

FW: EfW Guide Chapter 5 comes down hard on gasification and pyrolysis / Proposed Gasification Experiment in Bilsthorpe

Protect Bilsthorpe [RAGE@ecoworld.co.uk]

Sent: 06 March 2014 21:56

To: Mike Hankin

Hi Mike

On the 26th of February 2014 the Government published a revised version of 'Energy from Waste – a guide to the debate', a document which is intended "to provide a starting point for discussions about the role energy from waste might have in managing waste".

The Government's EfW Guide is available from: <https://www.gov.uk/government/publications/energy-from-waste-a-guide-to-the-debate>

Importantly, the Government has added Chapter 5 "which considers the future policy direction for energy from waste". According to the Guide, "This chapter does not set out any new policy but identifies underlying principles that are likely to continue as key considerations for both government and the sector in the future".

Chapter 5 represents one of the most sceptical looks at incineration and RDF production taken by the UK Government to date, with recognition that as the electricity supply is decarbonised incineration will become increasingly worse in climate change terms.

Chapter 5 makes it clear that the only way for new electricity-only incinerators to emit fewer GHG emissions than landfill in the long term is to burn less fossil-derived material such as plastics, but that this should not come at the expense of recycling, composting and Anaerobic Digestion. As part of this, Chapter 5 highlights the importance of understanding how the feedstock will change over the lifetime of an incineration plant, and how this is impacted upon by actions higher in the waste management hierarchy.

Chapter 5 also makes clear the general unacceptability of incinerators that fail to meet the Waste Framework Directive definition of Recovery. This is bad news for the large number of Gasification and Pyrolysis plants currently proposed because they would be so inefficient that they would not meet the unambitious R1 Formula Threshold.

The EfW Guide makes clear that incinerators are Disposal unless demonstrated otherwise, placing them at the bottom tier of the Waste Management Hierarchy. Facilities with a Design Stage R1 Certificate from the Environment Agency are listed at the bottom of <http://www.environment-agency.gov.uk/business/sectors/143711.aspx>

Chapter 5 of the EfW Guide sets out four "key principles which underpin policies now and are expected to remain critical in the future":

1. Energy from waste must support the management of waste in line with the waste hierarchy.
2. Energy from waste should seek to reduce or mitigate the environmental impacts of waste management and then seek to maximise the benefits of energy generation.
3. Government support for energy from waste should provide value for money and make a cost effective contribution to UK environmental objectives in the context of overall waste management

and energy goals.

4. Government will remain technology neutral except where there is a clear market failure preventing a technology competing on a level footing.

Key considerations arising from the First Principle are summarised at Paragraph 235, as follows: "To be consistent with the principle of energy from waste supporting waste management in line with the hierarchy, key considerations for the long term development or operation of an energy from waste solution are:

- The ability to at least qualify as recovery in the waste hierarchy
- To support and not compete with effective prevention, reuse and recycling and not be a brake on their growth
- Meeting the requirements of the hierarchy will be an important test for any policy or project aiming to increase the energy produced from waste
- The energy from waste sector needs to think beyond its own boundaries working with partners along the supply chain. It must be flexible to changing waste composition or drive recycling and/or collection processes that allow it to manipulate the composition of residual waste (the energy from waste feedstock) without compromising the above."

According to Paragraph 250 of the EfW Guide: "To address these changes and meet the second principle of minimising environmental impacts key considerations for both new and existing plants going forwards will be:

- Maximising the efficiency of existing plants to delay reaching, and avoid going beyond, any balance point
- The sustainable lifetime of an electricity only plant will be limited and extending it beyond that originally envisaged may not be beneficial
- Focus on development of energy outputs beyond electricity, both for new plants and ensuring existing plants that are 'CHP ready' becoming 'CHP in use'
- avoiding the use of waste in energy recovery with insufficient biogenic content to deliver environmental benefits, or capturing the environmental cost of doing so"

According to Paragraph 258 of the EfW Guide: "To meet the second part of this principle, maximising energy benefits, key considerations are

- Steering waste towards the most efficient plants/outputs on a lifecycle basis and away from less efficient solutions
- Selecting sites that do not limit plants to only generating electricity i.e. sites in urban centres and/or close to heat users should be preferred to remote rural locations where opportunities to utilise heat may be more limited.
- Delivery of wider energy policy goals and regulation"

According to Paragraph 268 of the EfW Guide: "To adhere to the principles key considerations for the production and use of refuse derived fuels are:

