## Briefing Note by a LOSRA Campaigner - E&OE

The discussion of SITA's assertions on their Eco Park, and SCC's regarding their waste plan, risks confusing political rhetoric - its eco/World Class - with the truth - its not. Its hi jacking eco language to cloak a bad and rushed fix to legal rebuffs elsewhere, which will deliver the highest profit to SITA at maximum risk to us - and get SCC out of the land fill hole they dug for themselves with a flawed plan

Surrey's waste plan isn't World Class by any standard applying this century. We know that, so do the politicians, and especially SITA who are digging SCC out of a hole for more PFI profit. Its also been found wanting in two High Court challenges to it, re: Capel and Trump's Farm. So not very legal either.

Its specifically NOT World Class or eco at Charlton Lane because its 30% disposal vs. the possible 65% recovery at a proper CHP (Combined Heat and Power) incinerator. The EC has defined this as DISPOSAL, vs. RECOVERY for efficient incineration.

The latest eco park pamphlet is characteristically very economical with the truth and VERY short on inconvenient specifics while claiming openness - on EC classification of recovery and disposal, what the serious HSE safety issues actually were, how they arose, and what is to be done about them.

**1. DISPOSAL:** SITA say the EC has "updated its guidance" on recovering "waste from energy", but not what that means - even the right way around. It means this gasifier is classified as un eco DISPOSAL. The proposals for this are at least a year old, whenever they became enacted. This EC guideline existed when we researched the planning application in October last year, and before the public were ever told about the Eco Park. No CHP has meant disposal from the start of SITA's representations. The EC simply confirmed that this April.

Fundamentally, burning waste in a non CHP gasifier is a waste of energy from waste - the c.35% lost as heat. In addition, burning Black Bag waste as it comes means you don't know what's in it that is recyclable, but turn that recyclable waste into CO2 emissions anyway. More waste of waste.

Finally burning is a last resort because that turns every tonne of waste into 3.7 tonnes of CO2 up the chimney, adding to taxable carbon footprint versus recycling. How is this eco?

A World Class plan would first process the waste to remove recyclables like food and other recyclable solid waste at a Waste Processing Centre *before* it is burnt.

The prepared residual solid waste can then be taken to a larger energy recovery incinerator that includes CHP - also optimised for its now better-known fuel content. Such a major industrial complex like Grundon's at Heathrow with nearby CHP demand is simply not possible at Charlton Lane, its residential Green Belt. I think Charlton Lane should upgrade its WTC to such a waste-processing centre to supply truly eco large-scale mass burn incinerators elsewhere with pre-processed solid waste to be truly "World Class". The opportunity was there. 2 years ago Grundon offered SCC to have their solid waste incinerated locally at Grundon's large scale CHP plant at Heathrow, which would have solved this problem at a World Class stroke. SCC declined the invitation. Why?

\*\*\*\*\*\*Perhaps because this approach would have lost SITA the Renewable Obligation Certificate subsidies -ROCs - for burning the waste themselves. A massive incentive, single ROCs for direct incineration but DOUBLE ROC subsidy at £100 per MWh for gasification which quadruples the value to SITA of the relatively insignificant and inefficiently produced amount of electricity the plant produces, but the grid is compelled to pay to SITA for qualifying generation by eco law from Brussels. It goes on our electricity bills. We have a choice; either get fined for landfill, or taxed for inefficient energy production. Finally when the plant is operational it can charge the highest gate fees around, up to £150/Tonne. Land Fill is about £20/Tonne. This plant is a licence to print money for SITA. The profits in prospect are also World Class. Why share them with another?

**2. PUBLIC SAFETY:** Protecting us are under resourced QANGOs like the HSE and EA, with a few professional staff supposed to sign off on everything councils are responsible for, such as public safety, emissions, etc., to keep Councillor's sorry backsides covered when it all goes wrong - as this experiment almost certainly will if allowed to proceed. One off chemical plant prototypes frequently go bang, and especially when started and stopped, as in Batch Operation. Which is why they are built in industrial parks away from people. We have experienced Plant design engineers in the area who know this stuff. It's not a maybe, its already happened.

Think Buncefield, see "CCTV captures Rotherham recycle plant explosion" on YouTube, another experimental technology subsidy mill funded by venture capitalists.

SITA's latest leaflet suggests the HSE approved of its initial application which in fact they do not, it further fails to describe what those risks to the public are, and says what ever they are won't be addressed before planning approval is given. That's OK, then.

The HSE had previously approved nothing. The issues later raised by the HSE were ALL of the concerns raised to them by our professional engineer objectors. The reason they had not objected before was not because they had approved them, but because they had missed them as they were slid past tick box approval processes on HSE's web site in the clouds. No face-to-face pro-active disclosure meetings.

So the truth about DISPOSAL and PUBLIC SAFETY, which stopped the last planning meeting, is not clarified in the leaflet and not actually addressed before the next hearing, no change at all, the same climate of secrecy and "Trust Us" that has gone before.

Charlton Lane remains an essentially unchanged Plan C panic fudge by SCC seemingly exploited by SITA in a dash to harvest a windfall from subsidies, using the waste they have their hands on by contract rather than hand it on for processing to a truly World Class energy recovery plant.

