

Eco Sustainable Solutions Limited Planning Application 8-21-0207

Application by Eco Solutions for permission to build “a low carbon Energy Recovery Facility for the generation of electricity and heat through a low-emission thermal process using residual waste”.

We consider the application to be premature to the local Plan and inconsistent with the principles of the Council’s Climate and Ecological Emergency Declaration and Action Plan.

1. The BCP Climate and Ecological Emergency Action Plan, states that the Council will
 - *“Seek to identify and consider purchase of sites for large-scale renewable energy installations*
 - *Identify suitable areas for large-scale renewable energy in the Local Plan*
 - *Seek to include Air Quality policy in the new Local Plan*
 - *Support community single-use plastic-free initiatives*
 - *Support and promote community waste reduction and reuse initiatives such as sharing and donation of materials*
 - *Promote business minimisation of packaging*
 - *Seek to influence the behaviour of our commercial partners and lessees in their retail operations to minimise or cease the sale of single use plastics”*

BCP Council Minutes 17/12/19, Selected elements (Appendix A)

2. The proposal is premature, in that the Council is still in the process of identifying potential sites for renewable energy production.

Specifically, we refer to para. 11d of the National Planning Policy Framework. This requires decisions to be based upon an “up-to-date development plan”. The BCP Local Plan is under development, and existing policies have been superseded by relevant decisions of the BCP Council, principally the declaration of the Climate and Ecological Emergency Declaration and consequent Action Plan.

Para. 11d identifies the grounds upon which planning permission can be withheld:

- i. “the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or*
- ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.”*

We consider that the proposed development is precluded by virtue of its location within a Green Belt (condition i above). As argued below, the impacts on climate and ecological integrity will far outweigh any benefits (condition ii above). These considerations, of protecting areas/assets of particular importance and of adverse

impacts, will need to be part of any identification sites for renewable energy production in the forthcoming Local Plan.

3. The proposed development is inconsistent with policies to improve air quality. Whilst we acknowledge that incineration may have marginally lower Greenhouse gas emissions than landfill, (CO₂ has a lesser impact than methane from decomposition of landfill waste), incineration is not the only option. If BCP Council moves to a Zero Waste strategy, emissions can be substantially reduced. The current proposal actually mitigates against waste reduction, as its economic model is based upon the continued creation of “hard-to-dispose of waste”, (see 4 below). Indeed, given that the application envisages a 25-year lifetime for the plant, we assume that it will require BCP and Dorset Councils to enter into long term contracts to provide such waste.

There is no guarantee that filters and closed-cycle design will prevent release of highly toxic air pollutants. The residual ash will also be highly toxic, and will require specialist disposal, (whilst, presumably, the plant will itself become toxic and require specialist disposal at the end of its working life).

Finally, the operation will require an additional 38 heavy vehicle movements per day – diesel vehicles of a highly polluting nature. It would involve 19 full loads per day by HGV^b, or 95 per week. If these are carrying an annual total of 75,000 tonnes, for 48 weeks a year, then the average lorry load would be 16 tonnes. Diesel consumption will be significant, as will the consequent impact on air quality.

4. The proposed development will work against the waste reduction principles of the Climate and Ecological Emergency Action Plan,
 - a. by providing a market for unnecessary waste products, especially plastics.
 - b. by discouraging businesses from minimising packaging and the sale of single-use plastics, and
 - c. by conflicting with attempts to promote community waste reduction and reuse initiatives.

The proposal would increase the amount of waste handled by the site by 75,000 tonnes pa, and would require 50,000 tonnes to be incinerated. This is waste that should be either recycled, if feasible, or not created in the first place. The latter option best reflects the principles of the Climate and Ecological Emergency Action Plan cited above.

The Committee on Climate Change recommends that “*Waste disposal should follow the waste hierarchy; reduction, reuse, recycling, composting & anaerobic digestion, before incineration or finally landfill.*” (our emphasis. Local Authorities and the Sixth Carbon Budget, December 2020, p.91). “*This means thinking ahead to ensure emissions are locked out rather than locked in at procurement.*” (*ibid.*). In other words, the proposed development is inconsistent with long term reductions in emissions and non-recyclable waste.

5. The proposed development is located within the Green Belt. Whilst existing use

has already breached the presumption against development in the area, we regard the current proposal to be inappropriate use.

The National Planning Policy Framework (p.42) is quite clear:

“143. Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.

144. When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. ‘Very special circumstances’ will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations.

145. A local planning authority should regard the construction of new buildings as inappropriate in the Green Belt.”

Recommendation.

Given our analysis above, we submit that the proposed development should be refused:

- 1. It is premature to the Local Plan, and could prejudice the selection of sites for renewable energy production;**
- 2. it is inconsistent with and contrary to the objectives and policies of the Climate and Ecological Emergency Action Plan, in respect of reducing greenhouse emissions from energy production, and of minimising waste disposal in line with the accepted waste hierarchy;**
- 3. it would constitute an unacceptable use within the Green Belt.**
- 4. Para. 11d) of the National Planning Policy Framework is the appropriate guidance to be considered when deciding this application. We argue that, in those terms, the proposal is unacceptable, as its adverse impacts do not demonstrably outweigh its benefits.**

Dr. Martin Price,
East Dorset Friends of the Earth.