



Joint response to the 2nd public consultation for an Energy Recovery Facility (ERF) for Commercial and Industrial Waste

Energy Alton and Alton Climate Action and Network

Introduction

Energy Alton is affiliated to Alton Climate Action & Network, which brings together people from Alton and the surrounding villages to tackle the climate crisis, by reducing CO2 from energy, waste, transport and food, and campaigning and lobbying for change in local and national policies.

Energy Alton and ACAN did not support the ERF proposal in the first consultation. In response to this second consultation, we focus on the further submissions from Veolia on the context of:

- The rationale and justification for this investment in this location in light of the national waste strategy and key developments during the life of the facility.
- The claims regarding energy production in particular renewable energy in the context of the drive to reduce carbon emissions.
- The impact on transport infrastructure and emissions
- Overall carbon emissions
- Socio-economic benefits

Executive Summary

E1 Energy Alton continues to support the incineration of waste in principle as a means of generating renewable energy from waste which cannot be recycled and should no longer be landfilled. From a climate perspective Energy Alton and ACAN are passionate about the global need to reduce waste, to recycle and reuse more and develop an integrated circular economy that is sustainable.

E2 Energy Alton **objects** to the application because the need for additional incinerator capacity is not proven.

- There is potentially sufficient capacity from existing and future ERFs across the UK if the UK reaches its 2030 recycling targets
- Since the Hampshire Minerals and Waste Strategy is currently under review and there can be no guarantees as to when the Alton site becomes available, the key estimates or assumptions about level of demand simply do not exist.
- Surrounding counties should not rely on Hampshire to build capacity to take their own residual waste.

E3 Energy Alton **objects** to this particular planning application for an ERF because it is not appropriately located.

- It will not be near the main sources of commercial and industrial waste in the county so transport links have to be much longer and emissions higher than if situated adjacent to the main populations and commercial activity in the county.
- The site is chosen, not because it is the most appropriate but because it could become free in the future. It is not known when this will happen and so the arguments in its favour depend on too many assumptions that are likely to change in the intervening years.
- Contrary to Government policy the incinerator will not use the heat generated to produce district heating for the benefit of the community.
- The benefit of electricity generated is overstated because grid losses will reduce the useable energy when transmitted away from the Alton area.

E4 Should the fundamental objections based on need and location nevertheless be ignored and an incinerator is approved at this location:

- It should be smaller and made flexible to be viable as future demand falls.
- Reuse of the heat energy for the benefit of the local community must be a planning condition
- Waste transported must be by rail and clean energy vehicles only
- Other renewable energy generation methods should be designed into the site including solar PV, ground and air source heat pumps.
- There should be a tangible and valued benefit for the community in addition to limited additional employment.

1. THE CASE FOR A NEW ERF IS NOT PROVEN

1.1 The National Context

In our first response we highlighted the national planning policy relating to waste recycling, stopping landfill and reducing carbon emissions. We argue strongly that the country and Hampshire should be aiming for ambitious levels of recycling. Incineration should be a last resort be it for domestic or commercial and industrial waste.

National policy is changing and becoming more challenging especially with the Environment Bill proposals and the possibility of taxing incineration. This will alter previous estimates of demand for residual waste treatment (ERF).

1.2 Hampshire County Council policy

The primary waste strategy in Hampshire is the 2013 Hampshire Minerals & Waste Plan. This was reviewed in 2018 and again in 2020. The HMWP Monitoring Report for 2020 states that the Hampshire household waste recycling rate is 41.3% and the overall recycling rate is

25%, meaning that the commercial and industrial waste and construction recycling rates are very low indeed.

In July 2020 Hampshire County Council considered reports on work undertaken to identify the most suitable recycling collection and processing system for Hampshire in line with the requirements of the Environment Bill 2020, including weekly food waste collection. The Decision Report suggests that with new systems, recycling rates could be expected to increase by approximately 15% particularly from the introduction of food waste collection, which would make a significant impact in the Commercial and Industrial waste sector as well as Household Waste.

In January 2021 HCC decided that the Waste strategy needed a partial update and set a timetable ending in Autumn 2023 for the process.

Furthermore, we understand that the plan to build a Materials Recovery Facility (MRF) at Eastleigh and developed by Veolia was rejected in 2020 because it does not improve Hampshire's performance sufficiently.

We consider it is wholly inappropriate to be making a long term, high- cost decision about a Veolia ERF in Alton when the strategy on which the investment case is founded is being reviewed and revised. It is very likely that, by the time the Alton site becomes available for redevelopment, the national and county picture will be substantially different.

1.3 Commercial and Industrial Residual Waste

Our view in our first response was that future estimates of the amount of genuine residual waste to be processed were very sensitive to the recycling rates achieved. Hampshire CC plans to improve recycling rates, as does the UK Government.

