

Question:

Please can you tell us the justification for the selection of Charlton Lane site versus alternatives in Surrey? Is it correct that Charlton Lane was not the first choice?

Answer:

It is understood that the selection of the Charlton Lane site for the proposed Eco Park is a matter of public concern. Therefore I have addressed this issue at some length to ensure that councillors and the public understand how the decision was taken and that there has been, and will continue to be, substantial provision for consultation with local residents. In January 2006, the county council's Executive approved a draft Waste Disposal Authority Action Plan. The Council subsequently adopted this plan later that year. At that time the Waste Disposal Authority's preferred method of dealing with residual waste was through energy from waste incineration technology. The Action Plan identified the preferred sites for energy from waste technology as Clockhouse Brickworks, Capel; land at Trumps Farm, Longcross and Charlton Lane, Shepperton. The report to the Executive in January 2006, went on to recommend that two energy from waste plants be developed to deal with residual municipal waste. The smaller of the two plants, some 100,000 tonnes per annum capacity, should be developed at Capel in the south of the county. A larger plant of 160,000 tonnes capacity should be developed in the north of the county at either Trumps Farm or Charlton Lane. At the time the preference was to site the northern energy from waste incineration plant at Trumps Farm. Both the Charlton Lane and Trumps Farm sites had planning considerations. In addition, as the Executive report of January 2006 states, there were also 'some clear operational benefits in choosing the Trumps Farm site over the Charlton Lane site'. Those 'clear operational benefits' related to the existing operational use of the Charlton Lane waste transfer station and community recycling centre and the fact that if a 160,000 tonne per year energy from waste facility were to be developed on the Charlton Lane site, it would be necessary to close the site to the public and to local authority and trade customers for the duration of the building works. The council's World Class Waste Solution proposes further reduction of waste arising as well as increased levels of recycling. This means that there will be less residual waste to be disposed of than was anticipated when the Waste Disposal Authority Action Plan was first drawn up in 2006. Some 160,000 tonnes per year instead of the 270,000 tonnes per year originally proposed. The emergence of batch oxidation system gasification technology as a viable alternative to energy from waste incineration enables plant to be constructed on a much smaller scale. The plant proposed for Charlton Lane will deal with only 60,000 tonnes of waste per year rather than the 160,000 tonnes proposed for the energy from waste plant at Trumps Farm. The configuration of the plant also allows for a much smaller building to house the process. The maximum building height proposed for the Eco Park is just over 18 metres, compared with a height of around 40 metres that would be required for any energy from waste incineration plant. The height of the stack is also significantly less, 49 metres as compared to 80 to 90 metres for any energy from waste

incineration plant. The reduced scale of the buildings also means that it would be possible to continue to operate the Charlton Lane facility during the construction of both the gasification plant and anaerobic digestion plant. In addition the council has managed to secure short-term capacity for Spelthorne's residual waste at the Lakeside energy from waste facility at Colnbrook and therefore the operational pressure on the Charlton Lane site, during construction, is reduced. Since the scale of the buildings, types of processes and footprint of the proposed Eco Park are very different to that of a 160,000 tonne per year energy from waste incineration facility and since there had been significant changes to the adopted Waste Plan as a result of the removal of Capel as an allocated site, Waste Disposal Authority officers considered that it was necessary to undertake a new planning assessment for the proposed Eco Park. A firm of planning consultants, Enviros were therefore commissioned to undertake this assessment and this was used to inform the report to cabinet on the 'World Class Waste Solution' in February this year. The report, which was produced in November 2009 has been published on the council's website. As a result of this detailed analysis, the Waste Disposal Authority believes that the Charlton Lane site is the most appropriate site for the development of an Eco Park. The principle of using the Charlton Lane site for waste processing, including thermal treatment, was subject to extensive public consultation during the development of Surrey Waste Plan. The council adopted the Waste Plan in May 2008 following an examination in public, with the inclusion of Charlton Lane as an allocated site. The planning application that is being developed by Surrey Waste Management will include a thorough and up to date alternative site assessment. The planning application will be subject to public consultation and residents will be able to make their views known with regard to all aspects of the application, including the suitability of the Charlton Lane site for the Eco Park. The demonstration of the suitability of the site is a material consideration for the council's Planning and Regulatory Committee when they consider the planning application. Therefore there has been and will continue to be further consultation with residents in relation to the principle of a waste processing facility at Charlton Lane.

Question: Will this mean that all of Spelthorne's waste will be dealt with locally?

Answer:

All of Spelthorne Borough Council's residual waste would be dealt with at the proposed Eco Park, together with any kitchen waste that is collected separately by the borough council in the future. Spelthorne Borough Council make their own arrangements for other recyclable material and it is likely that recyclable material collected in door to door collections will continue to be taken to the Grundon materials recycling facility at Colnbrook. Spelthorne's garden waste is currently being taken to a composting site near Virginia Water. Any future decision about a destination for green waste will be a matter for Spelthorne Borough Council. The Community Recycling Centre element of the Eco Park will continue to deal with waste brought into the site by Surrey residents, the majority of whom are from Spelthorne.

Question: We understand that it is proposed that 40,000 tonnes of Surrey's food waste out of an estimated 100,000 tonnes will be dealt with in the Eco Park, is the 100,000 tonnes a realistic figure and, if so, where will the balance of 60,000 tonnes be dealt with?

Answer:

A household waste analysis undertaken in November 2007 and March 2008 identified that kitchen waste comprised 40% of the weight of residual municipal waste. In 2007/8, district and borough councils collected 271,000 tonnes of residual waste and therefore if kitchen waste comprised 40% of this then there would be about 108,000 tonnes of kitchen waste in the household waste stream. Initially it is estimated that about 40% of the 100,000 tonnes of kitchen waste will be captured by separate kerbside collections. However if capture rates and participation rates increase, then there may be the need for additional facilities to deal with this waste in which case the council and SITA Surrey would consider the appropriate sizing and location of such a facility.

Question: If there is capacity at other nearby Energy for waste sites such as the Veolia plant in Hampshire - why do we need to build one in Surrey? Has Surrey County Council looked at other options for sharing waste facilities with other local authorities?

Answer:

The Surrey Joint Municipal Waste Management Strategy (Policy 1) states that Surrey authorities will plan for net self sufficiency for dealing with waste in Surrey, through the provision of waste management capacity equivalent to the amount of municipal waste arisings. The WCWS projects the need for 160,000 residual waste treatment capacity even after reducing waste further and recycling at 70%. In the short term SCC is sending 20,000 waste to the Lakeside facility at Colnbrook, but this capacity is only available for two more years. SCC also has an interim contract in place for 100,000 at Allington EFW in Kent which can last until 2019. The only other reasonably local option is Hampshire and we have been told in very clear terms that they have no capacity available for Surrey's waste. Therefore long term capacity at nearby facilities cannot be relied on and the Eco Park is the first step in addressing this issue. The WDA will continue to assess need and capacity and will bring recommendations to members in the future. The fall back position would be reliance on landfill which may not be available locally, is environmentally unsustainable, and would cost Surrey taxpayers around £11m a year in landfill tax alone within four years if we did not develop new solutions.

Question: If the Eco Park goes ahead what are the plans for other waste collection sites in Surrey?

Answer:

The proposed Eco Park is just one of a number of developments across Surrey that will be needed to handle Surrey's municipal waste. Waste is currently collected at fifteen community recycling centres and four waste transfer stations across Surrey and this number will increase as we develop more facilities to treat waste in Surrey. We are currently sending our green garden waste out of county for treatment and we have identified in our plans that we require a site or sites to compost up to 80,000 tonnes of green waste. We also have plans to develop new facilities at Guildford including a new community recycling centre, waste transfer station and a materials recycling facility for the dry recyclables currently delivered to the site. We are also looking to develop the existing site at Earlswood, Redhill to incorporate a new waste transfer station and bulking facility. We will also continue with our programme of refurbishment and improvements to the existing community recycling centres across the county to improve the service provided to customers and increase the recycling potential.

Question: If this Eco Park development does not go ahead what is Plan B? What are the implications for waste disposal in Surrey?

Answer:

If the Eco Park development does not proceed then the waste disposal authority would need to reassess how it will deal with the waste that will continue to be produced by Surrey residents. It is very likely that we would have to continue to rely on landfill, which has both environmental impacts and cost implications. Within four years, this would lead to £11m per year in landfill tax alone.

Question: Will the scout hut need to be moved?

Answer:

The proposed planning application for the Eco Park does not include the area that is currently occupied by the Scout hut. The Scout group can therefore continue to occupy these premises during the construction and operation of the proposed Eco Park.

Question: Will this affect house prices? If so, what will SCC do about it?

Answer:

The proposed Eco Park is designed to be an attractive facility, including a carefully designed stack, which would reduce its visual impact. There would also be benefits of enhancements to the local landscape and a reduction in heavy goods vehicle traffic compared with the existing operation. We therefore do not believe that the Eco Park will affect house prices in the area.

Question: What will be the benefits for Spelthorne Residents?

Answer:

Spelthorne residents will benefit from the following:

- A reduction in Heavy Goods Vehicle traffic associated with the site
- Access to an attractive landscaped area adjacent to the eco Park
- Improvements to the community recycling centre access to reduce queuing
- Improved recycling facilities including a reuse centre on the site
- Attractively designed iconic buildings to replace those currently on site

Question: We have been informed that at another site in Dumfries the plant is not operational, would you propose to open something here that does not work?

Answer:

SITA UK is not the operator of the Dumfries site but it is the reference site for the BOS gasifier proposed for the Eco Park at Charlton Lane, Shepperton. SITA UK follows the operation at Dumfries very closely and has a good relationship with Scotgen, the plant's operators. The Scottish plant has been operating successfully but inevitably there will be issues that need to be resolved during the commissioning phase. This is quite common with commissioning of a new plant. The main issue at Dumfries was that the facility did not have the correct type of boiler. The boiler was reconfigured last winter and used as a 'cooler' before a new type of boiler is installed. Since March 2010, Scotgen has been adjusting the plant and processing thousands of tons of waste. The commissioning period ended on 1 November 2010. SITA UK technical experts consider that there is no concern with the actual gasification process and we are confident that BOS gasification is a sound technology and is the right facility for Surrey. SITA UK's experts have extensive experience of thermal waste treatment methods and have thoroughly assessed the suitability of the technologies proposed for Surrey.

Question: What other examples are there of putting waste facilities together like this development? How does this benefit Spelthorne?

Answer:

Although this is the first Eco Park of its kind in the country, the technologies proposed are in use elsewhere. SITA UK has extensive experience of older style Eco Parks with co located facilities of different types. These include:- SITA Kirklees, which is in an urban setting and co-locates energy from waste and material recovery facility technologies;- Londonwaste Eco Park (where SITA was a 50% shareholder) is in an urban setting and co-locates energy from waste, in vessel composting and bulky waste recycling; It is SITA UK's intention to develop other Eco Parks across the country to modernise existing sites as well as at new sites to provide the UK with much needed

infrastructure to recycle and recover energy from waste. The benefits to Spelthorne of developing the Eco Park are that it secures a reduction in heavy goods vehicle traffic in the local area and it also secures the presence of the community recycling centre, which is a very important and busy local asset. Were the Eco Park not to be developed then the waste transfer station and material recovery facility would need to be retained for wastes to be bulked locally and transported somewhere else for recovery and disposal. Therefore there would be no reduction in heavy goods vehicle traffic.

Question: What is an Anaerobic Digester - What does it do (If not explained in the presentation)?

Answer:

Anaerobic digestion (AD) has been used in the waste-water industry for decades and almost every big sewage treatment plant in the UK has an AD plant as part of the water treatment. AD of solid and semi-liquid waste streams (e.g. food waste) is a more recent development, but has been used for around 15 years now. Germany alone has more than 4,000 AD plants and the number of plants in the UK is growing continuously. SITA Surrey Ltd, through SITA UK and Suez Environment, has considerable technical expertise and our technical experts have thoroughly assessed the suitability of the technologies proposed. Anaerobic digestion is a process in which biodegradable material – e.g. food waste – is broken down by micro organisms in a sealed container in the absence of oxygen. This produces a gas (known as biogas) consisting of methane and CO₂, which can be converted into electricity, heat and digestate. The process also produces what is known as a “digestate”. This product is dewatered and the solid part is similar to compost and can be used on land to replace artificial fertilisers.

Question: What exactly is batch oxidation? What does it do and is it safe? (If not explained in the presentation)?

Answer:

BOS gasification is a process where waste is heated in reduced levels of oxygen to temperatures above 650 degrees but not set on fire, to produce a gas. The gas (known as synthetic gas or syngas) is then used as fuel and burned at high temperatures to provide energy in a similar way to natural gas. A flue gas treatment system cleans the gas before it is released to atmosphere by a chimney or stack. BOS gasification is proven and safe, as is recovering energy from waste. Waste thermal treatment plants are amongst the most strictly regulated industrial processes in Europe and are closely monitored in England by the Environment Agency. SITA UK operates three thermal waste treatment plants safely and efficiently across the UK and Suez Environnement, our parent company, operate 50 in Europe. Before the Eco Park can operate it must have an Environmental Permit from the Environment Agency (EA), which is the industry regulatory body. This permit will set out conditions of operation and if these are breached the EA can – and does –

shut down sites. We would not be issued with an Environmental Permit if this site posed an unacceptable risk to safety

Question: There are concerns from residents about potential pollutions Can you tell us what are the emissions and health effects for water – bearing in mind 20% of Spelthorne is water.

Answer:

The gas engines connected to the anaerobic digestion units will release oxides of nitrogen, carbon monoxide and sulphur dioxide while the batch oxidation system gasifier will release products of combustion (nitrogen dioxide, carbon monoxide, volatile organic compounds), acid gases (sulphur dioxide, hydrogen chloride), particulate matter, heavy metals and trace elements including dioxins and furans. Gas cleaning systems will be installed to ensure that the levels of any emissions from the plant comply with all the relevant European emissions standards. In addition the Eco Park will have a chimney-stack to effectively disperse emissions and this will be 49 metres tall. A number of the reservoirs and other water bodies in Spelthorne Borough are protected as part of a Special Protection Area (SPA) and/or as Sites of Special Scientific Interest (SSSIs). In order to assess the impact on these sensitive areas, dispersion modelling was used to predict the concentrations of oxides of nitrogen and sulphur dioxide above them and compared this with the air quality objective for the protection of sensitive ecosystems. This showed that the impact would be insignificant. According to the Environment Agency guidance, the impact can be screened out as insignificant if the concentration is less than 1% of the acceptable level on a long term basis and less than 10% on a short term basis. As part of the Human Health Risk Assessment, we also considered the potential for pollutants to land on the water, accumulate in the water and contribute to concentrations in drinking water. It was assumed that residents of Spelthorne took all of their drinking water from the closet reservoir. The additional ingestion of pollutants through this route was found to be insignificant. Both Surrey County Council and SITA UK are committed to ensuring that emissions from the Eco Park are as low as possible. For example, the EU standard for Nitrogen Oxide is 200 mg/Nm³ but the clean up technology for the proposed gasification plant will reduce the emissions of Nitrogen Oxide to 100 mg/Nm³, which is a significantly lower level.

Question: There are concerns from residents about potential pollutions Can you tell us what are the emissions and health effects for air bearing in mind Heathrow and the motorways impact?

Answer:

The exhaust gases from the Eco Park will mainly consist of nitrogen, oxygen, carbon dioxide and water vapour, but there will also be small amounts of potential pollutants. The gas engines connected to the anaerobic digestion units will release oxides of nitrogen, carbon monoxide and sulphur dioxide. The BOS gasifier will release products of combustion, (nitrogen dioxide,

carbon monoxide, volatile organic compounds), acid gases (sulphur dioxide, hydrogen chloride), particulate matter, heavy metals and trace elements including dioxins and furans. Emissions will be minimised by various flue gas treatment methods. However, merely stating that pollutants are released is not sufficient. We also need to consider how much is released and how much, if any, reaches humans to have a health effect. This is worked out using dispersion modelling to predict concentrations at ground level, which are then compared with acceptable levels, including air quality objectives. For those pollutants that are not screened out further detailed assessment, including background concentrations, has been carried out and this confirms that the impact is negligible.

Question: There are concerns from residents about potential pollutions Can you tell us what are the emissions and health effects for noise and how will this be managed bearing in mind the proximity of the M3 to the proposed Eco Park.

Answer:

A detailed noise assessment has been undertaken taking existing background noise levels and adding predicted operational noise levels on top of background levels. This noise assessment has shown compliance of the proposed Eco Park not only with British Standard BS4142 noise levels, but also the much more stringent Surrey County Council noise guidelines.

Question: Can you categorically confirm there is nothing about operations of the site which will be detrimental to health?

Answer:

The waste management industry is strictly regulated by the Environment Agency. We would not be allowed to operate any facility that poses a significant risk to human health. The Environment Agency can – and does – shut down non-compliant sites. The risk to human health has been assessed in detail and has been found to be insignificant. This is worked out using dispersion modelling to predict concentrations at ground level, which are then compared with acceptable levels, including air quality objectives. For those pollutants that are not screened out, further detailed assessment including background concentrations, has been carried out and this confirms that the impact is negligible.

Question: How will these emissions be monitored ? Will the public have access to the data?

