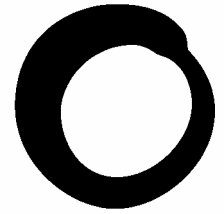


December 2005



**Friends of
the Earth**

Briefing

A Burning Issue

Why Friends of the Earth opposes the
Newhaven incinerator

Introduction

East Sussex County Council and Brighton and Hove Council want to use a 245,000 tonne incinerator to burn over half of their waste in Newhaven. The councils have a joint contract with the waste company Onyx, which includes incineration as the main method for dealing with waste. The joint Waste Local Plan, the blueprint for dealing with waste in the two areas, has not yet been adopted. ⁱ The Plan has been subject to public consultation and a Public Inquiry was held in 2003. Many of the recommendations made by the independent Inspector have been ignored by the councils. ⁱⁱ The planning application from Onyx was formally lodged on 2nd December 2005 with an eight week public consultation period.

Friends of the Earth inspires solutions to environmental problems, which make life better for people.

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- the most extensive environmental network in the world, with almost one million supporters across five continents and over 60 national organisations worldwide**
- a unique network of campaigning local groups, working in over 200 communities throughout England, Wales and Northern Ireland**
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Friends of the Earth opposes this incinerator because:

- It is part of a strategy that does not fit with Government Waste Policy
- High recycling and composting rates are at risk if an incinerator of this size is built
- It is a waste of resources to burn mixed rubbish
- There is no support in the community for the proposed incinerator
- It will create more traffic by using one site
- It is not the best solution to reduce climate change

Friends of the Earth wants to see:

- Greater focus on reducing waste in the first place
- Much higher recycling and composting targets: At least half of our waste recycled or composted by 2015
- Smaller composting and recycling sites nearer to where waste arises
- The safeguarding of potential sites for waste treatment methods
- A recycling led waste strategy as opposed to an incinerator led one

Why is incineration the wrong solution?

Lack of fit with Government Waste Policy

National policy on waste requires councils to follow a “waste hierarchy” which places different waste treatments in sequence. ⁱⁱⁱ This is to ensure that we do not use methods like incineration before better solutions, like recycling and composting, have been fully developed. The Newhaven Incinerator forms a core part of the Waste Local Plan which ignores the Government’s waste hierarchy by failing to give sufficient priority to recycling and composting.

Recycling and Composting too low

Brighton and Hove Council recycled or composted 16% of household waste in 2003/04. The rate for the same year in East Sussex was 22%. ^{iv} The councils’ target is to recycle and compost 38% of household waste by 2015, yet the Inspector of the Waste Plan said they should aim for at least 45% of municipal solid waste by 2015. ^v

Future high recycling and composting rates are at risk if a large incinerator is used. Incinerators are very expensive to build. Local councils therefore have to promise to provide huge amounts of waste for at least 25 years, in order for the incinerators to be worth building. This means there is little incentive for councils to reduce waste or increase recycling beyond minimum targets. Under some waste contracts local councils can be penalized if they fail to supply waste companies with enough waste to burn. This can

discourage greater efforts to recycle resources.^{vi}

Incineration is a waste of resources

Burning our waste rather than recycling it is part of a vicious cycle of using and producing. The material we burn, which is lost forever, must be replaced with other materials to satisfy our demand for new products. It reinforces the mentality that it's okay to throw away valuable resources.

Making materials, like paper and plastic, uses a lot of raw materials and energy, for example trees and oil. This can cause serious problems in the countries that supply such resources.^{vii} Re-use and recycling avoids the need to make use of increasingly scarce resources.

Incinerators need a mix of items, including plastic and paper, to burn at the right temperature. This means recyclable materials will be burnt and there is less incentive to ensure these materials are separated for recycling.

There is no community support for the incinerator

The Waste Local Plan, which the incinerator is a central feature of, has been completely rejected by the public. There were 83,117 objections to the first and second versions. The Councils' response to the independent Inspector's report on the Plan attracted a further 8,429 objections.^{viii} No other waste plan in the UK has caused such public controversy, with a widespread negative response from the public that the councils are meant to serve.

