than is required. When recycling increases the Incinerator will have to be fed by sourcing waste from elsewhere.
Pub 123	PFI/ 291	05	We hope that you are aware that there is a large groundswell of opposition to this project. North Yorkshire Action Group www.nywag.org can provide you with further information on the financial folly of this venture.
Pub 123	PFI/ 291	06	The Allerton Park Site could still be used for waste disposal on a smaller scale without the outdated process of incineration. I am sure that you will be aware that there are Incinerators within easy reach that are underused and could be considered by NYCC if necessary.
Pub 123	PFI/ 291	07	We understand that you will be asked to vote in favour of the Council's plans at a meeting in December. You will know that our local MPs Andrew Jones and are against this project. We urge you to oppose this plan and instead ask for a thorough review on the best way forward.
Pub 124	PFI/ 292	01	I am writing to you to ask you to please vote against the proposal to build an incinerator at Allerton Park.

Pub 124	PFI/ 292	02	The issue of penalties incurred by exceeding landfill limits are of course important, but I do not consider that this proposal is the only option, or even that it is better than incurring them.
Pub 124	PFI/ 292	03	I am appalled by the admission by AmeyCespa, dragged out of them eventually, that they in fact would be burning 80% of waste brought to them, with 20% supposedly recycled, but only if they could make a profit from recycling the remaining 20%. If they could not make a profit this 20% would also be incinerated bringing the figure to 100% incineration. Their pledge to be sorting the rubbish and removing 'recyc1ates' seems a little thin. To me this is all the more shocking, as I know from personal experience that once you genuinely remove everything from your rubbish that can be recycled, there is in fact, very little left. So, if recycling were something that North Yorkshire County Council was really serious about, there could be very little sent to landfill, and no need for an incinerator.
Pub 124	PFI/ 292	04	I have done a lot of research into the health risks of living near to an incinerator, and I am not at all happy at being so close to the one proposed for Allerton Park. I am very concerned about the dioxins and particulates that are undeniably produced by these facilities falling on myself, my family and on the fields around us where our food is grown.
Pub 124	PFI/ 292	05	In addition, what sort of a "Welcome to North Yorkshire" will the giant chimney for this incinerator make, sited as it is on the main artery to Yorkshire and the north? What does it say for the value we place on this beautiful part of the country that we can put something so industrial, dirty, ugly and huge at its entrance? Not only this, but it will mar the wonderful vistas to be seen such as from the top of the white horse, so unspoilt and marvellous as they are now.
Pub 124	PFI/ 292	06	I am not impressed by the electricity generation element of this proposal. This is not a sustainable way of electricity production. The emphasis in this area needs to be on cleaner ways of generating, and more efficient use of electricity.
Pub 124	PFI/ 292	07	I think the proposal for an incinerator at Allerton Park is a big, giant step in the wrong direction. At a time when we need to be looking to reduce what we use in the first place, and re-use and recycle as much as possible, this proposal locks the whole of North Yorkshire in to the production of waste as a raw material for the next 25 years. It is an absolute disincentive to reduce waste and to recycle. This is simply an unacceptable position to take at a time when environmental issues are of such global importance.
Pub 124	PFI/ 292	08	Please do not vote for this proposal because there appears to be no alternative at the present time. 'Plan B' is the status quo while a better, more sustainable, socially and environmentally acceptable solution can be devised.
Pub 125	PFI/ 293	01	I fully understand the proposal does solve problem in that it will dispose of waste without landfill but what is the REAL cost?
Pub 125	PFI/ 293	02	Why is its capacity so large?

Pub 125	PFI/ 293	03	Why has no attempt been made to recycle more?
Pub 125	PFI/ 293	04	Can you be sure about the long term health and environmental consequences?
Pub 125	PFI/ 293	05	The impact of moving all the waste from all over the county to this site is a grey area -its scale and location in rural countryside are quite out of order. Why burn the waste when it could be used as fuel for the new power station at Ferrybridge?
Pub 125	PFI/ 293	06	Finally and above all look behind the very professional presentation on the money issue and do the figures for yourself-do please check it out carefully and you will see you will be using public money to process commercial waste and the cost of this project and the savings are not what they seem! To agree might have been viable in 2005-it isn't now. You should be broad minded enough to ditch your PFI funding and find a more imaginative and cost effective solution. Future generations will thank you for your courage to think for yourself on this very complex issue.
Pub 126	PFI/ 294	01	We live at and from my house I do not want to look out onto the incinerator. Please don't build it. This will be our future. My sister and I don't want it to go ahead. I am 9 yrs old and it will be here for long after me. Please say no to the incinerator.
Pub 126	PFI/ 294	02	It will cost a lot more pocket money than I have got so it will be better to recycle.
Pub 109	PFI/ 295	01	There are many concerns shared by the residents affected by this scheme. I realise that for the meeting in December the main consideration is purely the financial figures and I'll address that aspect. The incinerator will have a capacity massively exceeding what is required. The projected waste figures are out of date and fail to take into account any increase in recycling or waste reduction (despite the latter being a key Government target). This will mean that NYCC will have to import waste to feed the incinerator, something which has happened at our Councils unwise enough to adopt incineration. How on earth is that in the best interests of the people of North Yorkshire. The anticipated increases in landfill tax have no basis in fact and yet the project fails to take into account any impact potential from other taxation e.g. on CO2 generation which could come into play thereby undermining the project financial viability The ineptitude of Councils throughout North Yorkshire on their poor handling of recycling gives me no confidence that you will achieve anything like the £320M savings. The history of PFI funding is hardly a glorious one, as has been shown in a recent Audit Commission Report.