Answer:

There will be a continuous emissions monitoring system installed for the gasifier, which will monitor nitrogen oxides, sulphur dioxide, hydrogen chloride, volatile organic compounds, carbon monoxide and dust. Other pollutants are released in such low concentrations that continuous monitoring

is not practical, so samples are extracted from the exhaust gases every three months for analysis. The results of the monitoring will be sent to the Environment Agency, where they will be made publically available. Recent tests at the batch oxidation system gasification plant in Dumfries indicated that dioxin levels were well below that permitted under the environmental permit.

Question: At the last Area Surrey Councillors meeting at Knowle Green it was stated that the residue from the anaerobic digester process will be 20 K tonnes a year which will be sold onto farmers for soil improvement. I want to know the process envisaged to store and transport this material away from the site as it is likely to have a very strong smell?

Answer:

All operations at the anaerobic digestion plant will be undertaken within the proposed buildings or within the sealed vessels, to minimise any possibility of odour. There will be air extraction within the buildings to hold them in negative air pressure, so that air is drawn in rather than any potential odorous air escaping out. There will also be fast acting roller shutter doors to enable vehicles to go in and out but no air will be able to escape whilst this is taking place. This extracted air is fed through a biofilter to remove odour. The process also produces what is known as a “digestate”. This product is dewatered and the solid part is similar to compost and can be used on land to replace artificial fertilisers. This will be stored on site inside a building under negative air pressure for a period of two weeks to allow it to mature and to ensure that the organic process has completed and produced a stabilised, processed material. An odour management plan is being compiled in support of the Environmental Permit application, which will be submitted to the Environment Agency in November 2010. If the permit were granted then the Environment Agency would monitor the site through regular unannounced site inspections. Digestate from the anaerobic digestion plant would be matured for a period of time within an enclosed building. It would then be transported from the site in covered vehicles.

Question: Why are you intending to build the facility so close to houses? What are the risks and how will they be managed?

Answer:

There are examples of thermal treatment plants being installed close to or in the middle of towns. These include:

- SITA Kirklees, which is in an urban setting and co-locates EfW and MRF technologies;
- Londonwaste Eco Park (where SITA was a 50% shareholder) is in an urban setting and co-locates EfW, IVC and bulky waste recycling;
- There is a plant in the centre of Paris on the banks of the river Seine;

Our technical experts have thoroughly assessed the suitability of the technologies proposed and we know that we would not be issued with an Environmental Permit if our facility posed an unacceptable health risk. Waste treatment plants are amongst the most strictly regulated processes in Europe and are closely monitored in England by the Environment Agency. SITA UK operates three thermal waste treatment plants safely and efficiently across the UK and our parent company Suez Environnement operates approximately 50 in Europe. Should we receive planning permission for the Eco Park, SITA UK will perform a Hazard and Operability study (HAZOP). This is an in depth assessment that evaluates and identifies possible issues that may arise. This assessment will take place during the detailed design stage of the project and will review all issues in order to guarantee that the facility is safe to operate. Going forward, the plant will be subject to 24 hour monitoring by trained, professional staff.

Question: Will there be any hazardous materials or by products of the process stored at the site? If so how will this be managed?

Answer:

The BOS gasification process produces what is known as a fly ash, which is a by-product of the flue gas treatment and is classed as hazardous waste. This is collected in specially designed bags during the gasification process and is removed from site to a specialist disposal facility. The facility at Charlton Lane would generate around 2,500 tonnes of this material per year.

Question: How will a major fire and consequent toxic gas explosion at the site be prevented? How will you manage health and safety

Answer:

Hazard and Operability Studies (HAZOP) have been used for many years as a formal means for the review of chemical process designs and are a quantitative risk assessment technique. A HAZOP study is a systematic search for potential hazards such as flow, temperature and pressure. The BOS gasification and anaerobic digestion processes will have already been subject to individual HAZOP studies and if we receive planning permission for the Eco Park, SITA UK will perform a HAZOP on the combined operations. This assessment will take place during the detailed design stage of the project and will review all issues in order to guarantee that the facility is safe to operate. Once operating, the plant will be subject to 24 hour monitoring by trained, professional staff.

Question: What is the difference between Energy from Waste and BOS Gasification?

Answer:

Batch Oxidation System (BOS) gasification and energy from waste (EFW) are two different processes. With BOS gasification waste is treated in batches rather than burnt continually. It involves waste being heated with little air in a compartment to produce a gas. This gas is then set alight in a secondary compartment, to produce energy. BOS gasification allows for a lower building height, such as standard low-level industrial use buildings. Alternatively, energy from waste (EfW) burns waste in the presence of lots of air. This means there is full combustion in only one compartment and the waste is fed continuously on a moving grate. EfW is cost effective on a larger scale than BOS gasification, for example 450,000 tonnes per year as opposed to 60,000 tonnes per year. This means that the facilities tend to be bigger.

Question: What will be done to mitigate odour?

Answer:

The Batch Oxidation system (BOS) gasification building will be run under a slight negative air pressure, as a way to mitigate any potential odours. This is a standard operational practice to control odour egress on facilities where odour could be produced. There are also odour suppressant fans spraying odour neutraliser onto the waste during loading operations as and when operations require. These fans can be left to run on timers throughout the night. An odour management plan is being compiled in support of the Environmental Permit application to be submitted in November and this will then be regulated by the Environment Agency during their regular unannounced site inspections. Food waste would be delivered to the plant in sealed containers which would be emptied inside the enclosed reception building of the anaerobic digestion plant. The anaerobic digestion reception, process and maturation buildings are run under deliberate negative air pressure with three air changes per hour and a biofilter to treat the waste air.

Question: Please can you confirm what the operating hours for the new Eco Park are?

Answer:

Opening hours of the site are outlined in the appendix. Please note that the opening hours don't necessarily mean the site is open to the public.

Question: Currently heavy lorries are a big area of concern for residents can you explain how the Eco Park will lead to reduced lorry movements?

Answer:

At present Charlton Lane is used as a bulking facility. This means that waste is taken into the site on one vehicle and deposited in a holding area. This vehicle then leaves the site empty. The waste is bulked and a bigger, empty vehicle comes to the site and is loaded with this waste before leaving again.. This means that all waste received at the Charlton Lane site at present is ultimately exported from the facility by road. i.e. 100% of what comes to the site, will go back out again. The proposed Eco Park scheme will include for waste processing on site in future, which will break down the received waste inputs and therefore deliver a reduction in the amount of final end product waste materials required to be exported from the facility. Just over two thirds of all waste to be received at the Eco Park will be subject to waste processing activities. The proposed BOS gasification and anaerobic digestion facilities at the Eco Park will process waste and reduce received waste mass by 77% and 50% respectively. Therefore only 54% of all waste mass received at the site will be required to be exported, with a consequent reduction in vehicle movements. In addition to the effects of waste processing, the Eco Park proposals are also anticipated to result in a further reduction in heavy good vehicle movements as a result of i) a reduction in trade waste levels received at the site, and; ii) ceasing the receipt of waste associated with the Hounslow kerbside recycling fleet, which is currently using the site as a temporary waste reception area. The reduction / removal of these existing waste streams from Charlton Lane as part of the Eco Park proposals will further help to reduce overall lorry movements. The planning application for the Eco Park proposal scheme will be supported by a detailed Transport Assessment report, which has been prepared to accord with Department of Transport guidelines and which was scoped with both the Local Highway Authority (Surrey County Council) and the Trunk Road Authority (Highways Agency). The results of these assessments suggest that the development of the Eco Park scheme is anticipated to lead to a 49% reduction in the number of lorries travelling to / from the Charlton Lane site on weekdays. At weekends, it is predicted that there will likely be a slight decrease in overall lorry movements on Saturdays and a slight increase in lorries on Sundays, when compared to current site operation. Any such weekend increases would be very low, being of the order of less than 20 a day, or equivalent to two additional lorry movements per hour (in+out).

Question: With the increased drive to recycling, what are the expected increases in private vehicle movements?

Answer:

The modelling of private vehicle movements for the Eco Park scheme has included for the following additional elements over and above current operation of the Charlton Lane site:- Additional staff vehicle movements reflecting the increased staffing levels proposed at the Eco Park; - Visitor

movements associated with the visitor / educational facility at the Eco Park;- 3% growth in observed public community recycling centre movements between 2010 – 2016; In fact, over the past few years the number of private vehicles accessing the existing Charlton Lane community recycling centre has actually been falling, reflecting the impact of the Surrey County Council's resident scheme and van permit initiatives in discouraging unauthorised use of the site and the effects of greater kerbside recycling in reducing the need for residents to regularly visit community recycling centres. We would anticipate this trend to continue. Notwithstanding this, in order to ensure a 'worst case' appraisal of highway network impact and capacity within the formal Transport Assessment report, we have included a small level of growth in our traffic modelling of the community recycling centre.

Question: Can you guarantee to local residents that waste vehicles going to and from the facility will not go through Upper Halliford or Charlton Lane?

Answer:

Waste management activities have been taking place at the Charlton Lane site since the 1950's, with associated levels of heavy goods vehicle traffic movements. Indeed, the existing waste management facility creates of the order of 350 heavy good vehicle (HGV) movements per day (weekday) with much lower levels of HGV traffic at weekends. Some of the current HGV traffic movements are known to route via Charlton Road through Charlton Village (of the order of 20-30% of total site HGV traffic, based on our surveys of May / June 2010). Very little waste related traffic is anticipated to route via Upper Halliford Village except when serving local frontage properties. The development of the Eco Park proposals will result in a substantive reduction in HGV movements to / from the Charlton Lane site, which will in turn result in a reduction in HGV movements on the immediate local network including through Charlton Village. The Transport Assessment report identifies that the development of the Charlton Lane Eco Park scheme would likely result in a 10.5% reduction in total HGV movements (including other non-waste related HGV traffic) through Charlton Village on weekdays. As the Eco Park scheme will be operated to serve Surrey County Council municipal waste inputs it is anticipated that there will potentially be greater opportunities for the control of vehicle routeing in future. Furthermore, the existing large vehicle routeing strategy at the Charlton Lane site would be retained and strictly enforced to ensure that no large (bulk) transfer vehicles use Charlton Road / New Road to the west of the site.

Question: Have the proposed plans been examined in conjunction with Surrey's Minerals Plan to ensure that the said waste traffic reductions are not offset by increases in minerals traffic?

Answer:

The Eco Park proposal is supported by a detailed Transport Assessment report, the scope of which was discussed and agreed with both the Local Highway Authority (Surrey County Council) and the Trunk Road Authority

(Highways Agency). These scoping negotiations identified that the Transport Assessment should follow best practice and therefore directly include for the traffic effects of the following as part of network traffic modelling:- 'Committed' major local development projects i.e. those schemes that have either received planning permission, but have yet to be constructed;- Those schemes that are currently the subject of a formal planning submission, but yet to be determined. Under this approach, the Transport Assessment for the Eco Park scheme has directly incorporated the predicted traffic effects of the approved Shepperton Studios re-development scheme. In addition to the direct modelling of this local major committed development scheme, the Transport Assessment for the Eco Park development also includes for increases in total observed background traffic levels in order to model predicted future network traffic growth. The methodology adopted within the Transport Assessment for the modelling of such growth is highly robust, using growth factors in excess of typical growth levels to ensure a 'worst case' capacity assessment. Given the above, the Transport Assessment does not directly include for the traffic effects of local 'allocated' sites (including minerals site). Scoping discussions with the formal highways consultees identified that direct modelling of allocated sites would be inappropriate, as they did not represent permitted sites and there could be no certainty as to when, or indeed if, such sites would ultimately be brought forward. Furthermore, little information is available as to how such facilities might operate in future, if permitted, and what planning or highways related restrictions would be placed upon such schemes. It is important to note that traffic volumes associated with the operation of waste management facilities at the Charlton Lane proposal site are already part of existing network traffic volumes and therefore inherent within existing observed baseline traffic flows. Given that the proposed Eco Park scheme is predicted to result in a reduction in traffic volumes when compared to current site operation, the proposals will actually result in a general improvement in local traffic conditions and therefore are unlikely to impact on the future viability of any local allocated site. Ultimately, the assessment of the transport suitability of an allocated site is best undertaken at the planning application stage, when each proposal can be assessed on its own merits, when viewed against the prevailing highway conditions at the time.

Question: Is it possible to access the site from the M3? What other options are there to transport the waste? Rail?

Answer:

SITA UK wrote to the Highways Agency requesting permission to build a slip road off the M3 to the site. However, they replied refusing us permission as it goes against national Government policy. The Highways Agency's letter stated: "There is a general presumption that there will be no additional accesses to motorways and other routes of strategic national importance, other than the provision of service areas, facilities for the travelling public, maintenance compounds and, exceptionally, other major transport interchanges. Access from other types of development to motorways and other routes of strategic national importance will be limited to existing junctions with all-purpose roads. Modifications to existing junctions will be

carried out only where traffic flows and safety will not be adversely affected. Connections to slip roads and/or connector roads will not be permitted.”In terms of potential rail access, the railway line near the Charlton Lane facility is a busy commuter route which is highly unlikely to have the capacity to transport waste by rail. Furthermore, an exporting railhead would need to be constructed to load the waste material onto rail in the first place. Rail works well with economies of scale transporting bulk materials over long distances. Those economies of scale would not be available for transporting relatively small quantities of waste within Northern Surrey by rail. The land that sits alongside the railway to the east of the Charlton Lane site is greenfield land within the Green Belt.

Question: The Charlton Lane site was originally rejected from the Waste Disposal Authority plans for Energy from waste site due to visual impact, why is it suitable for an Eco Park?

Answer:

The emergence of batch oxidation system gasification technology as a viable alternative to energy from waste incineration enables plant to be constructed on a much smaller scale. The plant proposed for Charlton Lane will deal with only 60,000 tonnes of waste per year rather than the 160,000 tonnes proposed for the energy from waste plant at Trumps Farm. The configuration of the plant also allows for a much smaller building to house the process. The maximum building height proposed for the Eco Park is just over 18 metres, compared with a height of around 40 metres that would be required for an energy from waste incineration plant. The height of the stack is also significantly less, 49 metres as compared to 80 to 90 metres for an energy from waste incineration plant. The overall visual impact of the Eco Park is therefore substantially less than that of an energy from waste incineration plant. The reduced scale of the buildings also means that it would be possible to continue to operate the Charlton Lane facility during the construction of both the gasification plant and anaerobic digestion plant. In addition the council has managed to secure short-term capacity for Spelthorne’s residual waste at the Lakeside energy from waste facility at Colnbrook and therefore the operational pressure on the Charlton Lane site, during construction, is reduced. Since the scale of the buildings, types of processes and footprint of the proposed Eco Park are very different to that of a 160,000 tonne per year energy from waste facility and since there had been significant changes to the adopted Waste Plan as a result of the removal of Capel as an allocated site, Waste Disposal Authority officers considered that it was necessary to undertake a new planning assessment for the proposed Eco Park. A firm of planning consultants, Enviros were therefore commissioned to undertake this assessment and this was used to inform the report to cabinet on the ‘World Class Waste Solution’ in February this year. The report, which was produced in November 2009 has been published on the council’s website. As a result of this detailed analysis, the Waste Disposal Authority believes that the Charlton Lane site is the most appropriate site for the development of an Eco Park. The principle of using the Charlton Lane site for waste processing, including

thermal treatment, was subject to extensive public consultation during the development of Surrey Waste Plan.

Question: What is the justification for the scale of the building and height of the stack?

Answer:

The height of the eastern elevation of the gasification building is 13.5m, rising to the highest western elevation of 18.5m and the proposed stack is 49m. The height of the process buildings and the stack are determined by technical assessments and the technology infrastructure inside the buildings. The height of the stack is a balance between the visual impact (a taller stack has more impact) and the air quality impact (a taller stack leads to lower ground level concentrations of pollutants). The stack needs to be a certain minimum height to ensure that the dispersion of emissions is not affected excessively by the disturbance of the air caused by the facility buildings. Above this height, we modelled the impact of a number of different stack heights. Due to the high levels of nitrogen dioxide which have been recorded in some parts of Spelthorne, the whole of the Spelthorne borough area has been declared an Air Quality Management Area (AQMA). This is an area where the air quality objective (which is set in the National Air Quality Strategy and European Directives) is at risk of being exceeded. Because of this, we aimed to reduce the impact of nitrogen dioxide so that the concentrations at ground level due to the facility would be no more than 1% of the air quality objective within the AQMA, and so would be defined as “insignificant” by the Environment Agency. Initially, we modelled the impact based on the gasifiers operating at the maximum permissible level under the Waste Incineration Directive. This led to a stack height of 70 metres, which was not considered to be acceptable. Therefore, we discussed the design of the facility with the technology providers and agreed that the emissions of nitrogen dioxide would be limited to 100mg/Nm³, which is half the permitted level. We also reduced the emissions of nitrogen dioxide from the gas engines. As a result of these changes, the required target of 1% of the air quality objective will be achieved with a 49m stack. The length of the building is determined by the primary BOS gasification compartments, which sit in a long line. In this case there will be twelve compartments in which the waste is heated in a batch system. Behind these are the three secondary compartments where the syngas is ignited and towards the back of the building and the centre of the site are the boilers. The boiler is the piece of equipment that sits tallest in the building bringing the height to 18.5 metres. The BOS gasification process enables us to keep the building low in height in comparison to traditional energy from waste and makes it suitable in a setting such as Charlton Lane where minimising the visual impact is important.