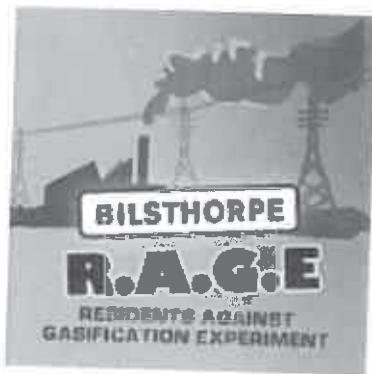
- Ensuring the hierarchy is applied and the need to maintain biogenic content the fuel fraction is not done at the cost of potential recycling
- Encouraging greater understanding of the biogenic content

- Increasing biogenic content through removal of fossil waste not addition of biogenic waste
- Ensuring material if exported delivers a better environmental outcome than domestic disposal"

According to Paragraph 276 of the EfW Guide: "To adhere to the first and second principles when considering energy from primarily fossil waste streams key considerations are:

- Encouraging recovery of the resource rather than disposal
- Disincentivising mixing with biogenic rich waste streams that could otherwise move up the hierarchy
- Supporting energy recovery processes that deliver overall lifecycle benefits compared to raw materials
- Ensuring recovery captures the environmental cost of the process where this is greater than landfill"

Paul Mackenzie



Ruth Kinsey

From: development management
Sent: 25 September 2014 09:40
To: development management
Subject: New comments for application ES/2950

Comment received on ES/2950

Comment from Mrs Sara Burton 9 Rufford Close Bilsthorpe Newark Notts

NG22 8SW

Comments:

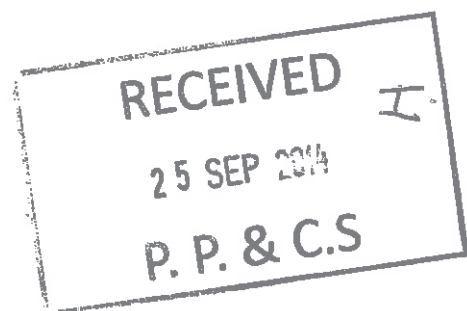
The following has been compiled by myself in my role as RAGE secretary. It summarizes all the concerns that have been raised and discussed during our meetings.

The following files have been uploaded:

Summary of Local Concerns Compiled by the RAGE group.doc

The following message has been applied automatically, to promote news and information from Nottinghamshire County Council about events and services:

We're supporting Stoptober. It's like October but without cigarettes. <http://www.nhs.uk/stoptober/>



Summary of Local Concerns Compiled by the RAGE group

Wildlife seen on the proposal site

The proposed development site is a site of importance for nature conservation (SINC). The recent addition of wind turbines and solar farm mean that if the incinerator was also given the go-ahead then there would be very little land left for Nature to survive. On a walk adjacent to the site earmarked for development, Andy Lowe of the Birklands Ringing Group (who also works for Notts Wildlife Trust) observed 1 male Little-Ringed Plover, 2 juvenile Kestrels, 7 Stock Dove and a pair of Grey Partridge with at least 10 day-old young - Notts Wildlife Trust said that these are a fast declining species in the UK and especially in this area. Andy says that all these species are either Birds of Conservation Concern (BoCC) Red or Amber listed species.

The new cycle trail connecting Bilsthorpe to Sherwood Pines and Clipstone begins very close to the proposal site. Nottinghamshire County Council has installed signs advising trail users to keep to the path and keep dogs under control as birds may be nesting in the area. Nottinghamshire County Council found Woodlark and Nightjar adjacent to the trail and considered these species so important that they erected the signs as a means of protecting their habitat. We therefore encourage Nottinghamshire County Council to ensure that adequate surveys, both in daylight and nocturnal, are carried out on the old colliery site. NWT informed us that if a survey has not been carried out during the night as well as the day then the applicant cannot be sure that the site isn't used for foraging and therefore still critical to the survival of the birds. The introduction of lighting and the increase in traffic associated with the Bilsthorpe incinerator proposal would result in a deterioration of the habitat and would therefore harm the local Nightjar population who are highly sensitive to disturbances.

Increase in HGVs

We are very concerned about the increase in Heavy Goods Vehicles (HGVs) using the already overloaded Deerdale junction to access the site. This very busy junction is also used by residents of the village who will face an increased risk to their safety and have their journey times affected when joining and leaving the A614. The increase in HGVs to the site will inevitably also increase the number of HGVs that accidentally come through the village, despite restrictions being in place. The safety of residents again is of paramount concern as children use this road as a route to school. We feel that this additional traffic needs to be considered with the compounded affect of lorries entering the wind farm for maintenance reasons and in addition the traffic to construct the solar farm that has recently been given the go-ahead.

What Waste?

