

Derrick Murphy  
Leader  
Norfolk County Council  
Martineau Lane  
Norwich  
NR1 2DH

11th March 2011

Dear Mr Murphy

**Proposed Energy From Waste Plant - Saddlebow Industrial Estate**

I write to give some initial comment from CPRE Norfolk on the proposed Energy-from-Waste (EfW) plant in King's Lynn.

CPRE believes that a fair and democratic planning system is the vehicle by which economic, social and environmental perspectives should be weighed accordingly and land use planning determined. To this end, we normally set out our views in terms of local, regional and national planning guidance and comment in direct response to planning applications. However, given the high profile nature of this case, we would like to make the following comments in advance of the application itself.

1. CPRE has a primary interest in the landscape. On this point, we find the site acceptable in terms of the immediate visual impact of the proposed Plant and its setting in the landscape. We have responded as such in previous consultations to the Minerals and Waste Local Development Framework. The existing power station, recycling centre and Palm Paper industrial unit already presents a focus of use for the site which makes the proposal compatible in principle. There is also good access from a primary route, the A47.

2. However, CPRE supports the 'proximity principle': the idea that compact cities, towns and villages, each with their own local area services, produce the best social, economic and environmental outcomes. We do recognise that there is an interaction between the size and viability of an operation, and that 'proximity' may differ in accordance with the inherent requirements of a particular technology. In this context, although the scale of the incinerator means that it best serves the whole of Norfolk, the facility would be best placed in the Norwich area, the centre of gravity of population. Thus, while we find the site itself acceptable, its strategic location remains questionable and the impacts on traffic movements and carbon emissions are obvious.

3. CPRE believes that any new proposals for incinerators or landfill sites should only follow after waste minimisation, recycling and composting options have been fully exploited. Although some progress has been made in these areas in recent years, it is clear that a lot more could be achieved. In the same breath, inflated targets for new housing and political ambition for population growth from inward migration, negate any such positive impacts, as an increase in waste is an inevitable part of a growth agenda. In our view, the Council has not done enough across departments and policy arenas to address the root cause of the 'need' for incineration, but rather sees it as an inevitable conclusion. A culture change is required at all levels.

4. While the Minerals and Waste Local Development Framework consultation process dealt with the site itself, we have not been asked to comment on the preferred technology. We note now that the Council has decided to go for incineration when there were four companies shortlisted, two for incineration and two for Mechanical Biological Treatment and Gasification technologies (MBT). CPRE believes that MBT is a much more environmentally friendly process and it is still not clear to us why this technology was discarded at such an early stage. As Cambridgeshire County Council uses such a plant for treatment of its waste, we would infer that the costs and logistics must be comparable.

5. CPRE is not in a position to assess the scientific evidence on safety issues surrounding incineration, nor is it part of our remit. Although we have attended meetings from both sides of the argument, it would not be fair for CPRE to pass judgement on matters for which it does not have suitable expertise.

6. Nevertheless, we do have concerns as to toxicity. The site is on the edge of King's Lynn and the prevailing wind will take any emissions across the town and surrounding natural environment. It is not just the 'immediate breath-in' level of materials that might be emitted, but the cumulative impact of deposition on land and water. Decades of landfill and 'dilute and disperse' methods have already left a toxic legacy for future generations as regards soil, and in particular water supplies. While an evolving strategy to deal with waste is welcomed, we are not yet convinced that incineration provides the best environmental solution.

7. We note that the Plant needs to run 24 hours a day, seven days a week, and at very high temperatures. Presumably this is to burn with a zero, or 'minimum and acceptable', emission level of specific toxic components. We fear that this requirement may lead to the import of waste from further afield or the use of waste which could have been recycled (for example, some plastics) if there is a shortfall in the local supply. It also leaves no flexibility to respond to future innovations in resource and waste management such as plant based packaging and the diversification of recyclable materials. Over time, these innovations could result in far less non-recyclable waste, while the Council remains locked into feeding a previously commissioned incinerator.

8. We assume that when lower temperatures arise from cooling down periods, servicing schedules or operational breakdowns, this will result in a

less efficient burn with a higher level of emitted particles, and/or a different range of chemicals with a different toxicity potential. This is also of concern and little information is available on this matter. At the very least, in the result of any such Plant being developed we suggest that the data on emissions in both normal and sub-optimal operating conditions should be in the public domain.

9. We recognise that there will always be a tension between the general public looking for absolute safety, and the experts seeking a 'very low' and 'acceptable' degree of risk. Nevertheless, it is clear that considerable public anxiety remains as to the potential impact on human health for incineration.

10. We note the results of the recent Referendum and the Council's subsequent decision to progress the plans by awarding the contract to Cory Wheelabrator despite a 93% No vote. Thus, while the Council talks about wanting to involve people in public consultation, all evidence suggests that the prevalent view of local people will not make a difference to the outcome. While the Council will argue that it must take the wider strategic picture into account, it cannot also say that public consultation is a fair and reasonable method for local people to be involved in the decision making, when such a clear majority are against the plans being furthered.

I am enclosing CPRE's National Policy on Waste as a companion to this letter. If you would like to discuss any of our views in person, we would be happy to meet with you. Otherwise, we will await the planning application later in the year.