Question: What measures will be put in place to mitigate the visual impact?

Answer:

Because the Eco Park buildings are proposed to be higher than the existing buildings on the site and because this is a green belt setting, we have deliberately designed the site structure and the buildings on site to mitigate the visual impact of the proposal from surrounding views. We wanted to produce a design which reflects the function and importance of the site as a world class facility but one which does not draw undue attention to itself by:- Positioning the tallest piece of process equipment in the centre of the site away from the boundary to reduce its visual impact- Making the buildings as small as they can be, given the size of the equipment inside.- Positioning the lowest building elevation facing the most sensitive eastern boundary- Curved eaves to the roof which slope up away from the eastern boundary to avoid shadows created by overhangs. As the roof slopes away towards the sky it will reflect the sky colour and merge with its backdrop - One simple, un-fussy, slim stack finished in polished/bright annealed stainless steel to reflect surroundings and sky. It will reflect the sky colour and merge with its backdrop- An Eco Park which is a single entity within its setting. The buildings and structures complement each other and fit the landscape- A building form which favours soft edges over hard lines - Increased landscaping and a 3.5m bund to the east to break up views towards the main process buildings- The eastern length of the building screens site activities to the west- Positioning solar panels on the buildings on the west side of the site so they have no additional effect on the visual impact During the design stage we considered many different architectural forms and different site layouts. To give you an idea of the work that went into finding the current design, we considered stepping the main process building up to its height but the visual impact assessments showed that this created shadow and drew attention to the building. We considered a different layout with the buildings positioned in reverse but this drew attention to the highest roofline when placed in a different part of the site. We considered green roofs to the buildings but found that this made the buildings taller, which is not appropriate in this setting. The architectural design of the Eco Park was consulted upon with the Commission for Architecture and the Built Environment (CABE). In their formal consultation response dated 19th August CABE stated that they “applaud the commitment to commission a well designed building. This scheme strikes us as a successful piece of architecture. It has the potential to become an exemplary facility and to offer an interesting visitor experience”. Cabe also stated that, “This site seems appropriate for a waste management facility”. There are three ways in which the visual impact of a development can be addressed, the design of the site, the architecture of the buildings on the site and the use of landscaping and geography to shield the site from view. Charlton Lane is quite an open site that has mature landscaping around it. We carried out a Landscape and Visual Impact Assessment to understand how visible the development would be and to identify the sensitive viewpoints. The result of this assessment enabled us to draft a mitigation scheme and consult upon it with Surrey and Spelthorne Landscape and Biodiversity Officers. The purpose of the landscape mitigation scheme, which will form part of the planning

application, is not to try and hide the proposed Eco Park but to break up the views to minimise the visual impact. A diagram of this was shown during the presentation.

Question: Will there be light pollution given the site will operate overnight? If so how will it be managed so that residents lives are not affected?

Answer:

The offices and visitor centre are designed to make the best possible use of natural light. All overnight operations will be undertaken solely within the gasification and anaerobic digestion (AD) building. There is no need for vehicular access in and out of these buildings during the night. Therefore external lighting will only be standard safety and security lighting with lights being standard down lights fitted with cowls to prevent light spill.

Question: What is the updated cost projection for the construction and commissioning of the facility should it be given the appropriate planning permission?

Answer:

SITA will shortly be going to market for the construction of the Eco Park. The exact cost will be known following completion of the construction tendering process. The Estimated capital cost for the construction of the Eco Park is circa £50 million. It is important to emphasise that the cost of continuing to rely on landfill will far outweigh the cost of developing the Eco Park.

Question: Are Surrey residents paying for the entire cost of the project from their council tax payments? If not how will it be funded?

Answer:

The financial responsibility for disposing of municipal waste and providing community recycling centres rests with Surrey County Council. The contract between Surrey County Council and SITA Surrey requires SITA Surrey to provide and operate infrastructure to deal with municipal waste. The cost of providing and operating these waste facilities is recharged to Surrey County Council over the life of the contract. Surrey County Council's sources of funding are the general government grant, PFI grant and council tax

Question: Who bears responsibility for ensuring the project comes in on budget if approved? Who would pay for any cost overruns?

Answer:

SITA UK is responsible for ensuring that the project is delivered within the agreed timescale and budget. In general, any cost overruns will be the responsibility of SITA UK or the sub contractor.

Question: Who will actually own the plant? Surrey County Council?

Answer:

The plant will be built, owned and operated under lease by SITA until the end of their contract with Surrey County Council in 2024. The facility will then become the property of Surrey County Council.

Question: Did this go out to tender? If so, why were Sita successful?

Answer:

In 1999, SITA Surrey, which was then called Surrey Waste Management were awarded a 25 year Public Finance Initiative contract to deal with Surrey's municipal waste. The contract was awarded following an extensive tendering exercise.

Question: As I understand the process, there are three by products going to be produced that have a commercial value; compost, hardcore ash that can be used by the construction industry, and electricity. Who will get the income (not the profit) generated by these three commercial by products? Surrey County Council or Surrey Waste Management?

Answer:

Income from sales of electricity, digestate and any value from ash will be collected by SITA Surrey and be used to reduce the operating costs of the plant. This will in turn reduce the amount Surrey County Council has to pay SITA Surrey for operating the plant.

Question: In view of the history of flouting human rights in the Waste Plan decision- making process, is SCC, as the Waste Planning Authority, going to:

- a) Revise the Waste Plan and siting policies with sound public consultation?
- b) Carry out a Sustainability Environmental Analysis (SEA) of the Ecopark proposal, evaluating it against all environmental receptors and produce a sound set of siting criteria for such a combined facility?
- c) Put all considerations of an Ecopark at Charlton Lane on hold until (a) and (b) have been carried out?

Answer:

The Waste Plan, which identifies sites suitable for waste development in Surrey, was adopted in 2008. In 2009 there was a successful legal challenge that led to the removal of the Capel site, one of the 5 sites identified as suitable for thermal treatment. Following the High Court decision the Council took advice on the effect that the judgement would have on the plan from leading counsel in March 2009. He advised that all the other sites in the Plan remain as Statutorily allocated sites. The Council therefore regards the plan as legally sound.

Question: Rubbish from Spelthorne is being incinerated by Grundon at Colnbrook. How much capacity does Grundon have available now and the short, medium and long term to burn rubbish from Surrey?

Answer:

The Surrey Joint Municipal Waste Management Strategy (Policy 1) states that Surrey authorities will plan for net self sufficiency for dealing with waste in Surrey, through the provision of waste management capacity equivalent to the amount of municipal waste arisings. The WCWS projects the need for 160,000 residual waste treatment capacity even after reducing waste further and recycling at 70%. In the short term SCC is sending 20,000 waste to the Lakeside facility at Colnbrook, but this capacity is only available for two more years. SCC also has an interim contract in place for 100,000 at Allington EFW in Kent which can last until 2019. The only other reasonably local option is Hampshire and we have been told in very clear terms that they have no capacity available for Surrey's waste. Therefore long term capacity at nearby facilities cannot be relied on and the Eco Park is the first step in addressing this issue. The WDA will continue to assess need and capacity and will bring recommendations to members in the future. The fall back position would be reliance on landfill which may not be available locally, is environmentally unsustainable, and would cost Surrey taxpayers around £11m a year in landfill tax alone within four years if we did not develop new solutions.

Question: The Enviro report highlighted the proximity of the M3 motorway and the railway as positive features to help choose the Charlton Lane site for an Eco Park. However there was no possibility that the M3 could service the site directly nor the railway at all. Did Enviro know this and choose to ignore it or was their methodology at fault? Did SCC notice this and if they did why did they accept and pay for a invalid report? Is the selection of the Charlton Lane site valid?

Answer:

The methodology that was used by Enviro was derived from established principles of national waste policy. The matters that have been identified were just two out of a total of 16 criteria used to assess all of the sites. There is no suggestion in the report that a direct connection to the M3 could be made available, the key factor here is the proximity of the site to the major road network and the fact that it is only 2km from junction 1 of the M3. In accordance with the national waste policy guidance, Charlton Lane scores relatively highly in the category ' Access to alternative forms of transport' because of its proximity to the railway line., however this was not a major factor in the selection of Charlton Lane as the preferred site for the Eco Park. This criteria is relevant in this assessment because the assessment follows national guidance and was undertaken before detailed evaluation of transportation impacts of the proposed Eco Park were undertaken.

Question: Our particular questions are:

1. Please supply full justification for the Charlton Lane site versus alternatives? Why was this site selected as it has poor transport links, is clearly in the protected Green Belt, and is in the north of the county not central to the county's waste production?
2. We know that there will be an Environmental Impact Assessment (EIA) due to be submitted as part of the plans, but can we have confirmation that all necessary environmental requirements are being met in respect of flooding, drainage, gas emissions, etc? Several draft assessments have been sent to Surrey County Council Development Control and Spelthorne Borough Council, have these been checked in detail and approved?
3. The latest drawings would indicate that both the buildings and the stack will be overpowering in height and colour, will steps be taken to mitigate those effects by ensuring that both buildings and the stack are the minimum height necessary for their required operations, whilst suitable colouring of walls, roofs and concealment will be provided together with significant planting of trees etc to minimise any detrimental effects on the local area?
4. We understand that it is proposed that 40,000 tonnes of Surrey's food waste out of an estimated 100,000 tonnes will be dealt with in the Eco Park, is the 100,000 tonnes a realistic figure and, if so, where will the balance of 60,000 tonnes be dealt with?
5. Can we see a breakdown by tonnages of the total current and planned Surrey waste split between recycling, food, and "black bin bag" by treatment at which waste plant location?
6. Leading on from the last question, if the Eco Park goes ahead what are the plans for the other Waste Collection Sites based in Surrey?
7. Can you confirm that SCC will agree to a restrictive covenant on the additional land that has been recently purchased to prevent any further building or further works other than landscape planting?

Answer: [See questions from Shepperton Residents Association](#)

Question: What criteria have been used in establishing Charlton Lane as a suitable site for 2 hazardous Experimental Plants ?

Answer:

It is understood that the selection of the Charlton Lane site for the proposed Eco Park is a matter of public concern. Therefore I have addressed this issue at some length to ensure that councillors and the public understand how the decision was taken and that there has been, and will continue to be, substantial provision for consultation with local residents. In January 2006, the county council's Executive approved a draft Waste Disposal Authority Action Plan. The Council subsequently adopted this plan later that year. At that time the Waste Disposal Authority's preferred method of dealing with residual waste was through energy from waste incineration technology. The Action Plan identified the preferred sites for energy from waste technology as Clockhouse Brickworks, Capel; land at Trumps Farm, Longcross and Charlton

Lane, Shepperton. The report to the Executive in January 2006, went on to recommend that two energy from waste plants be developed to deal with residual municipal waste. The smaller of the two plants, some 100,000 tonnes per annum capacity, should be developed at Capel in the south of the county. A larger plant of 160,000 tonnes capacity should be developed in the north of the county at either Trumps Farm or Charlton Lane. At the time the preference was to site the northern energy from waste incineration plant at Trumps Farm. Both the Charlton Lane and Trumps Farm sites had planning considerations. In addition, as the Executive report of January 2006 states, there were also 'some clear operational benefits in choosing the Trumps Farm site over the Charlton Lane site'. Those 'clear operational benefits' related to the existing operational use of the Charlton Lane waste transfer station and community recycling centre and the fact that if a 160,000 tonne per year energy from waste facility were to be developed on the Charlton Lane site, it would be necessary to close the site to the public and to local authority and trade customers for the duration of the building works. The council's World Class Waste Solution proposes further reduction of waste arising as well as increased levels of recycling. This means that there will be less residual waste to be disposed of than was anticipated when the Waste Disposal Authority Action Plan was first drawn up in 2006. Some 160,000 tonnes per year instead of the 270,000 tonnes per year originally proposed. The emergence of batch oxidation system gasification technology as a viable alternative to energy from waste incineration enables plant to be constructed on a much smaller scale. The plant proposed for Charlton Lane will deal with only 60,000 tonnes of waste per year rather than the 160,000 tonnes proposed for the energy from waste plant at Trumps Farm. The configuration of the plant also allows for a much smaller building to house the process. The maximum building height proposed for the Eco Park is just over 18 metres, compared with a height of around 40 metres that would be required for an energy from waste incineration plant. The height of the stack is also significantly less, 49 metres as compared to 80 to 90 metres for an energy from waste incineration plant. The reduced scale of the buildings also means that it would be possible to continue to operate the Charlton Lane facility during the construction of both the gasification plant and anaerobic digestion plant. In addition the council has managed to secure short-term capacity for Spelthorne's residual waste at the Lakeside energy from waste facility at Colnbrook and therefore the operational pressure on the Charlton Lane site, during construction, is reduced. Since the scale of the buildings, types of processes and footprint of the proposed Eco Park are very different to that of a 160,000 tonne per year energy from waste incineration facility and since there had been significant changes to the adopted Waste Plan as a result of the removal of Capel as an allocated site, Waste Disposal Authority officers considered that it was necessary to undertake a new planning assessment for the proposed Eco Park. A firm of planning consultants, Enviros were therefore commissioned to undertake this assessment and this was used to inform the report to cabinet on the 'World Class Waste Solution' in February this year. The report, which was produced in November 2009 has been published on the council's website. As a result of this detailed analysis, the Waste Disposal Authority believes that the Charlton Lane site is the most appropriate site for the development of an Eco Park. The principle of using the Charlton Lane site for

waste processing, including thermal treatment, was subject to extensive public consultation during the development of Surrey Waste Plan. The council adopted the Waste Plan in May 2008 following an examination in public, with the inclusion of Charlton Lane as an allocated site. The planning application that is being developed by Surrey Waste Management will include a thorough and up to date alternative site assessment. The planning application will be subject to public consultation and residents will be able to make their views known with regard to all aspects of the application, including the suitability of the Charlton Lane site for the Eco Park. The demonstration of the suitability of the site is a material consideration for the council's Planning and Regulatory Committee when they consider the planning application. Therefore there has been and will continue to be further consultation with residents in relation to the principle of a waste processing facility at Charlton Lane

Question: My particular question is:: I have recently read that many UK incinerators are running at 60%, due to LACK of rubbish. So why are we having this forced on us? Surely it would make sense to use underused incinerators elsewhere? Unless of course it is purely a money making/corporate exercise for Sita and SCC?!

Answer:

The Surrey Joint Municipal Waste Management Strategy (Policy 1) states that Surrey authorities will plan for net self sufficiency for dealing with waste in Surrey, through the provision of waste management capacity equivalent to the amount of municipal waste arisings. The WCWS projects the need for 160,000 residual waste treatment capacity even after reducing waste further and recycling at 70%. In the short term SCC is sending 20,000 waste to the Lakeside facility at Colnbrook, but this capacity is only available for two more years. SCC also has an interim contract in place for 100,000 at Allington EFW in Kent which can last until 2019. The only other reasonably local option is Hampshire and we have been told in very clear terms that they have no capacity available for Surrey's waste. Therefore long term capacity at nearby facilities cannot be relied on and the Eco Park is the first step in addressing this issue. The WDA will continue to assess need and capacity and will bring recommendations to members in the future. The fall back position would be reliance on landfill which may not be available locally, is environmentally unsustainable, and would cost Surrey taxpayers around £11m a year in landfill tax alone within four years if we did not develop new solutions.

Question: My particular question is:: 1) According to the Environment Agency, the available capacity around the UK for incineration in 2008 was 8.6m tonnes for England and Wales, with a total throughput of 5.2m tonnes. This is an underutilisation of some 40%. Economically, and environmentally this is not a viable solution on many fronts. Underutilisation means downtime for incineration plants and partial running, this causes inefficiencies in the burn processes, increased output of toxins that cannot be captured in the stack, and increased maintenance costs caused by the stop / start nature of the flows. In most cases the throughput to the existing plants has dropped year on year, meaning that less waste is being burnt across various waste

streams (on average), again this means that utilisation is actually getting worse, with the worst performing sites only running at 21% capacity. Incineration, specifically for Municipal waste is showing a downward trend, in terms of volumes disposed of, with 2006 being 74% of capacity and 2007 and 2008 dropping by a further percentage point year on year. So again this shows that the available capacity is not being utilised as it should be and the usage of this style of facility is in decline. So why add to the national capacity when it is not currently being utilised to its fullest extent? Indeed the more local issue of underutilisation has been raised before, and the offer from Grundon to take the waste in Slough will cover not only the proposed SITA limit, but another 27% on top of that, and that is before Slough even reaches any limitations. Would Surrey like to comment on the legal issues that stop them from doing this.

Answer:

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Question: My particular question is: Did not the SCC Waste Development originally reject plans due to the negative impact both visual and health wise? If so what has changed? Surely Asthma sufferers of all ages will be in danger from fallout?