Lewes District Council along with Newhaven, Seaford, Telscombe and Lewes Town Councils are all opposed to the incinerator.^{ix} The local Lewes MP, Norman Baker, has also voiced his opposition.

It will create more traffic

One single large waste site at Newhaven, burning waste from across the whole of East Sussex is likely to create more traffic than putting suitable waste treatment facilities in major towns such as Brighton, Eastbourne and Hastings. Sites dealing with waste nearer to where it arises will reduce congestion and pollution.

It is not the best solution to Climate Change

The energy used to make items such as cans, cardboard and plastic, mostly comes from burning fossil fuels (e.g. oil and coal). This leads to man-made climate change, the most serious threat facing the environment today.

One of the gases responsible for climate change is methane. This is produced in landfill sites when materials rot down, like grass cuttings and vegetable peelings. The Government must reduce the amount of such "green" waste going to landfill in order to reduce methane emissions.^x However, simply replacing landfill sites with incinerators is not the answer.

Incinerators are often called "Energy from Waste" or "Energy Recovery" facilities because they can produce small amounts of electricity as a by-product of burning rubbish. However, most UK incinerators are not very efficient at capturing energy, meaning that they release a

large amount of greenhouse gases to produce a small amount of energy.

In other countries, the heat from the waste water is used to provide heating to local communities. The proposed incinerator in Newhaven will not make use of this waste heat from the process.^{xi} This shows that the real purpose of the Newhaven incinerator is to dispose of rubbish, not to provide an efficient source of energy.

Whilst it is true that recycling also uses energy, the energy saved by avoiding the consumption of virgin resources, production and transportation of goods around the world is a greater saving. Numerous studies have shown that more energy is saved by recycling, than if the material is burnt.^{xii}

Better Solutions

Reduce the amount of waste produced

The councils should adopt a waste minimisation target, aiming to reduce the overall quantities of waste.^{xiii} An action plan would include a commitment to reduce the amount of unsorted waste collected per person every year.

Incentives to increase recycling need to be developed. Competitions, prizes, reductions on council tax and subsidized access to leisure facilities can all encourage higher rates. Reducing the capacity of bins for unsorted waste can help to divert materials to recycling, once a comprehensive recycling and composting system is in place.

A vital component of ensuring high participation rates in recycling and composting schemes is publicity and community outreach. Many of the most successful schemes use a range of promotional methods. Both councils must improve plans to make sure communities reach their maximum potential to re-use, recycle and compost materials to avoid them going up in smoke.

Aim to recycle and compost 50% of waste by 2015

Research shows that up to 80% of waste in our bins could be recycled or composted,^{xiv} but England currently manages around 23%. With the right approach high rates can be achieved. For example, Milton Keynes recycled 25% in 2003/4 and some collection authorities, such as Lichfield and Daventry, already recycle over 40% of their waste. Waste Disposal Authorities like Lancashire County Council aim to recycle and compost 58% of household waste by 2015.

The councils should aim to recycle and compost at least half of our waste by 2015, paving the way for further improvement as the recycling industry develops. This would help to create jobs in the recycling sector for the local economy. The modest recent improvements in local recycling levels will plateau at a low level under the current plan, and we will slip even further down the league table of high achieving recyclers.

The South East Regional Waste Strategy guides local authorities on waste issues. It sets an overall regional target of 50% recycling and composting by 2015 and 60% by 2025.^{xv} Our targets are not in line to help achieve this so people in other areas will have to make up for our poor performance.

Smaller, more local facilities needed

Communities should take responsibility for the waste they produce. The councils' strategy is to avoid taking responsibility by dumping most of it in Newhaven. It is unreasonable to expect Newhaven to cope with the waste from much larger towns across East Sussex. A better solution would be smaller, more local facilities dealing with waste nearer to where it is collected.

Equal treatment for Newhaven (Site safeguarding)

Currently there are a number of sites across Brighton and East Sussex that could be used for waste treatment.^{xvi} These should be safeguarded for such uses as recommended by the Inspector of the Waste Local Plan. Yet the councils appear to be ignoring this advice by pinning all their hopes on one large incinerator with no Plan B.

