



Kirklees Local Plan

Technical Paper: Waste

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Introduction

- 1.1 Kirklees Council is a Unitary Authority and therefore acts as the Waste Planning Authority (WPA) with regard to waste planning matters associated with the Kirklees District. As the WPA, Kirklees council is required to plan for the efficient management of waste which is either generated within the boundaries of the district or imported to the district for processing or final disposal.
- 1.2 Significant elements contributing towards achieving this ongoing requirement are the development of the waste chapter of the districts Local Plan and planning decisions which would subsequently stem from this.
- 1.3 Paragraph 011 of National Planning Practice guidance (NPPG) on waste indicates that when preparing a local plan relating to waste, WPAs should

“.....identify sufficient opportunities to meet the identified needs of an area for the management of waste, aiming to drive waste management up the Waste Hierarchy. It should ensure that suitable sites and areas for the provision of waste management facilities are identified in appropriate locations.”

- 1.4 Current waste management policy contained in European and national guidance/regulations seeks to move away from the landfilling of waste to a more sustainable approach involving strategies to prevent the generation of waste, increasing the levels of recycling and re-use of waste materials and seeking opportunities to generate energy from waste.
- 1.5 The waste element of the local plan has therefore been designed to ensure that the council has adequate and appropriate provision within the district to continue to move towards this approach over the plan period until 2031.
- 1.6 In preparation for the local plan the council commissioned consultants Urban Vision to undertake a ‘Forecasting and Capacity Gap Analysis Study’ in 2015 with a further update in 2016. The main objectives of the study were to:
 - Establish waste arisings forecasts for the waste streams of Commercial and Industrial (C&I), Local Authority Collected Waste (LACW), Construction, Demolition and Excavation (CD&E), Agricultural and Hazardous within the Kirklees District; to cover the local plan period (2013 - 2031);
 - Establish the existing operational capacity of waste management facilities treating the above waste streams;
 - Establish the capacity gap for each waste stream by management type; and
 - Identify the need for additional waste management capacity required to address the capacity gap for each waste stream

1.7 Full details of these reports can be found in the supporting documents section of the local plan, which are listed as:

- Waste Needs Assessment – Waste Arisings and Review of Cross-Boundary Movements
- Waste Needs Assessment – Growth Forecasts and Assessment of Future Capacity Requirements

1.8 This paper provides a summary of the key findings identified in the Waste Needs Assessment (WNA), the measures the council has included in the local plan to address the issues highlighted by these findings and a justification of the approach the council has taken in positively planning for the forecasted waste management needs of Kirklees for the duration of the plan period.

2 Legislative framework

2.1 The EU Waste Framework Directive (2008/98/EEC) sets basic concepts and definitions for waste and puts in place the legislative framework for its collection, transport, recovery and disposal. It also states that waste policy should aim at reducing the use of resources, and favour the practical application of the waste hierarchy which is illustrated in figure 1.



Figure 1 The Waste Hierarchy (Source: Waste Management Plan for England, 2013)

2.2 The directive lays down some basic waste management principles and requires all member states to ensure waste is managed in such a way that does not endanger human health or harm the environment.

