

GLOSVAIN'S RESPONSE TO URBASER'S INCINERATOR FAQ

This FAQ Information From Urbaser was simply published in full on the "This Is Gloucestershire" website, 15 Mar 2012.

In the interests of balance, GlosVAIN's commentary on the statements made by Urbaser can be read in **red** text against each response below

FAQ SUPPLIED BY URBASER:

Q. Who are Urbaser?

An international leader in the environmental sector, Urbaser operates more than 200 waste management facilities, including eight energy-from-waste (EfW) facilities, and processes around seven million tonnes of waste every year. Urbaser serves more than 50 million people worldwide with 35,000 employees.

Q. Who are Balfour Beatty?

Balfour Beatty is a world-class infrastructure services business, operating in four strong and substantial areas of business: professional services, construction services, support services and infrastructure investments.

A company with a very poor safety record, and has been heavily fined for the death of construction workers and rail users.

Q. Why is a new facility needed?

European law means that we cannot continue to rely on landfill to dispose of our waste and we must look at alternative options for its management. Organic Waste in landfill sites generates methane which is a potent greenhouse gas that contributes to climate change.

Landfill Tax is also continuing to rise – it is currently £56 per tonne and will rise to £80 by 2014. Gloucestershire County Council has estimated that a new residual waste facility will save the Council £150 million over the 25 year contract when compared with landfill.

The County Council will not reveal the basis for its claimed £150 million savings. What we do know is that when they wrote their PFI business case in 2008 they over estimated the total waste for 2011/12 by 28%. That represents a huge saving that they wont make and undermines

their case. The scrapping of the LATS scheme also means that over the life of the contract another £30million of forecast saving has disappeared.

Other alternatives such as MBT would provide 'second chance' recycling, reducing residual waste and taking out harmful methane-producing organic waste. The Business Case is not proven - it is based on 150,000 tonnes per annum of residual waste, but this is 'worst case scenario'. Other industry players (e.g Cory) and experts (e.g Alan Watson) believe that 90,000 -100,000 tpa is more realistic. If they are right then the business case goes out of the window and incineration becomes the MOST EXPENSIVE option. And if the Government brings in a carbon tax, which is very likely, then costs will increase, since incineration produces more CO₂ than a gas power-station.

Q. Can't we just recycle more?

The District Councils and the County Council have all agreed a target to recycle and compost a minimum of 60% of household waste by 2020. Gloucestershire County Council's aspiration is to achieve 70% recycling by 2030. However, this still leaves approximately 150,000 tonnes of waste per year to be treated by 2040.

The %age is being applied to a total waste figure which is proven to be wrong and that's why the 150,000 tpa is wrong. South Oxfordshire District Council already recycles 70% of waste - these targets are far too low. Presteigne in Wales is recycling around 74% because they have contracted with a low-tech social enterprise who undertake more kerbside recycling without building a massive multi-million pound capital asset which will take 25 years to pay off. Gloucestershire County Council has consistently over estimated its waste to the point where it now has a £12m pot of landfill tax savings from over budgeting.

The facility will help increase recycling by recovering metals that would have ended up in landfill. In addition, the Incinerator Bottom Ash (the glass, ceramics and stones that fall out of the bottom of the grate following combustion of the waste) will be recycled for use in the construction industry.

But all sorts of recyclable materials will be burnt including plastics, paper and disposable nappies. A factory in Birmingham recycles nappies to make plastic cladding, compost and syngas - see <http://www.knowaste.com/>

Q. What is being proposed?

Urbaser Balfour Beatty's proposal is for an energy-from-waste facility with an Education/Visitor Centre and wildlife zone. The facility will treat all of the residual household waste generated in Gloucestershire and collected by the District Councils. This will make the county self-sufficient in terms of waste treatment capacity; keep "waste miles" down and support recycling through recovery of metals and Incinerator Bottom Ash (IBA).

This is disingenuous - as much as half the waste treated will be commercial and industrial waste, much of which will come from out of county because controlling where this comes from is not possible. Municipal waste will be travelling from every corner of the County, for distances up to 40 miles. The energy from waste process will need further infrastructure and utilise little of the potential heat and power.

Q. Why Javelin Park?

Gloucestershire County Council considered all available sites in the county in the Waste Local Plan (adopted 2004). Of these, we identified Javelin Park as a suitable site for an energy-from-waste facility based on a number of planning and environmental criteria, including its proximity to the major road network and proximity to the main sources of waste within the county.

