

TOWN & COUNTRY PLANNING (INQUIRIES
PROCEDURE) (ENGLAND) RULES 2000

Appeal Reference

APP/D0840/A/09/2113075/NWF)

Site at Rostowrack Farm and Land at Wheal
Remfry, Goonvean and Parkandillick Dryers, St
Dennis, St Austell, Cornwall

**Summary of Proof of Evidence on Need and
Alternative Technologies of Simon Aumônier**

On behalf of SITA Cornwall Limited

14th February 2010

SUMMARY OF PROOF OF EVIDENCE: SIMON AUMÔNIER

INTRODUCTION AND QUALIFICATION

1. My name is Simon Aumônier. I hold a Bachelor of Science Combined Honours degree in Biology and Geography from the University of Exeter and a Master of Science degree in Pollution and Environmental Control, gained from the University of Manchester and UMIST in 1988. I am a Partner at Environmental Resources Management Limited (ERM), and direct ERM's waste management and energy and climate change practices.
2. I have over 20 years post-graduate experience in waste management and environmental protection, both in government research & development and in consultancy. I am a Member of the Government's Sustainable Development Commission Panel.
3. This Inquiry is considering SITA Cornwall Ltd's proposal in a Planning Application for an Energy from Waste facility (the Cornwall Energy Recovery Centre, or CERC) and the Appeal against refusal of this Planning Application (reference APP/D0840/A/09/2113075).
4. My Proof of Evidence is concerned principally with three issues:
 - i. the need for the CERC in managing residual municipal waste (MW) and residual commercial and industrial (C&I) waste arising in Cornwall, in accordance with policy;
 - ii. clarifying the environmental benefits that the CERC will deliver, including its contribution, as a supplier of renewable energy, to the reduction of greenhouse gas emissions; and

- iii. the CERC's classification as a recovery facility, rather than a disposal facility.

SYNOPSIS OF PROOF

5. The CERC offers significant sustainability benefits. It will:
 - i. make a significant contribution to delivery of the Government's Climate Change Programme;
 - ii. encourage competitiveness and technological innovation in mitigating and adapting to climate change;
 - iii. increase opportunities to drive waste management up the waste hierarchy; and
 - iv. minimise the disposal to landfill of valuable resources.

6. The quantitative need for the proposal is clearly demonstrated. Currently, there is no alternative to landfill for the management of residual waste in Cornwall, and new infrastructure is urgently required. Landfill capacity is itself in short supply. Without the CERC, Cornwall will rely on out-of-County management routes for its wastes. Much, if not all of that waste would be landfilled. An alternative recovery proposal for MW will take many years to bring into effect, during which time the County's residual wastes will be consigned to landfill and incur out-of-County transport impacts.

7. There is a similarly pressing need for renewable and low-carbon energy supply systems. The CERC offers a substantial contribution to the supply of renewable energy in Cornwall. It should be accorded the support demanded

of local authorities in the Planning Policy Statement 1 Supplement on Climate Change (PPS 1 Supplement, CD E3).

SUMMARY OF PROOF

8. The UK is committed to reducing waste and dependency on landfill under the EU Landfill Directive 99/31/EC (CD H2), in part to meet climate change obligations. As a result, most products should be re-used or their materials recycled. Energy should be recovered from the remaining residual wastes where possible.

9. SITA's proposal is consistent with the policy expectations in the national Waste Strategy for England 2007 (WSE2007, CD F1), Planning Policy Statement 10; Sustainable Waste Management (PPS 10, CD E6) and the Cornwall Waste Local Plan (CD D5). As such, it is not necessary to demonstrate quantitative or market need for its development.

10. Current policy on need is indicated in the Secretary of State's decision letter on Ince Marshes (CD I2), wherein the Secretary of State says: *"The Government's policy on energy is set out in the Energy White Paper 'Meeting the Energy Challenge May 2007 and includes the view that a diverse mix of energy technologies, including energy from waste generation, will be required to combat climate change and provide secure, clean and affordable energy. The market brings forward proposals to meet the needs of those policies, which then need to be considered on their individual merits. (...) At the same time the Secretary of State notes that neither waste nor energy policy places a rigid cap on the development of waste management capacity."*

