

## REGIONAL WASTE PLAN, FIRST REVIEW, CONSULTATION 15 Oct – 24 Dec 2007.

This is an individual response from one closely involved in a practical waste minimisation project in the community. The respondent is acutely aware of the urgent need to push for minimisation through his involvement with Friends of the Earth local group and Penhesgyn Action Group. Both organisations are strongly opposed to incineration and know that good waste management requires a good grasp of waste minimisation as a foundation to meeting recycling and landfill targets; the principle of the waste hierarchy.

I am reluctant to fill in the response form provided and be led into commenting on the **restrictive number of options** presented. The consultation does not engender public respect or confidence and lacks credibility. It does not begin at the beginning and work through, does not explore the scope of waste issues and opportunities in the region, leaves out many vital constraints and positive measures and above all does not display any rigor in it's analysis. The two presenters and an Anglesey Council Waste Management Officer seemingly concurred with me, after a presentation, that life styles have to and will change in response to new environmental legislation and has already commenced with a ground swell of feeling amongst the public about climate change. This will have extensive impact on the nature of waste and the methods we will need to adopt to manage waste in the future. The Principle Waste Management Officer said, "I agree we have to **explore all options**". This study falls far short of exploring all options.

This current exercise is supposed to be a revision (due every 3 years we are told) of the North Wales Regional Waste Plan. We are also urged that "The next three to four years will be critical in determining whether Wales establishes the necessary infrastructure in time to meet EU, UK and Welsh waste targets and provide the necessary alternatives to landfill". All the more reason to expect a full response to a review of all options we have to consider for waste minimisation, reuse and recycling. The present consultation does not facilitate an adequate response on all areas of waste management. We need a more rigorous and an honest genuine approach.

Question 3 "Would you propose other types of facilities..."

I will however attempt one formal general consultation question.

There exists a comprehensive Waste Strategy created for Anglesey and other Councils in North Wales, conducted by SLR, which identifies virtually all the avenues for treating waste as well as minimisation and re-use options. This extensive work has not been taken seriously or brought up to date in the region as a whole. Few new facilities or methodologies could be added and I would recommend the format of that earlier work as a start.

While the SLR studies have provided ample evidence of cost savings with on-farm composting and the advantages in engaging with the commercial sector the Councils of North Wales have not made much progress in these areas. Engaging with small businesses and farmers could make great inroads in diversion from landfill.

Councils in North Wales have also not engaged with the non-government sector to reach the public in a determined consistent way. This would merit a section of the revised waste plan of its own. Community organisations have an extensive track record with education work to minimise and reuse resources. CREST is a leading example of minimisation and re-use education and there needs to be many more similar examples established. A few other short lived examples exist but the communities they manage to reach on small short lived budgets is very limited. SRS funding lasted 9 months for NGO's and has now been wound up. Cymmorth Compost Aid and Brofylchu Bangor are such examples. Good examples of waste minimisation projects should be taken forward and expanded with comparable budgets to other waste projects. The waste hierarchy also reflects resource use and ecological footprint; logically investment in minimisation will guarantee proportionally more money is saved down the line and the environmental benefits which cant be costed are greater.

#### Timing of consultation

- National and Regional strategies for waste are being prepared before national and local government representatives or officers have got to grips with implications of proposed but widely anticipated climate change bill in 2008. There is no denying this will become a predominant planning issue in a few months time.
- Two intense rounds of conferences in two years around the UK on incineration of waste (EfW) have been timed to immediately precede the current national and regional planning work on residuals (as well as Climate Change Bill). The same effort has not gone into minimisation.
- No account is made of Planning Policy Statement on Sustainable Development (2006); Planning White Paper or the proposed Climate Change Bill (2008). These measures and new laws will take effect during the planning cycle of a new incinerator.
- European Parliament in its current review of the Waste Directive have indicated a majority of MEPs are in favour of promoting the waste hierarchy, including a commitment for the first time to stabilise waste production and reject the notion that incineration should be regarded as energy recovery. The implications of this directive would become effective during the planning cycle of a new incinerator.
- Regional Waste plan revision cycle should logically follow the National strategy, it is strangely timed in reverse order of that expected.
- A programme of preparation and qualification would have a lead in time extending to 7 or 8 years, judging by the lead-in time chart for complicated waste facilities presented in the Regional Waste Plan 2007 this would not help any Local Authority to reach targets.

#### Conduct of consultation

- There is an underlying assumption (only a suggestion from WAG) that all Regions have to plan to share waste management resources across one or two County boundaries. The alleged need for this is not backed up by any credible projections of waste arising on either WAG figures or trends reflecting minimisation measures.
- Discussion forums are fundamentally only about the discussion of waste burning.