Answer:

It is understood that the selection of the Charlton Lane site for the proposed Eco Park is a matter of public concern. Therefore I have addressed this issue at some length to ensure that councillors and the public understand how the decision was taken and that there has been, and will continue to be, substantial provision for consultation with local residents. In January 2006, the county council's Executive approved a draft Waste Disposal Authority Action Plan. The Council subsequently adopted this plan later that year. At that time the Waste Disposal Authority's preferred method of dealing with residual waste was through energy from waste incineration technology. The Action

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Question: What monetary compensation for house owners has been planned for those whose properties suffer in valuation terms due to this proposal?

Answer:

The proposed Eco Park is designed to be an attractive facility, including a carefully designed stack, which would reduce its visual impact. There would also be benefits of enhancements to the local landscape and a reduction in heavy goods vehicle traffic compared with the existing operation. We therefore do not believe that the Eco Park will affect house prices in the area

Question: My particular question is: WHY do Surrey County Council want to ruin this lovely quiet village? Why have Surrey County Council decided Shepperton is the best place as it was rejected previously.

Answer:

It is understood that the selection of the Charlton Lane site for the proposed Eco Park is a matter of public concern. Therefore I have addressed this issue at some length to ensure that councillors and the public understand how the decision was taken and that there has been, and will continue to be, substantial provision for consultation with local residents. In January 2006, the county council's Executive approved a draft Waste Disposal Authority Action Plan. The Council subsequently adopted this plan later that year. At that time the Waste Disposal Authority's preferred method of dealing with residual waste was through energy from waste incineration technology. The Action Plan identified the preferred sites for energy from waste technology as Clockhouse Brickworks, Capel; land at Trumps Farm, Longcross and Charlton Lane, Shepperton. The report to the Executive in January 2006, went on to recommend that two energy from waste plants be developed to deal with residual municipal waste. The smaller of the two plants, some 100,000 tonnes per annum capacity, should be developed at Capel in the south of the county. A larger plant of 160,000 tonnes capacity should be developed in the north of the county at either Trumps Farm or Charlton Lane. At the time the preference

was to site the northern energy from waste incineration plant at Trumps Farm. Both the Charlton Lane and Trumps Farm sites had planning considerations. In addition, as the Executive report of January 2006 states, there were also 'some clear operational benefits in choosing the Trumps Farm site over the Charlton Lane site'. Those 'clear operational benefits' related to the existing operational use of the Charlton Lane waste transfer station and community recycling centre and the fact that if a 160,000 tonne per year energy from waste facility were to be developed on the Charlton Lane site, it would be necessary to close the site to the public and to local authority and trade customers for the duration of the building works. The council's World Class Waste Solution proposes further reduction of waste arising as well as increased levels of recycling. This means that there will be less residual waste to be disposed of than was anticipated when the Waste Disposal Authority Action Plan was first drawn up in 2006. Some 160,000 tonnes per year instead of the 270,000 tonnes per year originally proposed. The emergence of batch oxidation system gasification technology as a viable alternative to energy from waste incineration enables plant to be constructed on a much smaller scale. The plant proposed for Charlton Lane will deal with only 60,000 tonnes of waste per year rather than the 160,000 tonnes proposed for the energy from waste plant at Trumps Farm. The configuration of the plant also allows for a much smaller building to house the process. The maximum building height proposed for the Eco Park is just over 18 metres, compared with a height of around 40 metres that would be required for an energy from waste incineration plant. The height of the stack is also significantly less, 49 metres as compared to 80 to 90 metres for an energy from waste incineration plant. The reduced scale of the buildings also means that it would be possible to continue to operate the Charlton Lane facility during the construction of both the gasification plant and anaerobic digestion plant. In addition the council has managed to secure short-term capacity for Spelthorne's residual waste at the Lakeside energy from waste facility at Colnbrook and therefore the operational pressure on the Charlton Lane site, during construction, is reduced. Since the scale of the buildings, types of processes and footprint of the proposed Eco Park are very different to that of a 160,000 tonne per year energy from waste incineration facility and since there had been significant changes to the adopted Waste Plan as a result of the removal of Capel as an allocated site, Waste Disposal Authority officers considered that it was necessary to undertake a new planning assessment for the proposed Eco Park. A firm of planning consultants, Enviros were therefore commissioned to undertake this assessment and this was used to inform the report to cabinet on the 'World Class Waste Solution' in February this year. The report, which was produced in November 2009 has been published on the council's website. As a result of this detailed analysis, the Waste Disposal Authority believes that the Charlton Lane site is the most appropriate site for the development of an Eco Park. The principle of using the Charlton Lane site for waste processing, including thermal treatment, was subject to extensive public consultation during the development of Surrey Waste Plan. The council adopted the Waste Plan in May 2008 following an examination in public, with the inclusion of Charlton Lane as an allocated site. The planning application that is being developed by Surrey Waste Management will include a thorough and up to date alternative site assessment. The planning application will be

subject to public consultation and residents will be able to make their views known with regard to all aspects of the application, including the suitability of the Charlton Lane site for the Eco Park. The demonstration of the suitability of the site is a material consideration for the council's Planning and Regulatory Committee when they consider the planning application. Therefore there has been and will continue to be further consultation with residents in relation to the principle of a waste processing facility at Charlton Lane

Question: My particular question is: Why are Surrey County Council Waste Development building such a polluted eyesore in Shepperton as it will have a dramatic and detrimental effect on our village. Who is going to compensate us??

Answer:

The proposed Eco Park is designed to be an attractive facility, including a carefully designed stack, which would reduce its visual impact. There would also be benefits of enhancements to the local landscape and a reduction in heavy goods vehicle traffic compared with the existing operation. We therefore do not believe that the Eco Park will affect house prices in the area

Question: My question is: As a responsible waste management authority have Surrey CC consulted with the seven neighbouring boroughs of Richmond, Hounslow, Hillingdon, Slough, Windsor and Maidenhead, Runnymede and Elmbridge, three of which (Richmond, Hounslow and Hillingdon) are Low Emission Zones and all seven have areas of AWM providing each borough with gas emission data from the two industrial processes at Charlton Lane for inclusion within their air quality management plans.

Answer:

The air quality assessment that accompanies the planning application and Environmental Statement takes into account background air quality and Air Quality Management Areas.

SITA UK was advised by Surrey County Council's Planning Authority who to consult with for the Eco Park application. A draft planning application was supplied to the County Planning Authority in August and was consulted upon with Surrey County Council, Spelthorne Borough Council, and the London Boroughs of Hillingdon, Hounslow and Richmond. No replies were received from any of the three London boroughs. When the Eco Park planning application is validated it will be sent out to consultation to a number of consultees. These include the London Boroughs of Hillingdon, Hounslow and Richmond as well as Spelthorne Borough and Surrey County Councils.

Question: My particular question is: Why are SITA claiming Surrey needs an incinerator/gasification operation when ALL of Surrey waste can be absorbed by a facility six miles and/or 66 miles away?

Answer:

The Surrey Joint Municipal Waste Management Strategy (Policy 1) states that Surrey authorities will plan for net self sufficiency for dealing with waste in Surrey, through the provision of waste management capacity equivalent to the amount of municipal waste arisings. The WCWS projects the need for 160,000 residual waste treatment capacity even after reducing waste further and recycling at 70%. In the short term SCC is sending 20,000 waste to the Lakeside facility at Colnbrook, but this capacity is only available for two more years. SCC also has an interim contract in place for 100,000 at Allington EFW in Kent which can last until 2019. The only other reasonably local option is Hampshire and we have been told in very clear terms that they have no capacity available for Surrey's waste. Therefore long term capacity at nearby facilities cannot be relied on and the Eco Park is the first step in addressing this issue. The WDA will continue to assess need and capacity and will bring recommendations to members in the future. The fall back position would be reliance on landfill which may not be available locally, is environmentally unsustainable, and would cost Surrey taxpayers around £11m a year in landfill tax alone within four years if we did not develop new solutions.

Question: What percentage of the waste processed in the gasification plant will be from Shepperton residents (not the 'Eco Park' – just the gasification plant)

Answer:

We are unable to determine exactly how much of the waste treated by the BOS gasification plant will come from Shepperton. However, the amount of residual "black bag" waste delivered by Spelthorne Borough Council from kerbside collections in Spelthorne amounts to 21.5 per cent of the input to the gasification plant. The majority of users of the community recycling centre are also Spelthorne residents. The residual material from the community recycling centre makes up another 10.5 per cent of the gasifier input. Therefore the total amount of Spelthorne residents' waste in the gasification facility is 32 per cent of the total input.

Question: My particular question is ~ In the light of the Alternative Site Assessment omissions is the choice of Charlton Lane as the proposed Eco Park a sound decision both economically and socially?

Answer:

The alternative sites assessment (ASA) is purely looking at what are known as appropriate available sites within the context of what we are seeking to provide, which in this case is a facility for dealing with a portion of Surrey's municipal waste. The cost of land is not a material consideration in this

assessment and cost is different to "availability" with availability being whether the landowner would be agreeable to consider selling / leasing the land for a waste management activity. Whilst the ASA will look at whether there are any "showstopper" issues at each site (e.g. access / flood risk / ecological constraints) the social impact of a proposed development is assessed in an Environmental Statement that would accompany a planning application and not the alternative sites assessment.

Question: My questions are when plans of the proposed Eco Park are published can they include a scale? Can the side elevations, front and rear elevations also be published? Where is the site ground datum level?

Answer:

This will all be available as part of the planning application which will be available on the Spelthorne Borough Council website

Question: My particular questions are as follows:- 1. The Surrey Waste Plan identifies a number of sites as being suitable for Waste treatment plants. In the case of Capel Parish Council v. Surrey County Council 2009 EWHC 350 (Admin), the villagers of Capel were successful in their claim, and as a result Capel was removed from section WD5 of the Waste Plan. Since then I understand a Legal Opinion has been obtained as to the validity of the remaining parts of the Plan. Can you please identify who provided the Opinion, were they a member of Surrey's legal team at the time of the action, and, most importantly, as it contains the only assessment of the validity of the Surrey Waste Plan, - a public document, - where the Opinion may be obtained? Since the legal victory by the villagers of Capel, has there been any Public Consultation on the duly revised Surrey Waste Plan?

Answer:

The Waste Plan, which identifies sites suitable for waste development in Surrey, was adopted in 2008. In 2009 there was a successful legal challenge that led to the removal of the Capel site, one of the 5 sites identified as suitable for thermal treatment. Following the High Court decision the Council took advice on the effect that the judgement would have on the plan from leading counsel in March 2009. He advised that all the other sites in the Plan remain as Statutorily allocated sites. The Council therefore regards the plan as legally sound.

Question:

- 1) Who completed the site assessments in the report and did the Boroughs contribute to the assessment?
- 2) What is the potential of the railway access for Charlton? This is rated as a “B” – “offering good potential to be used”.
- 3) Why does the report place no weight on the existing air quality and therefore give no consideration to cumulative impacts of pollution? Does Surrey CC accept that there is an air pollution problem across Spelthorne and in this area in particular? Does Surrey CC believe that this facility would have no adverse impact on local air quality?
- 4) What potential for energy exportation has been identified within 2km and what would be the cost of the infrastructure to provide it? Are Surrey undertaking to provide local energy export other than electricity?
- 5) Why does the Wisley commentary give weight to the “vulnerable receptors” at Wisley? What are the vulnerable receptors and why would an “Eco Park” impact on them? In what way are they more vulnerable than children and old people? Why is this a consideration for Wisley when hundreds of people live within a similar radius of Charlton?
- 6) In what way does the judicial review judgement impact the suitability of the Capel site for an “Eco Park”? Do Surrey intend to offer any direct benefit to Spelthorne residents to compensate them for the potential damage on their environment?

Answer:

- 1) The site assessment report was undertaken by Enviro on behalf of the Waste Disposal Authority. The borough and district councils were not involved in the production of the report although the policy framework that underpins a number of the criteria would have been formulated in consultation with the Surrey district and borough councils.
- 2) In accordance with the national waste policy guidance, Charlton Lane scores relatively highly in the category ' Access to alternative forms of transport' because of its proximity to the railway line, however this was not a major factor in the selection of Charlton Lane as the preferred site for the Eco Park. This criteria is relevant in this assesment because the assesment follows national guidance and was undertaken before detailed evaluation of transportation impacts of the proposed Eco Park were undertaken. When detailed traffic assessments were undertaken they indicated a reduction in HGV traffic as a result of the Eco Park development and therefore use of the railway line for transport and the associated costs could not be justified.
- 3) Adverse environmental impacts, of which air quality is considered to be an element of, is considered under the question: Will the use of the site for waste purposes result in the arising of adverse environmental effects such as noise and vibration, odour, vermin, litter etc? (ref: PPS10 para.21 (i) and Annex E), notably in Annexe E (g). The response highlights the proximity of the site to the M3 which is considered to result in the air quality surrounding the site to be of a degraded quality. It is recognised that the whole of Spelthorne has been designated as an air quality management area with respect to Nitrogen

Oxides and therefore the atmospheric emissions from the Eco Park must be so low as to be classed as insignificant.

4) The work to date suggests that whilst there are no single substantive potential heat users that could presently be economically supplied in their own right, this position is likely to alter. This is due to the fact that the fiscal drivers for heat supply are undergoing wholesale change and the economic factors would undoubtedly alter (beneficially) in the short to medium term due to a number of factors including the proposed Renewable Heat Incentive. The proposed plant will be designed with the capability to export heat to local users.

5) The vulnerable receptors identified in the report are presented in the response to: Will the use of the site for waste purposes impact on wildlife or an area where nature is of importance? (ref: PPS10 para.21 (i) and Annex E). These receptors are the Site of Nature Conservation Interest (SNCI), which Wisley is located in, and the Site of Special Scientific Interest (SSSI) which is 500m north of the Wisley site and not relating to proximity of population. The primary vulnerable receptor would therefore be the SNCI rather than the SSSI. The impact of the EcoPark on the SNCI would be significant, as would any industrial development be when it occurs within that SNCI, however these impacts could be managed. The proximity of population was considered in response to the question: "Will the development conflict or support RSS spatial strategy? (ref: PPS10 para. 17, draft RSS Policy W3)" where the proximity principle was applied to the immediacy of regional centres, following the RSS Policy W3

6) The Site selection report undertaken by Enviro Consulting, on behalf of the waste disposal authority, considered the potential of developing the Capel site for an Eco Park. The Enviro report took into account the fact that the Capel site had been removed from the Surrey Waste Plan. The Enviro report concluded that the Capel site would not be the best site for the development of an Eco Park. Benefits for local residents include an on-site Environmental Enhancement Area, to which the public will have access for recreational purposes. In addition, SITA proposes to make a one off financial contribution of £75,000 to a fund for local environmental enhancement projects. Any organisation or member of the public would be able to apply for money from this fund in respect of implementing an environmental improvement project within the geographic wards of Halliford and Sunbury West or Laleham and Shepperton Green

Question: In March 2009 a High Court decision removed Capel Manor in Mole Valley from the Surrey Waste Plan. (In the Plan, Capel Manor and Trumps Farm in Runnymede had been identified as probably sufficient to incinerate all of Surrey's residual 'black bag waste'.) One of the contributing factors in removing Capel was its proximity to an existing incinerator. Isn't the proximity principle as applied to Capel Manor also equally applicable to Charlton which is only a few miles away from a very large incinerator at Colnbrook?

Answer:

The High Court judgement in respect of the Surrey Waste Plan related, in the main, to the test of soundness applied by the inspectors, whilst there were other aspects highlighted in the judgement, including how the proximity principle had been applied by the inspectors, this related to the proximity of a plant to waste arisings and not to the relative proximity of disposal or treatment facilities.

Question: My Question is how much volume is currently available for the intermediate storage of Green Waste at the Charlton Lane site and how much will be provided at the proposed Eco Park?

Answer:

The existing waste transfer station has sufficient capacity to bulk up green waste generated from the Charlton Lane community recycling centre (around 7000 tonnes per year) and to bulk up green waste from other local community recycling centres (around 4500 tonnes per year). The recyclables bulking facility, proposed as part of the Eco Park development will have the same capacity.

Question: Why was this report not placed automatically in the public domain and why did it need a Freedom of Information Act request before the public could see it? Are there other documents about the Eco Park and the site selection that are not yet available to the public?

Answer:

A copy of the Enviros report was provided upon request to the local county councillor and was later placed on the council's website. There was no freedom of information request for this document. There are no other documents about the Eco Park or site selection which are not yet available to the public, other than in the planning application, which is expected to be available to the public in the last week of November.

Question: My particular question is: Why is all the PR and newsletters etc about this, so misleading? There is nothing eco or friendly about this giant unwanted rubbish factory!

Answer:

The Eco Park at Charlton Lane will provide a number of benefits to the local area. When we held an initial public drop-in session in April residents told us very clearly that they were unhappy with the number of heavy goods vehicles (HGVs) using the roads and stated that they often had to queue along Charlton Lane to pass the site, due to the number of vehicles queuing to use the facility.

As part of our planning application to build an Eco Park at Charlton Lane we have carried out a thorough traffic assessment to determine the highways and transport effects of the Eco Park on the local road network. The Transport Assessment identifies a reduction in the number of HGVs using the site. This is because the waste will be processed on site, rather than just being bulked and taken away, as happens currently. Additionally, we are proposing to improve the on-site queuing capability, which will prevent cars queuing along Charlton Lane, freeing up the road. Reducing the number of HGVs using local roads means we will reduce the level of carbon emissions compared to current operations at the Charlton Lane site.