Yours sincerely

James Frost  
Director



Campaign to Protect  
Rural England

## *Policy Position Statement*

# Waste

Until very recently the amount of waste generated has been growing. Rates of household recycling are still low at 15%. With controls on the amount of waste going to landfill sites – generally large holes in the ground which are gradually filled with domestic and commercial rubbish – what to do with our mounting waste problem is of growing importance.

### **What are the issues for the countryside?**

The UK produced around 330 million tonnes of waste in 2002/03. The vast majority of this is construction and demolition waste. A third is produced by industry, commerce and households. Household waste represents around 9% with almost 26 million tonnes generated in England in 2002/03. The vast majority of this (over 70%) went to landfill sites.

While the amount of waste being recycled or reused is gradually rising, these gains have tended to be outstripped by the growth in the overall volume of waste.

The legacy of disposing of household waste in landfill sites means that in many parts of the country you are rarely more than 10 miles from an existing site. Where sites are closed, they leave the landscape changed and the lurking threat of groundwater contamination and other pollution remains. Where sites are still open, there are the added problems of heavy lorry traffic, noise, odours and dust. Waste incinerators pose their own problems, raising concerns about the landscape intrusion from major plants

and uncertainties about the health impacts of associated emissions.

### **CPRE's approach**

CPRE believes waste policy should be governed by a waste hierarchy which places in order of priority waste minimisation, re-use and recycling and, lastly, disposal by incineration and landfill. The Government's Waste Strategy 2000 aims to reduce the volume of waste produced and to increase recycling, composting and re-use (which includes incineration), with energy from burning waste providing heat and power. In response to the EU Landfill Directive, the waste strategy aims to reduce the amount of biodegradable waste disposed in landfill sites. CPRE supports this, but so far progress has been slow in delivering results. There is an urgent need to do more to prioritise waste reduction, minimisation and reuse. Under the targets set in the waste strategy, one-third of municipal waste could still end up being incinerated and one-third sent to landfill, with unacceptable environmental impacts.

We believe governments at all levels need

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to do more to deliver change. In particular:

- > the Government needs to provide strong leadership to ensure that waste reduction is seen as a priority by local government, business and individuals. It should set challenging targets for waste minimisation to complement the existing statutory recycling targets;
- > the provision of new landfill sites and waste incineration plants should be strictly limited, and dependent on the relevant local authorities having achieved demanding targets for waste reduction and recycling. Provision should happen only after waste disposal options further up the waste hierarchy have been exploited. Landfilling and incineration should no longer be viewed as the acceptable default option where recycling ventures have failed;
- > the Government should significantly and progressively increase the landfill tax as a necessary economic incentive to reducing landfill, with the proceeds used to support waste minimisation programmes. The current commitment to increase the tax by £3 a tonne per year is insufficient. The tax should be broadened to include waste incineration. Other economic incentives should be examined to send the right price signals, such as enabling local authorities to charge for waste collection on the basis of the weight of rubbish collected; and
- > the planning and development of new houses and flats provides a crucial opportunity to install recycling facilities at the outset and to ensure that houses and flats can be served by doorstep

collections. Similar consideration should be given to the design of commercial properties.

### **What can you do?**

With waste strategies and plans being prepared in all areas, there are numerous opportunities to get involved and to press the case for protecting the countryside by reducing waste:

- > encourage your local authority to adopt measures to minimise the amount of waste produced and maximise re-use wherever possible. As well as introduced or improved recycling schemes, measures could include increasing popular understanding of the issues and of the need to reduce waste from the outset;
- > scrutinise your county council's or unitary authority's Waste Development Framework to check that policies are in line with Government policy on sustainable waste management and environmental protection set out in the Government's guidance on planning and waste management (called PPS10) and the national waste strategy;
- > track your local authority's progress in meeting its recycling targets. Information on recycling rates by each authority are available on the Defra website. Give it support when it is successful and quiz councillors and officers if targets are not being met. In 2002/3 only 14.5% of household waste was recycled in England – considerably lower than in most European countries. If your local authority is doing better than the average, then encourage it to do better still. If it is doing worse, then

try to shame it into at least achieving the average;

- > encourage your local authority to ensure that policies are included in the local development plan for your area which require large new housing, commercial and other developments to include recycling facilities through the use of planning conditions;
- > check that any proposals for new incinerators or landfill sites only follow after full exploitation of waste minimisation, recycling and composting options have been exploited. In exceptional circumstances, where incinerators are considered the best option to deliver environmental objectives, the incinerators should always incorporate energy recovery so that they are not simply a waste disposal facility;
- > encourage your local authority to set up a doorstep collection of recyclable waste as required under the *Household Waste Recycling Act, 2003*. Urge your authority to broaden the range of materials accepted for recycling. If one already exists in your local area, encourage friends and neighbours to use it; and
- > cut down on waste at home by setting up a compost bin, reusing containers and bags, avoiding heavily packaged goods and complaining to retailers and manufacturers about goods which are over-packaged.

**Further reading**

*Waste Strategy 2000 – A CPRE briefing*, CPRE, 2000. Available from CPRE Publications.

*Waste Strategy 2000: England and Wales*, Department of Environment, Transport and Regions, 2000. Available from the Stationery Office.

*PPS10: Planning for Sustainable Waste Management*, Office of the Deputy Prime Minister, 2005. Available from the Stationery Office.

*Hungry Housing*, CPRE, 1998. Available from CPRE Publications.

*Waste and the Countryside*, CPRE, 1997. Available from CPRE Publications.