Môr Hafren Bio Power

BRIEFING NOTE FOR PETITIONS COMMITTEE

BACKGROUND

The Welsh Government has a progressive waste management strategy 'Towards Zero Waste 2010-2050', which demonstrates their desire to make Wales a zero waste nation by 2050. Within the strategy, is a specific commitment to reduce residual waste and phase it out of landfill to high efficiency energy from waste (EfW. Therefore, building an energy efficient EfW plant, like our proposal, will help the Government's aim of phasing out landfilling of residual wastes. We call our EfW plant an Energy Recovery Facility (ERF) because the facility would be a recovery operation under the Waste Framework Directive achieving R1 Recovery status.

Further, in a recent post on social media, The Welsh Government said "For now, utilising these high efficiency EfW facilities is our preferred option…"

We have always stated that we see our proposal as a transitional technology to provide an interim solution to divert up to 200,000 tonnes of waste from landfill each year, as the rest of the 'Towards Zero Waste' strategy is delivered.

Within Wales, after all recycling activity there is still 1.6 million tonnes of residual waste (700,000 tonnes of household and 900,000 tonnes of commercial and industrial (C&I)) left each year – this is either treated or landfilled. New solutions are required for this residual material to help increase the recycling rate still further and by providing an outlet for non-recyclable materials - so it is diverted from landfill. However, even with the new facilities currently planned there will still be a significant capacity gap. The proposed Môr Hafren Bio Power facility is intended to help fill part of this gap by diverting up to 200,000 tonnes, of mainly commercial and industrial residual wastes. The proposed development site already had planning permission for a 200,000 tonnes per annum integrated waste management facility and within this permission there is approval for more than double the number of trucks proposed by this project.

PROJECT DEVELOPMENT

The proposed site lies on brownfield land within an industrial area on Newlands Road, Cardiff, with good links to the regional road network. If approved, the new facility would be built by a specialist German engineering company called Standardkessel Baumgarte, a recognised world-leader in this type of technology.

The proposed facility would generate 15 MWe of electricity and is therefore considered a Development of National Significance. As a result, the final planning decision will be taken by the Welsh Government. As part of this process, a detailed Environmental Impact Assessment has been conducted by independent consultants and will be assessed by an independent planning inspector who will make recommendations taking on board comments for the appropriate authorities, including Cardiff Council and Natural Resources Wales.

The project was publicly announced on 14 August 2019 and secured significant media coverage in the South Wales Echo, Western Mail and Wales On-Line, all included promotion of the project website (www.morhafrenbiopower.co.uk) which went live on 13 August. The website has further information about the project, that included details of the two rounds of public exhibitions (6 and 7 September and 4 and 5 October) and is where we will publish further information about the project as it develops. In addition to media coverage and the website we also publicised the exhibitions through:

- Three newspaper ads in the South Wales Echo
- Distribution of 7,400 leaflets to the nearest houses to the site (this distribution was by a reputable company who has the tracking data to show exactly which properties were visited and

the time of each delivery) – we have received feedback forms from residents who learnt about the proposals via these leaflets
- Posters were also given to some local businesses, community centres and copies were also posted on local social media.

As part of the ongoing consultation process we have also had meetings and discussions with:
- Elected representatives who have the proposal site within their constituency
- Local businesses who operate near the site, providing leaflets about the proposals and the exhibitions
- Local Schools and Churches were also contacted to organise a briefing meeting and to send further information as needed
- Residents who live on Newlands Road and the Shirenewton traveller community.

Although we have received thousands of feedback forms, questionnaires, letters and emails etc, we view the consultation as an iterative process and we extended the deadline for feedback as part of the pre-application public consultation on two occasions, to give residents more time to respond. In total there were 107 days of public consultation.

RESPONSE TO SOME ISSUES RAISED BY RESIDENTS

Emissions
All Energy from Waste (EfW) facilities in Wales must also obtain an Environmental Permit from Natural Resources Wales (NRW) who will strictly regulate emissions from the plant. A significant proportion of the proposed facility is the Air Pollution Control System (APC) that uses advanced technology to control and monitor emissions, allowing such facilities to meet the stringent emissions quality standards of the Industrial Emissions Directive and as updated by the new guidance called the BREF Notes, agreed in June 2019, more details can be found here:

https://eippcb.jrc.ec.europa.eu/reference/

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/221044/pb13898-epr-guidance-part-a-130222.pdf

The APC system generates a residue (trapped components from the combustion process and lime used as part of the cleaning process) which is classified as hazardous waste and needs careful management. The residue will be removed from site in sealed tankers and taken to a suitably licenced facility for recovery, treatment and disposal.