One would have hoped the requirement to build a joined up waste processing infrastructure to achieve World Class would have bought some joined up thinking across county boundaries to silo'd Surrey and other counties such as Hampshire and Sussex, plus the informed clarity of thought necessary to be World Class - both are demonstrably absent from Surrey's parochial little plan, pompously long and inaccessible on language and woefully short on deliverable commonsense - as at Charlton Lane. Its not just SCC........

PFI (Private Finance Initiative) outsourcing of council operations means arm's length Councils no longer control them effectively or understand them as they become more complex. And they are

run for profit rather than the best interests of ratepayers. With no resources to control and no practical expertise the politicians are de facto in the hands of the "independent" paid consultants and service providers with the resources to solve their problems as they choose, with profit as their main objective and regional plans cutting across PFI deals likely to reduce them.

In summary Surrey and other counties' attempts to take control of waste planning across county borders and PFI suppliers to realise a joined up 21st Century waste plan are frankly pathetic. They should be recycling more, separating all volume recyclables before incineration, then maximising energy recovery from the residual solid waste at large scale Regional CHP incineration facilities directly connected to rail and trunk roads, as is required to be World Class, but seem reluctant to do so. Anaerobic digestion - AD -should be where the large smelly biomasses are to reduce truck rolls, by a railway in the country, not in the suburbs.

Oh, and AD gets Double ROCs as well.

Perhaps this is happening because contractors profit motives loom larger in their proposals than best practices? Instead of managing SITA, it appears SCC and other counties are being controlled by PFI contractors and their consultants; supported by EC directives SITA are probably involved in "helping" to draft.

Faced with problems they don't understand and have allowed to slip, pushed hither and thither by Brussels driven political laws de jour creating fines and subsidies (stick and carrot) to force them into the waiting arms of the commercial waste lobbyists, they turn to these prepared lobbyists - like SITA or another PFI outfit - for rescue. Perfect sting on us, by law from Brussels.

Faced with the opportunity of a lot of subsidy guaranteed profit for a little bit of electricity the bin men now want to be electricity generators, proposing experimental technologies we already demonstrated they know little about – totally ignoring basic safety practice to mitigate the dangers of this dangerous chemical plant in green belt accessible to the public, until objectors blew the whistle. Surprise!

If SBC had a modicum of self-respect and their "Strongly Object" words meant anything they would have smelt the pile of rats and be fighting this in court. A QC would nail it in a trice, as has already been done twice. Three strikes and its out – as it should be.

This "World Class" plan is an inadequate, parochial, 20th Century fix for a much bigger 21st Century problem, certainly neither eco nor World Class in comparison to best practice.

Wrong thing, wrong place, wrong reasons.

**BUT DOES THAT MATTER?** As we saw with the 'permanent use' extension planning application this bunch of Surrey councillors would vote for any abuse of the planning system that their leader tells them to so as to continue dumping waste into Spelthorne (or they're off the planning committee) - anything Surrey's salaried planning officers can "independently recommend" by asserting things are as they should be and "exceptional circumstances\*" apply to rigorous Green Belt protection - because the planning officer's retained counsel says so - all to cover councillors block voting backs in court when it goes wrong.

nb: \* Assertively bad use of language again. There aren't "exceptional circumstances" as there are much better, safer and efficient options a World Class waste plan should have included in a regional solution and did not. The "World Class" plan's drafting failures do not create "exceptional circumstances" in an absolute sense.

SCC is voting on its own application: Note the democratic process here is the council voting on what is demonstrably an application made by their exclusive waste contractor, their outsourced waste department, on the recommendations of their salaried Planning officer, excused by saying SITA is a "Third Party Applicant". Try that on a Judge. Or getting a stable approved in the "Green Belt" field next door when you are a genuine Third Party.

FYI LOSRA members have informed planning committee councillors directly as engineering professionals that the gasifier uses dangerous technology that should be on an industrial estate away from the public on safety grounds. Each SCC planning committee councillor has been warned individually by an engineering professional of the dangers of accidents up to self destruction, and the inadvisability of the unique co-location of such a facility with a public facility, so deniability is not possible should an accident occur, as at Rotherham. This process will be repeated before the 30<sup>th</sup> June vote.

As far as June 30<sup>th</sup> Planning application is concerned I doubt Green Belt law or our safety will stand for much while marginal subsidy fuelled profits of over £150M over 25 years are in prospect to SITA just from burning our waste dangerously inefficiently, PLUS the elevated gate fees for Gasification of waste from elsewhere when its working. SCC simply want to save political face, as the council minutes have stated as a matter of record.

This proposal is self evidently about money and politics, not eco-ness or Spelthorne's people's safety. SITA must try to leverage its 25 year contract to maximise the profits it can make through processing the waste it controls, not give it to someone else to burn more efficiently, That's what businesses do. SCC is supposed to control that.

Those serially abused World Class eco babble words are being used, and will continue to be used, to disguise the reality of whatever delivers their goals at the best profit to SITA and gets SCC out of the land fill hole their inadequate plan has put them in. Until the EC make more laws enabling waste contractors to make more subsidy profits from their clients using the latest technology de jour. Follow the money........