Local residents are concerned to know the nature of the waste that will be processed on the site, should this development be given Council approval. The developers still have not told us what waste will be processed at the plant despite this being a key question asked by

Nottinghamshire County Council as a result of the preliminary objections submitted by Rob Hughes on behalf of RAGE and Shlomo Downen (UKWIN - UK Without Incineration Network). Shlomo has said "It is not surprising that local people have concerns about the proposal and do not want to live next to an experimental facility, especially as the application assumes the incinerator would treat hazardous waste. The applicant acknowledges 'advanced thermal treatment' has failed elsewhere, yet they refuse to answer questions about the track record of their technology. I hope the planning committee rejects this unwanted and unnecessary proposal." It is our view, therefore, that the Council would be acting recklessly if it takes a decision on this development without consideration of the details about the use of the site, including an appraisal of the risk to the long term health of the local community.

Impact on Tourism

The images included in Peel's proposal documentation clearly show that the plant will be visible from the A614 and therefore to everyone travelling up from the south to local tourism sites such as Rufford Park and Center Parcs (both just 3 miles away), Sherwood Pines and Sherwood Forest (9 miles away). A comment from a Center Parcs visitor on the popular travel review site TripAdvisor said: "I know of plans to build a giant industrial 'Gasification' plant (a type of household refuse incinerator) only a couple of miles away. If that goes ahead I definitely won't be going back. Why risk inhaling toxic fumes when there are plenty of other locations to enjoy a short break?" There are at least 3 similar comments that we could find and this is before planning permission has been granted. We believe that Nottinghamshire County Council should review the potential loss in tourists and therefore potential job losses in parallel to the relatively few jobs that Peel is offering to provide.

It should be noted that concerns about the impact of an incinerator on tourism in Sherwood Forest were taken seriously at the Rufford Inquiry. The Secretary of State agreed with the Inspector's observation that, like the proposed Bilsthorpe incinerator: "...the former Rufford colliery is not allocated for development. It is in the open countryside and away from Rainworth. However, the ERF [incinerator] would be prominent in residents' views and it would detract from their enjoyment of the area. It would also undermine efforts being made to develop Sherwood Forest as a tourist destination, because of the harm that would be caused to the rural landscape. This is clearly at odds with the need to protect the countryside for the sake of its intrinsic character and beauty, so that it may be enjoyed by all".

What Jobs?

Current claims of employment figures on Peel's website state that it could "create up to 46 permanent jobs", however the initial figures indicated by them were only around 30 jobs. At an Eakring Parish Council meeting that Peel attended they admitted that only a relatively small number of new jobs would flow from the development. When pushed as to how many local jobs would be created the answer was "well possibly 6-8, as specific skills will be required in certain areas". As for their claim that local workers will be used during construction, this was a claim made regarding the construction of the recent wind farm however specialist crews were brought in from Germany, as well as contractors from

Blackwells, so it is clear to us that any new jobs would be temporary in nature and that few local jobs would actually be available during the construction phase of the Gasification plant either. In addition members of the RAGE group have spoken to local businesses on the Energy village site where the plant is proposed and one business WILL move if the plant is given the go ahead and others have indicated that they will consider finding new premises.

Locals are fed up of being dumped on

It is a main concern of residents in Bilsthorpe that over the years, the village has had to suffer the landfill site, oil recycling plant which is currently being extended, recycling centre, wind turbines and the recently approved solar farm which is at present being built. Isn't it time that the residents were given something to feel positive about and that their village is not being turned into an 'industrial' centre and they do have a say what the land is used for.

Bilsthorpe Football Club

Bilsthorpe Football Club is growing with more and more youngsters from the village attending regular training sessions and matches with clubs from surrounding villages. The football ground is right opposite where the Incinerator is proposed to be built.

A representative of Bilsthorpe Football Club said, "An Incinerator so close to our playing fields would have a devastating impact. We regularly have over 100 children playing football at any one time. Because of health concerns parents may be fearful of bringing their children to the club. Bilsthorpe FC is growing in size and gaining momentum, this incinerator proposal could change all this. It will also ruin the surrounding landscape and due to the additional volume of traffic that the site would attract, there would be a detrimental effect on safe parking. Bilsthorpe residents have had enough of constant threats of unwanted development and as a village we deserve a break".

New cycle trail overshadowed

The County Council has invested substantial sums in the development of tourism in the area surrounding Sherwood Forest. The former Clipstone to Bilsthorpe rail line is now open as cycle route linking National Cycle Route 6 to the Southwell Trail. This is a very important new link as it carries walkers and cyclists and provides a safe alternative to the dangerous A614 crossing at the Labour in Vain junction (Bilsthorpe). However at the end of the Bilsthorpe Trail is where the planned Incinerator site is. A quote from the nottinghamshire.gov website says "This scheme increases the number of traffic-free leisure routes available to the people of Nottinghamshire and visitors, making our world-renowned county even more accessible to walkers, cyclists and horse riders." The proposed development would taint such a picturesque walking and cycling trail by overshadowing it with an industrial Incinerator.