Pub 109	PFI/ 295	02	Given that the Government will be consulting on the national waste disposal strategy early in 2011 it seems insane for NYCC to sign us up to a £1Bn mortgage.
Pub 109	PFI/ 295	03	Why are NYCC the only rural authority considering incineration?
Pub 109	PFI/ 295	04	Why has York banned incineration within its city boundaries?
Pub 099	PFI/ 296	01	North Yorkshire has undoubtedly a big challenge in dealing with its waste, which has been not been helped by poor recycling facilities and hence poor recycling rates particularly in the Harrogate Borough.
Pub 099	PFI/ 296	02	North Yorkshire needs to be dealing with its waste in a way which is financially sound, and uses the waste hierarchy as a guide to its waste strategy; firstly continually striving to reduce waste in the first instance, secondly facilitating reuse and repair to prevent waste and thirdly to recycle waste so it can be used in manufacturing once again. Using the principles of the waste hierarchy correctly will help reduce costs associated with dealing with waste, will reduce the need for transportation of waste, processing waste, will save energy, will reduce greenhouse gases and other pollutants associated with landfill.
Pub 099	PFI/ 296	03	I am however very concerned about the proposals put forward by North Yorkshire county council and Amey/Cespa's planned Allerton park waste site. On the basis of evidence I have read Incineration is not a sustainable option either in financial terms and certainly not environmentally.
Pub 099	PFI/ 296	04	Incineration creates toxic fly ash. Although modern incinerators doubtlessly produce less toxins in chimney emissions compared to older incinerators, more toxins are transferred into the fly ash instead. This ash has to be land-filled or spread on land, just moving the toxins elsewhere, rather than eliminating them. The toxins could then leach into the water table. Such toxicity problems don't occur if this waste is recycled or composted instead.

Pub 099	PFI/ 296	05	<p>From a climate change perspective, most worrying is the greenhouse gases produced by incineration. To a large extent incinerators burn fossils fuels, because of the plastics burnt, which are of course oil derived. Alan Walgate of Goldsborough Parish council calculates using median carbon dioxide emissions from incinerators that CO2 emissions from the incinerator will be 300,000 tonnes per year, possibly raising by 2035, to well over 300,000 tonnes per annum.</p> <p>Waste production makes up a small but non the less significant part of the UK's green house gas emissions, 3.6% in 2008.</p> <p>A Friends of the Earth (FOE) report calculates that incinerators emit 33% more fossil fuel derived Carbon dioxide than gas fired power stations. By 2020 FOE calculates that electricity only incinerators (which Allerton Park would be, as opposed to combined heat and power incinerators) will emit "78% more fossil CO2 than gas fired power stations and only around 5 per cent less than coal-fired power stations"³, given projections that plastics will make up more of household waste by 2020.</p> <p>Another 2008 report by three American NGOs takes a life cycle approach to incineration and suggests that contrary to many waste operators claims that waste incineration is carbon neutral, the truth is far from it. Most waste has high embodied energy (mostly fossil fuel derived energy) from its growth and production and is therefore not carbon neutral; some products which are burned will also be contributing to deforestation. It report also says that incinerating products discourages more recycling and therefore creates more demand for natural resources and their subsequent products which creates more greenhouse gases in the extraction and production. The report concludes "The bottom line is that tremendous opportunities for greenhouse gas reductions are lost when a material is incinerated".</p>
Pub 099	PFI/ 296	06	<p>Incinerators need to be continually fed waste to keep the power output constant. If, as should be the aim, household waste continues to be reduced the AmeyCespa have stated that they would then use commercial waste. I think this is problematic for the same reasons the above reports mention, that businesses would then recycle less and therefore energy and greenhouse gases savings couldn't happen.</p>