The Eco Park will use environmentally sound methods to treat residual waste, including anaerobic digestion and batch oxidation system gasification. These processes provide a more sustainable way of dealing with Surrey's household waste and eliminate the need for landfill.

Sustainability is at the core of the proposal, embracing the reduce, reuse, recycle premise, through new technology but also in its construction. The new Eco Park buildings will be sustainably designed with cladding materials selected to meet environmental and sustainability standards. Energy efficiency will be achieved through the use of high insulation materials, glazing and use of power saving measures such as intelligent lighting systems. This means that the site is self-sufficient in terms of energy, heat and hot water, with surplus energy being sold back to the National Grid with any revenue from this used to reduce the operating costs of the Eco Park.

We will also harvest rainwater to reduce the demand on mains supply and solar panels will be used to create renewable energy. These panels will be located on the pedestrian canopy over the community recycling centre and the roof of the recycling bulking facility to generate electricity for use on-site and for export to the National Grid.

Plans for the Eco Park include extensive landscaping to the ground surrounding the site. Nineteen acres of grassland, trees and hedgerows will be created. It is designed to be a community facility and residents will be able to use the green spaces for recreation.

For all of these reasons we consider that the Eco Park will have environmental benefits.

Question: My particular question is:: Can I ask the panel at the heal on Wednesday evenings' consultative session how many of them live in Shepperton?

Answer:

While none of the SITA UK panel themselves live in Shepperton, a number of our local site operatives who work at the Charlton Lane community recycling centre live in the local area.

Question: My particular question is:: The remote Dumfries plant (same as what is planned for heavily populated Shepperton) has suffered repeated malfunction since opening, and has not yet produced any 'renewable energy'. It has also experienced over 170 breaches of exceeding its emission. With then a 50% failure rate of 2 similarly built gasifiers, how are SITA being allowed to claim that the site planned here is safe and reliable when it absolutely is not?????

Answer:

SITA UK is not the operator of the Dumfries site but it is the reference site for the BOS gasifier proposed for the Eco Park at Charlton Lane, Shepperton. SITA UK follows the operation at Dumfries very closely and has a good relationship with Scotgen, the plant's operators. The Scottish plant has been operating successfully but inevitably there will be issues that need to be resolved during the commissioning phase. This is quite common with commissioning of a new plant. The main issue at Dumfries was that the facility did not have the correct type of boiler. The boiler was reconfigured last winter and used as a 'cooler' before a new type of boiler is installed. Since March 2010, Scotgen has been adjusting the plant and processing thousands of tons of waste. The commissioning period ended on 1 November 2010. SITA UK technical experts consider that there is no concern with the actual gasification process and we are confident that BOS gasification is a sound technology and is the right facility for Surrey. SITA UK's experts have extensive experience of thermal waste treatment methods and have thoroughly assessed the suitability of the technologies proposed for Surrey.

Question: I am Assistant Leader of 1st Charlton Scout Group. Our facility is next door to Charlton Waste Transfer Station and our use of the site is mainly after 5pm. Is the location of the scout hut still acceptable if the Eco park scheme goes ahead? Can Surrey County Council guarantee that there is nothing about the operation of the site or the emissions from the chimney that would prove detrimental to the childrens' health?

Answer:

The waste management industry is strictly regulated by the Environment Agency. We would not be allowed to operate any facility that poses a significant risk to human health. The Environment Agency can – and does – shut down non-compliant sites. The risk to human health has been assessed in detail and has been found to be insignificant. This is worked out using dispersion modelling to predict concentrations at ground level, which are then compared with acceptable levels, including air quality objectives. For those pollutants that are not screened out, further detailed assessment including background concentrations, has been carried out and this confirms that the impact is negligible.

Question: What about pollution to the area in an already densely populated area. Also now shown in article this week in national paper link to breast cancer.

Answer:

The waste management industry is strictly regulated by the Environment Agency. We would not be allowed to operate any facility that poses a significant risk to human health. The Environment Agency can – and does – shut down non-compliant sites. The risk to human health has been assessed in detail and has been found to be insignificant. This is worked out using dispersion modelling to predict concentrations at ground level, which are then compared with acceptable levels, including air quality objectives. For those pollutants that are not screened out, further detailed assessment including background concentrations, has been carried out and this confirms that the impact is negligible.

Question: How can you possibly look to increase of emissions to this already over-polluted area?

Answer:

The waste management industry is strictly regulated by the Environment Agency. We would not be allowed to operate any facility that poses a significant risk to human health. The Environment Agency can – and does – shut down non-compliant sites.

The risk to human health has been assessed in detail and has been found to be insignificant. This is worked out using dispersion modelling to predict concentrations at ground level, which are then compared with acceptable levels, including air quality objectives.

For those pollutants that are not screened out, further detailed assessment including background concentrations, has been carried out and this confirms that the impact is negligible.

Question: My particular question is:- Why are Surrey County Council not waiting to apply for planning permission until such time incinerators are proven safe and acceptable?

Answer:

SITA Surrey is working on behalf of Surrey County Council in its role of Waste Disposal Authority to develop an Eco Park at Charlton Lane. SITA Surrey, through SITA UK and Suez Environnement, has considerable technical expertise and operating experience. SITA and SUEZ Environnement have thoroughly assessed the suitability of the technologies proposed and we consider that the Eco Park technologies are proven, safe and acceptable.

Question: What is the contingency plan for dealing with rotting waste should this proposed incinerator fail? How will a major fire and consequent toxic gas explosion at the site be prevented?

Answer:

Hazard and Operability Studies (HAZOP) have been used for many years as a formal means for the review of chemical process designs and are a quantitative risk assessment technique. A HAZOP study is a systematic search for potential hazards such as flow, temperature and pressure. The BOS gasification and anaerobic digestion processes will have already been subject to individual HAZOP studies and if we receive planning permission for the Eco Park, SITA UK will perform a HAZOP on the combined operations. This assessment will take place during the detailed design stage of the project and will review all issues in order to guarantee that the facility is safe to operate. Once operating, the plant will be subject to 24 hour monitoring by trained, professional staff.

Question: My particular question is:: 1) Why are Surrey (or any) County Council proposing to build such a dangerous and questionable facility within 100 metres of our doorsteps? 2) Why is none of the above regarded important to you when in reality, your proposal borderlines on the criminal?

Answer:

There are examples of thermal treatment plants being installed close to or in the middle of towns. These include:- SITA Kirklees, which is in an urban setting and co-locates EfW and MRF technologies;- Londonwaste Eco Park (where SITA was a 50% shareholder) is in an urban setting and co-locates EfW, IVC and bulky waste recycling;- There is a plant in the centre of Paris on the banks of the river Seine; Our technical experts have thoroughly assessed the suitability of the technologies proposed and we know that we would not be issued with an Environmental Permit if our facility posed an unacceptable health risk. Waste treatment plants are amongst the most strictly regulated processes in Europe and are closely monitored in England by the Environment Agency. SITA UK operates three thermal waste treatment plants safely and efficiently across the UK and our parent company Suez Environnement operates approximately 50 in Europe. Should we receive planning permission for the Eco Park, SITA UK will perform a Hazard and Operability study (HAZOP). This is an in depth assessment that evaluates and identifies possible issues that may arise. This assessment will take place during the detailed design stage of the project and will review all issues in order to guarantee that the facility is safe to operate. Going forward, the plant will be subject to 24 hour monitoring by trained, professional staff.

Question:

1. The latest drawings would indicate that both the buildings and the stack will be overpowering in height and colour, will steps be taken to mitigate those effects by ensuring that both buildings and the stack are the minimum height necessary for their required operations, whilst suitable colouring of walls, roofs and concealment will be provided together with significant planting of trees etc to minimise any detrimental effects on the local area? And, as regards the stack, what is the validity of the computer programme used in the air pollution modelling that determined its height?
2. We keep hearing that similar gasification and anaerobic plants elsewhere in the UK have had problems in their operation, how can we be assured that similar situations will not arise at these plants, and have the relevant detailed risk assessments been completed? Has the Health and Safety Executive granted its approval in respect of the plant proposals?

Answer: [See questions from Shepperton Residents Association](#)

Question: My particular question is: How can it be safe to have the fumes from this rubbish factory so close to a residential area, and reservoir of human drinking water? What will the effects be? We do not wish to be guinea pigs!

Answer:

There are examples of thermal treatment plants being installed close to or in the middle of towns. These include:- SITA Kirklees, which is in an urban setting and co-locates EfW and MRF technologies;- Londonwaste Eco Park (where SITA was a 50% shareholder) is in an urban setting and co-locates EfW, IVC and bulky waste recycling;- There is a plant in the centre of Paris on the banks of the river Seine; Our technical experts have thoroughly assessed the suitability of the technologies proposed and we know that we would not be issued with an Environmental Permit if our facility posed an unacceptable health risk. Waste treatment plants are amongst the most strictly regulated processes in Europe and are closely monitored in England by the Environment Agency. SITA UK operates three thermal waste treatment plants safely and efficiently across the UK and our parent company Suez Environnement operates approximately 50 in Europe. Should we receive planning permission for the Eco Park, SITA UK will perform a Hazard and Operability study (HAZOP). This is an in depth assessment that evaluates and identifies possible issues that may arise. This assessment will take place during the detailed design stage of the project and will review all issues in order to guarantee that the facility is safe to operate. Going forward, the plant will be subject to 24 hour monitoring by trained, professional staff.

Question: My particular question is: I am strongly against this proposal for the so called 'eco park', and am particularly worried that due to no real data available on the effects of this kind of facility on people health, that my health and that of my children will be affected! So why on Earth is SCC etc even considering putting this unhealthy, un eco park anywhere near residential areas?

Answer:

The waste management industry is strictly regulated by the Environment Agency. We would not be allowed to operate any facility that poses a significant risk to human health. The Environment Agency can – and does – shut down non-compliant sites

The risk to human health has been assessed in detail and has been found to be insignificant. This is worked out using dispersion modelling to predict concentrations at ground level, which are then compared with acceptable levels, including air quality objectives.

For those pollutants that are not screened out, further detailed assessment including background concentrations, has been carried out and this confirms that the impact is negligible.

Question: Air Quality - The National Research Council found that “After pollutants from an incineration facility disperse into the air, some people close to the facility may be exposed directly through inhalation, or indirectly through food contaminated by deposition of the pollutants to soil, vegetation and water. For metal and other pollutants that are very persistent in the environment, the potential effects may well extend beyond the area close to the incinerator.” Why should we be expected to put up with a further decrease in the already poor air quality of Surrey (As recognised in the Surrey Waste Plan), by adding to it with the various dioxins that do not get captured in the Stack cleaning process? Also whilst incinerators may indeed meet the EU directives set down at this time, this in itself can be considered already out of date. The UK has committed itself to the OSPAR convention which sees the phasing out of ALL releases of hazardous substances to the environment by 2020. It will be impossible for incineration to achieve this and as such alternatives will need to be reviewed. Given that this facility would be built in 2013, it would have a VERY short shelf life in which to cause its damage, and then have to close. It cannot be economically sound to build a facility of this type that will have probably less than 7 years to run, can it?

Answer:

The waste management industry is strictly regulated by the Environment Agency. We would not be allowed to operate any facility that poses a significant risk to human health. The Environment Agency can – and does – shut down non-compliant sites

The risk to human health has been assessed in detail and has been found to be insignificant. This is worked out using dispersion modelling to predict concentrations at ground level, which are then compared with acceptable levels, including air quality objectives.

For those pollutants that are not screened out, further detailed assessment including background concentrations, has been carried out and this confirms that the impact is negligible.

Question: Gasification is a false promise in respect of recycling. The fact that gasification will REDUCE recycling is a myth, and thus means Surrey and more importantly Spelthorne miss their government targets, is significant enough. However the simple fact that for each item burnt, it will require a six fold amount of energy to replace the item. This is simply not green or ECO. It is more efficient to recycle the waste into the required streams and reuse, than it is to burn and then reproduce. Given that in many countries, incineration is now seen as a poor implementation for waste removal, should the ECO Park not be built under the real Eco banner and provide a better recycling facility and not a facility that will increase greenhouse emissions and cause missed targets?

Answer:

Surrey County Council's World Class Waste solution aims to minimise waste at the point of production, recycle 70% of the what is left and recover value from the remaining 30%. This accords with the waste heirachy and avoids disposal to landfill which is the least desirable option. Setting ambitious levels of recycling and appropriately sizing the infrastructure required to deal with the remaining 30% of waste ensures that there is no danger of crowding out recycling. A 100% recycling rate would require all waste to be recyclable and for 100% of residents to consign 100% of their waste to a recycling scheme. Unfortunately not all waste materials are recyclable. Often this is because there is no demand for the material, for example treated wood and laminates, MDF and chipboard and some types of plastics and carpets or waxed paper and card as well as composite materials such as plastic coated paper. At present there is no economic process to recycle these types of materials into new products. In addition, participation in recycling schemes is voluntary. Therefore not everybody will take part in a recycling scheme and of those participating, not all of them will place all their materials in the recycling container.

Question: As of the 15 October 2010 and within the UK, how many anaerobic digestion facilities of the size proposed for the Eco Park (or larger) are fully commissioned and operating? It would be appreciated if details of the location and length of time of full operation of these plants could be provided.

Answer:

There are currently six anaerobic digestion plants (AD) that treat food waste operating in the UK which are larger than the facility proposed for Charlton Lane. These are:

1. Biogen Greenfinch plant in Rushden, Northamptonshire, which accepts 45,000 tpa, and started up in 2009;
2. Wrangle, Northamptonshire, accepts 50,000 tpa and started up in 2010;
3. Cumbernauld, North Lanarkshire, accepts 60,000 tpa, and started up in 2010;
4. Bedford, Bedfordshire, accepts 42,000 tpa, and started up in 2006;
5. Holsworthy, Devon, accepts 80,000 tpa, and started up in 2008;
6. Driffield, East Yorkshire, accepts 50,000 tpa and opened in October 2010

Additionally, there are a number of smaller plants (around 24,000 – 30,000 tpa) that are operating.

It is worth noting that AD is not a new concept and has been used in the waste-water industry for decades. Almost every big sewage treatment plant in the UK has an AD plant as part of the water treatment.

AD of solid and semi-liquid waste streams (e.g. food waste) is a more recent development but has been used for around 15 years now. Germany alone has more than 4,000 AD plants and the number of plants in the UK is growing continuously

Question: As of the 15 October 2010 and within the UK, how many Gasification plants of the design and size proposed for the Eco Park (or larger) are fully commissioned and operating? It would be appreciated if details of the location and length of time of full operation of these plants could be provided.

Answer:

There are currently a number of gasification plants around the world that have been in operation for many years. Within the UK specifically there is one plant of a similar size and design to that proposed at Charlton Lane. The Dumfries plant has been in operation since October 2009 and features a similar batch oxidation system design to that proposed at Charlton Lane and at 40kt, extendable to 60kt it is also a comparable size. The Dumfries plant is still in the commissioning phase and is not yet recovering energy due to a technical issue with the boilers, which was quickly identified. SITA and Suez Environnement have the technical expertise and operating experience to ensure that a suitable and industry specific boiler will be proposed for Charlton Lane.

Question: As of the 15 October 2010, how many sites within the UK currently have both an anaerobic digestion facility and gasification plant located on the same site? It would be appreciated if details of the location and length of time of full operation of these plants could be provided.

Answer:

This is the first Eco Park of its kind in the country and anaerobic digestion and gasification have not been located on the same site before. The technologies proposed are in use elsewhere and SITA UK has extensive experience of older style Eco Parks with co located facilities of different types. These include:

- SITA Kirklees, which is in an urban setting and co-locates energy from waste and material recovery facility technologies with a community recycling centre;
- Londonwaste Eco Park (where SITA was a 50% shareholder) is in an urban setting and co-locates energy from waste, in vessel composting and bulky waste recycling;

The technical teams will undertake extensive hazard and operability studies (HAZOP) which will identify and mitigate all risks and hazards that arise from the engineering processes and the operation of the facilities. Before the Eco Park can operate it must have an Environmental Permit from the Environment Agency (EA), which is the industry regulatory body. This permit will set out conditions of operation and if these are breached the EA can – and does – shut down sites. We would not be issued with an Environmental Permit if this site posed an unacceptable risk to safety.

Question: It is appreciated that Surrey Waste Management does not currently operate any of the technology currently proposed. As of the 15 October 2010 does Sita UK Ltd operate fully commissioned and operating anaerobic digestion facilities of the size proposed (or larger) or gasification/incinerator of the type proposed of the same size or larger within the UK?

Answer:

SITA UK does not currently operate anaerobic digestion or BOS gasification facilities in the UK. There is one operating BOS gasification facility and six anaerobic digestion facilities of a comparable size in the UK. SITA and Suez Environnement technical and operational managers have extensive experience in the UK, Europe and around the world on five continents of waste management technologies similar to these proposed at the Eco Park. SITA UK has and will continue to submit planning applications for similar facilities elsewhere in the UK, including Mitcham, South London and Binn Farm in Scotland.

Question: What sort of quality systems and independent accreditation are in place at Surrey Waste Management and Sita UK Ltd?

