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Dorset Council
County Hall
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Letter via email

26th March 2021



Dear Mr Garrity

Energy from Waste Incinerator

Planning Application WP/20/00692/DCC Portland Port, Castletown, Portland DT5 1PP UK

we write Objecting to this planning application.

This week on the 24.03.21 the Welsh Government stopped all new Incinerators being built over 10MW with immediate effect ¹. The Portland application is for 15MW. If we were located in Wales, we would be very pleased that sound reasoning has prevailed, but no we must continue to bring attention to the lack of need and significant negative consequences arising from this application. The House of Commons also debated² this issue on 24.03.21 with Rebecca Pow stating: "Our intention is to focus on reducing, recycling, reusing and, indeed, cutting down on all waste and moving to a circular economy."

"We have a target to increase overall recycling rates to 65% by 2035. We have a target for zero avoidable waste by 2050."

"there will be less waste. Producers will be responsible for all the waste and packaging that they put on the market. They will be responsible for its whole lifecycle and the full net costs. They will not want to have to pay for it to end up somewhere else, such as incineration, which is, bar landfill, right at the end of our waste hierarchy."

"The [Government's] ambition is to have less and less waste going to incineration"

"we are cutting down on waste, and we certainly take such things as air quality extremely seriously."

On Tuesday 8th Dec 2020 our MP presented "The petition of residents of the constituency of South Dorset regarding a proposal to build a waste incinerator on Portland South Dorset." This is recorded in Hansard Volume 685: Petitions Waste Incinerator on Portland 17:52:00. George Eustice's reply in the form of Observations from the Secretary of State for Environment, Food and Rural Affairs was sent to us on the 28th January from the House of Commons by Richard Drax MP. This document was entered into the online planning application documentation dated 02.02.21 by the applicant entitled WP-20-00692-SoS-DEFRA-2021-02-02.pdf³.

It is therefore timely to respond to the Observations of the UK Secretary of State for Environment, Food and Rural Affairs³ as part of this appraisal of the planning application for Portland at this time and in the new context of the landmark Environment Bill proceeding into law. We wish this letter to be entered into the application documents in counter point. Extended Producer Responsibility for

packaging will be a game-changing measure that will make Producers responsible for disposal costs and thus incentivise better design and better recyclability. There will be Resource efficiency information requirements, Deposit schemes, Charges for single use plastic items all will reduce waste. Together with waste tracking the collection of household, industrial and commercial waste will become more strictly governed by the Waste Hierarchy. As George Eustice's states the key principle in the Resource and Waste Strategy (RWS) is to prevent waste occurring in the first place, reduce contamination of the waste stream and encourage markets for recycles. The envisaged increase in recycling rates to 65% by 2035 will reduce the residual waste stream. We quote ³. "the Government is very clear that EfW should not compete with greater waste prevention, reuse or recycling" "the Government are committed to closely monitoring EfW capacity as they take action to continue the shift away from take, make, use, throw system to a greener, more circular economy."

The recent documentary Dirty Truth About Your Rubbish ⁴. reported that the Secretary of State for Business, Energy and Industrial Strategy, Kwasi Kwarteng, refused planning development consent for a large energy-from-waste incinerator in Kemsley⁵, on the edge of Sittingbourne in Kent. One of the reasons cited was that the incinerator would cannibalise recycling. It is clear that there is a direct correlation between regions tied into incineration contracts also having low recycling rates. ⁶. In England, we now burn more of our waste than we recycle. In fact, the documentary showed that around 60% of the waste going to incinerators should be recycled. "At the end of the day, converting plastic waste into energy does nothing to reduce demand for new plastic products and even less to mitigate climate change. To push for these approaches is to distract from real solutions like reuse systems at scale." ⁷.

The British Plastics Foundation (BPF) have analysed market data and made an expert assessment to provide an ambitious vision for dealing with plastic waste by 2030. BPF report⁸. that if the UK gets things moving with investment and infrastructure we can expect:

- Minimal plastic to landfill (1%)
- Zero reliance on low quality export (9%)
- Over 30% reduction in EFW
- Over 3 times increase in UK mechanical recycling tonnage
- 3.5 times increase in reprocessing in the UK
- Waste plastic processed by non-mechanical recycling could grow 60 times.

Our English planning system NPPF is founded on the principle of sustainable development summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs. With the BPF predictions supported by the Environment Bill it simply makes no sense to allow the occupation of employment land with a use that is behind the curve of history.