- Waste minimisation is not at top of the agenda, it may get a brief mention and is subsequently ignored. Minimisation is the only way to contain the problem and move on and do better job of recycling.
- Members of the public are not likely to attain an adequate level of understanding of the residual treatment technologies before they are to make a reasoned judgement and respond to the Regional strategy.
- Waste management has been taken out of the LDP planning process. Waste in all its aspects is not been discussed at a County level, instead only burning is been consulted on at a regional level.
- Meanwhile Anglesey County Council have effectively removed the waste consultation element out of the LDP consultation process and transferred to less accountable and representative system we see in the Regional Plan consultation. Local residents have less recourse to local checks and balances at local level within the planning development cycle of LDP structures.
- There is no understanding of the baseline figures by the consultants, as evidenced by query from R Mills. What is the measure of municipal waste, residual fraction, where are we starting from and how accurate are the projections are they based on sound reasoning. We were unable to get answers in the presentation of the Regional Forum by Hyder. We expect at least best (waste minimisation plus whole community engagement) and worst case (increase in waste arising with modest recycling effort by Council).
- The consultants (Hyder) carry out most of their work in the civil engineering sector, this would bias the preparation, analysis and recommendations of the current consultation.
- Throughout all the correspondence to various departments locally and nationally over nearly two years residents of Penmynydd have proof that no department have either credible long term plans or a business case analysis including long term volume and usage projections for Penhesgyn. They suspect that decisions are continually being made without such background work being carried out.

### Waste Minimisation

- Somerset Council and examples in Wales like Ceredigion will not need waste incinerators to deal with excess residual waste because good progress has been made on minimisation and recycling.

### Penhesgyn, Anglesey, A Money led decision

- Large regional facilities have been refused in other parts of North Wales. Assumption is that all roads lead across bridge to Island.
- Waste unjustly arriving in Wrexham from Merseyside, there has been no public participation in this decision. Protesters at Hafod Quarry are seeking legal representation at European level. Distances from Merseyside to Wrexham and from Conwy, or South Gwynedd to Penhesgyn are comparable as is the lack of justice.
- Should waste facilities fail for any reason in the east, would this lead to a possible domino effect - moving waste on along A55 corridor?
- Anglesey will attract preferential levels of EU money (convergence funding round). This is evidence that the decision is money driven. The environment does clearly not come into the reckoning with such large sums of money from the public purse that have to be spent quickly.

- As minimisation is not being considered the region is potentially losing a tens of millions saving on waste budget (WLGAs findings). Better to produce less waste and save more – first principle of waste hierarchy. This way we should be able to do a better job without grant even.
- M Edwards in the recent forum meeting which was essentially about waste burners mentioned that Anglesey would be looking to the next final round of European convergence funding. The Regional burner will arrive in Penhysgyn in his mind. In a Council meeting 2005 M Edwards has been recorded as saying “...and to be honest incineration is the only option that works...”.
- Local residents have all along received no assurances on long term plans or any evidence of the presence of business plans or any analysis of volume projections.

#### Emissions and Air quality affecting residents

- There are far-reaching new European directives on the way to make all producers of emissions more accountable. This could severely test viability of waste burners and damage public relations irreparably. Public confidence in Sheffield and Padeswood Flintshire is as low as it gets now.
- The worst of the currently operational burners are little improved on the 19 century models and the best are adaptations from the medical waste incineration world. Hardly a mature good fit technology for 21 century waste management.
- If fly ash from burners is so toxic why are the fumes safe for the public to breathe? Where is the evidence from an independent competent body?
- Environmental Agency are typically coy about emissions levels for many UK facilities. In fact they are on record for deceiving the public and playing the part of facility developers – Sheffield experience.
- Emissions levels from Europe are often quoted but it should be borne in mind that many areas have superior minimisation, sorting and recycling strategies. The UK is as always far behind in sorting out clean waste streams.
- Burners produce toxic fly ash that requires a hazardous waste site to landfill it. North Wales does not have a single hazardous landfill site, or any in preparation. If this ash has to be transported many miles or a hazardous waste site specially prepared both scenarios involve a huge additional carbon footprint.
- All burning treatments are untried and tested, have effectively been written off or fail to inspire confidence for one reason or another (Region Strategy report).
- Green house gas potentials of different burning options have not been assessed).

#### Carbon foot print and Climate Change bill

- FoE investigations show that energy from waste (EfW) produces a 30% greater carbon footprint than gas power stations for a given unit of electricity. This assessment does not include the footprint of extra waste miles (from two other Counties in the case of an Anglesey burner), disposal of fly ash or the footprint of replacing/ manufacturing the resource lost.
- FoE think EfW should be redefined as a non-renewable source of energy and not put in same category as clean renewables.
- Incineration is not a logical alternative to landfill. Incineration is a linear dead-end waste option. There is no chance of recovering any resource once a relatively small amount of energy is produced. (Energy will have to be consumed and fossil fuels procured to remanufacture any replacement anyway). Landfill at least has the virtue of leaving the option to recover resource at a later date.

