

**SUMMARY OF OBJECTIONS TO APPLICATION 08 / 2816  
(PROPOSAL OF VIRIDOR TO BUILD AN INCINERATOR IN CARDIFF BAY)**

1. **The proposed incinerator will, during the long period of its contract, undermine the requirements laid down in the Waste Hierarchy.**

*Policies to comply with include:*

- 1) ***“the waste hierarchy shall apply as an order of priority in waste management legislation and policy”.*** EU Waste Directive 2008/98/EC, Article 4
- 2) ***“energy from waste’ is only to be resorted to when all possible materials recovery has already taken place.”*** National Waste Strategy for Wales (2002)

We believe Cardiff and the other LAs would strive less hard to achieve high growth rates in recycling and composting if the ‘easy solution’ of the Viridor incinerator was available.

- It has been found (e.g. in Denmark) that high incineration rates can lower recycling rates; The UK Government advises that only tight contracts can guard against this.
- Examples in the UK where incinerator contracts have resulted in a negative impact on recycling include Cleveland, East Sussex and Hampshire.
- Viridor’s incinerator would compromise recycling / composting rates by (for example):
  - setting their waste intake (350,000 tonnes p/a) too high;
  - doing no actual materials recovery itself other than of some low-grade metals;
  - claiming that finding use for some of its 75,000 tonnes p/a bottom ash counts towards LA recycling / composting targets – the UK government does not sanction this.

2. **The proposed incinerator is not demonstrated to be a Best Practicable Environmental Option, particularly with respect to climate change impact.**

*Policies to comply with include:*

- 1) European, national, regional & unitary authority policies all stress ***‘impact on Climate Change’*** and ***‘reduction in greenhouse gas emissions’*** in considering new developments.
- 2) Stage 5 of the BPEO process “should ...select two or three household and commercial waste options from the initial set which perform best on balance across the Decision Criteria.”

- Waste incinerators typically emit between 0.7 and 1.3 tonnes of CO<sub>2</sub> per tonne of waste; the proposed Viridor incinerator could release over 400,000 tonnes of CO<sub>2</sub> per annum.
- Viridor say they’d offset these damaging greenhouse-gas emissions by generating energy, but can they even do that? They would have to prove that without LA aid they can relay sufficient heat to attain the 65% efficiency necessary to qualify as “Energy Recovery”.
- Other technical options e.g. anaerobic digestion, MBT, autoclaving, pyrolysis, gasification (including plasma gasification) would emit less greenhouse gases, do more materials recovery & could supply energy from waste more efficiently; but Viridor avoids the comparison, comparing the environmental performance of its incinerator only with landfill.
- A 2008 study comparing the environmental impact of incinerators with other technical options, finds that “scenarios using incineration were amongst the poorest performing” and “were considerably worse than the best performers”. (Eunomia & EnviroCentre, 2008).

•Incineration does not meet the long-term needs of Cardiff or Prosiect Gwyrdd as, contrary to other technologies, it does not have the flexibility to adapt to changes in volumes and contents of waste, e.g. cannot downsize.

**3. There is Public Concern that the proposed incinerator will constitute a health risk because hazardous substances produced, for example ultra-fine particle (<PM 2.5) emissions from the stack, are not fully monitored or controlled.**

*Policies to comply with include:*

- 1) Waste management should “enhance the overall quality of the environment and **avoid risks to human health**” (TAN 21, Section 1.10);
- 2) “Member states should take the necessary measures to ensure that waste is recovered or disposed of without endangering human health”. EU Waste Directive 2006/12/EC, Article 4.

We do not need to be able to prove that health damage has occurred – harm that may be suspected may not be proven or there may be long latency periods. But we assert that:

- (1) particulate matter, especially ultra-fine PM<sub>2.5</sub> & PM<sub>0.1</sub> particles, can escape an incinerator’s pollution control equipment;
- (2) such ultra-fine particulate emissions from incinerators are not substantially monitored or regulated in the UK, can be carried several miles into populated areas and can be hazardous to human health via inhalation or ingestion.

**4. Pollution from the incinerator could damage the Severn Estuary Special Protection Area (which is also a Ramsar site & and possible Special Area of Conservation).**

*Policies to comply with include:*

‘the land use planning system should... have special regard to the **need to protect areas of designated landscape and nature conservation** (TAN 21 Sec. 1.10) including [in development of BPEO] **protection of habitats and species**” (Sec. 11.4).

•The Severn Estuary Special Protection Area adjoins the Cardiff docks area. It contains feeding grounds for populations of wild birds that are of European importance, and one of the most diverse fish populations in Britain, with over 110 species recorded.

•It would be damaged by gaseous pollutants from the incinerator and deposition onto its mudflats and sandbanks of toxic particulate matter.

**5. A significant proportion of the waste transportations generated by the incinerator would be in contravention of the Proximity Principle.**

[“Waste should be treated and or disposed of as near to the source of origin as possible because transporting waste itself has an environmental impact – TAN 21 Sec. 3.1.]

•Transportation of waste to the plant would be over longer distances (single journeys of up to 50km) than necessary, because the proposal is for a single centralised facility serving five local authorities; but there’s no reason (other than incinerator economics) why this should be so – two or more smaller facilities would bring treatment of waste nearer its point of origin.

•Because there is no hazardous land-fill site within SE Wales, nor in the whole of Wales, fly-ash (and possibly large quantities of bottom ash) would have to be transported to England.

**6. Pre-application public consultation was not well publicised or well attended, contrary to requirements for effective involvement of the public at an early stage.**

- Applications to build incinerators generally arouse intense public concern.
- Only eleven people attended the “Stakeholder workshop” at County Hall in September and only nine the one at Splott.
- Only 14 people attended the other main opportunity to engage face-to-face with the general public – the public exhibitions held at Novotel and at Splott. These were not advertised in the Western Mail or Echo until the day of the exhibitions.