George Eustice sets out that it is the established planning and permitting processes that must be followed. That proposals must be determined in accordance with the development plans unless material consideration indicate otherwise and it is for you the planning authority to take this into account. Government Waste Data Interrogator⁹. updated 29.09.20 shows that even in 2017 there was surplus capacity in the South West for Municipal, Industrial and Commercial Incineration. Dorset should be proud of not having an EfW Incinerator. Given that the adopted 2019 Dorset Waste Plan clearly sets out the role of allocated sites and assessment of need it is clear that this application is not an allocated site and there is no need to the facility proposed. The location in a Port offers a distinct risk that once built it must import fuel to function and this in turn will be contrary to the proximity principle.

George Eustice explains that the Environmental Impact Assessment will address a range of factors required by The Town and Country Planning (Environmental Impact Assessment) Regulations 2017¹⁰. The introductory text states that assessment is based on **the precautionary principle** and on the principles that **preventive action should be taken**, that environmental damage should, as a priority, be rectified at source and **that the polluter should pay**. Allowing emissions of 202,000 tons of CO₂ a year will not be paid for by the operators, it will be paid for by the increase in global warming unless as a planning condition insists on full carbon capture and prior effective carbon storage is guaranteed.

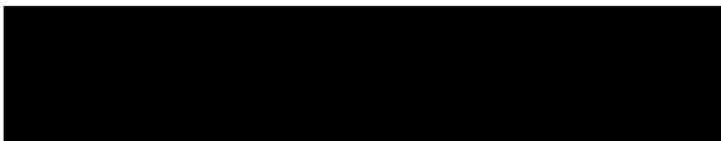
George Eustice explains that the Environment Agency are responsible for permits and compliance with strict limits. However, this provides no comfort to us when in the recent Environmental Audit Committee¹¹ meeting on 10.03.21 reported to Parliament via Guy Linley-Adams who said that there is currently "enough legislation" to tackle pollution but "The powers are all there but what we've suffered from is that successive governments have not allowed the Environment Agency to get on with the job. The agency has not so much had one hand tied behind its back, but it's been starved of funds and in many respects has been chained to its desk". The watch dog UKWIN¹², MPs reporting to Parliamentary debates on Incineration and nationwide Campaigners against incinerators consistently report breaches and incidents of fires¹³, odours¹⁴, vermin, and noise from operating plants. Questions about the effectiveness and transparency of the Environment Agency continue to raise concerns. "In February, the Environment Agency refused to explain why it had dropped a target to reduce the number of pollution incidents from a regular report on its performance against environmental objectives." ¹⁵. Why should we risk these adverse impacts when there is no need?

George Eustice relies on Public Health England. We have pointed out in our submission to you dated 22.03.21 that the PHE statement: "To date, PHE is not aware of any evidence that requires a change in the position statement" this is truly is not satisfactory given the evidence available and presented.

George Eustice explains that the Environment Bill delivers key parts of the Clean Air Strategy by establishing a duty to set a target on PM_{2.5} and other emissions. A duty to set a target is not the publication of limits and requirements. Reading of this Bill proves it to be mechanisms and frameworks not working parameters and limits.

George Eustice's summary shows the commitment to the circular economy and matching capacity to a reducing waste stream. Like in Wales and the South West there is already sufficient capacity and this application located on Portland should be refused.

Yours faithfully,



Paula Klaentschi BA Hons Dip Arch retired Architect

Coordinator
on behalf of Stop Portland Waste Incinerator Campaign

cc

Richard Drax MP

Cllr Ray Bryan

Cllr Rob Hughes

Cllr Susan Cocking

Cllr Paul Kimber

Cllr Giovanna Lewis

Reference sources

1. <https://gov.wales/written-statement-taking-action-make-circular-economy-reality> Wales have stopped all new Incinerators being built over 10MW with immediate effect from 24.03.21.
2. <https://hansard.parliament.uk/Commons/2021-03-24/debates/F4243C74-4547-4741-AF70-B51958A0D0F1/WasteIncinerators>
3. WP-20-00692-SoS-DEFRA-2021-02-02.pdf.
4. <https://www.theguardian.com/environment/2021/mar/07/revealed-why-hundreds-of-thousands-of-tonnes-of-recycling-are-going-up-in-smoke>
5. <https://www.letsrecycle.com/news/latest-news/secretary-of-state-rejects-wheelabrators-kemsley-north-plant/>
6. The relevant Defra data for 2019/20 is available from <https://www.gov.uk/government/statistical-data-sets/env18-local-authority-collected-waste-annual-results-tables> in a spreadsheet called 'Local authority collected waste generation from April 2000 to March 2020 (England and regions) and local authority data April 2019 to March 2020'. Specifically, you can look at 'Table 2: Management of Local Authority Collected Waste, England, 2014-15 to 2019-20'. However, the spreadsheet doesn't actually state a % for what is incinerated and what is recycled. This is calculated as a percentage using an appropriate formula. For recycling this is Column K ('Recycled-Composted') as a proportion of Column M ('Total'). For incineration it is the sum of columns I ('Incineration with EfW') and J ('Incineration without EfW') as a proportion of Column M. Once you have the percentages, you can then sort the local authorities by this and create a graph from all of the authorities or a sub-set (e.g. those with incineration rates above the England average of 45.5%). At <https://ukwin.org.uk/facts/#regionalincinerationrecycling> they have followed this process at a regional level.



