

RESIDENTS AGAINST THE CF3 INCINERATOR – DNS APPLICATION 3236340  
HEARING STATEMENT SESSION 1  
STRATEGIC/POLICY CONSIDERATIONS

**INTRODUCTION**

This document is the Residents Against the CF3 Incinerator’s Hearing Statement for Session 1 – Strategic/Policy Considerations.

We represent those communities severely impacted by the applicant’s proposal.

We have campaigned hard to engage these communities, which includes the traveller community, to raise awareness of the proposal.

Our communications, via an open social media platform, have kept over 3,100 residents up to date on the progress of the application.

Their serious concerns, the strength and number of their objections are clearly evident.

The applicant’s Consultation report confirms 97% of the residents either oppose or are strongly opposed to the applicant’s proposal.

There was also a large number of comments received during the DNS public consultation, again all are strongly opposed.

It is a fact, there is no common ground between our campaign group, the residents and the applicant.

We would like to take this opportunity to thank our ward councillors for their public support, our MP, Stephen Doughty, and Members of the Senedd (our ward representatives) who have met with us, discussed our concerns and lobbied for a moratorium on incineration.

We are also grateful for the advice and guidance provided through our links to wider voluntary groups (Greenpeace, FOE) and legal professionals.

With respect to this hearing, we would like to provide the following in response to the Inspector’s Initial questions/Discussion points for this session.

**1. National Policy**

**Question 1**

Welsh Government’s strategic direction and National policy landscape have changed considerably since the applicant’s selection and acquisition of the proposed development site.

The most recent of these changes, i.e., Future Wales, PPW 11 and Beyond Recycling, have, in our opinion, created multiple inconsistencies between the proposal and Welsh Government’s strategic direction and agenda, i.e., Climate Change, Decarbonisation, Low Carbon/Renewable Energy and the Circular Economy (reuse, recycle and repair).

Welsh Government recently accepted advice from the UK Committee for Climate Change (CCC) and set their greenhouse gas emissions targets through to 2050.

The CCC Waste sector report (Dec2020) identified a growth in greenhouse gas emissions in the Waste sector, which they have attributed to emissions from Energy from Waste (EfW) plants.

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Their report recommended a number of key policy changes to constrain emissions from existing EfW, i.e., increase in recycling and reuse to reduce waste and stopping construction of all EfW plants in the pipeline.

Mitigation of emissions through the adoption and fitting of Carbon Capture and Storage (CCS) technology was also recommended.

The applicant is on record as saying that fitting CCS would make their proposed development non-viable.

Welsh Government's strategic direction for energy generation, as stated in Future Wales and PPW 11, is low carbon and renewable energy projects that contribute towards their decarbonisation targets with a presumption in favour of large-scale wind energy development.

The applicant's proposal is inconsistent with PPW 11's environmental considerations as it provides no demonstration of how it will support decarbonisation and the transition to a low carbon economy.

Welsh Government's Future Wales and PPW 11 support the establishment of District Heat Networks and identifies Priority Areas for investigation. The closest Priority Areas to the applicant's site are in Cardiff, Caerphilly and Newport.

The applicant's proposal does not demonstrate support for these policies. It does not include a Heat Network development to supply the local area or businesses.

The specific aim of the applicant's proposal is to divert residual waste from landfill for incineration. There are no recycling facilities. We find this inconsistent with PPW 11 as the applicant's proposal does not promote recycling or reuse.

Legislation has been introduced by the Welsh Government to ban certain recyclable materials from landfill or incineration, with the aim of improving recycling, reducing landfill and incineration.

Wales has one of the highest recycling rates in the world. Their strategic direction and targets will improve this further. They have recently stated: ***"we will not need any new large-scale energy from waste infrastructure to deal with the residual waste generated in Wales"***.

Therefore, we are of the opinion, that the applicant's proposal demonstrates no contribution or consistency with Welsh Government's policies on Climate Change, Decarbonisation, Low Carbon/Renewable Energy or the Circular Economy (reuse, recycle and repair) and there is no demonstrable need for it.

## **2. Conformity with the development plan.**

### **Question 1**

We have submitted our comments on the non-conformity of the applicant's proposal with a number of LDP policies, i.e., W1 and Locating Waste Management Facilities SPG, in the LPA development plan. These are in our response to DOC100 Section 2 – Planning Statement.

Cardiff City Council are much better placed to comment in detail on this section.

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However, we are keen to hear whether conformity can be demonstrated. In particular, we are keenly interested to know whether the applicant's proposal is compatible with, or impacts, the LDP strategic plans for Cardiff East. In particular Cardiff Parkway and associated business park development at St Mellons.