Pub 099	PFI/ 296	07	<p>Another issue is health concerns over emissions. Of particular concern are Dioxins, one of the mostly harmful toxins to Human health. These are released by incinerators and long term exposure in the wind fall area would be damaging to human health. Also particulate matter PM2.5 and PM10 are carcinogens, there is no know safe level of these particulates. So when as claimed, the emissions are regulated by the Environment Agency, safe regulation of particulate emissions isn't actually occurring. As Dr. Keith Rowell a former World Health Organisation authority on respiratory disease stated, long term exposure to these particulates can lead to a number of respiratory diseases 5.</p> <p>With a good wind these pollutants will be well dispersed, but the vale of York often experiences little wind and temperature inversions, when pollutants will quickly sink to ground level. People visiting the area or passing through will be little affected but for those who are residents in the Vale of York in the prevailing wind direction over 20 years or so people will be to suffering the effects of the dioxins and particulate matter which they have inhaled.</p> <p>AmeyCespa have sought to alay fears about air pollution by correctly stating that the Health Protection Agency and Environment Agency do monitor and regulate incinerators. However the regulation will only really safe guard peoples short term health, as with vehicle pollution near roads, those whom live close by suffer respiratory illnesses over a prolonged period of time and regulation of course evolves over decades in response to health studies and scientific findings.</p>
Pub 099	PFI/ 296	08	<p>I am surprised that this scheme with incineration as a central aspect, has claimed to be the option with the biggest cost savings. I would have thought a scheme which maximised recycled and Anerobic Digestion would be far more cost efficient if health costs and the different environmental costs are factored in, as recommended in planning guidance. I doubt the waste strategy or the business plan has done such a vigorous cost benefit analysis because it had I am sure incineration would not be a central part of this plan.</p>
Pub 099	PFI/ 296	09	<p>As many others have commented in the local press, the county council officers or Amey Cespa seem to have got some of their figures incorrect with regards to the amount of municipal waste which is predicted for coming years. The approximate current municipal waste is 470,000 tonnes for North Yorkshire. There have been claims that waste in the county has gone up. However this more likely to be due with waste streams, being moved. For example the introduction of a home, garden waste collections would have produced figures which would have made it look like waste was increasing, when in fact it meant less people having to go to their local tips such as Stonefall in Harrogate, so overall household waste is unlikely to have risen. Indeed DEFRA's figures show that household waste has been decreasing since 2006, from 2008/09 to 2009/10 there was a 2.7% decrease in waste. The plans for the Allerton Waste recovery park raise questions of over capacity right from the start, with average recycling rates in the county of 45%, 211,500 tonnes out of the 470,000 is recycled, leaving 258,500 black bin waste. So why is the facility and the incinerator being built to handle a total of 320,000 tonnes? Its certainly not because household waste is going up because the figures shows its not and neither is DEFRA predicting it will be.</p>

Pub 099	PFI/ 296	10	I conclude that incineration should be excluded from a waste plan on the many grounds I have covered.
Pub 099	PFI/ 296	11	<p>An Alternative solution Friends of Earth says that by 2020 the UK should be aiming for a recycling rate of 70% by 2020, which will have a large impact in reducing greenhouse emissions, create thousands of new jobs and help us on the path to a zero waste or closed loop economy 6. Indeed the current target which is 50% recycling may be revised upwards to 70% by the Government when their waste strategy is produced in the spring.</p> <p>A zero waste society should be one which we aspire to. It is surely desirable for society, to try to eliminate landfill as much as possible and have no need for incineration. It is also desirable because it will help create a closed loop economy where waste is not seen as waste but it is used as resource to manufacture new goods, such an economy would create more jobs as would a waste facility in North Yorkshire with recycling rates of 70% or more .</p> <p>Recycling rates of 70% and higher are technically possible now, Flanders in Belgium already recycles over 70% 6. At the University of Leeds, Premier Waste the Universities waste contractor recycles over 90% of Universities waste, which just shows what is actually possible. The high recycling rate is partly because there is a separate collection for Food waste which means the majority of organic waste can be put into an Anerobic Digester (AD).</p>
Pub 099	PFI/ 296	12	<p>A strength of the current proposal is the plan for an anaerobic digester which would handle 40,000 tonnes per annum. Anaerobic Digestion, produces low carbon electricity (much lower than incineration) and produces a compost which can be used on farms or in gardens. However 40,000 tonnes out of a total of 470,000 is only 8.5%, or 12% of Dust Bin waste (excluding kerbside recycling), this seems a much too small amount. Figures from waste studies from 2000-2005 show that food waste makes up between 15-20% of waste from Dust Bins. If the county council had a more joined up approach and asked local authorities to implement a separate food collection then potentially up to 20% of dust bin waste could be put into an Anaerobic Digester. This step alone would substantially increase recycling rates, in a relatively small amount of time.</p> <p>As well as AD, recycling more types of plastics, cardboard, more paper types at local authority level or at the size by using the latest mechanical machines could increase recycling of materials substantially more than is currently planned. Additional recycling planned of 20,000 of dustbin waste equates to a mere 4.3% extra of total household waste. Although Arney Cespa state the opposite, the planned facility would without a doubt be burning waste which could be recycled. At least 70% of waste can be recycled now, with more waste types predicted to become economic to recycle in the future with rising oil and natural resource prices.</p>

