

MARSHFIELD COMMUNITY COUNCIL

COMMENTS FOR DNS MOR HAFREN HEARING

29TH JUNE 2021

This hearing statement is commenting on the revised Waste Assessment for Mor Hafren planning application submitted by the applicant following the publication of the Welsh Government report “Strategic assessment for the future need for energy from waste capacity in the three economic regions of Wales”.

The Moratorium:

On page 30 of the revised Waste Assessment, the applicant states “that the Moratorium should not be applied”. The Community Council does not accept this position.

The Applicant’s Position

The applicant has questioned the legality of the moratorium issued in a ministerial statement, and also the statement that this moratorium will be applied in the future. They have also argued that the application for Mor Hafren is in an advanced stage of the DNS planning system (p16, para 3.2.28).

Our Response

The legality of the moratorium may not be determined as yet, but it conveys the clear commitment that Welsh Government is making to reducing commercial and industrial waste from sources in Wales, therefore reducing the need to provide additional incinerator capacity.

The moratorium also recognises that waste recycling is a more appropriate method of achieving the circular economy than using incineration of waste, where the likelihood of achieving lower carbon release than landfill is not entirely clear.

We propose that the date for the application of the moratorium was intended to be immediate and therefore applies from the date it was issued, i.e. 24th March 2021.

The application has also confirmed that the Mor Hafren plant will not be operational until 2025. This date is most definitely some considerable time in the future and therefore cannot be considered as a current or near current energy from waste provider. The need for additional incinerator capacity in SE Wales by 2025 is also not required, as discussed below.

The Mor Hafren Incinerator is proposed to supply 15MW of energy from waste to homes in SE Wales. However, the moratorium has stipulated that no incinerator supplying greater than 10MW would be required and therefore, the incinerator in this planning application should be considered as no longer required.

The Need for Additional Incinerator Capacity

The Applicant's Position

The applicant has criticised the calculations of need for additional incinerator capacity as proposed in the Welsh Government Strategic Assessment document.

The principle objection is their reflection that the major neighbouring incinerator Trident Park does not operate at their full capacity and therefore the calculations of existing capacity in SE Wales are incorrect. They maintain that this shortfall in local incinerator capacity justifies the need for additional capacity that Mor Hafren would provide.

The applicant also argues that the calculations based on Welsh Government targets for reduction in residual commercial and industrial waste are ambitious and cannot be reliably predicted as achievable.

A further objection is that the population growth and subsequent business growth in previous years in SE Wales will continue. The applicant suggests that this will drive a significant increase in residual waste from residential, commercial and industrial waste, which will therefore require additional incinerator capacity throughout Wales. They therefore propose that the Welsh Government calculations of future waste have not taken these factors into account.

Our Response

Scenario 1 of the Welsh Government waste assessment is based upon target reductions in residual commercial and industrial waste for each of the three Welsh economic regions up to to 2035.

This assessment predicts that there will be an over-supply of incinerator capacity in SE Wales by 2025, which is the date that the Mor Hafren Incinerator will be due to commence operation.

We support these calculations as sufficiently reliable to reject the need for additional incinerator capacity in SE Wales for the following reasons:

The causes for the under-utilisation of the Trident Park operating capacity are not clear. There are many possible reasons for this including the under-supply of residual commercial and industrial waste, and the lack of collection and delivery systems of suitable waste to Trident Park.

The emphasis of the targets for waste reduction in SE Wales has been for residential waste led by careful separation of waste for recycling for an increasing number of waste types.

However, many operating businesses in Wales have started recycling their waste as the pressure to reduce waste has increased in response to the declaration of a climate emergency. This will have already started to reduce the volume of waste requiring incineration.

The applicant has also suggested that Welsh Government might not meet its waste reduction targets for residual waste, which will further justify the need for additional incinerator capacity in SE Wales.

However, Welsh Government has been highly successful in driving and exceeding its targets for reductions in household waste. It's strategy for commercial and industrial waste is underpinned by significant and well-designed proposals, and with the added experience of achieving previous household waste targets. Therefore, we support the calculations that additional incinerator capacity will not be required.

We agree with the prediction of future population and business growth in SE Wales over the next 50 years. However, it is also safe to predict that the climate change emergency will continue to drive changes in manufacturing processes, the development of more recyclable materials, and the implementation of processes funded by Welsh G that support businesses in recycling their waste.

It is unthinkable that we continue to produce waste and burn resources that were once of natural origins. These resources must be recycled and reused in our products wherever possible.

The principle of the circular economy is the most robust model for addressing the climate and biodiversity emergency declared by Welsh Government and therefore it's strategy to stop any additional future energy from waste incineration must be implemented. We agree that this should include the plans for the Mor Hafren Incinerator.