3 National Waste Planning Objectives

- 3.1 WPAs play an important role in implementing the directive in England. The obligations and aspirations for waste management nationally are set out both in legislation, through the Waste (England and Wales) Regulations 2011 (as amended), and in Government's policy for waste management in the "Waste strategy for England 2007" national planning policy currently set out in "National Planning Policy for Waste, 2014", "The Waste Management Plan for England, 2013" and the waste chapter of National Planning Practice Guidance (NPPG).
- 3.2 The waste strategy for England 2007 set a number of key objectives and targets in order to secure a more sustainable approach to waste management. These are listed as follows:
- decouple waste growth (in all sectors) from economic growth and put more emphasis on waste prevention and re-use;
 - meet and exceed the Landfill Directive diversion targets for biodegradable municipal waste in 2010, 2013 and 2020;
 - increase diversion from landfill of non-municipal waste and secure better integration of treatment for municipal and non-municipal waste;
 - secure the investment in infrastructure needed to divert waste from landfill and for the management of hazardous waste; and
 - get the most environmental benefit from that investment, through increased recycling of resources and recovery of energy from residual waste using a mix of technologies.
- 3.3 The Waste management Plan for England sets out the government's ambition to work towards a more sustainable approach to waste management and the National Planning Policy for Waste indicates that positive planning provides a key role in delivering these ambitions through:
- delivery of sustainable development and resource efficiency, including provision of modern infrastructure, local employment opportunities and wider climate change benefits, by driving waste management up the waste hierarchy
 - ensuring that waste management is considered alongside other spatial planning concerns, such as housing and transport, recognising the positive contribution that waste management can make to the development of sustainable communities;
 - providing a framework in which communities and businesses are engaged with and take more responsibility for their own waste, including by enabling waste to be disposed of or, in the case of mixed municipal waste from households, recovered, in line with the proximity principle ;

- helping to secure the re-use, recovery or disposal of waste without endangering human health and without harming the environment; and
- ensuring the design and layout of new residential and commercial development and other infrastructure (such as safe and reliable transport links) complements sustainable waste management, including the provision of appropriate storage and segregation facilities to facilitate high quality collections of waste.

4 Kirklees waste management objectives

4.1 In order to address the obligations for dealing with waste set out in the Waste Framework Directive and the national objectives which have developed from this, Kirklees seeks to manage waste in a more sustainable way by developing opportunities within the district to:

- move the management of waste up the waste hierarchy
- become self-sufficient in managing waste generated within the district
- provide adequate and appropriate waste management facilities within the district which are as close as possible to the generation source of the waste.

4.2 With regard to municipal waste now referred as local authority collected waste (LACW), the Council currently facilitates the management of such waste in partnership with a private company (SUEZ) via a Private Finance Initiative (PFI). Primarily this involves the Council collecting the majority of municipal waste across the district or by providing recycling facilities for the public to deliver such waste. The Council's partner operates the waste management facilities and processes the waste. This involves recycling the waste and arranging for the transport on of the recycled material for future use, the incineration of non-recyclable waste to generate energy at the districts energy from waste facility and by securing the final disposal of any residual waste. The current PFI will run until 2023 but negotiations are currently taking place to secure the extension of the contract until 2028

5 Duty to cooperate

5.1 As part of waste plan preparation NPPG (paragraph 15) emphasises the importance of WPAs cooperating with one another on strategic issues in relation to waste. Such cooperation between WPAs and waste bodies will help to ensure a suitable and sustainable network of waste management facilities is in place.

5.2 Prior to forecasting the projected waste arising's and identifying potential waste facility capacity gaps for Kirklees over the plan period (2013 – 2031) the council used the Environment Agency's Waste Data and Hazardous Waste Data Interrogators to identify current waste movements between the district and other WPAs.

- 5.3 As a result of this exercise, letters were sent to each of the affected WPAs regarding the quantity of waste being sent, the type of waste, which facility it was being sent to, and sought confirmation from the relevant WPA of whether the waste movement could continue for the duration of the Kirklees Local Plan period (2013-2031). Details of this exercise can be found in the 'Duty to Cooperate Statement' page 22 paragraph 5.35. Also, see Appendix 1 for a list of all the WPAs consulted.
- 5.4 In analysing the responses the council was mindful of those waste movements that were of a more strategic nature i.e. 1,000 tonnes of non-hazardous waste exported in a year and 100 tonnes of hazardous waste exported in a year. The details of how the value of strategic waste quantities was derived can be found in 'Duty to Cooperate Statement' page 22 paragraphs 5.35-5.36.
- 5.5 Analysis of the responses indicated that the data concerning waste movements was accurate. Taking account of the evidence obtained, the council has been able to plan for waste with the view that this external capacity will continue to be available for the duration of the Kirklees Local Plan. The evidence derived from the DtC letters has been used to inform the decisions taken based on the conclusions from the WNA commissioned by the council.
- 5.6 For further information in relation DtC and waste please refer to the Submission Document SD14 'Duty to Co-operate Statement' pages 22-24.