Pub 099	PFI/ 296	13	Together a materials recovery facility and an anaerobic digester create an anaerobic mechanical biological treatment (Anaerobic MBT) facility, these can significantly reduce landfill whilst avoiding all the ill effects incineration. Indeed in Friends of Earths' analysis of all waste management options Anaerobic MTB is the most beneficial for the environment even though it would involve a small percentage of residual waste going to landfill (which would reduce over years) as more things can be recycled.
Pub 099	PFI/ 296	14	It is not too late for you to change the county's waste strategy and direction. I strongly believe on the evidence I have seen that incineration is clearly not a technology of tomorrow and mechanical biological treatment is now the technology to use. I ask you to reject the current proposals in favour of a more radical waste strategy based on waste reduction and increasing recycling rates to at least 70% by 2020, including more emphasis on anaerobic digestion, which would deliver better environmental and financial outcomes. I realise you are not my county councillor, but I have sought to provide you with information from a local perspective, which I hope will give you enough information to reject this proposed waste strategy and support a different waste strategy outlined here.
Pub 002	PFI/ 297	01	Why is it that a Conservative council is attempting to push through this contract in the month prior to the introduction to the House of Commons the new strategy for waste that the Party has been developing and that may be in conflict with the said strategy?
Pub 002	PFI/ 297	02	In the Knaresborough Post Mr Jarvis of AmeyCespa is reported as saying that AmeyCespa were only requested to tender an incineration solution for the NYCC waste disposal contract: a. Is this correct? b. Were any other solutions considered and/or tenders requested? c. If not, why not?
Pub 002	PFI/ 297	03	In a report prepared by the Parish Council of Marton-cum-Grafton (hereinafter referred to as "Marton"), it was shown that the figures used to prepare the request for tender are significantly incorrect. a. Are the NYCC or the Marton figures correct? If the NYCC figures are correct, which of the various sets of figures put forward by NYCC do you say are correct since NYCC appear to have been using different sets of figures at different times at in different presentations and how are they substantiated? b. If the Marton figures are correct, the basic business case for the contract is clearly flawed and, as such, the terms of the contract need to be re-negotiated so that the facilities created are more appropriate for dealing with the revised level of waste. Is this occurring and if not, why not?
Pub 002	PFI/ 297	04	Bearing in mind the technological developments currently taking place, especially in relation to, inter alia, the extraction of oil from plastic, it appears that to lock into a 25 year contract relating to technology that will be, by the time that the plant is built be dated, with no realistic break clause is commercially unacceptable. How does NYCC justify this?

Pub 002	PFI/ 297	05	I have been unable to access any data or information that indicates that AmeyCespa has a adequate experience or a proven track record within the business. Perhaps you would be kind enough to let me know how they justified their tender in this respect.
Pub 002	PFI/ 297	06	There is considerable concern over the Ferrovia SA connection because: a. It has an unsustainable debt: equity ratio (in excess of 500%); b. It has incurred the very substantial losses made in 2008, 2009 and 2010 (to date) c. It is currently trying to sell 10% of its stake in BAA so as to pay down a very small part of its debt but more importantly in order to justify the carrying value of the remainder of its stake in BAA which, if it fails will result in further write-offs.
Pub 002	PFI/ 297	07	All of these imply that it is likely to breach its banking covenants. Per se this will not impact NYCC although the existence of a contract for in excess of £1 billion makes the joint venture a likely candidate for early sale. Have terms been written into the contract under which termination of the contract can be triggered in the event of a change in beneficial ownership in order to protect NYCC's interest?
Com 007	PFI/ 298	01	We would like to update our website with details of this project for our subscribers. Please can you confirm when financial close for the authority and Amey/Cespa consortium is due? Also, please can you confirm the names of the legal, technical and financial advisers assisting North Yorkshire County Council on the project?
Pub 127	PFI/ 299	01	Could you please send me by email a copy of the working group report on this subject which I understand is now available for public inspection.
Pub 128	PFI/ 300	01	I understand that this report is now available. Could you please send me 1 hard copy a.s.a.p.
Pub 113	PFI/ 301	01	If you could clarify please, does this mean that if councillors approve the contract, work starts straight away or are the planning issue to still then to be resolved?
Pub 113	PFI/ 301	02	Also you make no mention about the comparison in height between Knabbs Ridge Wind Farm and the proposed chimney height. Surely a better comparison would be the physical height of the chimney compared with each other notable structures in the region... York Minster come to mind, or maybe graphic impressions of the views of the chimney with the billowing smoke from different areas around the County...ie the top of Sutton Bank as well as local views.
Pub 113	PFI/ 301a	01	I would be pleased if you would forward my concerns to them. (Re PFI301). Re the planning and my concerns re conflict of interest - are any of the members who vote for or against this contract being awarded also representatives on the NYCC Planning Committee?

