

**APPLICATION BY VEOLIA ES
TO BUILD A RECYCLING AND ENERGY RECOVERY FACILITY
AT NEW BARNFIELD, HATFIELD, HERTFORDSHIRE
Planning Application 6/2570-11
Planning Inspectorate Ref: APP/M1900/V/13/2192045
October 2013**

My name is Mick Bee, I am a resident of Letchworth in North Hertfordshire. I am a founder member of Hertfordshire Without Waste (HertsWOW).

1. **Need.** We have heard a lot of evidence to prove the 'urgent and compelling' need for this incinerator (to reinforce the very special circumstances required), and a considerable amount of evidence rebutting that claim.

And any "urgent and compelling need" would surely apply more specially to the primary purpose, the driver, of this proposal - a procurement for HCC WDA for the management of its waste.

Let's think then of waste management ten and twenty years ago and compare that with the present - how it has changed - - and then from here forward. Best projections show that overall waste decreases and there should be an increase in diversion to recycling and whatever. That is the first thing to hold in our heads - the change that has and is occurring.

I append a graph, with notes, of the recent HCC waste projections for both the procurement and the Waste Core Strategy which illustrates that change - over a relatively short time. (*App 1*)

But it goes beyond amounts - the changes we witness effect the waste itself and the methods we deal with it. How will it be in another ten years time or, more importantly, in another twenty years time.

2. The Waste Review 2011 (V5) Para 230 states: "Waste infrastructure has a long lifetime and therefore changes in the composition and potential volumes of waste in the future cannot be ignored in the development and selection of technologies now"

Hence my quest for information, not now forthcoming, from Veolia via Mr McGurk about the predicted future composition of residual waste. And, of course, lots of things are dependent on the composition of waste as we have been shown in my colleagues' evidence regarding WRATE, regarding efficiency, regarding renewability - all the things which either move 'recovery' down to disposal, at a similar level to landfill, or lift it to the next modest level of the Waste Hierarchy.

And this has to be about more than justifying an application today - it really requires justification over the predicted life of the proposal.

The quantity of residual waste is dependent on overall reduction of arisings, which we see is occurring and predicted to continue, regardless of the ADEPT letter which should be given no weight in the Inspectors decision*, over the foreseeable future - but much more importantly, and obviously, it is a product of the level of recycling and composting.

* See: HertsWOW response to Mr Kosky: ADEPT letter and Note INQ/12

3. The Waste Prevention Programme for England (App 2) consultation was launched on 6th August 2013 by Defra, and is relevant because of the emphasis that the Government places on continuing the reduction in waste arisings and on the role that Local Authorities can play in making this happen.

The consultation document's Executive Summary (second paragraph) states that: "...Preventing excess waste from arising delivers environmental, economic and social benefits, and is key to moving towards a more sustainable economy. Hence, action to reduce waste arisings and increase resource efficiency should be a priority for all sectors of the economy...Despite waste generation gradually declining in England, there are still significant opportunities for further reductions".

The Government's proposed Vision for Waste Prevention in England (p9 - same doc) opens with the intention that: "Over the longer-term, substantially less waste is created across the economy..."

Regarding the role to be played by Local Authorities in making the case for waste prevention, the consultation document states on pages 16 and 17 that: "Local authorities can play a key role in reducing waste in their local area, by providing leadership through their own business practices as well in the information and services they provide to their customers. Local authorities are strongly encouraged to develop local waste prevention plans. These will allow action to be taken, perhaps focused on particular waste streams, which takes account of local factors".

[https://consult.defra.gov.uk/waste/waste_prevention/]

4. One of the most notable changes to the National Waste Management Plan (E10) (i.e. compared to its predecessor, the Waste Strategy for England 2007) is the Government's use of the Forecasting 2020 paper as the sole basis for their forecasting of future C&I and MSW arisings.

