

Shaping the Regional Waste Plan

The vision and Aims of the Regional Waste Plan

1. Do you agree with the Vision for the Regional Waste Plan 1st Review?

Yes / ~~No~~ / ~~Don't know~~

Additional Comments:

2. Do you agree with the Aims for the Regional Waste Plan 1st Review?

Yes / ~~No~~ / ~~Don't know~~

Additional Comments:

How Much Waste?

3. Would you propose other types of facilities that are not on the list, to be considered to deal with the waste generated in your region?

Yes / ~~No~~ / ~~Not enough information to decide~~ / ~~Don't know~~

If yes, add comments here:

Hazardous waste facilities and treatment of unmodelled waste:

Facilities to treat and dispose of hazardous waste are not dealt with in the consultation drafts. Their treatment couldn't be modelled through the Life Cycle Analysis tool, and therefore did not undergo a Sustainability Appraisal. However this does not remove the need to ensure that there is adequate provision for hazardous waste treatment. There is no indication as to whether the identified industrial land would be suitable for hazardous waste facilities. It should also be recognised that there is significant treatment capacity for some types of hazardous waste in Wales. Indeed more hazardous waste is treated within South East Wales than is produced in the region.

Similarly, some waste types were excluded from the modelling exercise due to the fact that their treatment is specialised. There is discussion in the North Wales document (para 6.10.1) of the types of facilities that may be needed to treat this waste. Of particular significance is the need for the treatment of Food Sludges, which could undergo Anaerobic Digestion. We would suggest that these facilities be given consideration and an indication of land requirement, and availability, be given where possible.

Modelled waste:

Environment Agency Wales representatives were members of the Technical Groups for each of the three Regional Waste Groups. The list of facility types (and combinations of facilities) were considered very thoroughly by the Technical and Member Groups, and they represented fairly comprehensively the range of facilities being marketed in the UK at the time.

There will obviously be new technologies being developed and marketed, and we would not want to preclude any that perform well from contributing to the waste management infrastructure that we need. However, any additional technology should be subject to the same rigorous assessments as those included in the development of these waste plan reviews.

Further refinement may also be made to some of the newer technologies included in this review, which could lead to second generation technologies with better environmental performance, or full sets of data for current plant. Any companies developing these technologies should be encouraged to submit environmental and process information in order that it can be subject to assessment through the use of Life Cycle Analysis.

Technology Options

4. Are the indicators used to assess the Technology Options suitable?

~~Yes / No / Not enough information to decide / Don't know~~

Please provide any additional comments you may have or leave blank

The Regional Waste Groups followed ODPM guidance in the choice of indicators. This represented a good range of sustainable indicators. The inclusion of an additional dioxin emissions indicator will partly double-count the total emissions injurious to public health indicator. The groups decided to keep both of the indicators; this should be debated again when the plans are reviewed.

5. Should additional indicators have been used in assessing the technology options?

~~Yes / No / Not enough information to decide / Don't know~~

Please provide any additional comments you may have or leave blank

The number of indicators is comprehensive, and the total indicator set is well balanced (not withstanding the double-counting issue outlined against Q4). If additional indicators were to be considered, their effect on this balance should be taken into account.

It is also important to recognise that the Health Impact Assessment and the Strategic Environmental Assessment, if they had been carried out throughout the process, could have been used to feed into the Sustainability Appraisal. They may have suggested other indicators or ways of measuring indicators that the Regional Waste Groups could have discussed.

6. Do you think the explanation of treatment options is sufficient for you to understand the differences between them?

Yes / ~~No~~ / ~~Not enough information to decide~~ / ~~Don't know~~

Please provide any additional comments you may have or leave blank

Environment Agency Wales believe that the individual treatment technologies are covered in sufficient detail in the consultation documents. The Themes document provides a reasonable overview of the technologies, and is sufficient for the lay person to understand and form opinions. What is lacking is an explanation of the effects of combining technologies, as happens in options 3 & 4. An example would be the use of MHT to recover additional recyclable materials and create a homogenous material for use as a feedstock in a CHP plant or cement kiln.

7. Which of the options below and itemised on page 18 is your preferred choice?

Please rank them in order of your preference (1 being the option you most prefer, and 7 being the least preferable option.)

Comment:

Environment Agency Wales carried out the Life Cycle Analysis of the options, and carried out the Sustainability Appraisal work on behalf of the Regional Waste Groups. After discussion with the Groups it was decided that as a number of options scored well in the appraisal, the highest scoring options should form a technical basis for further development of the Regional Waste Plan reviews. This would allow for some flexibility in the option finally chosen, but would give broad guidelines as to the types of facilities that should be considered.

For North Wales, we are content that the top seven options from the Sustainability Appraisal were taken forward for further consideration. As the HIA and SEA have not resulted in these options being deemed

unsuitable, it is reasonable to assume that any of these could be used with confidence to meet the Region's waste management needs.

South East Wales have proposed the same seven options, and we are content with this as they were the top performing options in the LCA and SA.

For South West Wales, the top eight options were proposed in the consultation – those listed below plus MHT plus energy from Waste (option 4C). For consistency between the three regions, and as option 4C scored notably less than option 4D in the Sustainability Appraisal, we question why an additional option was included for consideration in the SW Wales Regional Waste Plan.

2a: **Pyrolysis**

2c: **Incineration**

3a: **MBT followed by pyrolysis**

3b: **MBT followed by gasification**

3c: **MBT followed by incineration with energy recovery**

3d: **MBT followed by fuel to off-site energy use**

4d: **Autoclave followed by fuel to off-site energy use**

The Health Issues

8. Did you find the Final Draft RWPR HIA Report & Summary useful in informing you about the potential positive and negative health impacts?

