

From: Crampton, Ariane <ariane.crampton@wiltshire.gov.uk>

Sent: 17 December 2020 17:03

To: Guest, Andrew <Andrew.Guest@wiltshire.gov.uk>

Subject: RE: Consultation on proposed waste incinerator, Westbury Wiltshire. Planning Application 20/06775/WCM

Dear Andrew

Following my holding objection dated 22 October 2020, I have now had a chance to review the response from the applicant dated 2 November 2020 and a further response and review of the evidence by the University of Exeter dated 15 December 2020 (attached).

As previously stated, there has been a material change in policy (Climate Emergency Wiltshire, Climate Change Act 2008 (2019 update)) since the 2018 application 18/09473/WCM, and a material change in size and scale of the proposals (from processing 160,000 tonnes per annum (tpa) waste to 243,000 tpa waste).

The site will emit carbon dioxide. This is considered to be on a much greater scale than that suggested in the 'Northacre carbon assessment report', which has been peer reviewed by the University of Exeter (see previous email dated 22 October 2020). This review has found errors in the values used, and as such the 'Northacre carbon assessment report' is considered to currently understate the amount of carbon dioxide the proposed site would emit in its lifetime. The peer review concludes:

that the Assessment's starting point, a comparison with landfill, is not correct. The Assessment uses input data and assumptions that understate the carbon dioxide emission from the proposed Northacre EfW facility which, were these changed to more realistic values, would increase carbon dioxide emission by 278%. The Assessment does not address ways in which carbon dioxide emission from the EfW facility could be reduced. Methods include reducing plastics in the waste input stream, increasing the thermal efficiency of the plant through the local use of very significant amounts of heat and providing for carbon capture and storage of flue gasses.

The applicant restated their position on 2 November 2020. In response, the University of Exeter has highlighted some key flaws in the applicant's carbon assessment which are that it:

- 1. Compares landfill as the alternative to EfW when landfill, with the exception of inert waste, is likely to stop;*
- 2. Uses historic compositional analysis when segregation, recycling and circular economy initiatives will see the composition of residual waste change significantly;*
- 3. Ignores decarbonisation of the electricity grid which is expected to reduce emissions factors to near zero by 2050;*
- 4. Does not consider steps to minimise and mitigate CO₂ emissions from the facility through reduced fossil waste input, substantial heat use and carbon capture and storage.*

The University of Exeter's response dated 15 December 2020 further points out that while a condition requiring local use of the heat produced could help to mitigate the plant's carbon impact, the actual potential for local use at the Northacre site is extremely limited. The largest potential user locally is Arla dairies, which is estimated to be able to absorb at best just 10% of the heat produced by the EfW facility.

The scale of carbon emissions from the plant is significant when set in the context of Wiltshire's current carbon footprint. Using the University of Exeter's calculations for the facility's lifetime emissions (2,689 ktCO₂ over 25 years), these are equivalent to more than three times the annual industry and commercial emissions for Wiltshire (808 ktCO₂ in 2018, from BEIS local authority CO₂ data).

The Tyndall Centre has allocated a science-based target and [carbon budget](#) for Wiltshire based on an apportioned allocation from the UN Paris Agreement, amounting to 17,300 ktCO₂. This requires Wiltshire to reduce emissions year on year by 13.5% which will be much more difficult to achieve should this plant be built. The plant would use up 15.5% of Wiltshire's carbon budget over its lifetime.

In contrast, the sustainable energy strategy for the application that has approval (it was subsequently amended in 2018 but the technology and throughput remain the same) calculated that the ATT plant would be carbon-positive – to the tune of 2.5m tonnes CO₂ over its 20 year life span. Planning permission was granted on this basis.

Wiltshire is seeking to be carbon neutral by 2030, with the national policy target being 2050. New development should therefore look to be in accordance with these aims.

On the basis of all the above, I object to this application on the grounds of carbon impact.

Best wishes

Ariane

Ariane Crampton
Head of Carbon Reduction
Economic Development and Planning

Wiltshire Council

Tel: 01225 718831

Mob: 07879 661084

Email: ariane.crampton@wiltshire.gov.uk

Web: www.wiltshire.gov.uk

Follow Wiltshire Council



[Sign up](#) to Wiltshire Council's email news service