The draft Plan states that: (3rd# p28) "...The Government will encourage local authorities to manage sustainably their food waste, providing technical support and advice on collections and appropriate use and treatment options that meet local needs.and (last# p29)...We anticipate that waste prevention measures will ensure that the progress that has been made in decoupling growth and waste arisings will continue...We anticipate that the measures outlined in this plan will achieve continued growth in recycling of key materials such as glass, metals, plastics and paper"

- with separate, efficient collection and AD of the food waste, and increased recycling of plastics, paper and other key materials, there will little residual waste, and even less combustible genuinely residual waste in the coming years. (my emphases)

The need then seems to be changing along with everything else - not in the quantity of waste to be 'managed' but in how we deal with it - the urgent and compelling need, set by these policies and visions, is to do anything and everything to raise the level of recycling and composting.

5. All of this makes Hertfordshire's WCS recycling target of 60% by 2026 (C1 p84, T6) look modest - and it is compared with others (and one hopes it is exceeded before that date - as it is about to be in Three Rivers) -

As an example, the just published Planning Inspector's 7th October 2013 Report for the Nottingham and Nottinghamshire Waste Core Strategy, paragraph 25 states (**App 3**)

"...The overall target of adopted by the WCS for the recycling or composting of 70% of municipal, commercial & industrial, and construction & demolition waste by 2025 is balanced and realistic." (Note - that is a joint target for each of the three waste streams separately)
[from: <http://www.nottinghamshire.gov.uk/EasySiteWeb/GatewayLink.aspx?allId=345412>]

Scotland and Wales have the same 70% target -

Scottish Government's Zero Waste Plan (**App 4**)

Action 2: "The Scottish Government will introduce a long term target of 70% recycling for all waste arising in Scotland by 2025, regardless of its source, based on improved data and supported by sector-specific programmes of work"

[from: <http://www.scotland.gov.uk/Resource/Doc/314168/0099749.pdf>]

Welsh Government's Zero Waste Plan (**App 5a**)

"Following a financial, environmental and feasibility appraisal, it was concluded that a minimum level of 70 per cent recycling would be the most cost effective and deliverable level that should be set..."

[from <http://www.wrapcymru.org.uk/sites/files/wrap/Municipal%20Sector%20Plan%20Wales.pdf>]

This was adopted as a statutory target in the Waste (Wales) Measure 2010 (**App 5b**)

[from: <http://www.legislation.gov.uk/mwa/2010/8/contents/enacted>]

And a 70% target is not out of reach - the top three English authorities were within reach in 2011/12 (the latest figures published by Defra)

Highest Household Recycling and Composting Rates (2011/12)			
Authority	Region	Authority Type	Percentage Household waste sent for Reuse, Recycling or Composting (Ex NI192)
Vale of White Horse District Council	South East	Collection	68.71%
South Oxfordshire District Council	South East	Collection	67.92%
Rochford District Council	Eastern	Collection	67.35%
Surrey Heath Borough Council	South East	Collection	64.99%
Stockport MBC	North West	Collection	62.62%
Harborough District Council	East Midlands	Collection	61.56%
Rutland County Council	East Midlands	Unitary	61.29%
West Oxfordshire District Council	South East	Collection	61.21%
Three Rivers District Council	Eastern	Collection	60.47%
West Devon Borough Council	South West	Collection	59.90%

6. The direction of travel was recognised, set even, six years ago by the Waste Strategy for England 2007 (**E4**, Chapter 1, Paragraph 1): "We are living beyond our environmental means. If everyone consumed as many natural resources as we do in England, then WWF suggests we would need three

planets to support us. So our goal is 'One Planet Living'. Using the planet's resources within the limits of its eco systems is vital to the survival, health and prosperity of future generations."

And this is, of course, what the EU Roadmap is about - saving every possible scrap of recyclable resources for reuse to both maintain materials sustainability and limit climate change - that is the urgent and compelling need (however rhetorical it sounds!). Once a material resource has been evaporated, regardless of any energy extracted, it has gone.

7. To return to Hertfordshire, a survey of 'black bag' waste (we actually have grey bins for householder selected residual waste) carried out in N Herts in October 2010 (**App 6**) found that over 60% was potentially recyclable or compostable - that is the equivalent, if the same held across Hertfordshire, of ~164,000t - plenty of scope to increase recycling to over 70%. Of that approximately 33% was food waste that could better go, ideally, to AD but otherwise to composting - again, extrapolated over Hertfordshire that food waste alone would be ~83,000 t. If only half of the recyclable, compostable waste in that residual bin waste was captured Hertfordshire would have attained a 64% recycling rate, on the way to a 70% target if we had one, leaving ~194,000t of residual. If all of it was captured we would be nudging 80%.

