# Energy Alton response to the Veolia consultation on the Advanced Energy Recovery Facility near Alton

## Energy Alton

Energy Alton is a volunteer run community interest company dedicated to giving impartial and practical advice to homeowners about saving energy in Alton and the surrounding villages. Established in 2011 Energy Alton holds regular evening open films and talks, offers free home energy surveys and thermal images, holds home energy events and workshops and provides information and advice via our website and mobile. We comment on national and local policy and programmes relating energy and the environment and collaborate closely with Alton Town Council, East Hampshire District Council and other community groups. Energy Alton is now affiliated to the Alton Climate Action and Network. We communicate locally via the local press, radio and our newsletter is received by 800 individuals and groups. We are in a uniquely strong position to respond to this consultation.

## Overview

The reason that we promote energy efficiency and the advance of renewable energy production is to make our community less reliant on fossil fuels as the primary energy source. Therefore, in principle and usually in practice we support wind power, solar energy, hydro and biomass schemes and the use of combined heat and power sources of energy such as the incineration of waste that produces electricity as a by- product. However, our support has to be conditional on a detailed assessment of the economic and environmental pros and cons especially in the case of a very large infrastructure costing a great deal of money. Even at the outline plan stage the community must be able to come to an informed view and based on the public exhibition and information on the website there are many questions to be answered before we can declare our support either way.

## Why do we need it?

This proposed incinerator is for commercial and industrial waste after material for recycling is removed. Currently this waste is not processed in Hampshire, it is exported to landfill and incineration in other counties and we understand exported to other countries. Landfill is not a good place for our waste leading to CO2 and methane emissions and as a country we are running out of space. We can argue about where a plant should be located but should not be asking other parts of the country or other countries to take our waste into the future.

## Justification for the new incinerator

Veolia states that the Government plans to get the UK recycling more and to stop waste going to landfill. This is true but not the whole story. We can expect that following consultation on the UK Government Resources and Waste Strategy for England 20181 government plans may well include:

* A deposit return scheme
* Higher mandatory recycling rates
* Kerbside food collections
* Producer responsibility scheme where producers pay local authorities for the full net cost of packaging waste.

These imminent proposals should have a dramatic effect on domestic waste volumes. In addition, public opinion is moving against excessive packaging and promoting other improvements potentially leading to reduced waste volumes. Similarly, kerbside food waste collections should open up the possibility of converting this to energy by anaerobic digestion – reducing further the future demand for incineration and its associated emissions including CO2.

In contract to this trend in waste production the economic argument for a local incinerator assumes that there will be 330,000 tonnes of commercial and industrial waste to feed the plant each year for its lifetime. To some extent investment in a large incinerator could be a disincentive to reduce reuse and recycle. And once built with a 25 year plus lifespan falling levels of waste will be hard to accommodate. It maybe that this can been justified by taking a national view that anticipates expected Government plans. We would expect to see the demand side calculations that Veolia has used to size the plant take these factors into account.

## Side benefits of incineration

Veolia makes the claim that the incineration process coupled to a steam turbine will produce electricity to power 75,000 homes. No information is currently available on the total energy to be produced nor the amount that will be needed to operate the plant. We do need to be given the detail at the next stage of consultation.

This is a potential benefit – energy without using coal, oil or gas. However as with ordinary gas fired power stations up to 70% of the raw energy is used up before electricity gets to the end user. Much better to use the heat as power ideally via a district heating network as has been the case for decades in some far-sighted development, especially in Europe. Typically, between 70 and 80% of the heat can reach homes within a 5km distance of the plant and be a much better investment long term. Of course, this requires detailed planning with local authorities, commercial property and house builders and there are many challenges, however if we are serious about tackling our climate emergency, district heating must be considered whenever possible.

## Impact on the environment

In dealing with household and commercial waste every method of treatment is likely to impact on our environment in some way. Is the proposed method of incineration acceptable given the alternatives? Members from Energy Alton visited the Veolia plant in Chineham Basingstoke in 2019 to understand how it works and learned about the environmental impact. This plant takes domestic waste from the north of Hampshire and is very similar in design to that proposed for Alton except that it is smaller: processing 102,000 as opposed to the expected 330,000 tonnes. The fact is that incinerators of this scale are highly regulated by the Environment Agency, daily emissions data is recorded and there are stringent requirements about notification of performance. This data is available for public scrutiny for all their sites including Chineham3 Our overall view of this existing facility was that emissions were controlled, monitored and within the limits set by the Environment Agency.

Though this is encouraging, evidence from one working example cannot be used as justification for a new plant other than to say the technology is tried and tested and that Veolia has a track record in this specialised field. We need to understand the extent to which technologies have advanced and will be applied in this plant. We understand that improved treatment will reduce the levels of Nitrous Oxide compared to the plant at Chineham, but there are several other emission types to be considered too.

An appropriate way to allay fears and consider the features of the proposed plant in the particular landscape is to conduct an Environmental Impact Assessment by a qualified organisation and for the results to be made public. We understand that this will be part of the full planning application

## Waste recycling in Hampshire

The latest figures show that the recycling rate in Hampshire is 41.3% for domestic waste placing the county 197th and EHDC 272nd out of 345 authorities (Defra 2019 data).4 Top authorities achieve more than 60%. Any proposal to increase recycling rates by building new facilities for reusing or recycling domestic or commercial waste in Hampshire is strongly supported by Energy Alton.

This proposal for an Advance Energy Recovery facility is only possible because the current recycling facility is to be moved elsewhere and yet there is no information on what is proposed or the timescale. How will it be part of the strategic approach to waste management in Hampshire (Project Integra)?

This first consultation presents the AERF largely as an isolated facility. Until we have the bigger picture it is impossible to judge its worth to the local community and to Hampshire as a whole. We look forward to receiving and evaluating a much more detailed case for this development.

Energy Alton

March 2020

## **References**

UK Govt Resources and waste strategy for England 20181

<https://www.gov.uk/government/publications/resources-and-waste-strategy-for-england>

Digest of Waste and Resource statistics 2018

<https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/784263/UK_Statistics_on_Waste_statistical_notice_March_2019_rev_FINAL.pdf>

Statistics on waste managed by local authorities in England in 2018/19

<https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/849167/201819_LA_collected_waste_mgt_annual_Stats_Notice_FINAL_Accessible_v4.pdf>

Recycling rates in Hampshire and EHDC

<https://www.letsrecycle.com/councils/league-tables/2018-19-overall-performance/4>

Emission rates at the Veolia Incinerator at Chineham

<https://www.veolia.co.uk/hampshire/energy-recovery/energy-recovery/chineham/emissions>3,