Modern EfW facilities are designed and operated to have no significant impact on air quality and as part of the application a detailed Air Quality Assessment will evaluate current air quality and any potential impacts from the facility or associated traffic.

Further details on EfW facilities and their control and management can be found here:
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/284612/pb14130-energy-waste-201402.pdf

Noise
Strict noise limits will be set as part of the permit from NRW, these will be met by ensuring that all operational activity is taking place within a sound-proofed building specifically designed to reduce off-site noise levels. These levels will be assessed by the Regulator to ensure they are satisfactory and then verified during facility commissioning, and commencement of operations, to demonstrate compliance with the Planning and Environmental Permit. In particular, lorries delivering to the site would have a white noise reversing alert rather than electronic beepers (which can be heard at far greater distances) and would undertake their operations inside the building. Deliveries and other lorry movements would follow agreed working hours nominally 07:00 to 18:00.

Lorries
The proposed site already had a planning permission for a 200,000 tonne waste facility. The previous planning permission included approval for up to 272 vehicle movements per day. Our proposal requires 40 lorry (including those removing the residue) and 18 cars resulting in a total of 116 lorry and car movements per day -approximately half the number previously approved. All lorry movements for this project would use the previously approved route to the site on major roads from junction 30 on the M4. The use of the official route would be specified and controlled by having a single contractor for all lorry movements.

Planning application
No planning application has been submitted; we are in the pre-application stage. Residents had the opportunity to give us feedback on our proposals by the extended deadline of 29 November 2019. All feedback, supported with a name and address, will be included in our consultation report submitted with the planning application. Our second round of engagement will be the statutory consultation phase which will last for a minimum of 42 Days. This will mean that this proposal has been supported by almost 150 days of consultation.

As the project is going through the Developments of National Significance process, residents will also get a second opportunity to comment on the proposals during a 5 week period of publicity and consultation run by the planning authorities. Further details of the DNS consultation process can be found at https://gov.wales/developments-national-significance-dns-engaging-process

Smells and dust
All tipping operations at the facility would be within an enclosed building that is kept under negative pressure. Negative pressure means fans will suck air into the building from the atmosphere, capturing dust and odour, which is then feed into the combustion process. Each tipping bay will be accessed via a roller shutter door, no material would be stored outside of the main building, and all these issues are specifically controlled through the Environmental Permit.

Proximity to houses and schools
We are mindful of the fact that the nearest school building to the site is just over 650m and our nearest residential property (on Newlands Road) is approximately 150m from the site. The key issue here is that the facility would be entirely safe and does not pose a risk to our neighbours. Well run EfW facilities that meet the latest emissions regulations are often located within residential communities in countries like Denmark, Sweden, and Netherlands. In the UK, there are a number of EfW plants nearer to residential communities than at this site. Emissions and public safety are key regulatory concerns and detailed assessment of the proposals will be undertaken by NRW and the statutory consultees including the local NHS trust – all before a permit to operate is granted.

Types of waste
The facility has been specifically designed to cope with a wide range of materials safely and efficiently, extracting valuable energy. The facility would take residual waste that remains after recycling has taken place and will not take hazardous waste. We are targeting primarily commercial and industrial wastes from businesses, most of which currently goes to landfill or for treatment outside Wales.

Friends of the Earth define C&I wastes as:

Commercial and industrial (C&I) waste is controlled waste arising from the business sector. Industrial waste is waste generated by factories and industrial plants. Commercial waste is waste arising from the activities of wholesalers, catering establishments, shops and offices.

Their full report can be found here:

https://friendsoftheearth.uk/sites/default/files/downloads/commercial_and_industrial.pdf

Finance
This facility would be privately financed with no money or subsidy coming from the public sector.

Further independent (Imperial College London and the University of Leeds) questions and answers on the performance of modern EfW facilities can be found here: http://wtert.co.uk/faqs

KEY POINTS

- The proposed site is on a brownfield land on an industrial park, which already had planning permission for an integrated waste treatment facility
- Diverts up to 200,000 tonnes of residual commercial and industrial waste from landfill
- Helps the Welsh Government achieve its progressive waste strategy
- The facility would be a recovery operation under the Waste Framework Directive achieving R1 Recovery status
- The facility would generate 15MWe of electricity, enough to power approximately 30,000 homes.
- The proposed facility would create 40 permanent jobs and 300 during construction
- Pre-application public consultation: Summer to Autumn 2019
- Pre-application statutory consultation: Summer 2020
- The planning application is likely to be submitted Summer 2020