(Note: N Herts has about the same recycling rate as the county as a whole.)

For C&I waste the oft quoted NW of England 2009 survey found that 97.5% of landfilled C&I waste could have been recycled/composted. I cannot do a similar Hertfordshire calculation for this waste because it is difficult to decide which C&I figure to use.

8. So - not only is recycling desirable and best value (it is less costly than any other waste management solution) it is also becoming an overarching priority of policy. The question for here is - will the proposal before us assist in that task, that new need (the need to preserve resources). Will it assist in raising the recycling/composting rate to 70% and beyond towards the 'One Planet Living' goal, shifting large quantities of waste, waste that itself is changing, up the hierarchy into usable sustainable resources? And will it be doing so in 20 years time? And the other question is - can it itself be sustained for that long 25+ years projected operational life? Can it really commit to not burn any usable waste? Will it really cope when, say 20 years hence, just about every usable scrap is captured and just about every scrap is usable - that is the way we are heading, the direction of change. There is a clue, of course, in the claimed recycling that the MPT will contribute - it will contribute to raising the County's recycling rate by 3% (**A2 PSS #4.105 p26** - although if you do the sum it doesn't work out). Compare that with the capture of just half the recyclable waste two paragraphs above - 80,000t or 15% added to the recycling rate.

9. **What if ?** The question has been posed - what if this proposal was stopped. Some pretty daunting scenarios have been painted but, and briefly -

1. Short term/ interim. Obviously carry on as present - work on recycling and composting to at least preserve current 50% but better, economically as well as environmentally, to raise it, continue to send some residual waste to Edmonton and Lakeside EfW (currently 17%), maintain level of landfill (currently 35%). The cost will escalate a little from the current overall average £72 per tonne handled by the WDA (but not by as much as it would with the proposed RERF).

2. Short to medium term - research how best to respond to government policy shift as addressed above - i.e. how to improve recycling, etc, focus on resource capture not burning or burying. One way would be to instigate thorough and separate collection of food waste for AD - it is cheaper than IV composting, very benign and produces excellent fertilizer for agriculture - companies like Biogen are waiting in the wings to build smaller scale plants (22k to 45ktpa). See above the reduction in residual waste which that alone could bestow if done well. It would also reduce the biodegradable fraction to landfill. There are other similar mid-size companies with technologies for different waste streams eager to do the same.*

3. Medium term. Find or commission a MRF (two or three would be better - maybe jointly with neighbouring authorities) to increase recycling capture. Aim to get recycling, etc up towards 70% or 75% - quickly. A more drastic strategy would be to join the exporters - RDF to near Europe - the cost is less than through a home based RERF - estimates in the £80 - £100pt region including transport (it's a competitive market) and environmental impact gauged to be advantageous - due to the higher efficiency of the CHP plants over there (I need to find the study). Contracts are short but the need is great so could be relied on for a good while. Alternatively find or commission MBT-AD facilities that output stabilized waste to use in land reclamation (restricted to non-agricultural land) or landfill (tax payable though) - or try something a little more radical, although well tested, like wet MBT-AD which have higher recyclables capture, are very cost effective (more than this proposal), relatively small (could have several closer to waste). Facilitate but don't unnecessarily cater for C&I - with regulation and fiscal control/steering it looks after itself and you'll have much less waste to actually deal with - even today only about 270,000 tonnes.

Beyond any hidden penalty cost for this not going ahead, I calculate no great increase in overall cost and probably the opposite - actually, definitely the opposite. Done with care and optimism it would likely result in a considerably better, more sustainable solution more able to respond to change. North London WA took the opportunity of doing just that when left with only one bidder for each of their two procurements - the rules meant they had to reassess VfM, found it lacking and, I understand, see themselves as off the hook.

In such circumstances I would say to the authority - look forward. Embrace the change.

* I have written some brief almost anecdotal case studies of a number of such companies that I have spoken with or known for a while - this is simply for background information. **It is not necessary to read it except out of interest.** It is : **Info 1**