7. <https://www.clientearth.org/latest/latest-updates/stories/the-environmental-impacts-of-waste-incineration/>
8. <https://www.bpf.co.uk/roadmap>

9. <https://data.gov.uk/dataset/312ace0a-ff0a-4f6f-a7ea-f757164cc488/waste-data-interrogator-2018>

South West: Incineration throughput 2017

All figures provided in 000s tonnes

Incineration Type	Sub-Region							SOUTH WEST
	Cornwall	Devon	Dorset	Gloucestershire	Somerset	West of England Unitaries	Wiltshire	
Animal By-Product	-	-	-	-	-	-	-	-
Animal Carcasses	-	-	-	-	-	-	-	-
Clinical	3	3	7	-	-	4	-	17
Co-Incineration of Hazardous Waste	-	-	-	-	-	-	-	-
Co-Incineration of Non Hazardous Waste	-	-	-	-	-	-	-	-
Hazardous	-	-	-	-	-	3	-	3
Municipal and/or Industrial & Commercial	189	307	-	-	-	341	-	836
Sewage Sludge	-	-	-	-	-	-	-	-
Biomass/Waste Wood	-	-	-	-	-	-	-	-
Total	192	309	7	-	-	347	-	856

Table Notes:

This datatable is for operational incineration facilities that accepted waste from off-site sources. It does not include facilities that burned waste from their own in-house processes or were non or pre-operational.

South West: Incineration capacity 2017

All figures provided in 000s tonnes

Incineration Type	Sub-Region							SOUTH WEST
	Cornwall	Devon	Dorset	Gloucestershire	Somerset	West of England Unitaries	Wiltshire	
Animal By-Product	-	-	-	-	-	-	-	-
Animal Carcasses	-	-	-	-	-	-	-	-
Clinical	5	4	8	-	-	7	-	24
Co-Incineration of Hazardous Waste	-	-	-	-	-	-	-	-
Co-Incineration of Non Hazardous Waste	-	-	-	-	-	-	-	-
Hazardous	-	-	-	-	-	9	-	9
Municipal and/or Industrial & Commercial	240	325	-	-	-	406	-	971
Sewage Sludge	-	-	-	-	-	-	-	-
Biomass/Waste Wood	-	-	-	-	-	-	-	-
Total	245	329	8	-	-	422	-	1,004

Table Notes:

This datatable is for operational incineration facilities that accepted waste from off-site sources. It does not include facilities that burned waste from their own in-house processes or were non or pre-operational.

10. <https://www.legislation.gov.uk/eudur/2011/92/introduction>
11. <https://www.endsreport.com/article/1709825/environment-agency-has-starved-funds-chained-its-desk> <https://parliamentlive.tv/event/index/1b267a49-4772-41c2-8330-053a2019b798>
12. UKWIN asked the EA for electronic copies of all 2020 performance reports and have now received most of them. They are currently available via: <https://ea.sharefile.com/d-sbfad1137da084ca5afb2818a3d66e644> as well as on the UKWIN website. The EA link will expire at some point, but of course the reports will remain on the UKWIN website, associated with each map/table entry.
13. <https://www.manchestereveningnews.co.uk/news/greater-manchester-news/investigation-underway-after-huge-fire-13634950> <https://www.yourlocalguardian.co.uk/news/17763822.fire-beddington-lane-recycling-centre-brought-control/>
14. <https://insidecroydon.com/2020/07/22/something-still-stinks-over-viridors-beddington-lane-fire/>
15. [https://www.endsreport.com/article/1709807/public-environment-bodies-becoming-less-transparent?bulletin=ends-report-products-chemicals-waste-resources-bulletin&utm_medium=EMAIL&utm_campaign=eNews%20Bulletin&utm_source=20210318&utm_content=ENDS%20Products%20Chemicals%20Waste%20and%20Resources%20\(59\)::&email_hash=](https://www.endsreport.com/article/1709807/public-environment-bodies-becoming-less-transparent?bulletin=ends-report-products-chemicals-waste-resources-bulletin&utm_medium=EMAIL&utm_campaign=eNews%20Bulletin&utm_source=20210318&utm_content=ENDS%20Products%20Chemicals%20Waste%20and%20Resources%20(59)::&email_hash=)