We based our conclusion partly on research undertaken by Tolvik consulting in 2017/18. Axis/Veolia now quote from more recent research by Tolvik (2019) which argues that even with food waste reduction, legislation for separate food waste collection, a deposit returns scheme and extended producer responsibility for packaging, together enabling national household recycling rates of 50.8 % and commercial and industrial rates of 67.5% - there would nonetheless still be a substantial capacity gap for residual waste treatment.

However, Tolvik consulting produced a briefing "Residual Waste as a Fuel in a Low-Carbon Economy" in December 2020 based on the analysis in the Committee on Climate Change's recent carbon budget and concluding, "Based on the Budget, the analysis in this Briefing Note therefore suggests that if:

- The UK were to reach the Budget's 2030 recycling targets;
- A reliable technology is identified to convert Residual Waste to SAF [Sustainable Aviation Fuel];

there would be no need for any further Energy from Waste capacity to be developed in the UK."

Tolvik also say, "The above analysis suggests that **if the Budget's proposed recycling targets are met, in 2030 the UK Residual Waste Market will be largely in balance** [their emphasis] with negligible tonnages of Residual Waste being landfilled or exported to Europe.

Tolvik remains of the view that, without what could well prove to be politically unacceptable Government economic and legislative intervention (for example “Pay as You Throw”, mandating recycled content across a range of products), the targets will not be achieved in the timescales set out in the Budget because of the barriers that exist.

Nevertheless, we repeat that the need for additional incinerator capacity is not proven. Locally and nationally, we must demand that higher standards of managing waste are implemented rather than make plans assuming that we will fail.

We are also surrounded by councils (Surrey, Dorset) that do not have any incineration capacity and that could or should build their own incinerators to meet any shortfall, rather than transport their waste into a rural part of north Hampshire.

2. IS THIS SITE AN APPROPRIATE LOCATION FOR AN ERF?

2.1 Distance from waste sources

The Hampshire Minerals and Waste Strategy (2013) states on page 96: ‘All waste development should be located near to the sources of waste, or markets for its use.’

Commercial and industrial waste in Hampshire is produced largely on the south coast, 30 miles away, not in rural east and north Hampshire. The plan is for 216 HGV movements per day seven days a week including Saturday and Sunday. Most of the traffic will be during weekdays 7am to 7pm with potentially one HGV movement every three minutes during that period. This continuous level of traffic movements will not just affect Alton but all routes through rural NE Hampshire. This is not insignificant and is unacceptable.

2.2 Heat Generation

We stated in our first report that the proposal failed because the potential heat output from steam or hot water would not be used in conflict with clear Government policy.

Veolia stated in the Planning Application Heat Plan Appendix 1.2 that there is no economic business case to use the heat. This is because there is no potential user of the heat to join a heat network and because of the rural location the cost of installing the piped network is too high. Instead the plant will be designed for ‘potential’ heat production sometime in the future.

In the Letter of clarification Veolia now states that that housing developers will not be interested until the building of the ERF is underway. That could be true although we do not believe that Veolia has made any real effort to promote this option. Besides if the heat network is not installed as part of the initial development it will never become a reality.

2.3 Electricity Generation

The plant will produce 33Mw of electricity and export 30Mw to the grid. This equates to 247,500MWh per annum. This is vastly more than the power needed in Alton. The fact is that sending electricity long distances results in grid losses of between 8-15% of the amount generated. Therefore, a proportion of energy produced will be wasted by siting the plant in this rural location.

In conclusion, for the reasons summarized in this section 2 a future ERF will be in the wrong place due to high transport costs and emissions, due to the major lost opportunity to use the heat generated and due to the waste of energy caused by grid losses when the electricity is exported.

3. Alternative renewable energy sources

All new buildings should be designed to generate and use renewable energy. Whilst the main output of the ERF will be energy from biomass this does not preclude other possibilities. Solar PV should be incorporated into the south elevation of all buildings and ground source and wind energy be fully considered.

4. SOCIO ECONOMIC AND SOCIAL BENEFITS

Apart from an apparent economic benefit to the area of 40-45 additional jobs there is no proposal in the application to give some of the rewards that would no doubt accrue to Veolia to the local community if this application is approved. It should be a condition of approval that Veolia makes a significant community contribution to offset the disbenefits associated with this ERF. The contribution should support the highest priorities identified by the local population. This might include radically improving the low carbon transport infrastructure including cycling, walking and public transport.

Energy Alton has sought to analyse reliable statistics in our response, but cannot guarantee their accuracy.

Energy Alton

Alton Climate Action and Network

August 2020