Answer:

SITA UK has a comprehensive Quality, Environment and Management System of audits, monitoring and reporting action plans and targets which result in an annual management programme seeking continuous improvement. Attached is SITA UK's integrated policy statement for safety, health, environment and quality.

Question: What sort of safety culture is operated within Surrey Waste Management and Sita UK Ltd?

Answer:

SITA UK Ltd has, over a number of years, strived to develop an active safety culture in all parts of the company. This has required a substantial investment in terms of personnel, training and the development of a robust health and safety management system. In order to ensure that all this effort and investment was directed effectively and that the management system met the highest standards, SITA UK made a commitment to achieve BS OHSAS 18001 accreditation across all its activities and 300 plus operational sites. External auditing (carried out by a UKAS accredited body) began in December 2009. The first 35 sites have achieved accreditation and a further 45 are currently undergoing external auditing. Additional sites will be added every six months until the whole organisation is accredited with meeting this very demanding standard.

Question:

Every organisation strives for zero safety incidents as a target and I assume that Surrey Waste Management and Sita UK Ltd are the same. How many breaches of Health and Safety Legislation have Surrey Waste Management and/or Sita UK Ltd been warned or prosecuted over in the last 10 years?

Answer:

SITA UK takes health and safety extremely seriously and continues to make every effort to reduce its accident rate. At the end of 2009, our RIDDOR incidence rate was down 68 per cent from the 2005 level.

To ensure that health and safety is at the forefront of everything we do, SITA UK has signed up to the industry-wide accident reduction charter that is established jointly between our main trade body, the Environmental Services Association, and the Health and Safety Executive. We are now into the second five-year commitment to reduce reportable accidents by 50 per cent over a five-year reference period, having exceeded this target during the first five-year period. Additionally, SITA UK employs health and safety coaches, whose job involves visiting sites to demonstrate best practice. We also employ health and safety managers and have regional health and safety

representatives who attend monthly meetings to raise anything they believe to be an issue on their sites. This ensures any potential concerns can be acted upon.

Since 2000 SITA UK has received:

- Four prosecutions relating to health and safety.
- Six prohibition notices, of which one was for SITA Surrey.
- 10 improvement notices

Question: Of these how many have resulted in a serious injury or death of an individual?

Answer:

Since 2000 SITA UK has been prosecuted four times for the serious injury or death of an individual. Following each event there have been rigorous and extensive investigations and overhauls of procedures to ensure this type of incident does not occur again.

Question: How does this record compare to other waste companies within the UK?

Answer:

We believe that we are broadly in line with other similar sized companies within the industry and are constantly striving to improve health and safety.

Question: How many infringements or breaches of environmental legislation have Surrey Waste Management and/or Sita UK Ltd been notified of or prosecuted for in the past 10 years?

Answer:

SITA Surrey has not received any prosecutions or formal cautions in its 11 year history. SITA UK has received the following:

- 37 prosecutions from 2000 to present date
- 7 formal cautions from 2004 to present date.

Question: Have Surrey Waste Management and/or Sita UK Ltd been commended by any UK government agency as being exemplary in their waste handling operations?

Answer:

The Environment Agency (EA) uses a Compliance Classification Scheme to monitor permitted waste sites across the country. This scheme assesses the potential environmental impact of any breaches of permit conditions. Each site is assessed using this system and given a point score.

Using this scheme the EA defines a good waste operator as one who averages less than 30 points per year across all of their facilities. In 2009 SITA's average score was 2.64 per site, which is significantly better than the industry average and an improvement on the 2008 average of 5.4 points. It is also worth noting that SITA UK has its own internal target that no site can exceed 10 points

Question: Have Surrey Waste Management and/or Sita UK Ltd been criticised by any UK government agency (or similar) as being a bad Polluter or manager of a waste disposal facility.

Answer:

Neither SITA Surrey or SITA UK have been criticised as a bad polluter or operator.

Question: How frequently will the emissions of the various outlets and stacks be monitored for environmental pollutants?

Answer:

There will be a continuous emissions monitoring system installed for the gasifier, which will monitor nitrogen oxides, sulphur dioxide, hydrogen chloride, volatile organic compounds, carbon monoxide and dust. Other pollutants are released in such low concentrations that continuous monitoring is not practical, so samples are extracted from the exhaust gases every three months for analysis.

Question: If the monitoring of waste products of the processes are done on site, will the analyses be carried out to ISO 17025 requirements?

Answer:

Monitoring of waste products will not be done on site. SITA UK uses ISO 17025 accredited laboratories for testing waste products from a number of existing sites.

Question: If not ISO17025, what internationally recognised standard will be used and who will independently audit the processes?

Answer:

SITA UK uses ISO 17025 accredited laboratories for testing waste products from a number of existing sites. Additionally, SITA UK is accredited with ISO 9001 and ISO 14001

Question: If the monitoring of emissions is done off site, how many times a year with the site be sampled and for what analytes?

Answer:

No offsite monitoring is planned.

Question: Who will carry out the sampling and analysis?

Answer:

No offsite monitoring is planned.

Question: Will the sampling and analysis laboratory carry the appropriate accreditation standard such as ISO17025?

Answer:

No offsite monitoring is planned. Analysis of extracted samples will be carried out at UK Accreditation Service accredited laboratories, which are accredited to ISO17025 for general quality and specifically accredited to do the ISO and British Standard tests which they will be carrying out.

Question: Will the external laboratory allow access to its performance in proficiency testing schemes to be made public to build confidence in the local community that the processes are safe, robust and reliable?

Answer:

The laboratory has achieved UK Accreditation Service accreditation as well as ISO accreditation for both general quality and for the tests specific to SITA UK's proposed BOS gasifier. Therefore this should provide members of the public with sufficient assurance that the results are correct.

Question: Will all monitoring data be made available to the public and local residents for scrutiny to build confidence in the local community that the processes are safe, robust and reliable?

Answer:

All of the results received as part of the monitoring process will be sent to the Environment Agency. These results will then be available for the general public to view.

Question: Any complex process will fail. Does Surrey Waste Management have any Lean Processing and Systematic Improvement programmes in place aimed at reducing such process failures with a target of zero process failures?

Answer:

SITA UK has a comprehensive Quality, Environment and Management System of audits, monitoring and reporting action plans and targets which result in an annual management programme seeking continuous improvement.

Question: How will this be monitored or enforced by Surrey County Council?

Answer:

Awaiting response from Surrey County Council.

Question: Should planning permission be given, is Surrey Waste Management prepared to commit now to such a program with clearly defined targets, such as reducing the number of emergency vents per year, reducing the volume of NOx discharged, etc on an annual basis?

Answer:

SITA UK has an annual management improvement programme which seeks continuous improvement in our performance and is reviewed quarterly as a minimum. Each improvement programme is site and facility specific. Current programmes include initiatives that will reduce our carbon footprint, improve energy efficiency, reduce consumption of natural resources and improve recycling.

Question: My particular question is: Why is there a proposal to put a potentially highly polluting development in an area of high human habitation which already suffers from pollution from the M25, M3, local traffic and aircraft?

Answer:

The waste management industry is strictly regulated by the Environment Agency. We would not be allowed to operate any facility that poses a significant risk to human health. The Environment Agency can – and does – shut down non-compliant sites. The risk to human health has been assessed in detail and has been found to be insignificant. This is worked out using

dispersion modelling to predict concentrations at ground level, which are then compared with acceptable levels, including air quality objectives. For those pollutants that are not screened out, further detailed assessment including background concentrations, has been carried out and this confirms that the impact is negligible.

Question:

My questions are:

- 1) What is the water demand for The gassifier plant? The anaerobic digester? Other site services? Emergency contingency?
- 2) Why has SCC knowingly embarked on a non sustainable policy which threatens the availability of water supplies, the very essential of life, in an area of highest population density in Surrey?

Answer:

The AD facility will use 6,100 m³ of water per year. Additionally, the BOS gasification plant will use 6,000 m³ per year. The rest of the site will require water for toilets, welfare facilities and dampening down dusty areas, as is common practice at sites like these. The design of the Eco Park includes rainwater harvesting, to ensure the site is as sustainable as possible and some of this will be used in the AD and BOS gasification processes. The purpose of the Eco Park is to create a sustainable way of managing Surrey's waste.

Question: My particular question is ~ What European, National and Local Standards and Safe Operating Practices have been followed to determine the minimum safe distances between public areas and the industrial processes

Answer:

Awaiting response from Surrey County Council

Question: My particular question is: Will automatically initiated visual and audible alarm systems be installed to alert the public to the need to immediately vacate the waste transfer station in the event of an emergency?

Answer:

The Eco Park will have full and integrated fire protection and prevention systems. SITA UK has set procedures for every site that are used in the event of an emergency. The Eco Park will have a full evacuation policy, procedure and drill. Only waste management professionals will be permitted to access the process buildings and CRC staff will evacuate members of the public if necessary.

Question: My particular question is: With a 50% failure rate of the gasifiers in operation within Europe, including 172 short-term breaches of emissions, how can SITA possibly be telling Shepperton residents these units are reliable?

Answer:

SITA UK is not the operator of the Dumfries site but it is the reference site for the BOS gasifier proposed for the Eco Park at Charlton Lane, Shepperton. SITA UK follows the operation at Dumfries very closely and has a good relationship with Scotgen, the plant's operators. The Scottish plant has been operating successfully but inevitably there will be issues that need to be resolved during the commissioning phase. This is quite common with commissioning of a new plant. The main issue at Dumfries was that the facility did not have the correct type of boiler. The boiler was reconfigured last winter and used as a 'cooler' before a new type of boiler is installed. Since March 2010, Scotgen has been adjusting the plant and processing thousands of tons of waste. The commissioning period ended on 1 November 2010. SITA UK technical experts consider that there is no concern with the actual gasification process and we are confident that BOS gasification is a sound technology and is the right facility for Surrey. SITA UK's experts have extensive experience of thermal waste treatment methods and have thoroughly assessed the suitability of the technologies proposed for Surrey

Question: My particular question is the remote Dumfries plant (same as what is planned for heavily populated Shepperton) has suffered repeated malfunction since opening, and has not yet produced any 'renewable energy'. It has also experienced over 170 breaches of exceeding its emission. With then a 50% failure rate of two similarly built gasifiers, how are SITA being allowed to claim that the site planned here is safe and reliable when it absolutely is not?????

Answer:

SITA UK is not the operator of the Dumfries site but it is the reference site for the BOS gasifier proposed for the Eco Park at Charlton Lane, Shepperton. SITA UK follows the operation at Dumfries very closely and has a good relationship with Scotgen, the plant's operators. The Scottish plant has been operating successfully but inevitably there will be issues that need to be resolved during the commissioning phase. This is quite common with commissioning of a new plant. The main issue at Dumfries was that the facility did not have the correct type of boiler. The boiler was reconfigured last winter and used as a 'cooler' before a new type of boiler is installed. Since March 2010, Scotgen has been adjusting the plant and processing thousands of tons of waste. The commissioning period ended on 1 November 2010. SITA UK technical experts consider that there is no concern with the actual gasification process and we are confident that BOS gasification is a sound technology and is the right facility for Surrey. SITA UK's experts have extensive experience of thermal waste treatment methods and have thoroughly assessed the suitability of the technologies proposed for Surrey

Question: In a Press Release dated 15/12/09, Dr Andrew Povey, Leader of Surrey County Council is said to have made the following remark, "I am very pleased to announce that we are scrapping plans for any Efw incinerators in Surrey. Today I will be instructing that the planning applications for incinerators at Capel and Trumps Farm be withdrawn". What authority did Dr Povey have from Surrey County Council to make such a remark ? Further, what authority did Dr Povey have from the applicants for the Planning Permission, Surrey Waste Management Ltd., for making such a statement?

4. In the same Press Release, Dr Lynne Hack introduced the county council's new "waste vision" for an "eco park", at Charlton Lane, Shepperton, which she said would include amongst other things, a "gasifier". The release continued "in a gasifier waste is heated to produce a gas, which can then be burned cleanly at high temperatures to provide energy, in a similar way to natural gas ". My understanding is that a gasifier is in fact an incinerator itself, so, in such circumstances was not Dr Hack's statement a tad misleading under those circumstances?

5. My next question is therefore to Dr Hack. Are you now prepared to accept that a gasifier is in fact an incinerator under the Waste Incineration Directive, and if not, please give your reasons?

6. This question is for the experts. Would you accept that a gasifier is an incinerator under the Waste Incineration Directive, and if not, please give your reasons? Would you consider that the above statement , (at 4), concerning the gas burning cleanly, in a similar way to natural gas, to be a fair and accurate reflection of the qualities of the gas produced in a gasifier, and known as syngas? Please give your reasons for the answer, including within its terms, the constituents of syngas, its calorific value, and the calorific value of natural gas, as supplied to households

Answer:

As the Leader of the Council, Dr Povey has full authority to make statements of council policies such as its policy with regard to waste management. SITA Surrey are the council's waste management contractor and the proposed planning applications for energy from waste plants were developed as part of the council's contract with SITA Surrey. Dr Povey's statement was made with the agreement of SITA Surrey. 4) Dr Hack's statement is factually correct in that in a gasifier, waste is heated to produce gas which is then burnt in a secondary combustion chamber. The process differs from energy from waste incineration where the solid waste is combusted directly on a grate with excess air. Gasification is classed as an advanced thermal treatment process. 5) All thermal treatment processes such as pyrolysis , gasification and incineration are regulated under the Waste Incineration Directive however the pyrolysis, gasification and incineration are different processes. 6) As stated above, advanced thermal treatment processes such as gasification are covered by the waste incineration directive however they differ in character from waste to energy incineration. In a gasification plant the Syngas typically comprises a mixture of hydrogen carbon monoxide, hydrogen and methane. Typically, the gas generated from gasification will have a net calorific value (NCV) of 4 - 10 MJ/Nm³. The calorific value of syngas from pyrolysis and gasification is lower

than natural gas, which has a NCV of around 38 MJ/Nm³. The gas is however combusted in a similar way to natural gas.

Awaiting response from Surrey County Council

Question: In the same Report to Committee is a remark about the gasification technology at paragraph 29. "In addition it is currently unlikely that banks will provide lending for this technology as there is not a history of effective operation, and commissioning tests to ensure effective operation and management of risks will be required". Have these commissioning tests been undertaken on the type of gasifier chosen, have they been completed, were they successful? If not, please provide a full explanation. Is the plant generating electricity?

Answer:

Commissioning tests have now been completed on the Dumfries plant which is of a similar design and scale to that proposed for Charlton Lane. These tests were successful in ensuring effective operation. The tests regarding the generation of electricity are yet to be completed as they will only be possible after a boiler at the plant has been replaced as the plant is not currently generating electricity.

Question: In a Report to both the Environment and Economy Committee, which met on 12 January 2010, and to the Surrey Cabinet, which met on 2 February 2010, there is a remark about the chosen gasifier plant, "two plants are successfully in operation (in Iceland and Scotland) and the plant in Scotland has been tested on residual waste delivered from Scotland". Please indicate the date on which Surrey waste was treated at the plant. Please confirm that at the date of those Committees, the reference gasifier plant, in Dargavel, near Dumfries, Scotland was working. If the plant was not in fact working at the time of the Committee meetings, please indicate what the problems were with the plant. Have the problems now been permanently and fully rectified?

Answer:

Specific trials of Surrey's waste at the Dumfries plant were carried out during the period of 3 - 9 December 2009. The plant was in the early stages of commissioning and the trial was successful. Issues with the boiler had been identified at that point and while the site processed waste successfully no electricity was generated.

Question: For the experts. What are the causes and effects of corrosion in gasification plants. How easy is it to recognise, and what is the result of failure to identify corrosion in the plant?

Answer:

The main cause of corrosion in gasification plants is the high levels of Hydrogen Chloride present in the gases at the exhaust of the secondary chamber. This presents a risk of corrosion of the boiler tubes which can be easily avoided by ensuring the boiler is made from the correct material and the placement of refractory materials. All of these factors have been considered by SITA UK and are part of what we would consider adopting an adequate boiler configuration for the purpose of gasification.

Question: In the Decision Document for the Dargavel incinerator, the Scottish Environment Protection Agency, the permitting authority for incinerators in Scotland states at page 19, "The proposed installation is to use unproven batch gasification incineration technology. This technology has been adopted elsewhere in the world since the 1970s but there are currently no plants using this technology operating to the standards of the Waste Incineration Directive. There is a similar (but not identical) plant using the batch gasification technology in operation in Iceland". Is this correct?

Answer:

While this statement was correct at the time of going to press, it has since been superseded and is no longer accurate. The plant at Dumfries is operating to the Waste Incineration Directive and the proposed BOS gasifier for Charlton Lane would comply with the Waste Incineration Directive.

Question: SEPA indicated (page 92 DD) that for the emissions at the plant in Iceland "SO₂ and HCl were above daily emission limit values with a significant number of short term excursions that resulted in non-compliance with both sets of short term average ELVs". It continued "This position was confirmed during the fact finding visit to the Husavik facility". And later "Periodic monitoring for dioxins at this plant in May 2008 (undertaken by an independent contractor) indicated I-TEQ weighted emissions of dioxins of 2.1 ng/Nm³. This is of concern and suggests the unabated emissions of dioxins may be in excess of the required emission limit values". There is qualification that the precise operating conditions of the plant were not known, however is it safe to say that these remarks should raise significant concerns about the Icelandic plant? What is the U.K. maximum limit for dioxins? 14. Would the author of the Report to the two above mentioned Committees like to retract or modify his/her remarks about the reference Icelandic and Scottish plants being "successfully in operation", and if not, why not?