Pub 129	PFI/ 302	01	<p>Comment received relating to the proposed North Selby mine Development referencing Allerton Park (Planning permission is being sought by a Joint Venture (UK Coal, Peel Group and Science City, York) for a plant that burns commercial and industrial waste in order to produce electricity and steam):</p> <ul style="list-style-type: none"> UK Coal has put in an application for the North Selby Site to be used as an 'Energy from Waste' site and claims it has the support of York City Council. Why then has both York City Council and North Yorkshire Council chosen an old quarry site on the A1 at Allerton Park and are currently proceeding towards their preferred location for an 'Energy from Waste' operation, which they say will divert 230,000 tonnes away from landfill which is 90% of that currently sent to landfill. Where therefore is the 190,000 tonnes of waste referred to in this Joint Venture proposal coming from? York City and North Yorkshire Councils should talk to Drax again about taking the Region's waste via train to meet N. Yorks landfill targets. There is also a site at Seal Sands for the North of the Region. The expertise is already there at those locations. To allow new incineration plants to be installed anywhere by anyone is irresponsible. We have a beautiful City and County let us keep it that way. The financial incentive for the installation of incinerators as in this case is clear. These projects will give a very high return on investment virtually guaranteed by Government. They therefore can be put anywhere suitable. We as home owners will still be paying for them in the form of higher electricity costs and higher disposal costs.
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Pub 129	PFI/ 302a	01	<p><u>Ref: Allerton Park Waste Recovery Plant</u></p> <p>An article in the Darlington and Stockton newspaper on 25/11/2010 said that the Council would save a huge sum of money by allowing this plant to be built.</p> <p>The landfill tax was introduced to divert waste from landfill but the incinerator companies (see WRAP report of July 2010 on gate fees) charge in all cases more than the £70 (includes landfill tax at £48 per tonne) for your size of plant: 230,000 tonnes. So basically instead of the Government getting the landfill tax the private owner effectively receives a sum equal to it. This is of the order of £11 million per year lost tax.</p> <p>Secondly, the government subsidies result in higher electricity costs (from your proposal the private company will receive about £35 per MW-hr more than the current wholesale price) so this gives a further £11 million per year to the private Company from us.</p> <p>Thirdly the EU is currently deciding the carbon tax to be levied on carbon dioxide emissions of which this plant will emit more than 420,000 tonnes. The private company will no doubt charge us for this burden also.</p> <p>In short you will be costing us a lot more for our waste disposal by incineration (unless you have negotiated gate fees of only £22 /tonne).</p>
Pub 130	PFI/ 305	01	<p>Noting that the Planning Officers have supported ArneyCespa's proposals I ask myself why would they object as I am sure that they cannot be independant on this issue. Furthermore how can the various Councillors who will be asked to consider this proposal be unbiased? I am not involved with the objectors but the whole situation and decision making process seems totally UNDEMOCRATIC for a Country which prides itself in fair play and particularly in view of Mr Cameron's aims of his Big Society. I suggest a final decision be delayed and the whole proposal be reviewed by an Independent Inspector-at least the man in the street will have been given a fair chance to be heard on such an important issue.</p>
Com 008	PFI/ 306	01	<p>Where are the current locations of landfill sites in NY & York and which if any will remain in use after construction of your energy from waste plant. In other words what the whole system would look like if it were up and running in a few years time.</p>

CGr 013	PFI /307	01	<p>Transport and the Proximity Principle - The Sustainability Working Group has aspirations to deliver local solutions to deal with waste produced within the locality. Under the auspices of the proximity principle there are clear environmental and potential economic benefits from this approach and the Sustainability Working Group is concerned that the current GMT requirements for this plant may temper or effectively stop these aspirations. A particular example could be the potential for a local solution for food waste, through a small scale in vessel composting operation delivering recovery of this waste within the Borough.</p> <p>The cost of transporting waste from Scarborough to Allerton Park is likely to rise significantly in future and although the Council was assured that transportation costs have been taken into account, if it is the case that no-one can predict how these might change over the next 25 years. Notwithstanding the economic variables, members are concerned about the long-term environmental impact of the necessary haulage and would seek a commitment, at this stage, to minimise this impact at much as possible. Examples include use of methane generated on site as a fuel for haulage, use of a green fleet policy etc .</p>
CGr 013	PFI /307	02	<p>Guaranteed Minimum Tonnage Calculations</p> <ul style="list-style-type: none"> The Sustainability Working Group has some concerns regarding the baseline evidence for forecasting future waste arisings and population trends. The proposal is based on the assumption that the annual increases in the GMT were the result of projected population/household growth figures in excess of 1% per year. The population increase between 2008 and 2009 was only around 0.3% in the York and North Yorkshire Sub-Region. Whilst demographic changes in recent years have meant a tendency for more people to live in single-person households it's certainly questionable whether it can or will continue as pressure on resources increases. Recent Government announcements on Housing Benefit changes, stating that it will no longer support people under the age of 35 to live in single occupancy households, could well be the first significant event in the reversal of that trend. The Sustainability Working Group would seek more clarification of compensation costs in relation to the GMT. NYCC have explained that there is no fixed penalty, but compensation would be paid according to a proportion of lost income from electricity generation. However, it would appear that other local authorities have been required to pay a significant sum every month. We have reservations that the GMT could impact upon our recycling rates should EU or UK government legislation targets in the future require higher recycling rates, because our capacity to achieve these could be compromised by a requirement for GMT. The Local Government Association have recently (October 2010) provided a case study example of how Horsham District Council has undertaken a radical review of its waste collection services that have seen recycling rates increase from 14% to 56% in a decade. Therefore, we are concerned that any future higher recycling targets, for example, because of progress in technology over the next 25 years that will see more materials being recycled, could leave the Council vulnerable to further financial burdens if we are not able to achieve the required recycling rate target.

