

MARSHFIELD COMMUNITY COUNCIL

MOR HAFREN ENERGY RECOVERY FACILITY

HEARING PRE-STATEMENT DAY 1 - 23RD MARCH 2021

Question 1: What is the materiality of the newly published Welsh Government Strategy 'Beyond Recycling' to the determination of the Mor Hafren DNS application?

Beyond Recycling gives a specific commitment to reducing all waste with the intention of Wales becoming a circular economy, where all resources used are collected and reused wherever possible. The document makes a specific statement that Welsh Government will:

'Place a moratorium on any future large scale energy from waste developments, 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.'

'We will send zero plastic to landfill and progressively reduce the amount sent to energy recovery.'

- **The key issue is the timing of the restriction on large scale energy from waste developments and how this will impact upon Mor Hafren.** For example, if the Welsh Government was to put this restriction in place from 2025, the investment and building of Mor Hafren would not be viable.
- **The strategy will also directly impact upon the current application for the Mor Hafren ERF in several other ways:**
 - the predicted lifespan of the incinerator (25-30 years)
 - the investment and expected return period
 - the supply of the waste to the incinerator as this is predicted to decrease by:
 - 26% by 2025
 - 36% by 2030
 - 62% by 2050

The implications of these targets is that waste will be managed in a number of ways in the future, including a significant reduction in non-recyclable materials in the manufacture of products.

There is also a large energy recovery facility already sited on the east of Cardiff and we would wish to raise the issue that this could be sufficient for future energy to waste recovery.

ALL OF THESE ISSUES POINT TO A DRAMATIC REDUCTION IN THE MATERIALS TO BE SENT TO ENERGY - WASTE RECOVERY FACILITY, AND THE POSSIBILITY THAT THE PLANS FOR MOR HAFREN COULD BE REDUNDANT.

Note - these responses also apply to question 5 of the Hearing.

QUESTION 2: How well does the Mor Hafren proposal fit with the published strategy and its milestones towards zero waste by 2050, including the intention to place a moratorium on all future large-scale energy from waste developments?

Given the information above outlining the targets for reductions in waste in Wales, and therefore the reduced supply for the energy recovery facility, it seems highly probable that the plant would not achieve its predicted levels of energy recovery over the predicted lifespan.

There is also a possibility that the plant is built, functions at restricted capacity and then closes before the end of its expected lifetime. This would be a conclusion that should be avoided by making a decision to begin the restriction of building future energy recovery facilities with immediate effect.

QUESTION 3. What implications do the strategy and milestones have for the reliable availability of an adequate supply of feedstock (200,000 tonnes per annum of residual commercial / industrial waste which would otherwise go to landfill sources from the stated catchment area) throughout the intended lifetime of the Mor Hafren proposal?

Whilst it is quite feasible that the supply of suitable waste will be available for the next 10 years, it is clear that government targets for waste disposal will be beginning to function across Wales by that time, and that waste suitable for the facility will be starting to reduce in volume. Whilst the overall level of waste at that time may still be sufficient, it is inevitable that there will be a continued decline in supply from 2030.

We recommend:

- **that an overall waste supply review and future analysis for Wales is conducted**
- **that, given the availability of the energy recovery facility already based at the east of Cardiff, the need for waste energy recovery capacity for Cardiff and South Wales be reviewed immediately.**

(cont..)

HEARING DAY 1: RESPONSES TO QUESTIONS

1. NATIONAL POLICY:

Does the publication of Future Wales: the national plan 2040 and Planning Policy Wales (PPW) Edition 11 on 24 February 2021 materially alter the national planning policy considerations which bear upon the determination of the application? If so, in what respect(s)? Is the proposal consistent with the new published documents?

Policy 19 of Future Wales stipulates that strategic policies should be put in place for regional planning of specific services and facilities, including renewable energy and waste treatment.

Although the current application for Mor Hafren is being considered by the DNS, it is not clear how this fully qualifies as regional planning. The consultation and planning process has invited only local parties with interest and therefore the process could not be considered as inclusive on a regional basis. Therefore, the application should be postponed, until the procedures for regional planning of developments for waste / energy recovery are in place, especially as neighbouring authorities are also accepting applications for energy recovery (Newport County Council).

2. Conformity with the development plan.

i. Does the LPA consider that the proposed development conflicts with any of the policies of its Local Development Plan? If so, with which policies and in what way?

FOR CARDIFF CC TO RESPOND.

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

i. What are the key waste statistics (including source references) that provide the most authoritative, reliable and accurate basis for assessing the need for the ERF within the S E Wales context and through the lifetime of the development?

ii. What are the key factors that support the selection of the application site as the site best placed to accommodate the proposed ERF facility?

iii. To what extent were other sites considered in the initial sieving exercise described in the ES Chapter 5 Consideration of Alternatives? Was the initial search restricted to sites already possessing planning permission for a waste processing facility and, if so, why?

Upon reading the application, it is not clear that any other sites were reviewed and that as the Cardiff LDP had already designated the chosen site as suitable for waste management, this was made the first and only choice for the proposed development.

4. Waste Planning Assessment and Sustainability Considerations

It is quite feasible that the availability of sufficient amounts of waste suitable for the energy recovery facility will diminish within the 30 mile radius of the plant, given the targets now put in place by Welsh Government Strategy 'Beyond Recycling'.

Similarly, it is intended that changes in manufacturing to products which are recyclable or managed by different recycling / waste arrangements will reduce the availability of feedstock in the future.

The pressure on communities, both domestic and commercial, must continue to be to recycle, avoid waste and re-use / repair wherever possible. The emphasis needs to be on the principle of the circular economy, NOT the waste economy.

Therefore, all decisions made since the publishing 'Beyond Recycling' should be about reducing waste and managing waste regionally. The current application should therefore be postponed while region planning processes are put in place.

5. ALREADY ANSWERED ABOVE

HEARING PRE-STATEMENT DAY 2: 24TH MARCH 2021

1. Air Quality and Odours

- We remain concerned that the applicant refers to the occurrence of NO₂ Nitrogen Dioxide from the plume to occur at various locations beyond the site and as above significant levels.
- We are aware of the dangers of excess NO₂ settling on land and waterways in the area, and note that NRW have also expressed concerns about the normative values being applied.
- We are particularly concerned that consideration is given to the wildlife that will be remaining in the areas around the plant, and advise that ongoing monitoring of levels of NO₂ is conducted throughout the lifetime of the plant if it is built.

2. Noise and Vibration

- No comment

3. External Appearance

- We remain concerned that the appearance of the plant (as shown in photomontages 9, 1, 14, and 19) to be obtrusive and out of keeping with the topography of the Gwent Levels, which is predominantly flat, and green.