- A Regional Strategy must also factor in change of consumer habits anticipated in parallel with a raft of other measures following climate concerns, such as packaging, action on food waste and pressure on supermarkets.
- The Waste Plan must factor in food waste studies such as 'Understanding Food Waste' by WRAP and Defra's Survey of Public Attitudes and Behaviour'.
- The WRAP report states 'The whole food supply chain accounts for around 20% of the UK's green house gas emissions. We could make carbon savings equivalent to taking one in five cars off the road if we avoided throwing away all the food we could have eaten'.

#### Other options

- No details are provided on developing partnerships with the commercial sector. At the moment they don't have statutory targets as for municipal waste. Soon this must change and the Regional Strategy ought to be designed to reflect this dramatic potential change. Potentially because the commercial sector have such a large proportion of waste the needs of this sector must be reflected in the strategy. Projecting the current scenario for commercial tonnages without taking into account need for new legislation, as for municipal, is bound to vastly over-inflate the case for a burner. The commercial sector merits a section of it's own in the Regional Waste Strategy. Once the commercial sector perceive that waste minimisation and recycling can save money things may change at a faster rate than we could imagine.
- The Waste Plan makes no attempt to revive the interest across the region in on-farm composting.
- Farmers in a conference in St Asaph understood they were being told 'Don't bother the Regional Composting site would be built and you would lose your investment'.
- Local Authorities in the region are ignoring cheaper on-farm composting option for the sake of three Local Authorities working together on one Regional facility.
- There is evidence that Anglesey County Council have refused to deal with two local farmers at average commercial rates. This evidence for ignoring other options and constructing an artificial case for regional facilities where waste burners and in-vessel composting facilities go hand in hand.
- Trucking tonnes of low bulk density waste with high water content many miles past a farmer, or a community, willing to take it is an economical and environmental travesty.

#### Environment

- Compost made at Penhesgyn will be destined to cover ('landscape') the old tip. It will not be used back on gardens or as a peat replacement or to grow food. All alternative options would be better for the environment. The compost on top of the tip would over the years load up the river Bariant with dissolved carbon chemicals and reduce capacity for improvement. Better to put subsoil and other harmless material on top.
- All burning options mention long operational times, night and day. Is this another environmental factor to add to a long list of factors not to consult the public about.
- A strategy should factor in world trends such as peak oil and commodity price projections.

- Taxpayers in each region served by incinerators need to be asked if they would want the tax burden of unnecessary transport of waste with associated high carbon footprint.
- Each participating Local Authority needs to assess where they will stand in the soon approaching era of carbon accounting.
- Soil Association has a policy against development of waste incineration. They believe that organic status would be threatened. FoE believe organic farming is the only way forward for agriculture a life-line in fact for future sustainability of the industry and rural areas as well as the preferred choice for an increasing number.

### Public engagement and involvement

The current protest, in a long line of many, at Penhesgyn may seem to be a local concern arising from local anguish but is in fact of great Regional significance. It contains a mix of the injustices indicated above and seems to be creeping along towards the largest waste complex in the whole of North Wales. The experiences of Penhesgyn people seem to be repeated all too often in North Wales, for example Hafod Quarry Landfill and Clynnog Fawr.

The Regional Waste Plan needs to take the general public into account and develop policies, frameworks and measures to include and actively engage with people to an acceptable standard and satisfaction of the public.

- Anglesey Council have shown frustration that Regional IVC not being built in Penhesgyn yet. Land purchase issue is holding up upgrading full length of access road; part of the list of planning conditions. Now IACC have decided to drop the original planning condition and replaced this with a modification to the junction at the turn into the access road only.
- Anglesey County Council has simply changed the condition so they would not delay the development of the IVC. A classic case of moving the goalposts.
- Residents feel Anglesey County Council has demonstrated utter contempt towards the residents in this matter in deliberately denying them the opportunity to gain knowledge of the highways scheme in its entirety before work begins and to ask questions about the scheme and necessary works before work commenced.
- Operating times for all waste burning options extend into the night. This is a major proposed change to introduce into a quiet rural area. Yet another shock discovery waiting for Penmynydd residents.
- Waste burners produce some of the most toxic fly ash known and require hazardous waste approved hazardous landfill sites to treat it. Would this be planned for Penhesgyn or elsewhere on Anglesey and can residents look forward to a meaningful consultation?
- Meaningful consultation with the public on the likely site for a Regional waste burner does seem to be a non-starter.

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