**3. Need for the ERF and rationale for site location/consideration of alternatives**

**Question 1**

The Applicant identified the need for additional residual waste management capacity in the South East Wales region and acquired a site with planning permission for a waste management facility.

In our opinion, as discussed in our response to DOC100 Section 4 – Waste Planning Assessment, the applicant's analysis of the availability of C & I waste is seriously flawed. It was not recognised or considered that their C & I waste analysis was inflated by combustion waste. We identified this and provided an explanation with evidence.

We also provide extensive analysis and research of the key waste information in our response to DOC100, Section 4 – Waste Planning Assessment, which generated, we believe the most up to date set of key waste statistics.

These demonstrated there is no need for an ERF in S. E. Wales.

However, there may be one question that remains, what is the authority attached to our key waste statistics?

Welsh Government's Beyond Recycling (page 32) confirms our analysis, stating:  
*"as the increase in recycling and reduction in waste already seen means that **we will not need any new large-scale energy from waste infrastructure to deal with the residual waste generated in Wales**".*

This is an authoritative source. We reached the same conclusion and agree with the Welsh Government's statement.

**Questions 2 & 3**

We have no comments to make. They are more relevant to the applicant.

**4. Waste Planning Assessment and Sustainability Considerations**

**Questions 1 & 2**

The applicant's Waste Planning Assessment provided no certainty on;

- What the availability of feedstock for the lifetime of the development is?
- What amount of waste is available within a 30-mile radius?
- What specific waste would be considered as feedstock?
- Who would supply their C & I feedstock?

We trust that our comprehensive and extensive analysis included in our initial response and then subsequently in our response to DOC100 Section 4 – Waste Planning Assessment, addresses and provides answers to these questions.

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**Question 3**

We anticipate that the reduction in available feedstock will not be as heavily influenced by advances in waste recycling technologies but more significantly by Welsh Government policy, legislation and investment.

These are already in place or committed to by Welsh Government, i.e., recent changes in legislation, which ban certain recyclable materials from landfill and incineration, and Welsh Government commitment to invest in developing the Recycling/Reuse infrastructure.

These policy and legislation changes will drive down the waste sent to landfill and incineration, reducing the amount of waste available as potential feedstock.

We have been unable to identify the amount of C & I waste the applicant states they can divert from S E Wales landfill, i.e., 200,000 tonnes per annum.

**Question 4**

We have no comments to make. This is more relevant for the applicant to address.

**Question 5**

We are unable to identify how the development would make any contribution to meeting the national objectives in Towards Zero Waste, as these are focussed on recycling, or of achieving net zero carbon emissions by 2050 as the plant is a significant source of greenhouse gas emissions.

**Question 6**

We would like to see a condition or planning obligation attached to this, which ensures that the GVA generated remains locally based and is not leaked from Wales.

**Question 7**

We would like to see a condition or planning obligation attached to this, which ensures that an element of local ownership is embedded in the proposed development.

**Question 8**

We understand the ERF will be capable of providing a Heat offtake. We would like to understand, if this is used to supply a Heat Network, what the impacts and implications are. Will there be an impact on the efficiency of the ERF? Will there need to be an increase in throughput capacity to maintain heat and efficiency?

**5. Publication of WG strategy “Beyond Recycling” (2 March 2021)**

**Questions 1 & 2**

We understand the demonstration of a need for any new large-scale energy from waste infrastructure is a material consideration.

The recently published “Beyond Recycling” strategy clearly states the Welsh Government’s commitment to a Circular Economy, i.e., Reuse, Recycle, Repair, which negates the need for any new large-scale energy from waste infrastructure.

Based on our understanding of the Welsh Government’s policy and strategic direction, we have evidenced there is no need for the applicant’s proposed facility.

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This has been endorsed and confirmed by the statement on page 32 of “Beyond Recycling”:  
*“as the increase in recycling and reduction in waste already seen means that **we will not need any new large-scale energy from waste infrastructure to deal with the residual waste generated in Wales**”.*

**Question 3**

We addressed this in an earlier section due to the interlinking between the Strategic and Policy considerations and this section.

**CONCLUSION**

We fully endorse and support Welsh Government’s stated policies, aims, targets and strategic direction with respect to Climate Change, Decarbonisation, Low Carbon/Renewable Energy and the Circular Economy (reuse, recycle and repair).

There is a significant level of inconsistency between the applicant’s proposed ERF development and these Welsh Government strategies/National policies and local policies.