6 Spatial Strategy for waste

- 6.1 In order to move towards higher levels of re-use rather than landfilling, the Plan places emphasis upon enabling the development of additional capacity in the form of recovery operations. To that end, the Plan identifies one strategic large-scale non-landfill waste management operation and sets out a policy framework concerning the locations for non-strategic waste uses. This site is important to enable the Plan to achieve the National Waste Planning Objectives and the Waste Management Plan for England.
- 6.2 The strategic site is:
- W1 Emerald Street, Huddersfield (See Allocations and Designations Document)
- 6.3 This site has been identified to accommodate the significant capacity gap for the recycling of LACW waste (see Table 2). The allocation allows the council to safeguard significant existing operational facilities for the management of LACW and to accommodate the future needs for the management of LACW with a particular focus on bringing the treatment of LACW waste up the waste hierarchy and delivering more efficient processes to the current methods being applied to the management of LACW waste. The site will treat the whole of the district in conjunction waste transfer stations which are located across the district.

- 6.4 The shift away from a reliance on landfilling has already begun, with local performance currently exceeding the EU target (35% to landfill based on 1995 levels by 2020) with only 7% being sent to landfill. The council will seek to maintain its position as both the council and business waste managers continue to change their behaviour away from using landfill to using any or all of the range of recovery processes available (which include waste handling, separation of re-use and intensive residual treatment processes).
- 6.5 The Plan also seeks to promote sustainable development through its policy framework. Policy PLP45 safeguards existing waste management facilities and surrounding land, unless there is a justified reason for not doing so. The policy seeks to ensure that existing waste management capacity is retained and properly monitored for the duration of the Local Plan period. Such an approach will assist the council in working towards net self-sufficiency, continuing to meet the long-term waste management needs of the district and prevent the emergence of conflicting neighbouring uses that may hinder the continuation of established waste operations.
- 6.6 The council has given consideration to the recommendations made by the Waste Needs Assessment (WNA), based on the identified capacity gaps for each of the waste streams and methods of waste management. Table 3 summarises the council's responses to each of the identified capacity gaps. This information, along with national planning guidance, has been used to inform the Kirklees Local Plan's approach to policies and site allocations in relation to waste. These policies include:
- **Policy PLP43 – Waste management hierarchy** - commits the council to the guiding principles of the 2008/98/EC directive on waste. In particular, Policy PLP43 aims to encourage the management of waste up the waste management hierarchy. The policy recognises that the continuing disposal of large amounts of waste in landfill is unsustainable and, instead, promotes the consideration and treatment of waste as a valuable and usable resource. The policy contains specific principles upon which decisions relating to waste management will be based.
 - **Policy PLP44 – New waste management facilities** - recognises the potential need to accommodate some new waste management facilities, as identified through the capacity gap analysis in the WNA. Policy PLP44 requires that waste management facilities must be sustainably located and puts in place sequential priorities, drawing upon guidance for waste set out in National Planning Practice Guidance (NPPG), paragraph 018. NPPG paragraph 018 emphasises the preference for the use of previously developed industrial land and to account for the need for waste management facilities when reviews of employment land are undertaken. The sequential approach therefore reflects this.
 - **Policy PLP46 – Waste disposal** - gives recognition to the fact that, despite efforts to reduce the amount of waste produced in the district, there may still be some need for landfill. The policy states that sites for the disposal of waste will only be

permitted where they meet a need which cannot be met by treatment higher in the waste hierarchy.