CGr 013	PFI /307	03	<p>Alternative Strategies</p> <ul style="list-style-type: none"> Given the concerns in relation to the GMT calculations and possible penalties the Sustainability Working Group suggests a viable solution to address the restrictions on the land-filling of waste would be to explore shorter term contracts with the operators of existing energy from waste plants whilst encouraging the development of decentralised local solutions to waste management. For example, local food waste schemes; and educational projects aimed at encouraging waste minimisation. It is understood that there are procurement issues with this approach but it would appear to be a more sustainable solution given the environmental impact of investing in new infrastructure. At Seamer Carr we still have the gas pyrolysis pilot plant which is currently not in operation. If this were to be successfully operated then there would be the opportunity to dispose of up to 18,000 tonnes of residual waste locally and with the benefit of energy recovery. We would like to see clauses within the contract which would permit the use of the gas pyrolysis plant as a local waste recovery solution should the plant become fully operational during the contract period. The proposals presented do not appear to demonstrate effective use of the heat generated by the incineration process. The Sustainability Working Group would wish to see a commitment to utilise this heat and if no opportunity is available at the outset then we would wish to see clauses within the contract that would enable its use should a sustainable outlet for this heat become available, for example district, agricultural or industrial heating. The Sustainability Working Group is keen to investigate the potential to utilise the MRF capacity at the plant for the sorting of dry recyclables to provide a secure outlet for this material. We would like to see the GMT requirements reflect the potential to deliver dry recyclables as well as non-separated residual waste. <p>The Sustainability Working Group has reservations that this project is likely to stifle local innovation and solutions and may result in unexpected additional financial burdens incurred to the tax payer.</p>
Pub 131	PFI/ 308	01	<p>The Council's proposals at first seemed to me very sensible and plausible but, having considered the issues since then, I am now very firmly opposed to the plans. The clearest arguments I have come across are those of the Marton cum Grafton Parish Council. Their report, updated on November 16 and which I have studies is attached and I urge you to look again at their arguments. There is an excellent summary of the report which should be seen by all councillors before they cast their vote. A copy is also attached.</p>
Pub 131	PFI/ 308	02	<p>A capacity of 320,000 tonnes is clearly far too large. Recycling rates will be much higher than predicted. The proposal is too expensive, too risky and too long term</p>

Pub 131	PFI/ 308	03	I urge you to encourage Councillors to think again even after having gone so far down the road. You should be pushing for a thorough review to seek the best way forward. In particular I ask that you press for a big increase in recycling, thus removing the need for such a colossally expensive and risky venture. At a time of deep Government spending cuts, it would be irresponsible to continue the current strategy without careful review.
Pub 132	PFI/ 309	01	Before making that vote can you ensure that you address all the major elements that are involved Cost implications Alternative Systems Effect of the transportation and costs incurred Substantiate the costs fully and ensure that the need is necessary to solve NYCC problems not adjoining authorities and others waste problems.
Pub 045	PFI/ 310	01	Let me start by addressing some of the major errors or misleading statements in your letter. Option 2 My understanding is that this option will be your sole proposal to the Executive and is based on an outdated Waste Management Strategy. In recommending this massive investment, you should be studying international best practice A world expert, Dr Connett, ridicules incineration as a route for the next 25 years and no incinerator has been built in the USA for 15 years! To my knowledge, you didn't even bother to attend either one of his 2 recent presentations, held in Yorkshire.
Pub 045	PFI/ 310	02	Option 3 You state that there is a further process required and additional haulage. The inference is that there will be additional costs. This isn't the case. Any additional process, if required, is already included in the £69 per tonne and as far as haulage is concerned there will be a lower charge than for Option2 as many of the activities could be handled locally rather than hauling to a single, central point (ie Allerton Quarry) which is unnecessary and inappropriate in England's largest county.
Pub 045	PFI/ 310	03	This county should be working towards Zero Waste with increased source separation of household waste, The advantage of using existing adjacent incineration capacity eg Teeside is far more attractive and flexible than building a £100m facility in the heart of our beautiful county. You also query the fact that the costs haven't been verified and are not directly comparable to Option 2. Your office has been in possession of these comparative costs for 3 months. What have you done with them? Why have you not made a few phone calls and either dismissed them or verified them? You have had ample opportunity to investigate the information supplied to you; why the reluctance?

