

**Planning Application for expansion of WRG's Eastcroft Incinerator**  
**Ref: 05/01520/PMFUL3**

WRG are asking for planning permission to add a third furnace to the Eastcroft Municipal Waste Incinerator, which would increase capacity from 150,000 tonnes per annum (tpa) to 250,000tpa.

Preliminary comments are required by 16 September 2005, quoting the above reference, to Mike Senior, City Development, Exchange Buildings North, NG1 2BS (tel: 0115 915 5406 email: mike.senior@nottinghamcity.gov.uk )

### **Background**

- 1) Planning decisions should be based on the Development Plan, which includes Regional Spatial Strategy and the Waste Local Plan. The Structure Plan and Local Plan may also be relevant.
- 2) The overarching level of the Development Plan is Regional Spatial Strategy (RSS8), published by ODPM in March 2005. Policy 39 requires, amongst other things,
  - all local authorities to achieve a minimum target of 50% recycling by 2015;
  - Waste Local Plans to take into consideration:
    - the Best Practicable Environmental Option (BPEO) for each waste stream;
    - socio-economic implications;
    - the principle of regional self-sufficiency;
    - the proximity principle: and
    - the waste hierarchy.
- 3) The Waste Local Plan (WLP) for Nottinghamshire and Nottingham did not take into consideration the BPEO for each waste stream, but does include Policy W2.1 which states that "Waste management proposals will only be permitted where they represent the best practicable environmental option, based on a hierarchy within which the order of preference is:
  - Reduction
  - Re-use
  - Recovery – composting and recycling
  - Recovery – energy from waste
  - Disposal with environmental benefits"BPEO is defined as "the outcome of a systematic consultative and decision making procedure . . ." (WLP section 2.21). It should also be judged against the waste hierarchy and the proximity principle (section 2.19).
- 4) Other relevant policies in the WLP include
  - Policy W3.1 which requires need for a facility to be balanced against environmental impacts.
  - Policy W6.1 which supports expansion of the Eastcroft Incinerator on the basis that it would result in more of Nottinghamshire's waste being managed higher up the waste management hierarchy (WLP section 6.12).
- 5) Planning decisions should also take full account of the principles and objectives in the Government's waste policy, Waste Strategy 2000 which

states in paragraphs 4.4 and 4.5:

4.4 The objectives of waste management decisions should be:

Reducing the environmental impact of waste by moving waste management up the waste hierarchy;

Managing waste in ways that protect human health and the environment and in particular:

Without risk to water, air, soil and plants and animals;

Without causing a nuisance through noise or odours;

Without adversely affecting the countryside or places of special interest;

Disposing of waste at the nearest appropriate installation, by means of the most appropriate methods and technologies.

4.5 Waste decision-making should be based on the following principles:

Individuals, communities and organisations should take responsibility for their waste;

In taking decisions there should be consideration of alternative options in a systematic way;

Effective community engagement should be an important and integral part of the decision making process;

The environmental impacts for possible options should be assessed looking at both the long and short term;

Decisions should seek to deliver the environmental outcomes that do most to meet the objectives in para 4.4 above, taking account of what is feasible and what is an acceptable cost.

6) WRG's own estimate is that the maximum pollution permitted each year within the Waste Incineration Directive limits (365 times daily limit) would be:

400 tonnes nitrogen dioxide  
 100 tonnes sulphur dioxide  
 100 tonnes carbon monoxide  
 20 tonnes particulates  
 20 tonnes hydrochloric acid  
 2 tonnes hydrogen fluoride  
 20 tonnes volatile organic compounds  
 100kg mercury  
 100kg cadmium and thallium  
 1 tonne other heavy metals  
 200mg dioxins & furans TEQ

These figures include emissions from all three lines, but do not include breaches of emission limits which are permitted for upto 60 hours a year for each type of emission.

- 7) WRG estimate an increase from 158 daily HGV traffic movements to 264 movements. Many of these movements could be bringing waste from upto 35 miles away. This will add to noise, pollution and congestion. The main concern for local air quality management in the city and surrounding districts is already pollution from traffic.
- 8) The incinerator chimney looms over Sneinton, where people can frequently see the plume coming towards them. Many people believe that respiratory problems are associated with incinerator emissions.
- 9) Incinerators need to run at near full capacity, so they tend to 'crowd out'

recycling – discouraging future improvements in recycling or re-use. Recycling creates more jobs (around 400 – 590 jobs per one million tonnes p.a. waste recycled, compared to 100 – 290 jobs for incineration). Recycling saves a lot more energy than is created by burning waste.

- 10) WRG submitted their planning application the day after Nottinghamshire County Council decided to contract with Onyx to manage all of their municipal waste for the next 26 years. But WRG fail to mention this and continue to give the impression that most of the additional 100,000 tonnes p.a. of waste for their incinerator will be sourced from within Nottinghamshire.
- 11) WRG also failed to report that the Environment Agency had asked serious questions about their ability to manage the range of wastes listed in Appendix 3.1 of the Environmental Statement. (The Agency wrote to WRG on 8 July 2005 asking, amongst other things, how WRG can justify the wide range of non-municipal wastes which they have listed, with particular reference to calorific value and moisture content. The Agency also asked why they had not considered fluidised bed incineration (which allows a wider variety of wastes to be burnt). It is not yet clear what restrictions the Agency will put on the range of wastes which WRG is permitted to incinerate.)
- 12) WRG's response to the Agency, received 13 August 2005, shows that the Eastcroft Incinerator is designed to operate with waste with a calorific value of 8.3MJ/kg. It can burn waste with a lower calorific value down to 6.7MJ/kg with reduced heat output. Waste with a higher calorific value upto 12MJ/kg can be burnt, but with proportionately reduced throughput in tonnage. WRG have not provided detail of how they would control waste input to maintain appropriate calorific value, moisture content and throughput. WRG also stated that the additional 100,000tpa could be any type of waste depending on market conditions. But they refused to consider fluidised bed incineration because it would require new pre-treatment facilities to shred waste, separate storage, and new skills for personnel.
- 13) WRG have not stated where the additional residues from incineration will go, so have not demonstrated that they will be disposed of in accordance with the proximity principle. (Burning an extra 100,000tpa waste will produce around 30,000tpa extra bottom ash (making a total of 70,000tpa bottom ash from WRG's incinerator), and an extra 3,500tpa fly ash (making a total 10,000tpa).

### **Abbreviations**

BPEO - best practicable environmental option  
 HGV - heavy goods vehicle  
 ODPM- Office of the Deputy Prime Minister  
 RSS8 - Regional Spatial Strategy for the East Midlands  
 tpa - tonnes per annum  
 WLP - Waste Local Plan  
 WRG - Waste Recycling Group