These two reasons are just about the only ones in Javelin Park's favour, other than that GCC have already bought it for £7.4m. Reasons against the use of Javelin Park include:

- Massive unacceptable visual impact from the AONB and Cotswold escarpment - this is a very exposed site and will dominate the views from both sides of the Severn Vale
- No easy link up to the electricity network
- No opportunity at this site to use combined heat and power - so energy efficiency will be around a paltry 22%
- Concerns about the impact on nearby protected environmental sites from toxic emissions, particularly the Cotswold Beeches Special Area of Conservation around Cranham
- The geography of the Vale means that polluted air often remains hanging as a blue haze - this incinerator will add to this pollution and the fear is it will increase health risks

Q. Why recover energy from waste?

After reduce, reuse, recycle, the recovery of energy from waste is considered to be the most sustainable option. EfW has a number of benefits:

- It diverts the maximum amount of waste from landfill.

And from recycling

- It treats waste that cannot be recycled or composted that is currently landfilled.

And waste that could be recycled

- It reduces the amount of methane released from landfill (methane is more than 21 times more effective at trapping heat within the atmosphere than carbon dioxide).

Stabilised waste, from which the organic matter has been removed does not create methane. MBT (Mechanical Biological Treatment) can stabilise waste.

- It generates energy in the form of electricity and heat.

In theory, but in practice the heat will not be used

- It provides indigenous energy supply – adding to the UK's energy security.

At around only 22% efficiency, it is much more energy efficient to recycle than to burn materials and then produce replacement goods from raw materials. For instance it is 26 times more energy efficient to recycle a PET plastic bottle than to burn it.

- It generates renewable energy – contributing to the UK's renewable energy targets.

This depends on what is burnt. Paper and wood in your black plastic bags is considered renewable, but plastic and other items made from fossil fuels and non-renewable raw materials isn't. They won't be sorting out the rubbish and taking out the non-renewables before they burn it.

Why was this technology chosen?

The EfW technology we are proposing has been selected because it has a sound operational record, and can be relied upon to deliver the above benefits. In particular we are proposing a facility that will provide consistently low emissions, high energy recovery, additional recycling, and high diversion from landfill.

The plant will emit a range of toxic pollutants, below present legal limits, but still significant. Some of these toxins, such as dioxins, are very poisonous and will only be monitored on a six-monthly basis.

The specific technology chosen for each aspect of the (combustion) process will use Best Available Techniques (BAT). A BAT assessment will be reviewed by the Environmental Agency as part of the Environmental Permit Application.

Once we have the incinerator, we will not be able to make use of new technologies that come along that are safer, more efficient, cheaper, more flexible, provide more jobs. We will be locked into using the incinerator until 2040 and beyond.

Q. What happens to the energy generated?

A small amount of the energy generated will be used to power the facility. The remainder will be exported to the National Grid – Gloucestershire County Council will benefit from the sale of this electricity, offsetting the costs of the project and therefore costs to the tax payer.

See above - this is not an efficient way of generating energy, and burns much more energy embedded in the waste than it produces.

Q. Will the facility generate heat and how will it be used?

The facility will be designed as a Combined Heat and Power (CHP) plant, so that as well as generating electricity, heat can be used by neighbouring industrial users. Urbaser Balfour Beatty are investigating the opportunities for the export of heat to neighbouring industrial and other potential users.

In other words, there are no other users at present, and no guarantee that there will be in the future. These are just fine words.

Q. Is energy-from-waste safe for the environment and human health?

Modern EfW technology is very different to the old-style waste incinerators. Modern EfW technology has been recognised by the UK and EU as safe for the environment and human health.

All EfW facilities must now comply with European legislation that sets stringent limits on emissions. EfW is a tried and tested technology and there are currently more than 350 energy-from-waste plants operating throughout Europe. The facility's operations and emissions will be monitored and regulated by the Environment Agency.

Specifically the potential impacts of emissions from the facility on human health will be assessed in a Human Health Impact Assessment. This assessment will be reviewed by both the local Planning Authority and the Environment Agency as part of the planning and environmental permitting process. If the impact is regarded as unacceptable the plant will not gain planning permission or an Environmental Permit.

If this is such a clear case, then why have the Health Protection Agency just commissioned a study by Imperial College into the health impacts of waste incineration, particularly on children, who are 2 to 3 times more vulnerable? Levels of cadmium in this area are already higher than allowable for children. This facility can only add to that. The environmental assessment already states that there is risk to the Cotswold Beechwoods even from a facility half the size of that proposed.