Answer:

SITA UK is not the operator of the plant in Iceland and it should be noted that the Waste Incineration Directive is not applicable in Iceland. However, we believe that the Icelandic plant is operating very closely to the WID levels. The reference plant for the facility at Charlton Lane is the Scotgen plant at Dumfries, which has been built and designed according to UK regulations. SITA UK and SUEZ Environnement will use our expertise of running multiple

plants in the UK and Europe to WID levels, to ensure that we always meet or improve on the standards set.

Question: On page 31 of the Dargavel Decision Document, SEPA wrote "The frequency of operation of the bypass stack is predicted to be 60 hours per year (10 off 4 hour events and 10 off two hour events). This prediction is stated to be based on operational data from the similar plant Husavik in Iceland . However, it does correspond exactly to the maximum period for such venting allowed under the WID (60 hours per annum)". In the site status report recently issued by SEPA, 15 activations of the bypass stack were said to have occurred between March and September 5, 2010. My understanding of these events is that they are abnormal, and akin to an emergency shutdown, where the contents of the secondary chamber are heated and exhausted from stacks, which in the present case at Charlton Lane will be situated on the roof of the main building, 20 metres high, as opposed to the main stack, 49.5 metres high (on present estimate). The exhaust will therefore avoid filtration. Would the experts care to comment, and in particular clarify the time that the by pass stacks may be operated. In the SEPA report, it talks of a maximum of 60 hours, however, the writer understands from permissions drafted in England, that the bypass stack activations are limited to 60 hours per line. As a result, with three lines, 180 hours is the permitted length of time for the plant at Charlton Lane.

Answer:

Awaiting response from Surrey County Council

Question: Please indicate how far the Visitor Centre, car parks, and recycling areas are likely to be from the bypass stacks at Charlton Lane. 16. In the South East of England we are in an area of extreme water stress. The gasifier plant at Dumfries is said to require over a million litres of water per day (Source documents available from SEPA). In view of the remarks, how is it anticipated that sufficient water will be available for the plant, without inconveniencing in any way, the existing water consumers in the area. In this context, it is understood that rainwater harvesting will be available. Would all the sources of available water for the WHOLE plant at Charlton Lane be indicated, their proportion and quantities. Will there be any effect on the water table, and on the flow of the River Ash?

Answer:

The bypass stacks are situated above the gasification building immediately adjacent to the visitor centre and the staff carpark behind the community recycling centre. The Charlton Lane BOS gasification plant will not use a million litres of water per day. We can confirm that the plant will use far less than that at around six million litres of water per year. The water needed to operate the plant will come from the water mains and also rainwater harvesting. Thames Water is a consultee for the planning application and has not raised any concerns over the site's potential water use.

Question:

According to information obtained, water vapour emitting from the stack will include biocides and anti corrosion water treatments. Would the experts please explain this in relation to Charlton Lane.

Answer:

The flue gases released from the stack will come from biogas and syngas combustion. The water vapour comes from water within the waste and from hydrogen within the waste. It will not contain biocides and anti-corrosion water treatments.

Question: Surrey explained in its reports to Committee that it required a technology which avoided pre-treatment of fuel. It found it in the batch loading gasifier which it proposes to install at Charlton Lane. The type of fuel will be unsorted black bin bag waste a recent reply from Surrey C.C Waste managers (21.9.10 Local Area Committee) states "it is a fact that not all waste can be recycled and that not all residents will fully participate in recycling schemes". This statement indicates it is aware of the fact that black bin bag waste will also include recyclable material. The Surrey Waste Plan indicates at WD5 that it requires waste to be sorted and separated prior to incineration. At Dumfries, waste is sorted to the extent that gas canisters which exceed 190 grammes are removed. By allowing a system which avoids pre-treatment as Surrey intends, is this not both contravening the Waste Plan, and taking an unnecessary risk?

Answer:

Firstly, it is incorrect to say that the Waste Plan requires pre-treatment of black bag waste prior to it being disposed of. The Waste Plan requires applicants for planning consent to demonstrate that the waste that is being processed cannot be practically or reasonably reused, recycled or processed to recover materials. This means that applicants must demonstrate that sorting and separation for recycling or composting has taken place at the 'front end' before the residual waste can be accepted at a thermal treatment plant. Recycling and composting at the 'front end' means capturing materials before they are consigned to the residual waste bin or black bag, for example through kerbside collections of recyclables or at through recycling and composting containers at community recycling centres

In its World Class Waste Solution, the council has identified extensive measures that would be taken to extract more materials for recycling and composting at the 'front end' with the aim of achieving a target of 70% recycling and composting.

The proposed gasification plant at the Eco Park will be designed to deal with all the components that are to be found in residual waste and therefore no pre sorting will be required.

Question: Surrey claims its gasifier, fuelled by black bin bag waste will be providing renewable energy. The County is asked to back up this claim with solid evidence. The European Directive seems to exclude it, saying "energy from renewable sources, namely wind, solar, aerothermal, geothermal, hydrothermal and ocean energy, hydropower, biomass, landfill gas, sewage treatment plant gas, and biogas". Have I missed anything, or is Surrey wrong?

Answer:

The residual waste that is proposed to be dealt with in the gasification plant will comprise a proportion of biomass, from which 'renewable energy' will be recovered.

Question: The whole of Spelthorne is an Air Quality Management Area. The Borough Council is asked to explain the meaning of the term Air Quality Management Area, and asked to confirm that it is to improve the quality of the air within the Borough. The Council is asked to give recent examples of its work in this particular subject. Is the Council prepared to oppose the proposed Planning Application for the Eco Park on air quality grounds, bearing in mind there is no possibility of the emissions improving our local environment?

Answer:

Local authorities have to carry out local air quality management (often shortened to LAQM) duties under part VI of the Environment Act 1995. The Air Quality Objectives (AQOs) are the standards (concentration levels) of specified air pollutants to be met by specified dates as set out in the Air Quality (England) Regulations 2000, as amended.

Every local authority has to review the air quality within its area, both at the present time and for future air quality. Section 83 of the Act requires a local authority to designate an Air Quality Management Area (AQMA) where AQOs are not being achieved, or are not likely to be achieved, within the relevant period set out in the regulations. An AQMA is designated by the local authority making a formal Order.

Setting the boundary of an AQMA involves an element of judgement, considering the extent of predicted areas of exceedence, locations of relevant receptors, nature and location of relevant sources, and other local factors. Once an area has been designated Section 84 requires the local authority to carry out an assessment and then develop an Action Plan for the AQMA. An Air Quality Action Plan must include the following:

1. quantification of the source contributions to the predicted exceedences of the relevant objectives; this will allow the Action Plan measures to be effectively targeted;
2. evidence that all available options have been considered;

3. how the local authority will use its powers and also work in conjunction with other organisations in **pursuit** of the air quality objectives;
4. clear timescales in which the authority and other organisations and agencies propose to implement the measures within its plan;
5. where possible, quantification of the expected impacts of the proposed measures and an indication as to whether the measures will be sufficient to meet the air quality objectives. Where feasible, data on emissions could be included as well as data on concentrations where possible; and
6. how the local authority intends to monitor and evaluate the effectiveness of the plan.

It should be noted that, as point 3 above, there is no requirement for the local authority to actually meet the AQOs. Neither is there any requirement to seek continuing improvement to air quality below the AQOs. The onus is actually on central government to do this in order to comply with the over-arching EU requirements. The local authority does have to consider the wider economic, social and environmental impact of its action planning.

Spelthorne Borough Council has designated the whole area of the borough as an AQMA, in respect to the AQO for the annual mean concentration of nitrogen dioxide (NO₂). The problem is predominantly from diesel and petrol engine vehicle emissions. This does not mean this AQO is being exceeded everywhere in the borough, rather that, for action planning purposes, the Council at that time felt this was the most appropriate way to tackle the problem.

This AQO is actually only being exceeded in specific areas within the borough. Currently a further study is being undertaken in the light of current guidance, which may lead to the suggestion that the area of the AQMA should be more tightly focussed on areas of exceedence.

The Council's Action Plan is published on its website www.spelthorne.gov.uk . Many of the actions refers to actions from other organisations, because the scope of the Council, as a district council, in directly influencing local air quality is limited. For instance, a significant example is that Surrey County Council is the highways authority responsible for local roads and traffic management, so its Local Transport Plan highlights air quality issues in Surrey's district councils and sets out relevant actions. Similarly the Highways Agency are responsible for trunk roads and motorways, and BA are responsible for Heathrow Airport. All these are the significant air pollution sources affecting the borough.

As examples of its own work, Spelthorne Borough Council considers vehicle emissions when purchasing new vehicles, and is preparing a Green Travel Plan for its staff.

Another relevant activity of the Council is in its approach to planning applications and air quality. Generally, air quality can be a material consideration for planning purposes. In arriving at a decision on a particular planning application, the Council will decide what weight to give to air quality which will depend on national guidance, local planning policy (there is a specific local planning policy EN3 for air quality) and factors such as:-

1. The severity of the impact of the development on air quality
2. The existing/future air quality surrounding the proposed development
3. The likely use of the development
4. The positive benefits provided through other material considerations, and generally the balance of social, economic and environmental factors, of which air quality is one. It is also important to note that an AQMA does not sterilise an area for future development.

Thus an air quality assessment is required from developers where their proposals are considered to have significant air quality implications, proportionate to the scale of the development and issues involved. This will then lead to a decision of no objections on air quality grounds, or a recommendation for planning conditions to mitigate air quality impacts, or a recommendation for refusal on air quality grounds.

Therefore the fact that a proposed development would cause an adverse effect on local air quality does not automatically mean that the Council is able to refuse to grant planning permission. Even where air quality is used as a ground for refusal, developers have a right of appeal to the government's planning inspectorate.

As an example, air quality was one of the reasons for refusal of the application by London Irish Rugby Club for redevelopment of their training ground in Sunbury. This will be the subject of an appeal by the developer. Therefore, in relation to the proposed Waste Management Eco Park, the Council cannot state at this stage that it will oppose the proposal "*bearing in mind there is no possibility of the emissions improving our local environment*". Before it forms an overall opinion, it will have to consider in detail all the information provided in the planning application (which will be decided by Surrey County Council) and the factors outlined above.

Question: At a presentation to Spelthorne Councillors it was stated that emissions from the "Eco Park" would be half those required by EU law. What emission levels, for each regulated pollutant, are Surrey / SITA guaranteeing to meet and what is the equivalent EU standard? How will these lower levels be guaranteed to the public? Will these lower level form part of the planning application? 1) We are close to the Thames here with water supply reservoirs. I am worried that this large waste plant will affect our water supplies. Is the water going to be safe or will it be poisoned by waste gases or effluent? 2) Have bad weather conditions been taken into account particularly as aircraft and low flying helicopters pass over this area?

Answer:

The breakdown of emissions are listed in the air quality assessment that has been submitted with the planning application. This will be publically available when the application is validated.

The presentation to Spelthorne Councillors was specifically referring to emissions of oxides of nitrogen, which are of particular interest due to the local Air Quality Management Area. The emission limit in the Waste Incineration Directive is 200 mg/m³ as a daily average and SITA has committed to a limit of 100 mg/m³.

There will be no effluent releases. The impact of pollutants landing on the local watercourses and reservoirs has been assessed as part of the human health risk assessment and the impact was found to be insignificant. Weather data from Heathrow has been used in the assessment and we used five years of data, taking data for each hour in those five years, to ensure that a wide variety of weather conditions were assessed.

Question: At the last area surrey councillors meeting at Knowle Green it was stated that the residue from the anaerobic digester process will be 20k tonnes a year which will be sold onto farmers for soil improvement. I want to know the process envisaged to store and transport this material away from the site as it will have a poo smell off the Richter scale. As nitrogen dioxide (main cause breathing problems) has the same weight as air can the chimney be as high as possible to as to disperse/dilute this noxious gas before it mixes down to ground level on days of calm, no wind will it be possible to scale back the incineration process so that there will not be a pollution hot spot in the immediate area. Has any health survey been carried out to find out the amount of people in the local vicinity who have breathing problems ie using inhalers etc Will any health survey be put in place in the future to monitor and to ascertain if there will be increased amounts of people developing breathing difficulties in the local vicinity to the plant.

Answer:

All operations at the anaerobic digestion plant will be undertaken within the proposed buildings or within the sealed vessels, to minimise any possibility of odour. There will be air extraction within the buildings to hold them in negative air pressure, so that air is drawn in rather than any potential odorous air escaping out. There will also be fast acting roller shutter doors to enable vehicles to go in and out but no air will be able to escape whilst this is taking place. This extracted air is fed through a biofilter to remove odour. The process also produces what is known as a "digestate". This product is dewatered and the solid part is similar to compost and can be used on land to replace artificial fertilisers. This will be stored on site inside a building under negative air pressure for a period of two weeks to allow it to mature and to ensure that the organic process has completed and produced a stabilised, processed material. An odour management plan is being compiled in support of the Environmental Permit application, which will be submitted to the Environment Agency in November 2010. If the permit were granted then the

Environment Agency would monitor the site through regular unannounced site inspections. Digestate from the anaerobic digestion plant would be matured for a period of time within an enclosed building. It would then be transported from the site in covered vehicles.

Question: My particular question is: Why Charlton line? I concern the only reason Charlton Lane has been chosen is cost reduction because there is already a Waste transfer area.

Answer:

It is understood that the selection of the Charlton Lane site for the proposed Eco Park is a matter of public concern. Therefore I have addressed this issue at some length to ensure that councillors and the public understand how the decision was taken and that there has been, and will continue to be, substantial provision for consultation with local residents. In January 2006, the county council's Executive approved a draft Waste Disposal Authority Action Plan. The Council subsequently adopted this plan later that year. At that time the Waste Disposal Authority's preferred method of dealing with residual waste was through energy from waste incineration technology. The Action Plan identified the preferred sites for energy from waste technology as Clockhouse Brickworks, Capel; land at Trumps Farm, Longcross and Charlton Lane, Shepperton. The report to the Executive in January 2006, went on to recommend that two energy from waste plants be developed to deal with residual municipal waste. The smaller of the two plants, some 100,000 tonnes per annum capacity, should be developed at Capel in the south of the county. A larger plant of 160,000 tonnes capacity should be developed in the north of the county at either Trumps Farm or Charlton Lane. At the time the preference was to site the northern energy from waste incineration plant at Trumps Farm. Both the Charlton Lane and Trumps Farm sites had planning considerations. In addition, as the Executive report of January 2006 states, there were also 'some clear operational benefits in choosing the Trumps Farm site over the Charlton Lane site'. Those 'clear operational benefits' related to the existing operational use of the Charlton Lane waste transfer station and community recycling centre and the fact that if a 160,000 tonne per year energy from waste facility were to be developed on the Charlton Lane site, it would be necessary to close the site to the public and to local authority and trade customers for the duration of the building works. The council's World Class Waste Solution proposes further reduction of waste arising as well as increased levels of recycling. This means that there will be less residual waste to be disposed of than was anticipated when the Waste Disposal Authority Action Plan was first drawn up in 2006. Some 160,000 tonnes per year instead of the 270,000 tonnes per year originally proposed. The emergence of batch oxidation system gasification technology as a viable alternative to energy from waste incineration enables plant to be constructed on a much smaller scale. The plant proposed for Charlton Lane will deal with only 60,000 tonnes of waste per year rather than the 160,000 tonnes proposed for the energy from waste plant at Trumps Farm. The configuration of the plant also allows for a much smaller building to house the process. The maximum building height proposed for the Eco Park is just over 18 metres, compared

with a height of around 40 metres that would be required for an energy from waste incineration plant. The height of the stack is also significantly less, 49 metres as compared to 80 to 90 metres for an energy from waste incineration plant. The reduced scale of the buildings also means that it would be possible to continue to operate the Charlton Lane facility during the construction of both the gasification plant and anaerobic digestion plant. In addition the council has managed to secure short-term capacity for Spelthorne's residual waste at the Lakeside energy from waste facility at Colnbrook and therefore the operational pressure on the Charlton Lane site, during construction, is reduced. Since the scale of the buildings, types of processes and footprint of the proposed Eco Park are very different to that of a 160,000 tonne per year energy from waste incineration facility and since there had been significant changes to the adopted Waste Plan as a result of the removal of Capel as an allocated site, Waste Disposal Authority officers considered that it was necessary to undertake a new planning assessment for the proposed Eco Park. A firm of planning consultants, Enviros were therefore commissioned to undertake this assessment and this was used to inform the report to cabinet on the 'World Class Waste Solution' in February this year. The report, which was produced in November 2009 has been published on the council's website. As a result of this detailed analysis, the Waste Disposal Authority believes that the Charlton Lane site is the most appropriate site for the development of an Eco Park. The principle of using the Charlton Lane site for waste processing, including thermal treatment, was subject to extensive public consultation during the development of Surrey Waste Plan. The council adopted the Waste Plan in May 2008 following an examination in public, with the inclusion of Charlton Lane as an allocated site. The planning application that is being developed by Surrey Waste Management will include a thorough and up to date alternative site assessment. The planning application will be subject to public consultation and residents will be able to make their views known with regard to all aspects of the application, including the suitability of the Charlton Lane site for the Eco Park. The demonstration of the suitability of the site is a material consideration for the council's Planning and Regulatory Committee when they consider the planning application. Therefore there has been and will continue to be further consultation with residents in relation to the principle of a waste processing facility at Charlton Lane

Question: What are the benefits for the residents to take all the risks of such unproven technology?