North Quay in Newhaven and other potential sites must all be treated as equally suitable for a range of waste treatment facilities.

Conclusion

The Newhaven incinerator is at the heart of the councils' flawed waste strategy. Their plan is to burn all types of waste after meeting minimum targets for recycling and composting. A sustainable strategy would consider waste materials as valuable resources to be re-used, with each element of the waste in our bin separated out. In particular, greater efforts need to be made to compost organic material like food waste, to create a useful, valuable product to return to the land.

Recent Government figures show that we are producing less waste per year than we used to.^{xvii} However, the councils' plans are based on an analysis that assumes slowing levels of **growth** in waste. This is why they say they need to plan for a large incinerator with the capacity to burn over 200,000 tonnes per year.

The councils need to radically rethink their whole waste strategy with waste reduction, recycling and composting driving it. Until that happens, it is impossible to work out the need for, and the size of, any incinerator.

Friends of the Earth is working with local communities across East Sussex and Brighton and Hove to fight this incinerator. We want to see a recycling led strategy with at least half of our waste composted or recycled by 2015. We believe that all the larger towns in the area should have local sites to manage the waste they produce - reducing traffic and greenhouse gases.

The Newhaven incinerator must not be approved until all of these issues are addressed.

Notes

ⁱ Waste Local Plan - <http://www.brighton-hove.gov.uk/index.cfm?request=a800>

ⁱⁱ See the councils' response to the Inspector's Report:

<http://www.brighton-hove.gov.uk/index.cfm?request=b1138485>

Friends of the Earth's comments on the Council's response is available on request.

ⁱⁱⁱ The sequence is: Reduction, Re-use, Recycling and composting; energy recovery; disposal. Planning Policy Statement 10, Annex C:

http://www.odpm.gov.uk/stellent/groups/odpm_planning/documents/divisionhomepage/039993.hcsp

^{iv} Municipal Waste Management Survey 2003/2004

<http://www.defra.gov.uk/environment/statistics/wastats/index.htm>

^v Household waste makes up 95 per cent of municipal solid waste

^{vi} See "Up in Smoke: briefing on incinerators", Friends of the Earth 2003, page 4

^{vii} *ibid* page 3

^{viii} A summary of objections to the Councils' response to the Inspector's Report are at <http://www.brighton-hove.gov.uk/index.cfm?request=b1144184>

^{ix} Final submission to Public Inquiry: http://www.lewes.gov.uk/Files/plan_finalsubs.doc

(and Lewes Local Plan p158), Newhaven and Seaford town Councils have adopted the Zero Waste Charter.

<http://www.seaford-sussex.co.uk/swf/us.htm>

^x EU Landfill Directive 1999 see <http://www.defra.gov.uk/environment/waste/topics/landfill-dir/>

^{xi} Regional waste guidance to councils states "Proposed thermal facilities should, wherever possible, aim to incorporate combined generation and distribution of heat and power." Policy W12

<http://www.gose.gov.uk/gose/planning/regionalPlanning/311250/?a=42496>

^{xii} Sound Resource Management Group Inc (1992) Recycling Versus Incineration. Canada, Pollution Probe Ontario; and Morris, J (1996) Recycling v incineration: an energy conservation analysis. *Journal of Hazardous Materials* 47, 277-293.

^{xiii} Waste minimisation is at the top of the Waste Hierarchy – see note 3

^{xiv} Maximising recycling: tackling residuals

http://www.eunomia.co.uk/maximising_recycling_rates_full_report.pdf

^{xv} Regional Waste Management Strategy, Proposed Changes,

<http://www.gose.gov.uk/gose/planning/regionalPlanning/311250/?a=42496>

^{xvi} The Inspector recommended a number of sites be assessed for their suitability for a range of waste facilities: See the report at:

<http://www.brighton-hove.gov.uk/index.cfm?request=b1125324>

^{xvii} Municipal Waste Management Survey 2003/2004

<http://www.defra.gov.uk/environment/statistics/wastats/index.htm>