6.7 The Plan’s delivery of a sustainable waste strategy is integral to the plan and is supported by a range of other plan policies:

- Climate change (PLP26)
- Design (PLP24)
- Sustainable transport (PLP 19 - PLP21)

7 Current waste management arrangements in Kirklees

7.1 Waste in Kirklees is generated by a wide range of sources and processes. The most familiar is waste collected from households, such as packaging and food. However this material only accounts for part of the overall waste arisings and much larger quantities are generated by the construction industry (Construction, Demolition and Excavation waste – CD&E), such as broken bricks and cables; and from business activities (Commercial and Industrial waste – C&I), such as food from restaurants and paper from offices. These three streams make up the majority of waste produced within Kirklees. Table 1 below shows the estimated waste arisings (and the relative proportions of each stream) in Kirklees in 2014/15.

Table 1: Arisings of Controlled Wastes in Kirklees

Waste Type	Tonnage (2014/15)	Percentage
Local Authority Collected Waste (H) (all household waste but excluding trade waste) ¹	160,974	23%
Local Authority Collected Waste (Other) (all other waste from non-household sources but excluding trade waste)	17,400	
LACW (Secondary) secondary waste from energy recovery includes – this includes some LACW that is classed as hazardous	27,734	
Commercial Waste (CI) (including the trade waste element of LACW)	180,820	20%
Industrial Waste (I)	181,843	20%
Construction Demolition Waste (C&D)	77,000	9%
Excavation(E) ²	216,000	24%

¹ Trade waste is material collected under contract by the local authority from business premises. It is also contained in the estimates of C&I waste generated by businesses. It is excluded from the LACW stream in this study to prevent double-counting.

Waste Type	Tonnage (2014/15)	Percentage
Hazardous waste (is a sub set of other waste categories and can originate from CD&E, C&I & LACW sources)	32,516	4%
Agricultural Waste (leaving farm holdings)	4,012	<1%
Total	872,300	100%

(Source: Kirklees Waste Needs Assessment, 2016)

7.2 A review of existing licensed waste management facilities operating within Kirklees has been undertaken, and this identifies a total of 64 sites. Most of the facilities are household waste recycling centres and transfer stations where LACW, C&I and CD&E wastes can be sorted, bulked and separated before onward transport for further management. There is a substantial amount of metal recycling capacity also, but a limited amount of treatment capacity, the most important of which is the Huddersfield Energy from Waste Plant. There are also a number of landfill sites and other sites where inert wastes are imported for landscaping and restoration purposes. See Appendix 1 of the WNA: Growth Forecasts and Assessment of Capacity Requirements for details of these sites.

8 Identified waste management needs in Kirklees

8.1 The Waste Needs Assessment modelled 12 different waste scenarios which were generated by a combination of growth and behaviour assumptions applied in the modelling. See 'Waste Needs Assessment Part: 2 Growth Forecasts and Assessment of Future Capacity Requirements' (Table's 2 and 3, pages 25 – 29) for a full breakdown of these various scenarios.

8.2 The purpose of forecasting waste arising's based on various scenarios provided the council with a range of potential capacity gaps, by waste stream and management type, thus allowing the council to understand the implications of a chosen strategy. In doing so recognition has had to be given to the fact the council does not currently have an adopted waste strategy in place. Therefore careful consideration has had to be given to the council's current waste management performance and emerging strategy objectives.

8.3 Ongoing reductions in the council's budget present the authority with a major challenge in relation to waste management. One of the council's most significant challenges is tackling the predicted future increases in household waste, which, if not addressed effectively, will lead to major increases in cost. Whilst the level of waste

² C&D and E wastes are assessed separately as there is more scope to recycle the former which has implications for estimating how much waste will need to be disposed to landfill.

diversion from landfill places Kirklees amongst the very top performing authorities in England, increasing the council’s recycling performance in the current financial climate will also present a significant challenge. The council is however, committed to working towards the EU Waste Framework Directive and the National Planning Policy for Waste and will therefore manage waste at the highest technically and economically feasible level in the Waste Hierarchy, while recognising that landfill will remain the only realistic option for disposing of certain wastes.

