

further evidence for LDP sessions on 12-13 February 2015 Minerals and Waste.

Cardiff Against the Incinerator (CATI) no. 2444

Cardiff has now contracted to send about 35% of its municipal waste to the Viridor incinerator.

This is in context of

- a) policy not to send recyclable waste for incineration
- b) WG assessments that at least 70% of the waste stream can be recycled
- c) Cardiff assessments that up to 80% of its black-bag waste is recyclable on top of the 50% green bag/bin recyclables.

Cardiff's recycling fell last year (to 50% from previous 52%) and fell short of the 52% minimum set by WG.

Cardiff's Lamby Way MRF appears to be unable to separate much of the mixed recyclables to a standard that can be sold; this is either being stored, sold or disposed of (to the incinerator) but Cardiff doesn't publicise this.

Cardiff has not met the new requirement under the Waste Directive (from January 2015) for separate collection of at least 3 recycling streams (where economic and practicable). They have talked about it, but come to no decisions.

As the LDP's waste section is part of the Waste Plan required under the WFD (and rWFD), it needs to

- a) include proposals to meet the separate collection and recycling requirements;
- b) show how the authority can get out of the contract with the incinerator to take 35% of the waste stream, seeing that over 70% of this is recyclable.
- c) show proposals to meet the separate collection and recycling requirements, which may require further 'bring' sites or bulking up sites, taking into account the transport difficulties and costs

Cardiff has closed the Waungron Rd recycling centre to save money; it's intended two 'super' Recycling centres at Bessemer Close and Wedal Road have access difficulties and are remote from many people. The costs and trouble in taking recyclable materials to them deters many. Lamby Way is more accessible for many residents of SE Cardiff. The 2014 decision for only two Recycling sites made no assessment of convenience, accessibility and fuel/time costs for people. The LDP should specify setting up HWR centres throughout Cardiff convenient for people including residents of new developments, requiring around 6-8 sites. Allocating Lamby Way only (Q. 20) is neither realistic or appropriate in failing to cover this need and others (comprehensive network of waste management facilities is required).

Smoke Plumes and unhealthy emissions from the Viridor Incinerator

Contrary to promises and the Council's visionary statements, the incinerator regularly shows a smoke plume over the Cardiff Bay area. Quite frequently odours of the smoke plume can be sensed in the Bay and neighbouring wards (Butetown, Grangetown, Splott, Tremorfa and even Rumney. Residents in the tower blocks suffer particularly – not only smells but also dirt on their windows. Evidently, the incinerator was not properly designed or is not being operated to avoid pollution and nuisance. Cardiff Council has an interest in doing nothing about these deficiencies, as their officers were responsible for advocating the incinerator to meet their waste targets.

The LDP should state how they intend to address the problems of visual, odour and dust pollution. The LDP should say they and the NRW will collect evidence and seek to modify the environmental permit to correct the problems of plume grounding and plume visibility. They have so far turned down our proposal for automatic monitoring by camera/CCTV.

Energy recovery from Viridor Incinerator

Though claimed to be CHP and supply heat to premises around, there are no firm plans for this and Viridor say it's not their business. This shows Cardiff's planning permit was defective.

TAN 21 says: The Welsh Government aims for energy from waste facilities to be 'heat enabled' to allow the subsequent development of combined heat and power options. This then allows the development of facilities with thermal conversion efficiencies which approach, or even exceed, 60%. (By comparison, attaining an R1 value of 0.65 equates to a thermal efficiency of approximately 35%).

It appears this is wrong. Viridor's incinerator is about 22% efficient, yet claims R1 value of 0.675. It's nowhere near 60% efficient. Though designed to allow some heat supply, even then it has been limited to 35% efficiency in order to maximise the electricity generation.

Such an energy-wasteful plant is far from 'sustainable'. Though the WG wants to call it "high efficiency" on the basis of the R1 value, the LDP needs to recognise it as highly inefficient energy-wise and to say that Cardiff Council with the NRW will seek to ensure use of the waste heat – by setting requirements in the license for increasing use of this heat on specified time scales.

Disposal of incinerator ash

Cardiff Council permitted Viridor's sending incinerator fly-ash out of Wales, saying there's no Hazardous waste facility in the SE Wales region able to dispose of it. It amount to 7000-10 000 tonnes pa. The LDP must say how it will do this, as

- a) it's contrary to policy to dispose of regular, large quantities of waste outside the SE Wales region and
- b) the LDP's 3.91 m says "To lead and participate in securing regional facilities"

Incinerator bottom ash (IBA) is currently being dumped (disposed of) on Lamby Way landfill, at over 200 tonnes per day (70 000 tpa).

- a) the IBA was to be 100% 'recycled' into construction and building materials
- b) It is being accepted and used for 'reprofiling' the landfill on the basis of Viridor's (false) information that it is "inert"
- c) Spreading of the ash raises clouds of dust, some of which is likely to reach the public attending the recycling centre and residential areas of Tremorfa and Rumney
- d) Viridor informed us that any IBA they could not use or dispose of in SE Wales would be taken to their facilities in England
- e) Cardiff Council is not enforcing the requirement on Viridor to remove recyclable metals from the ash; instead is facilitating post-dumping removal by a separate contractor and taking money for it
- f) Cardiff Council is not enforcing 100% recycling, but rather is complicit with dumping it, happy to be receiving payment for taking the IBA.

Landfill capacity is needed in SE Wales to dispose of this ash (up to 90 000 tpa) as the market for IBA appears limited and large fractions from other incinerators are found to be unusable. Therefore Cardiff must identify landfill to take it and explain in the LDP how this fits with the WG target for only 5% landfilling of the municipal waste stream.

Atlantic Recycling and Neal Soils site, Rumney

This waste transfer and 'recycling' site on a farm within the Levels SSSI caused "substantial and serious pollution" in 2012/13 according to Cardiff Magistrates Court conviction. In 2014 they had a serious fire, causing air pollution for days, as well as pollution of the farmland and reens. I attended the public inquiry last year over revoking the waste management license.

The Neal-site clearly shows failure to meet TAN21's 3.26

"Particular care should be taken to avoid locations where new or extended waste facilities may be incompatible with existing land-uses."

The Council was wrong not to enforce planning law and the EA/NRW wrong to tolerate the accumulation of wastes on this site and not enforce its advice on fire-breaks. The LDP should reject Neal's application.

----- William Prosser / CATI January 2015