Pub 045	PFI/ 310	04	Let me now tackle the nub of the issue, the Procurement Process itself, No matter how diligently your officers have conducted the process, they have arrived at a 'solution' which is totally wrong in today's environment. Surely alarm bells must have started to ring when they saw the comparative costs of viable alternatives. Why do you continue to defend the indefensible instead of admitting the problem and asking for a deferment to update your thinking and your figures?
Pub 045	PFI/ 310	05	I note that you indicate that the Council must provide 'Leadership' and I would be interested in your definition of this. In my book Leaders should be aspirational and inspirational and yet you dismiss Option 4 because it is 'speculative and assumes aspirational changes'. Leadership is also dependent on superlative communication and yet both you and your Chief Executive hide behind Arney Cespa who appear to be leading you by the nose into a disaster.
Pub 045	PFI/ 310	06	The world has changed and will continue to change, I once again urge you to defer the December decision until a full and independent public re-examination/enquiry has taken place, which should include all options, fully costed and a full description of the siting and technology involved. Only then will the Councillors be able to fulfil their fiduciary duty by examining the complete and most up to date information available. Presenting one option to them is simply not good enough.
PCo 042	PFI/ 311	01	It would be appreciated if you will advise the relevant committee of NYCC of the Parish Council's support at the proposed site as indicated.
PCo 003	PFI/ 312	01	We do not agree that North Yorkshire Council should enter into a fixed 25 year contract with any company that has no flexibility at all. Improvements in design and functionality of waste disposal plants are ongoing and this does not seem to be a sensible business decision in today's world.
PCo 003	PFI/ 312	02	Disposing of waste from other authorities does not give the true figures of waste from North Yorkshire's waste disposal problem. Does NYCC intend to continue to absorb waste from other authorities? If so, the County's waste problem figures given to the public were not honest.
PCo 003	PFI/ 312	03	The consultation process carried out by NYCC has taken little account of rate payer's views. The timing has been rushed and our parish was not notified by yourselves of the proposal, in fact the only communication we have had apart from an acknowledgement to a letter we sent you, was a letter attempting to reassure us that rumours advising against this proposal were untrue. We have not had the time to contact parishioners, as being a Parish Meeting, we only have meetings twice a year, and this fell outside those times. The process you have embarked upon has been undemocratic in its procedure.

Pub 129	PFI/ 313	01	I am looking at the project as a tax payer and so any loss of income to government or any subsidies given by government are sums out of our pockets that go in this case to a private investor.
Pub 129	PFI/ 313	02	By the way an incinerator releases all the carbon in waste as oxides of carbon whereas landfill only releases carbon compounds if the waste is biodegradable or is set on fire. The project as defined on your website will therefore increase carbon emissions compared to landfill.
Pub 133	PFI/ 315	01	<p>The NY Times dropped through our letter-box recently and I eagerly turned the pages both hoping and expecting to find an article by the council or its leader concerning the proposed waste incineration plant at Allerton. Alas, nothing. Not a word. And here we are just a few days away from the Council making its decision whether to place a contract with AmeyCespa or not. The local press advises that councillors are recommended to approve this proposal, but we are not told why. There is SO much opposition to it on every count, yet the County Council chooses to remain silent. Why?</p> <p>The whole internal process by which this proposal has nearly come to fruition makes me cross. It would appear that councillors have been ordered to keep quiet pending the decision meeting due on 15th December. No wonder we feel it has been deliberately secretive, devious and underhand. Why else, given its own platform in which to make its ideas, plans and proposals known to the public, should it chose to remain silent.</p> <p>Perhaps you have also been given orders, to print nothing about this monstrous proposal!</p> <p>The Councillor's article is alarmingly disingenuous. It talks of the County Council spending a great deal of money 'to protect the vulnerable, keep the roads running smoothly, reduce waste' and then entreats us to '... help us make informed choices.'</p> <p>For the sake of North Yorkshire residents please show that you are not another mendacious politician, and defer the council's decision on acceptance of the AmeyCespa contract until after publication of DEFRA's report on Waste Management in the new year.</p>
PCo 002	PFI/ 316	01	<p>At the meeting of the Parish Council held Monday last, the 29th of November 2010, the Council agreed that we had been provided with sufficient information to come to a conclusion and resolved that, in representing the interests of our community Council Tax payers, we would strongly advise NYCC not to proceed with the proposal as presented to us by AmeyCespa.</p> <p>Our objection is principally on economic grounds although there are clearly environmental considerations. Accordingly, we have asked our elected representative on NYCC, to take our concerns into account and make representations to you on our behalf.</p>
Pub 002	PFI/ 317	01	Boiling down your response to the first issues, am I to understand that Mr Jarvis of AmeyCespa was wrong when he stated that they were only asked to tender for an incinerator?