8.4 Based on the results of the 12 scenario options (see Appendix 3 of the ‘Waste Needs Assessment Part: 2 Growth Forecasts and Assessment of Future Capacity Requirements’) the council has determined that the ‘Growth 3/Median Recycling’ option best reflects the council’s likely objectives for the duration of the Local Plan period. The ‘Growth 3/Median Recycling’ scenario applies assumptions which include a higher growth (Growth 3) of waste for various sectors. This has been based on external influences on waste arising’s and the councils own expectations, reflecting the council’s projections for LACW waste as a result of waste reduction and recycling initiatives, and includes the impact of future population growth in the district in line with the council’s objectively assessed needs for jobs and homes.

8.5 Table 2 below presents the three scenarios which represent the least and most extensive changes from the current position and the impact of the council’s selection of the ‘Growth 3/Median Recycling’ option. The negative values in the table imply a capacity surplus.

Table 2: Capacity Gap Comparison for the Scenarios Modelling the Least and Most Extensive Changes in Requirements by 2031

Waste Management Route & Wastes	Baseline / No Growth 2031	Growth 4 Maximised Recycling 2031	Growth 3 Median Recycling 2031
Landfill (C+I)	101,515	44,301	48,957
Landfill (LACW)	16,140	12,701	21,394
Landfill (Hazardous)	6,386	7,103	7,289
Landfill (C+D&E)	-19,600	-60,189	-66,636
Thermal treatment with energy recovery ('Energy from waste') + Thermal Treatment (without energy recovery)	-19,600	-3,009	37,187
Recycling (C+I, & Agricultural)	88,678	172,653	156,835

Recycling (LACW only)	37,936	126,154	98,551
Recycling (C+D)	71,531	137,283	113,639
Recycling (metals only)	- 38,227	- 32,950	- 31,115
Recycling (Hazardous)	17,706	19,049	19,670
Composting	15,406	19,487	19,670
Treatment plant	-84,612	-81,293	-81,034
Other treatment plant / transfer (Hazardous / C&I)	27,438	22,144	61,308
Land recovery	- 58,321	-55,286	- 55,902

(Source: Kirklees Waste Needs Assessment model August 2016. All figures in tonnes)

8.6 Based on Table X above scenario 'Growth 3 / Median Recycling' indicates that the following waste management route and waste would result in a capacity gap:

- Landfill (C+I)
- Landfill (LACW)
- Landfill (Hazardous)
- Thermal treatment with energy recovery ('Energy from waste') + Thermal Treatment (without energy recovery)
- Recycling (C+I, & Agricultural)
- Recycling (LACW only)
- Recycling (C+D)
- Recycling (Hazardous)
- Composting
- Other treatment plant / transfer (Hazardous / C&I)

8.7 Consideration has been given to the extent of the identified gap and the viability of making provision to address the deficiency in capacity. Taking account of the recommendations made in the WNA the council's response to this is as follows:

Table 3: Summary of preferred scenario capacity gaps, WNA conclusion and council response

Waste Management Route & Wastes	Identified capacity gap based on Growth 3/Median Recycling (tonnes per annum)	Waste Needs Assessment Conclusion	Council's Response
Landfill (C+I)	48,957	The council will need to assume that disposal of	This capacity gap would be subject to the current non-

