

A QUICK GUIDE FOR RESPONDING TO CONSULTATION ON VEOLIA INCINERATOR

If you have limited time and/or expertise, please enter your group's main concern(s) and contact details into the online response form and submit it by 31st March: [here](#)¹
Whether you make a short or long response, you are welcome to contact us for advice via hertswow.info@gmail.com.

INTRODUCTION

- Hertfordshire County Council has a contract with the waste management company Veolia Environmental Services (VES) for a service to dispose of its residual (non-recycled) waste.
- The company's first proposal was for a mass burn incinerator on a site at New Barnfield, Hatfield. They failed to get planning permission for that, yet they have the right to one more try under the same contract.
- The new planning application is in a set of documents that are available online [here](#),² at County Hall, in district/borough council offices and in libraries.
- On that page, you can access the response form via a link at the top: 'Submit comments about this application'³ and the documents are in folders on a page that you can (*sometimes!*) open via the Documents heading.

THE PROPOSAL

- This proposal is for a central facility consisting of a mass burn incinerator to be located at a Hoddesdon in the Broxbourne district on the Herts.-Essex border.
- That would be capable of disposing of household, commercial and industrial waste, not just from the Hertfordshire's municipal waste collections but from farther afield, e.g. London boroughs and other counties.
- If this project went ahead, the facility would be constructed by the early 2020s, then commissioned and operated for 30 years under this contract plus a further 10 years of lifetime under other arrangements.
- In the early years, the plant would process both kinds of waste (household plus commercial & industrial)/
- Our county council's intention is that as Hertfordshire's population rises, its household waste would take up the full capacity of the incinerator.
- The household component would only relate to residual waste, that is to say mixed materials left over after re-use, recycling and composting.
- Incinerator bottom ash (IBA) would be a byproduct that would be removed via railway sidings on the site for use in construction.
- Metals would also be extracted from the IBA and clinkers for 'recycling'.

HOW TO RESPOND

- You can respond online (as above), via email, by letter or even on a recycled cat-flap, so long as you show the application number, you identify yourself and your response is legible to the recipient (Rob Egan) at Herts. County Council.
- Anyone can respond, from anywhere, though this quick guide is for community groups in Hertfordshire other than those based in the Lea Valley, close to the proposed site.

The screenshot shows the 'Representation Comments Form' on the Hertfordshire e-planning website. The form is titled 'Representation Comments Form' and includes a navigation bar with 'Home / Planning Home / Search Again / Representation...'. Below the title, there is a brief instruction: 'You can submit a representation, specifying either support or object for any application which has not been determined. Please complete this form and click submit.' A note indicates that asterisks denote mandatory fields. The form is divided into several sections: 'Your Details' (Title, Forename, Job Title, Surname, Qualifications, Organisation), 'Your Address' (Property Name, Street, Town, Postcode, Property Number, Area / District, County), 'Contact Details' (Telephone Number, Fax Number, Email Address, Mobile Number, Confirm Email Address), and 'Your Response' (Support or Object, Comments). The 'Comments' field has a character limit of 3900. At the bottom, there are 'Submit' and 'Reset' buttons.

- The Comments box in the online form is limited to less than 4,000 characters which is usually just over 700 words. By email (perhaps with attachment) or letter you can make your response as long as you like. We recommend that you always start with the information required at the start of the online form.
- Ideally your response will be on planning grounds but whatever your group's concerns may be, you are entitled to declare them.
- You can send a copy of your response to your MP, County executive member Councillor Richard Thake and the Waste portfolio holder on your district/borough council (for information, though not essential).

1 <https://cloud1.atrriumsoft.com/HCCePlanningOPS/loadRepresentation.do?pprAplId=25790>

2 <https://cloud1.atrriumsoft.com/HCCePlanningOPS/loadFullDetails.do?aplId=25790>

3 <https://cloud1.atrriumsoft.com/HCCePlanningOPS/loadFullDetails.do?aplId=25790>

ISSUES

- It may seem obvious that disposal by incineration would limit Hertfordshire's rate of diversion via re-use, recycling and composting. However this time it's different: the contract allows our county council to reduce its use of the incinerator to such a low level that recycling etc. rates could exceed 70%. Even then, negotiation might enable the diversion rate to go much higher still.
- For us the point is rather that if this project went ahead, Veolia would install an huge incinerator and it would operate toward full capacity 24/7 for the next 30-40 years, regardless of where the waste streams came from.
- For calorific value, the waste materials thus burned would have to include fossil fuel derived substances such as plastics (and fuel oil whenever either of the two furnaces was re-started after maintenance).
- 'Energy from Waste' generates electricity and is promoted to justify the wastage of materials. However the energy derived from doing so is far less than the energy that would be saved if the materials were re-used, recycled and composted to the fullest extent possible.
- A central facility would require municipal waste to be hauled by heavy goods vehicle from transfer stations in each part of the county, plus other waste streams from elsewhere.
- The choice of site is appalling: next to important wildlife reserves and recreational areas. However we are not saying that the facility should be put somewhere else; we say it should not be built at all.
- Clinical waste from health centres would be stored at and transferred through the site but not deliberately incinerated there.
- There would be increased emissions of exhaust gases and toxic particulates from the diesel powered HGVs on the roads and on site, and from the plant's chimney stacks.
- Veolia has applied to the Environment Agency for a permit to run the plant. At present there may be no adequate grounds for refusal since Veolia has specified precautions and procedures for operation.
- However Public Health England is due to publish a long-delayed study report in 'Spring 2017' that might provide the health grounds for challenging the proposal. [here](#)⁴ Until then we doubt that it's worth doing so.
- By the way, the council is running another consultation about its public health services, which closes on 24th March. It does not mention harmful effects from the council's present and potential services. [here](#)⁵
- Since the incineration process is so destructive, we do not value the 'recycling' of IBA or metals extracted from the ash and clinker as justifying the use of incineration.

WHAT SHOULD HERTS. COUNTY COUNCIL BE DOING INSTEAD?

- In our view, we should all be progressing toward a 'circular economy' of materials in which there is almost 'zero waste'. Despite what Veolia and others claim, 'energy from waste' is part of the linear economy since it relies on destroying materials.
- Through the Hertfordshire Waste Partnership (branded 'WasteAware'), the county council and district/borough councils are already promoting all forms of diversion of materials from disposal.
- The district and borough councils, as the collection authorities for household waste, should separate the materials at source (households) and at a materials recovery facility (MRF) so as to reduce drastically the amount that remains to be treated as 'residual'.
- The technologies for doing so are now well proven: mechanical biological treatment (MBT), anaerobic digestion (AD) and composting. These can all work within a circular economy of materials.
- Smaller plants for those purposes should be located on agricultural and industrial sites close to each of the main conurbations across the county.
- They would provide local employment, education centres (for the right technologies) and avoidance of having HGVs hauling compacted waste on already congested main roads.

4 <http://www.letsrecycle.com/news/latest-news/incinerator-health-study-results-expected-in-2017/>

5 <https://beta.hertfordshire.gov.uk/about-the-council/consultations/health-and-wellbeing/consultation-on-the-draft-hertfordshire-public-health-strategy-2017-21.aspx#>