

Main Matter 2 – Scope and Context of the Plan and Waste Management in the Plan Area

Issue: Whether the identification of future waste needs is sufficiently evidenced based and robust.

1. Does the Waste Needs Assessment (May 2023) (WNA) provide an appropriate and robust mechanism to support the identification of the future waste management needs in the Plan area and does it adequately take into account future growth forecasts and Government targets to reduce residual waste and increase recycling rates?

No.

Firstly, regarding using Scenario B “low rate of decline” to calculate the amount of waste per household in future years... With new legislation banning single use plastics, implementation of extended producer responsibility (EPR) etc. I would expect Scenario A “high rate of decline” is a more appropriate standpoint to use.

Secondly, regarding the recycling scenarios, only the “high recycling rate” is nearing the waste reduction required to meet Government legislation. This should be the starting point for targets not the highest rate we can possibly imagine. The “alternative” recycling options of “low” and “medium” recycling are out of date and should not be included. A more aspirational target should be included.

Thirdly, there should be plans in place to increase recycling of all kinds – composting, anaerobic digestion etc. should all be increased – especially to accommodate the separate food waste collections coming soon.

All calculations show that any shortfall in capacity for residual waste disposal will be temporary and as recycling rates increase, in line with government legislation to halve residual waste per capita by 2042, any shortfall will be eliminated. It is therefore essential that long term planning does not include building more incinerators as this will be against national guidance/legislation to avoid overcapacity of incineration both nationally and locally. Any new incinerators will be functional well beyond 2042 at which point no additional capacity for residual waste disposal will be necessary. The temporary shortfall can easily be solved by use of incinerators in neighbouring areas such as Sheffield (already being used) and the newly built incinerator at Shephed/Newhurst Quarry (455ktpa capacity!) – only one junction down the motorway from the proposed unnecessary incinerator at Ratcliffe on Soar.

Incineration cannot be considered part of a circular economy and energy from waste (EfW) cannot be considered green energy. Incineration has a high environmental cost, not just greenhouse gas (GHG) costs and air pollution costs, but also extraction of new resources to replace the incinerated items.

2. Does the WNA adequately take into account levels of waste management capacity in neighbouring authorities?

No.

The WNA takes no account of levels of waste management capacity in neighbouring authorities. We currently send waste to Sheffield from North Nottinghamshire to use some of their spare capacity. Sheffield City Council is currently trying to get exemptions to government legislative reductions in waste because it is signed up to contracts to feed incinerators many years into the

future. We could easily sign up to using their spare capacity rather than building our own. Our shortfall in capacity will only be temporary so signing up to spare capacity nearby makes a lot of sense. We have no need to provide overcapacity ourselves.

We also have the option of the newly built 455,000 tonnes per annum (tpa) Shepshed/Newhurst Quarry incinerator.

Our plans to build new incineration capacity of 892,100tpa is against all government legislation and is totally inappropriate, irresponsible planning.

3. Does the WNA and the Plan adequately consider the relationship between increased energy recovery capacity and landfill capacity?

There are several arguments to be used re energy recovery in the form of EfW incinerators vs landfill and the environmental impact of each.

If the landfill is stabilised, then the problem of methane production can be minimised thereby negating arguments of GHG emissions being as bad as/worse than EfW.

There is also an argument that for plastics currently not recyclable it may be best to store them until such time as technology can recycle them rather than losing the resources forever by burning them and releasing all the carbon dioxide into the atmosphere. This is more in line with a circular economy than incineration.

4. Are the chosen scenarios for forecast waste arisings sufficiently evidence based to be considered as the preferred options upon which to base the Plan?

No.

As I have previously said in answer to point 1, the Scenario A “high rate of decline” would be more appropriate to use due to new government legislation banning single use plastics, implementation of extended producer responsibility (EPR) etc. This would mean that there should now be a significant decline in the Local Authority Collected Waste (LACW) per household.