Pub 002	PFI/ 317	02	Your response on interest rates is noted, however, it does not appear to address the issue of interest rates rising sharply, and especially after 7 years. I ask again, is there any clause that will allow ArneyCespa to call for additional price increase to cover interest rate rises?
Pub 002	PFI/ 317	03	I would venture to suggest that the inference that you have drawn regarding Lord Henley's letter may be incorrect and if so, it would be more politic to await the release of the full strategy, unless there is an extremely good reason for pressing on regardless. I note, however, that you have used the figure of savings of £320m but I have yet to see how this is made up. I assume that it represents the cost of continuing to use landfill using the figures that have been used to justify the business case for the contract, they themselves are the subject of some debate.
Pub 002	PFI/ 317	04	Your observation on the comments made by Diana Linskey are interesting but do not reflect the political reality that incineration is being rejected by the electorate where they organise themselves e.g. Chesterfield.
Pub 002	PFI/ 317	05	I note your response on the Marton-cum-Graffon ("MCG") reports and whilst I note that you have responses to their points, the real issue of this is whether or not a single set of figures can be agreed as between yourselves and MCG. I am somewhat surprised that the Executive made their decision without this issue being resolved since if NYCC's assumptions and figures are wrong and MCG's are right, the financial implications to the tax-payers are very substantial indeed, and NYCC will be locked into a 25 year contract.
Pub 002	PFI/ 317	06	You have made exactly the point I wished to get across, namely you prepared the figures a long time ago in order to proceed to the bidding process. Technology is developing very rapidly and therefore it does not make any commercial sense to enter into a contract for this length of time using technology that will be overtaken even by the time the plant becomes operational!
Pub 002	PFI/ 317	07	I assume that you are aware of the demise of the rail company GNER caused, to a significant extent by the failure of Sea Containers, its American parent company. I would therefore be extremely cautious in entering into such a contract without having first ensured that: <ul style="list-style-type: none"> a. The entity taking to contract was a separate legal entity, rather than a joint-venture; b. There are independent directors on the Board c. Its share capital (permanent capital) was fully paid up; d. There was a prohibition on inter-company/group debt; e. There was a prohibition on any form of management charges except at arm's length pricing overseen by the independent directors.

Pub 129	PFI/ 318	01	<p>I thank you for the clear explanation of the EfW subsidies. I was surprised that the plant owner receives the market price for the electricity in addition to the very generous Government subsidies (I had wrongly assumed more modest support). If the Government are not going to increase electricity prices to recover this and other similar subsidies how are they going to be funded?</p>
Pub 109	PFI/ 319	01	<p>Thanks for your response. I'll ask NYWAG to check the rural aspect of incinerators but you have totally failed to understand the point re: York. They have unilaterally banned incineration within city limits - whether as a stand alone operation or in conjunction with NYCC and that pre-dates the selection of Allerton Park. In other words they just don't want it on their doorstep but are happy to dump it on ours.</p>
Pub 109	PFI/ 319	02	<p>In addition the fact remains that PFIs have a very poor value for money reputation and there is no reason to believe that this one will be any different. The likelihood of NYCC having to import waste for this oversized project just reinforces the failure of due diligence on the part of the County Council.</p>
Pub 131	PFI/ 320	01	<p>Please see the attached file and be aware of the massive feeling there is in the community against this foolhardy plan to build the waste incineration site at Allerton Park. The costs involved alone should be enough to send serious alarm bells ringing throughout the two authorities. The fact that the figures being used do not stack up and the technology and processes being proposed are outdated as is the idea of incineration to deal with waste. Please take the correct and only decisions when this matter comes before you and agree to at least delay the decision pending a full review of alternative processes. Any other decision will be gross incompetence that will leave a massive financial legacy for many years to come.</p>
Pub 093	PFI/ 321	01	<p>Following your letter in September, can you clarify whether any energy from waste facility will be included in the Allerton proposal, and whether this will include a connection to the National Grid?</p>
Pub 093	PFI/ 321	02	<p>Also, on health, has the Health Protection Agency conducted any studies of the effects of incineration on adjoining populations anywhere in the UK?</p>
PCo 043	PFI/ 322	01	<p>We write to inform you that, after due consideration over the last three months, during which time councillors have considered arguments from all sides, overall this parish council does not support the County Council's proposal for waste management concerning the Allerton Quarry site.</p>
PCo 043	PFI/ 322	01	<p>The 25 year plan is too long a commitment to a technology already been shown to be in the process of being overtaken by more modern technologies.</p>
PCo 043	PFI/ 322	02	<p>There is concern about the length of commitment to what is ultimately an overseas company.</p>

PCo 043	PFI/ 322	03	Incineration is pollution in itself; the transportation of waste to the site will be more polluting than dealing with waste on a more local basis.
PCo 043	PFI/ 322	04	Dealing with waste on a smaller scale, locally, provides a flexibility to adopt more modern technologies as they arise.
PCo 043	PFI/ 322	05	Money should be spent on reducing/eliminating waste products consumption, which in turn would reduce the need for such a grandiose scheme.