		residual C&I waste will continue to depend on external capacity.	hazardous waste site in Kirklees closing in 2016. A resolution to grant planning permission to extend the life of the site by 10 years has been secured and will help to address this capacity gap for the majority of the plan period. However, based on DtC discussion external capacity is something that can be relied upon.
Landfill (LACW)	12,394	Shortfall has been forecast throughout the plan period. Reliance on external capacity likely.	The shortfall predicted in capacity is relatively low and it is considered that this can be accommodated via the restoration of mineral workings as supported by policy PLP46
Landfill (Hazardous)	7,289	Kirklees is a net importer of hazardous waste. There is potential for a limited shortfall in capacity if both facilities did not extend their operational life beyond the plan period. If this was to happen then external capacity will need to be relied upon if additional local sites cannot be found.	A relatively small capacity gap is predicted should the current hazardous waste landfill sites in Kirklees close before the end of the plan period. However, bearing in mind the quantities of hazardous waste currently exported from the district, and based on DtC discussions, it is likely this shortfall could be adequately addressed by external capacity.
Thermal treatment with energy recovery ('Energy from waste') + Thermal Treatment (without energy recovery)	37,187	If the EfW plant closes in 2028, a capacity gap in the region of 100,000 tonnes would need to be planned for. However, if facility was to operate up to the end of the plan period then the capacity gap would be relatively small (approx. 37,000 tonnes per annum)	Marginal capacity gap subject to the existing waste to energy plant operating until 2031. Should plant cease to operate before then, local plan allocation W1 would provide opportunities for the provision of alternative facilities.
Recycling (C+I, & Agricultural)	156,835	Increased recycling rates of C&I waste would lead to a capacity gap of up to 157,000 tonnes per annum based on the Growth 3/Median Recycling level. Additional sites may therefore be required. However existing waste transfer stations may provide	Policy PLP44 would provide opportunities, dependant on market need, to develop new sites where required across the district. Policy PLP 45 safeguards existing waste management facilities and therefore seeks to maintain any additional

		additional capacity.	recycling capacity.
Recycling (LACW only)	98,551	A significant amount of additional capacity is needed for managing recycle LACW if the council is to achieve self-sufficiency. The gap represents the requirements for the initial stage of separating materials, whether this occurs at MRFs or HWRCs. The separated material requires further downstream capacity to reprocess it into secondary products and at present this mainly occurs outside Kirklees. Because this is sourced from LACW and C&I and from a wide geographic range the delivery of new capacity will depend on whether it is commercially attractive to private waste contractors. Continued reliance on external capacity will depend on DtC discussions.	Policy PLP44 would provide opportunities, dependant on market need, to develop new sites where required across the district. Local plan allocation W1 would provide opportunities for the provision of additional LACW processing facilities. Based on DtC discussions, the external capacity is expected to remain for the duration of the plan period.
Recycling (C+D)	113,639	The capacity shortfall for C & D wastes is predicted to be 113,639 tonnes per annum by 2031 at the Growth 3/Median Recycling level. However existing waste transfer stations may provide additional capacity.	Policy PLP44 would provide opportunities, dependant on market need, to develop new sites where required across the district. Policy PLP 45 safeguards existing waste management facilities and therefore seeks to maintain any additional recycling capacity.
Recycling (Hazardous)	19,670	Three quarters of locally-produced hazardous wastes are exported to management facilities in other authorities due to a lack of local capacity. The Plan can continue to rely on this approach provided the	The majority of hazardous waste is dealt with at sites outside the district. Based upon consultation with relevant WPAs capacity will be sufficient to allow this to continue during the plan period.

		Council continues to check the availability of this external capacity with the authorities where the facilities are located.	
Composting	19,017	There is no operational green waste composting capacity at present and components of the LACW and C&I streams. Consequently it would be prudent for the Kirklees Local Plan to provide for a small merchant facility to address the capacity gap and reduce reliance on external capacity.	The WNA suggests that a single site should be brought forward during the plan period to reduce reliance on external capacity. Policy PLP44 would provide sufficient opportunities to deliver this if required.
Other treatment plant / transfer (Hazardous / C&I)	61,308	<p>The Local Plan needs to be flexible to a point, to cater for the districts waste transfer needs if it can be demonstrated that there are local shortages of waste capacity close to where waste arises.</p> <p>A small proportion of C&I waste is going to thermal treatment and under the maximum growth assumptions the requirement would be 31,000 tonnes per annum. The quantity is too small to make a local facility viable unless it served a wider market. The UK has surplus operational or planned EfW capacity and therefore there would be limited incentive to bring forward additional capacity locally. External capacity should therefore continue to be relied upon.</p> <p>With regards to hazardous waste, the level of reliance on external capacity is unlikely to change due to the small quantities of waste which</p>	<p>Policy PLP44 would provide opportunities, dependant on market need, to develop new sites where required across the district.</p> <p>Based on DtC discussions, current external capacity can continue to be relied upon for the duration of the plan period.</p>