Yes / No / ~~Have not read it / Did not know a HIA was done / Don't know~~

Please provide any additional comments you may have or leave blank:

The Health Impact Assessment document is very long, and it is unlikely that it will be widely read. Environment Agency Wales feels that there are two key messages that come from this work.

The first is the need for the public to be made more familiar with the technologies, and for a comprehensive consultation process to be conducted. Open discussion often results in a more positive public opinion, reduced stress and anxiety and therefore improved public health.

The second message is that facilities will be well designed, well operated and properly regulated, and as such are likely to have mainly positive and little or no negative impacts on overall health. As the regulator for waste management facilities, the Agency is charged with safeguarding the

environment and human health through the permitting process and through regular monitoring and inspections.

9. Do you have any health concerns regarding the any of the specific Options?

~~Yes / No / Not enough information to decide / Don't know~~

Please provide any additional comments you may have or leave blank

No concerns. Please see our comment to question 8.

10. Do you have any health concerns regarding the waste treatment technology options identified in the strategic options?

~~Yes / No / Not enough information to decide / Don't know~~

Please provide any additional comments you may have or leave blank

No concerns. Please see our comments to question 8.

The Agency is aware that there are concerns among some members of the public about waste management facilities, particularly incineration, and the effects of emissions on health. The Waste Incineration Directive sets very stringent limits on emissions from facilities that derive energy from waste. These limits are much tighter than those placed on facilities that generate energy from other sources, for instance gas or coal fired power stations. This fact should be made more widely known in order to raise public confidence in these facilities. By ensuring that we are effective regulators, the Agency can help with this issue.

11. Were there any health issues that were not covered, or poorly covered, in the Final Draft RWP 1st Review HIA Report & Summary?

~~Yes / No / Lack of information~~

If yes, please identify those not covered and those that were poorly covered

The issues were covered, but unfortunately the evidence base largely consists of reports of ill-health as a result of badly run facilities, or old style landfills that were operational before tight environmental legislation came into existence.

The Implications for Planning

Before we can select sites for waste management facilities we need to agree the methodology for the selection of sites

12. Are the objectives for the Areas of Search suitable?

Yes / ~~No~~ / ~~Not enough information to decide~~ / ~~Don't know~~

Please provide any additional comments you may have or leave blank

Environment Agency Wales were involved in the development of the objectives, and we are confident that the environmental issues have been covered in terms of a broad scale strategic assessment. This does not preclude the need for a full assessment at the local level for a specific site.

13. Should additional objectives have been used?

~~Yes~~ / No / ~~Not enough information to decide~~ / ~~Don't know~~

If yes, please identify them

Please tell us about any other comments or concerns you may have about the Regional Waste Plan for your Region.

Please see Additional Comments below.

Additional questions for Strategic / Informed Stakeholders

This section is only for those people involved with the management of waste in Wales at a professional level, either directly or indirectly.

If this doesn't apply to you, please go straight to the [last page](#).

14. Do you have any comments on the following calculations:

- Apportionment of the total capacity required at various types of waste management / resource recovery facilities in 2013 to each Unitary Authority area on the basis of forecast arisings;
- Calculation of an indicative new capacity required and an indicative number of new facilities required for new non-landfill

waste management / resource recovery facilities by 2013 in each UA area; and

- **Forecasts of the remaining landfill void in 2013 in the region.**

This issue is partly covered in our response to the consultation on the SEA of the Waste Management Options and the Areas of Search Maps.

In brief:

- There is little discussion in any of the consultation drafts on the reasoning for apportionment of capacity requirements according to arising beyond citing the proximity principle and regional self-sufficiency. The Agency is concerned that there may be environmental or sustainability factors which would suggest that an alternative method of apportionment would be preferable. We consider this to be a weakness in the process.
- The calculation was based on the best information available at the time. All land use requirements for facilities are indicative only, and therefore total land requirements will also be estimates. We do not believe that the level of over-provision has been discussed and explained adequately in the reports, and the difference in over-provision between the regions deserves clarification.
- Forecasting the remaining landfill void at 2013 was based on a known starting void, and a fill rate that was assumed to be constant to 2010/11 and then a linear reduction to the target year. This forecast is based on the assumption that facilities will be commissioned in the period between 2010/11 and 2013 that will divert waste from landfill. If development of treatment capacity is delayed, the forecast void will be an over-estimate. The forecasting was discussed with the Technical Groups and was determined to be a reasonable approach at estimating future void, but the dependency on the development of alternative facilities should be highlighted in the plans. The key message here should be that some void will be required whichever option is chosen. Requirement for further landfill is something that the regions all need to address urgently.

15. Do you have any comments on the guidelines that individual Unitary Authorities may wish to follow in bringing together the RWP Technology Strategy and the RWP Spatial Strategy through the Local Development Plan preparation process in their individual Unitary Authority areas in order to identify appropriate sites for waste management / resource recovery facilities?

The implementation plan explains in depth the process that local authorities should follow to adhere to the Regional Waste Plans in the preparation of Local Development Plans (LDP).

We are concerned however that although the guidance from WAG states that *"If spatial options are not considered as part of the Preferred Strategy Proposal Document, then there will need to be a fall-back*

reference to the RWP and the Strategic Policy” the spatial element of the RWP does not provide sufficient detailed locational criteria or guidance to become an effective fall-back position. The implementation plan states that the Areas of Search should only be used as a starting point for more detailed local level assessments.

The guidance also suggests that the LDP should take account of the RWP Technology and Spatial strategy to identify a choice of locations for in-building and open air facilities including those for hazardous waste whereas the RWP does not make a full assessment of the needs for facilities for hazardous wastes.