11. In effect, there is no need to demonstrate a quantitative need at the local level given the step change required in waste management and in energy supply. Bringing forward planning applications, and constructing and operating facilities where these applications are successful, is a commercial matter for the industry, in this case for SITA, responding to its contract with the WDA.
12. Nevertheless, there is a compelling need case in support of the proposal. Considerable additional capacity for diverting waste from landfill to management routes further up the waste hierarchy is needed in order to meet national and regional targets and obligations. The scale of the opportunity for new infrastructure in the Cornwall is substantial.
13. Under the most optimistic of the scenarios for Cornwall that I consider likely, arisings of MW will be approximately 314,000 tonnes per annum (tpa) in 2020 and arisings of C&I waste will be about 440,000tpa in the same year. Under less optimistic scenarios, the arisings of MW could reach 399,000tpa by 2020 and those of C&I waste 617,000tpa by the same year.
14. Under the best case scenario, the total amount of residual waste (after recycling and composting) in Cornwall requiring management by 2020 will be approximately 406,000tpa, comprising 157,000tpa of MW and 249,000tpa of C&I waste. Under the worst case scenario, the figure for 2020 is a total of 666,000tpa, comprising 239,000tpa of MW and 427,000tpa of C&I waste.
15. The CERC will meet the pressing need for an alternative to landfill for Cornwall's residual MW - in whole if measures to minimise waste generation and maximise waste recycling and composting are effective - or at least to a

large extent even if waste arisings continue to grow and waste recycling and composting is not quite so effective.

16. The need for capacity for residual C&I waste remains largely unaddressed. A small proportion of the CERC's capacity will be available for C&I waste. If local schemes for recycling and composting MW out-perform expectations, then less residual MW will be sent to the CERC, with the remaining capacity being used to treat more C&I waste. Under these circumstances, the CERC will compete with landfill or other forms of out-of-County treatment for the residual C&I waste.

17. There is a similarly pressing need for renewable and low-carbon energy supply systems as there is for waste management infrastructure. The Renewable Energy Strategy lays out plans to meet the legally binding UK target of producing 15% of the UK's energy from renewable sources by 2020. The draft Draft Overarching National Policy Statement for Energy (NPS EN-1) makes clear the significant need for new, major energy generating infrastructure and advises the Infrastructure Planning Commission that it should start its assessment on the basis that need has been demonstrated.

18. In its glossary, the PPS 1 Supplement (CD E3) defines renewable energy and low-carbon energy, in order to clarify what are supplies of these technologies so that they may benefit from the support the PPS provides. EfW is defined as a renewable energy, whilst CHP is defined as a low-carbon energy. Therefore, SITA's proposals should receive the strong support required by the PPS from local authorities.

ENVIRONMENTAL AND ECONOMIC BENEFITS DELIVERED BY THE PROPOSALS

19. The *WRATE* (Waste and Resources Assessment Tool for the Environment - described further in *Annex A*) life cycle software has been used to identify, in general terms, the environmental benefits gained through development of a single, centralised large scale EfW facility with combined heat and power (CHP), compared with other technologies and with smaller, decentralised EfW plants.
20. The *WRATE* modelling demonstrates that diversion of residual MW and residual C&I waste from landfill through EfW with CHP offers significant environmental benefits.
21. Using a range of scenarios, *WRATE* also demonstrates that operating a single, larger scale plant is more efficient than operating a number of smaller scale facilities, again delivering a number of environmental, as well as deliverability, benefits.
22. Benefits are particularly recognised within the *abiotic depletion* and *global warming* criteria. Both are largely unregulated, and the *global warming* criterion is of key significance to the Government's sustainable development agenda and its intentions with respect to combating climate change.
23. These environmental benefits reflect the recognised financial economies of scale that will have a beneficial influence on the costs of the services provided.

CONCLUSIONS

24. Within its Executive Summary (paragraph iv.) WSE2007 (CD F1) states: *“The dividends of applying the waste hierarchy will not just be environmental. We can save money by making products with fewer natural resources, and we can reduce the costs of waste treatment and disposal. Waste is a drag on the economy and business productivity. Improving the productivity with which we use natural resources can generate new opportunities and jobs.”*
25. The PPS 1 Supplement (CD E3) promotes the delivery of decentralised and renewable or low-carbon energy and explicitly recognises the benefits of CHP. In relation to the Key Planning Objectives set out in Paragraph 9 of the PPS 1 Supplement, the submitted proposals will:
- make a significant contribution to delivering the Government’s Climate Change Programme;
 - secure the highest viable resource, and energy efficiency and reduction in emissions; and
 - encourage competitiveness and technological innovation in mitigating and adapting to climate change.
26. Delivering a sustainable waste management will require the diversion of greater quantities of waste from landfill, a demand which will be matched by the market as the Landfill Tax brings landfill gate fees into line with those of other management routes. SITA’s proposal will deliver diversion of residual wastes and the associated environmental benefits, both of which are sought by national policy.

27. The need for new waste management infrastructure, nationally and locally, is urgent. The need for renewable and low-carbon energy supply systems is equally pressing. SITA's proposal offers a deliverable and a significant contribution to meeting both these needs in Cornwall. In the nature of the technology employed and in its scale, the proposal will provide security of management for residual wastes arising in Cornwall, and deliver the environmental benefits of management further up the waste hierarchy, including the reduction of carbon emissions. The Inspector is respectfully requested to uphold this appeal.