		would make new local facilities economically unviable.	
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8.8 Aside from the capacity gaps identified in Table 3 above, it can be concluded that the plan area is well served by transfer station capacity, specialised recycling facilities (eg. those handling metal wastes), and voidspace at inert and hazardous landfills. Existing disposal and recycling arrangements for agricultural and low-level radioactive wastes are not expected to require additional capacity during the Plan period.

Appendix

Appendix 1: List of waste planning authorities consulted

No.	Waste Planning Authority	No.	Waste Planning Authority
1	Barnsley Metropolitan Borough Council	46	Medway Council
2	Bedford Borough Council	47	Middlesbrough Council
3	Birmingham City Council	48	Milton Keynes Council
4	Blaenau Gwent County Borough Council	49	Newcastle City Council
5	Bolton Council	50	Newport City Council
6	Bristol City Council	51	Norfolk County Council
7	Bury Council	52	North East Lincolnshire Council
8	Caerphilly County Borough Council	53	North Lincolnshire Council
9	Calderdale Council	54	North Tyneside Council
10	Cambridgeshire County Council	55	North Yorkshire County Council
11	Cardiff Council	56	Northamptonshire County Council
12	Carmarthenshire County Council	57	Northumberland County Council
13	Cheshire East Council	58	Nottingham City Council
14	Cheshire West & Chester Council	59	Nottinghamshire County Council
15	City & County of Swansea Council	60	Oldham Council
16	City of Bradford Metropolitan District Council	61	Oxfordshire County Council
17	City of Stoke on Trent Council	62	Redcar & Cleveland Borough Council
18	City of York Council	63	Rochdale Metropolitan Borough Council
19	Coventry City Council	64	Rotherham Metropolitan Borough Council
20	Croydon Council	65	Salford City Council
21	Defra	66	Sandwell Metropolitan Borough Council
22	Derby City Council	67	Scottish Borders Council
23	Derbyshire Council	68	Sefton Council
24	Doncaster Council	69	Sheffield City Council
25	Dudley Metropolitan Borough Council	70	Shropshire Council
26	Durham County Council	71	Slough Borough Council
27	East Riding of Yorkshire Council	72	Somerset County Council
28	East Sussex County Council	73	South Gloucestershire Council
29	Environment Agency	74	St Helens Council
30	Essex County Council	75	Staffordshire County Council
31	Gateshead Council	76	Stockport Metropolitan Borough Council
32	Gloucestershire County Council	77	Stockton-on-Tees Borough Council
33	Halton Borough Council	78	Suffolk County Council
34	Hampshire County Council	79	Sunderland City Council
35	Hartlepool Borough Council	80	Surrey Council
36	Hertfordshire County Council	81	Tameside Metropolitan Borough Council
37	Kent County Council	82	Trafford Council
38	Kingston Upon Hull City Council	83	Wakefield Council
39	Knowsley Council	84	Walsall Council
40	Lancashire County Council	85	Warrington Borough Council

41	Leeds City Council	86	Warwickshire County Council
42	Leicestershire County Council	87	West Berkshire Council
43	Lincolnshire County Council	88	Wigan Council
44	Liverpool City Council	89	Wiltshire Council
45	Manchester City Council	90	Wolverhampton City Council