Also, as I have mentioned previously the “high” recycling rate scenario is the only appropriate option. The “low” and “medium” are not appropriate and should be dropped from the list of options with a more ambitious/aspirational target of higher recycling rate included as an option to consider/try to achieve.

5. Does the approach taken in the plan to not identify any specific allocations for new waste management facilities inhibit the attainment of the preferred high recycling scenarios for LACW, C&I and CD&E waste?

Yes.

As previously mentioned in answer to point 1, there doesn't seem to be any plans to increase recycling options to accommodate the separate food waste collections coming soon (composting, anaerobic digestion etc. There should be plans in place to increase recycling of all kinds including sorting facilities to separate waste.

6. How does the Plan influence the attainment of the preferred high recycling scenarios to ensure that the capacity gaps identified in tables 11 and 12 are robust?

It doesn't.

The Plan doesn't accommodate for anything different to what has been done in the past. No extra provision for recycling facilities of any type and the entire plan seems to be based on using the planned extra, unnecessary, 892,100tpa EfW incineration capacity to "solve" all the waste problems. This is not in line with any government legislation/directives/guidance or with any direction towards a circular economy.

7. Does the Plan make adequate provision for future non-hazardous landfill to manage LACW and C&I in circumstances where paragraph 5.49 of the Plan identifies that opportunities for new provision during the Plan period may be limited?

No.

The Plan does not make any provision for landfill capacity. The Plan relies totally on proposed new build EfW to take on all the waste disposal capacity gap. The capacity gap is not large and only temporary, so relying on the building of an extra 892,100tpa EfW incinerator capacity is irresponsible. It goes against circular economy principles, making no accommodation for alternative solutions higher up the waste hierarchy and signing us up to burning our waste far beyond a time when any extra capacity will be needed. As I've said previously, irresponsible and not in line with government legislation to avoid overcapacity of incineration. This policy is the opposite of planning for the future.

Question 8

I have already made comments which are relevant to this question in previous answers – see above.

9. Does the Plan adequately take into account the implications of the declarations of climate change emergencies and consequent reductions in CO2 emissions targets and the impacts this might have on sites with contracts for the management of household, industrial and commercial waste with those bodies?

No.

The Plan does nothing to encourage or set in place concrete options/facilities to increase "reduce and/or re-use" and almost nothing to increase recycling. The Plan to increase recycling seems to be an aspiration without any input into how exactly this will be achieved. The Plan to "deal with" any residual waste capacity gaps is to build massive overcapacity of EfW incineration which releases more carbon into the atmosphere (and a lot more pollutants too) than burning gas and in some cases more than burning coal. Not exactly in line with reductions in CO2 emissions and against government guidance/legislation to avoid overcapacity of incineration both nationally and locally.

Incineration is a high carbon and high pollution waste treatment option which does not contribute to a circular economy. EfW is not low carbon energy.

The upcoming inclusion of EfW in the UK Emissions Trading Scheme (UKETS) will make incineration more expensive and therefore a less attractive waste treatment option. No account has been made of the likely impact of this on amounts of residual waste being sent to EfW not

only locally but also nationally, likely freeing up incinerator capacity in all areas of the country. Even more reason not to build any more incineration facilities.

10. Should the Plan be more explicit regarding the approach to net self sufficiency with particular regard to energy recovery?

Yes.

Nottingham and Nottinghamshire should not seek to be self sufficient for EfW capacity in the short/medium term. If it does so it is contrary to the legislative directives to avoid overcapacity of incineration both nationally and locally. There are two reasons for this. Firstly, waste from the Notts area is being relied upon to fulfil obligations to provide enough feedstock for incinerators in neighbouring authorities (e.g. Sheffield). Secondly, if we become self sufficient in the short/medium term we will be contracted into providing feedstock for the newly built EfW incinerators well beyond a time when we will need extra capacity. This will be detrimental to meeting our obligations to Environmental legislation, against the aim of treating waste as high up the waste hierarchy as possible, and devastating to the climate. Do we propose to import waste from abroad to feed these incineration facilities? Where else will we source the feedstock for an extra 892,100tpa of EfW capacity locally?