Comments on behalf of Planning Policy

Site reference/Reference: EH141

Site: Alton Materials Recovery Facility, A31, Alton GU34 4JD3PF

Description:
Development of an Energy Recovery Facility and Associated Infrastructure

Date: 18 September 2020

Prepared by: Planning Policy Team

☐ No objection ☐ Objection ☒ Other

1.1 Documents reviewed

As part of responding to the above planning application, we have reviewed the following documents:

- Application form
- Supporting planning statement
- Environmental Statement
- Location plan

1.2 Background

The Alton Materials Recovery Facility is an existing waste site that is being moved into a consolidated MRF facility elsewhere. The proposal is to redevelop it as an Energy Recovery Facility (ERF) which is a form of Waste to Energy development.

The Hampshire Minerals and Waste Plan (2013, the Plan) contains various policies that serve to deliver the waste management development that is needed, while protecting the environment and communities. The following policies are considered key regarding Waste to Energy development specifically:

Policy 29: Locations and sites for waste management, which outlines the criteria for sustainable location of waste facilities.

Policy 13: High-quality design of minerals and waste development - Expectations of Waste to Energy facilities are particularly high, as they are of considerable scale and as it has been shown that they can be built to exemplify good design, for instance the Portsmouth and Marchwood Energy Recovery Facilities have both received recognition for their high-quality design.

Policy 28: Energy recovery development

Energy recovery development should:
a. be used to divert waste from landfill and where other waste treatment options further up the waste hierarchy have been discounted; and
b. wherever practicable, provide combined heat and power. As a minimum requirement the scheme should recover energy through electricity production and the plant should be designed to have the capability to deliver heat in the future; and
c. provide sustainable management arrangements for waste treatment residues arising from the facility.

Policy 28 particularly stresses the need for energy recovery development to divert waste for landfill and avoid using waste that could be recycled, reused or minimised. The planning application has relevant information on heat provision and management of residuals, but insufficient information on waste sources.

The Plan was reviewed in 2018 and it was noted that there has been provision of additional waste capacity. Whilst it is recognised that there has been significantly less capacity delivered for recycling from 2011-15 against the target, in terms of the total capacity provided for non-hazardous waste, this has been counter balanced by the additional recovery capacity delivered (Table 1).

Table 1: Targets for additional capacity to be delivered and actuals 2011-15

	Target (2011-15)	**Actual (2011-15)**	**Difference**
Recycling (tonnes per annum (tpa))	108,693	16,888	-91,805
Recovery (tpa)	260,904	354,950	94,046
Landfill	0	0	0
Total	369,597	371,838	2,241

As such, the policy is delivering the required level of capacity. However, the type of waste management facilities being delivered could be better aligned with the waste hierarchy. It is worth noting the targets in the Plan to the end of the plan period (Table 2).

Table 2: Requirements for non-hazardous waste management capacity over the plan period

	2016-2020	**2021-2030**
Recycling (tpa)	114,693 tpa	64,215 tpa
Recovery (tpa)	89,904 tpa	37,459 tpa
Landfill	132,135 t	1,280,587 t

While the landfill requirement is considerable, this is a total requirement rather than a per annum requirement, equating to 94,200 tonnes per annum. The Review notes that the amount of waste going to landfill has slowly been reducing from around 400,000 to at around 300,000 tonnes per annum.

Overall, the Plan considers that an additional 400,000 tonnes per annum of waste management capacity would be required from 2016 to 2030. It would be expected that this capacity is met by a variety of waste facilities, as different types of waste will be best handled by different waste management technologies. There is also a need for a strong focus on recycling facilities in order to be in line with the waste hierarchy.

As Waste Planning Authority, the County Council is actively involved with the South East Waste Planning Advisory Group (SEWPAG) which comprises Waste Planning Authorities in the south east of England and other relevant stakeholders. The purpose of the Group is to ensure meaningful and collaborative joint working between Waste Planning Authorities, the Environment Agency and the waste industry (represented by the ESA) on strategic waste management issues.

The SEWPAG authorities have prepared a Statement of Common Ground (SCG) concerning the strategic matter of planning for the management of waste, which is in the process of being signed by the authorities. The SCG states that 'the Parties agree that they will continue to plan for net self-sufficiency which assumes that within each waste local plan area the planning authority or authorities will plan for the management of an amount of waste which is equivalent to the amount arising in that plan area'.

Therefore, while it is sensible to provide some extra waste management capacity than needed, significant over-provision would not be in line with national policy or the position of other local authorities in the region. A key reason for this is that it would necessitate waste travelling longer distances and potentially drawing in waste from materials that could be managed higher up the waste hierarchy.

Whilst there are some waste types that require specialist facilities to be provided regionally or nationally, for instance hazardous waste, Waste to Energy facilities cater for a wider range of waste and therefore can be geographically distributed in order to minimise waste travel distances.

1.3 Summary

The overall waste capacity gap that is expected in the next decade is around 400,000 tonnes per annum. Amongst other facilities, this could partly be served by an ERF within the Hampshire Plan area, of an appropriate scale and located in accordance with Plan policies. Considering that Hampshire has three active ERFs, a fourth large-scale facility such as that proposed is likely to draw waste from a wider area and may not be able to operate solely

on residual waste. The proposed development could therefore impact the provision of recycling facilities and drive waste down the waste hierarchy.

The proposed development rightly demonstrates its sustainability within the context of using an ERF to divert waste from landfill and after all efforts have been made to ensure the waste going to the ERF is residual, i.e. it cannot reasonably be managed higher up the waste hierarchy. However, the proposed development does not make it clear how it will ensure that this is indeed the case.

Furthermore, an assessment of the sources of waste that this proposal would handle may also reveal that waste will be drawn from other planning areas, which may mean that their local plans (including any waste plans) may be of relevance.

The proposal will also need to be in compliance with the other relevant policies of the Plan, however comment on those is left to other relevant consultees.

1.4 Recommendations, Conditions and Submissions

Subject to compliance with the rest of the Hampshire Minerals and Waste Plan, Planning Policy has **a holding objection** against the proposed planning application with regards to **Policy 28 (a)**.

In order to achieve compliance with Policy 28 (a) the development proposal would need to significantly clarify the steps taken to ensure the waste processed will be genuinely diverted from landfill and demonstrate that the waste input will consist of materials unable to be processed higher up the waste hierarchy. This further information will need to address the issues of potential overprovision of recovery capacity in Hampshire and potential for impacts on the provision of recycling.

1.5 Source(s) of information

Hampshire Minerals and Waste Plan (2013)
Review of the Hampshire Minerals and Waste Plan (2018)
Annual Monitoring Reports (2014-2018)

1.6 Contact Information

If you have any queries please contact planning.policy@hants.gov.uk