Q. What will the visual impact be?

Energy-from-waste facilities by their nature are quite large buildings. However, our design seeks to minimise the visual impact of the facility through the use of efficient design techniques and use of carefully considered building materials. We have consulted with Gloucestershire County Council and the Design Council to ensure the design is suitable and addresses comments received from stakeholders.

'Quite' is an under-statement - this building is basically a power station. It is a very large industrial building. 45 metres is about 150ft. A mature oak tree is about 40 or 50ft. It will be higher, and about twice the size of Gloucester Cathedral.

Q. How high will the chimney be?

We have undertaken detailed modelling of weather patterns and the

local topography. Guidelines set by the Environment Agency then determine the height of the chimney to ensure that there is sufficient dispersion of emissions. The chimney is proposed to be 70m high.

This is about 230ft high. When you consider that floors in most tower blocks are about 12 foot apart, this equates to about 20 storeys high. The prevailing wind will take emissions over much of Gloucester and Cheltenham.

Q. What will the traffic impacts be?

We have undertaken detailed transport modelling to minimise “waste miles” and the impacts of additional traffic. As the site is close to the main road network the majority of the waste will be brought in via the M5 and A38. Only local refuse and recycling collection vehicles will pass through the local villages, as currently happens. Current restrictions on heavy goods vehicle (HGV) access to local roads will ensure that large waste trucks will not pass through local villages on their route to and from the proposed facility. HGV waste deliveries would be limited to 0700 - 1900 hours, and the majority of deliveries will occur outside of peak rush hour periods.

Current restrictions are not enforced - there is a limit on the B4008 that is disregarded by many large vehicles each day. Up to half the waste will be commercial and industrial waste - uncontrollable by either the County Council or UBB - and lorries will use satnav which will bring them through Stonehouse and the villages along the way. 500 tons of waste per day plus 24 tons of flue cleaning materials will be delivered, with the latter ending up as toxic waste to be disposed of.

Q. Will it be smelly?

No. All incoming waste will be stored inside the building where the odour will be managed. The air that is drawn into the building is fed through the furnace where it is combusted, destroying odours. Waste will not be held at the facility for long periods of time so the chance of bad odour is minimal.

...until the plant is shut down for maintenance, which will happen at least once a year for a couple of weeks, when waste will build up

Q. Will it be noisy?

No. The process itself is not noisy although motors that drive fans and

pumps do create some noise. The noise will be reduced by the use of acoustic enclosures and earth bunding along the eastern edge of the site. Strict limits on noise are likely to be imposed by the Planning Authority and the plant will have to demonstrate compliance with these limits.

The nearest house is about 50m away - the noise for them will be unacceptable

Q. Will the development result in flooding?

A Flood Risk Assessment (FRA) has been prepared as part of the Environmental Impact Assessment. This complies with the requirements of the Environment Agency and ensures that the development will not increase the risk of flooding in the local area. The FRA takes into account predicted changes as a result of climate change.

Measures included in the design to ensure that the development does not increase flood risk in the local area include retaining the watercourse that flows around the southern and western perimeter of the site and introducing a number of surface water ponds into the landscaping design. These ponds will be used to control the volume of surface water released into the adjacent watercourse during rainfall events.

The site flooded in 2007

Q. How can the community get involved?

We are inviting feedback from the community on the proposals. Later on in the process there will be the opportunity for local residents to join a Community Liaison Group (CLG), and to get involved in our proposals for the Visitor Centre. We also propose to hold CLG meetings on an ongoing basis during the construction and operational stages.

The community has been feeding back for over 3 years on the Council's plans and more recently on the company's proposals and our views have been ignored. The community does not want this incinerator.

Q. What happens next?

We will be taking all feedback from the community into account in our planning application.

Urbaser Balfour Beatty will submit the planning application and supporting documents, which will then be assessed by Gloucestershire County Council as the Waste Planning Authority (a different department to the residual waste project team) and the Authority will run its own formal planning consultation on the application. The planning officers then make a recommendation to the Planning Committee of county councillors who can choose to approve or reject the application

It is nonsense to imply there is not a close working relationship between the Waste Disposal Authority (the part of the council which has contracted for an incinerator) and the Waste Planning Authority (the part of the council which will consider the Planning Application for the incinerator). We will be fighting this planning application at every stage.