Answer:

Spelthorne residents will benefit from the following:

- A reduction in Heavy Goods Vehicle traffic associated with the site
- Access to an attractive landscaped area adjacent to the eco Park
- Improvements to the community recycling centre access to reduce queuing
- Improved recycling facilities including a reuse centre on the site
- Attractively designed iconic buildings to replace those currently on site

Question:

How could the road traffic reduce if you increase the amount of Waste to Charlton lane? How can we measure the pollution? Why nobody else wants this nightmare and we must accept it?

Answer:

At present Charlton Lane is used as a bulking facility. This means that waste is taken into the site on one vehicle and deposited in a holding area. This vehicle then leaves the site empty. The waste is bulked and a bigger, empty vehicle comes to the site and is loaded with this waste before leaving again.. This means that all waste received at the Charlton Lane site at present is ultimately exported from the facility by road. i.e. 100% of what comes to the site, will go back out again. The proposed Eco Park scheme will include for waste processing on site in future, which will break down the received waste inputs and therefore deliver a reduction in the amount of final end product waste materials required to be exported from the facility. Just over two thirds of all waste to be received at the Eco Park will be subject to waste processing activities. The proposed BOS gasification and anaerobic digestion facilities at the Eco Park will process waste and reduce received waste mass by 77% and 50% respectively. Therefore only 54% of all waste mass received at the site will be required to be exported, with a consequent reduction in vehicle movements. In addition to the effects of waste processing, the Eco Park proposals are also anticipated to result in a further reduction in heavy good vehicle movements as a result of i) a reduction in trade waste levels received at the site, and; ii) ceasing the receipt of waste associated with the Hounslow kerbside recycling fleet, which is currently using the site as a temporary waste reception area. The reduction / removal of these existing waste streams from Charlton Lane as part of the Eco Park proposals will further help to reduce overall lorry movements. The planning application for the Eco Park proposal scheme will be supported by a detailed Transport Assessment report, which has been prepared to accord with Department of Transport guidelines and which was scoped with both the Local Highway Authority (Surrey County Council) and the Trunk Road Authority (Highways Agency). The results of these assessments suggest that the development of the Eco Park scheme is anticipated to lead to a 49% reduction in the number of lorries travelling to / from the Charlton Lane site on weekdays. At weekends, it is predicted that there will likely be a slight decrease in overall lorry movements on Saturdays and a slight increase in lorries on Sundays, when compared to current site operation. Any such weekend increases would be very low, being of the order of less than 20 a day, or equivalent to two additional lorry movements per hour (in+out).

Question:

- 1) That the proposal of a gasification plant generally produces incinerator bottom ash - which can be quite toxic - but no 'residual waste' is noted in the Surrey Waste Strategy (see http://www.surreycc.gov.uk/sccwebsite/sccwspages.nsf/LookupWebPagesByTITLE_RTF/Key+changes+to+the+strategy?opendocument) so my concern is what the plans are for the use of this ash, and what the health implications might be of this.
- 2) Please confirm what the ash and particulates from the gasification plant will be used for if they are not to be landfilled.

Answer:

After the BOS gasification process, two types of ash are left over, bottom ash and fly ash. We are investigating ways to recycle bottom ash as aggregate for the building industry while the fly ash is disposed of in a specialist landfill or salt mine. The Surrey strategy aims to send no household residual waste to landfill and the Eco Park will support this strategy.

Question:

- 3) Please confirm the emissions statistics for similar plants that have been operated elsewhere? Please confirm the exact levels of Dioxin and other toxins which are expected to be emitted from this plant. Please confirm what the mix of waste is for those plants and how it compares with the typical mix of residual waste proposed for the EcoPark gasification feedstock. Please confirm the mix of waste for the feedstock and how this is expected to change with time? Please confirm the level of plastic envisaged in this waste when it starts operation? Please confirm what space, finance and plans for increased plastic reuse and recycling once technology have been included in plans for the site development.

Answer:

SITA UK 's proposed gasification plant at Charlton Lane will conform fully with the Waste Incineration Directive. Details of emissions for the Eco Park will be set out in the planning application, which will be publically available when the application is validated. Details of emissions for other plants are available from the Environment Agency. The main feedstock for the BOS gasifier will be household residual waste. Currently SITA Surrey accepts plastic bottles for recycling at the Charlton Lane CRC and we are constantly looking to recycle more materials and hope that in the future mixed plastics is one of them. More widely, SITA UK has signed a deal with Cynar to turn end of life plastics into diesel.

Question: Although the summary of this report has been published the publication of the full report has been delayed. Why is this, as the summary should have been written after the full report?

Answer:

A full Traffic Assessment has been completed as part of the planning application and will be publically available when the planning application has been validated. As yet, no summary of the Traffic Assessment has been published, however, a copy of an overview presentation on the results of the Traffic Assessment has been published. This is not the same as a Traffic Assessment summary

Question: Our particular questions are:

1. There appears to be some confusion over the stated reductions in traffic, with different percentage reductions being quoted, can the correct figures be identified with confirmation that they have been checked and agreed by the appropriate authorities? Can you relate simply the relationship between tonnages and HGV movements?
2. Have the proposed plans been examined in conjunction with Surrey's Minerals Plans to ensure that the said waste traffic reductions are not offset by increases in minerals traffic?

Answer: [See questions from Shepperton Residents Association](#)

Question: As proposed this facility is a monstrous imposition on an overloaded infrastructure. The current levels of traffic servicing the dump are too high (mainly heavy trucks, too big and heavy for our local roads) The roads are damaged but not repaired by council and the amenity of Charlton and Halliford Villages never mind road safety all around is severely compromised? NOW MORE WOULD BE UNACCEPTABLE – COMPROMISE SOLUTION?

Answer:

At present Charlton Lane is used as a bulking facility. This means that waste is taken into the site on one vehicle and deposited in a holding area. This vehicle then leaves the site empty. The waste is bulked and a bigger, empty vehicle comes to the site and is loaded with this waste before leaving again.. This means that all waste received at the Charlton Lane site at present is ultimately exported from the facility by road. i.e. 100% of what comes to the site, will go back out again. The proposed Eco Park scheme will include for waste processing on site in future, which will break down the received waste inputs and therefore deliver a reduction in the amount of final end product waste materials required to be exported from the facility. Just over two thirds of all waste to be received at the Eco Park will be subject to waste processing activities. The proposed BOS gasification and anaerobic digestion facilities at the Eco Park will process waste and reduce received waste mass by 77% and 50% respectively. Therefore only 54% of all waste mass received at the site will be required to be exported, with a consequent reduction in vehicle movements. In addition to the effects of waste processing, the Eco Park proposals are also anticipated to result in a further reduction in heavy good vehicle movements as a result of i) a reduction in trade waste levels received

at the site, and; ii) ceasing the receipt of waste associated with the Hounslow kerbside recycling fleet, which is currently using the site as a temporary waste reception area. The reduction / removal of these existing waste streams from Charlton Lane as part of the Eco Park proposals will further help to reduce overall lorry movements. The planning application for the Eco Park proposal scheme will be supported by a detailed Transport Assessment report, which has been prepared to accord with Department of Transport guidelines and which was scoped with both the Local Highway Authority (Surrey County Council) and the Trunk Road Authority (Highways Agency). The results of these assessments suggest that the development of the Eco Park scheme is anticipated to lead to a 49% reduction in the number of lorries travelling to / from the Charlton Lane site on weekdays. At weekends, it is predicted that there will likely be a slight decrease in overall lorry movements on Saturdays and a slight increase in lorries on Sundays, when compared to current site operation. Any such weekend increases would be very low, being of the order of less than 20 a day, or equivalent to two additional lorry movements per hour (in+out).

Question: My question is can the access to the site for trucks be mandatory via a new slip road from the M3? To be limited site access for trucks only off/on the westbound carriageway of the M3, not connecting to local road system. This would make things better not ever worse.

Answer:

SITA UK wrote to the Highways Agency requesting permission to build a slip road off the M3 to the site. However, they replied refusing us permission as it goes against national Government policy. The Highways Agency's letter stated: "There is a general presumption that there will be no additional accesses to motorways and other routes of strategic national importance, other than the provision of service areas, facilities for the travelling public, maintenance compounds and, exceptionally, other major transport interchanges. Access from other types of development to motorways and other routes of strategic national importance will be limited to existing junctions with all-purpose roads. Modifications to existing junctions will be carried out only where traffic flows and safety will not be adversely affected. Connections to slip roads and/or connector roads will not be permitted." In terms of potential rail access, the railway line near the Charlton Lane facility is a busy commuter route which is highly unlikely to have the capacity to transport waste by rail. Furthermore, an exporting railhead would need to be constructed to load the waste material onto rail in the first place. Rail works well with economies of scale transporting bulk materials over long distances. Those economies of scale would not be available for transporting relatively small quantities of waste within Northern Surrey by rail.

Question: My particular question is:

1). Current Eco Park sketched imagery fail to include the giant chimney that would be visible from miles around – River Thames and aircraft above included. When are accurate images of the Park' to be released so everyone in North Surrey is made aware of the impact this proposed site will have on our/their once-pleasant green belt landscape? (Before you submit your planning permission I hope.....) proposed 'Eco

Answer:

The images of the Eco Park are now available and were presented at the previous exhibition. The images of the Eco Park are available as part of the planning application.

Question: You reported yourselves (Surrey County Council Waste Development Plan) that the Shepperton site was originally rejected from hosting an incinerator due to i) gross “negative visual impact” on the village and surrounding area, and ii) logistical issues. Why suddenly, overnight, was this site considered “the best”, given it is the most visually exposed proposed site in the country???

Answer:

The emergence of batch oxidation system gasification technology as a viable alternative to energy from waste incineration enables plant to be constructed on a much smaller scale. The plant proposed for Charlton Lane will deal with only 60,000 tonnes of waste per year rather than the 160,000 tonnes proposed for the energy from waste plant at Trumps Farm. The configuration of the plant also allows for a much smaller building to house the process. The maximum building height proposed for the Eco Park is just over 18 metres, compared with a height of around 40 metres that would be required for an energy from waste incineration plant. The height of the stack is also significantly less, 49 metres as compared to 80 to 90 metres for an energy from waste incineration plant. The overall visual impact of the Eco Park is therefore substantially less than that of an energy from waste incineration plant. The reduced scale of the buildings also means that it would be possible to continue to operate the Charlton Lane facility during the construction of both the gasification plant and anaerobic digestion plant. In addition the council has managed to secure short-term capacity for Spelthorne's residual waste at the Lakeside energy from waste facility at Colnbrook and therefore the operational pressure on the Charlton Lane site, during construction, is reduced. Since the scale of the buildings, types of processes and footprint of the proposed Eco Park are very different to that of a 160,000 tonne per year energy from waste facility and since there had been significant changes to the adopted Waste Plan as a result of the removal of Capel as an allocated site, Waste Disposal Authority officers considered that it was necessary to undertake a new planning assessment for the proposed Eco Park. A firm of planning consultants, Enviro were therefore commissioned to undertake this assessment and this was used to inform the report to cabinet on the 'World Class Waste Solution' in February this year. The report, which was produced

in November 2009 has been published on the council's website. As a result of this detailed analysis, the Waste Disposal Authority believes that the Charlton Lane site is the most appropriate site for the development of an Eco Park. The principle of using the Charlton Lane site for waste processing, including thermal treatment, was subject to extensive public consultation during the development of Surrey Waste Plan.

Question: Building such a hideous site that benefits no one WILL have a detrimental effect on the demand for, and value of, properties in the TW17 area. How are we to be compensated for this unwelcome loss?

Answer:

The proposed Eco Park is designed to be an attractive facility, including a carefully designed stack, which would reduce its visual impact. There would also be benefits of enhancements to the local landscape and a reduction in heavy goods vehicle traffic compared with the existing operation. We therefore do not believe that the Eco Park will affect house prices in the area.

Question: Our particular questions are:

1. The latest drawings would indicate that both the buildings and the stack will be overpowering in height and colour, will steps be taken to mitigate those effects by ensuring that both buildings and the stack are the minimum height necessary for their required operations, whilst suitable colouring of walls, roofs and concealment will be provided together with significant planting of trees etc to minimise any detrimental effects on the local area?
2. As regards the stack, what is the validity of the computer programme used in the air pollution modelling that determined its height?

Answer: [See questions from Shepperton Residents Association](#)

Question: My particular question is: Maps provided by Surrey indicate that the plant will be easily visible for up to 1.5 miles, and more from taller locations, why should a small village that seems to have strict planning control on the height of buildings, be acceptable of such an eyesore?

Answer:

Given the green belt designation of the area, the mass, scale, layout and height of the proposed buildings is a significant issue for design. We wanted to produce a design which reflects the function and importance of the site as a world class facility but one which does not draw undue attention to itself. We have:

- Positioned the tallest piece of process equipment in the centre of the site away from the boundary to reduce its visual impact
- Positioned the lowest building elevation to face the most sensitive eastern boundary

- Curved the eaves to the roof which slope up away from the eastern boundary to avoid shadows created by overhangs. As the roof slopes away towards the sky it will reflect the sky colour and merge with its backdrop
- Created one simple, slim stack finished in polished/bright annealed stainless steel to reflect surroundings and sky. It will blend and merge with its backdrop
- Created a building form which favours soft edges over hard lines
- Increased landscaping and a 3.5m bund to the east to break up views towards the main process buildings
- Positioned solar panels on the buildings on the west side of the site so they have no additional effect on the visual impact

Strenuous efforts have been made to ensure that the proposed buildings are the minimum height that they need to be. This includes internal structural steelwork and columns for roof support to reduce the thickness of the roof structure. Some pieces of equipment, particularly within the gasification building, are of a certain size which then dictates the minimum height of the building. However, SITA has worked hard to ensure that the buildings are as small as they can be, given the equipment that must fit inside.

A significant amount of effort has also been put into the architectural design of the proposed facility. The Commission for Architecture and the Built Environment has commented on the proposed architectural scheme and have commented that they "applaud the commitment to commission a well designed building. This scheme strikes us as a successful piece of architecture. It has the potential to become an exemplary facility and to offer an interesting visitor experience".

Scrutiny and testing of the design assumptions, height, mass and layout of the proposed facility has been undertaken in consultation with Surrey County Planning Authority and Spelthorne Borough Planning Authority to ensure that no elements are larger or higher than they need to be.

As part of the planning application there will also be substantial landscaping around the grounds. This will serve to break views of the Eco Park.

The full Air Quality Assessment will be publically available as part of the planning application once it has been submitted.

Question: My particular question is I am a member of the Liaison Group, and I have yet to have a straight answer to this question answered - How big will this Eco Park be in relation to what is already there and will there be a comparison model created, along with, current photographic views with the Eco Plant super-imposed on it to show what we can expect to see and give us clear guidance over size, and something that is tangible that people can grasp. ie current facility size – two football pitches big and one double decker bus high, and No chimney Eco Park – three football pitches big and two double decker buses high and chimney

Answer: See the [Eco Park footprint document](#)

Question: Light Pollution The existing waste transfer station is not visible after dark with the exception of the small entrance block which is lit overnight but only visible, and then briefly, to motorists as they pass the entrance. Surrey County Council has set itself a plan in accordance with government directives to reduce light pollution. As this plant is:

- i) a 24 hr process and therefore requires to be manned 24 hours a day
- ii) it also comprises hazardous processes
- iii) it is an increase in height including the chimney it will have to be lit up overnight. Bearing in mind that recently the area has suffered a significant increase in light pollution from the floodlights at Kempton Park (which can be seen for miles); and bearing in mind that the waste transfer station is in Green Belt, how does this application comply with the requirement to reduce light pollution?

Answer:

The offices and visitor centre are designed to make the best possible use of natural light. All overnight operations will be undertaken solely within the gasification and anaerobic digestion (AD) building. There is no need for vehicular access in and out of these buildings during the night. Therefore external lighting will only be standard safety and security lighting with lights being standard down lights fitted with cowls to prevent light spill.

Question: My particular question is:: Given the situation in Hampshire, what is stopping Surrey County Council arranging for Surrey municipal waste to be disposed of a few miles down the M3, where empty incinerators are in need of new waste to incinerate?

Answer:

The Surrey Joint Municipal Waste Management Strategy (Policy 1) states that Surrey authorities will plan for net self sufficiency for dealing with waste in Surrey, through the provision of waste management capacity equivalent to the amount of municipal waste arisings. The WCWS projects the need for 160,000 residual waste treatment capacity even after reducing waste further and recycling at 70%. In the short term SCC is sending 20,000 waste to the Lakeside facility at Colnbrook, but this capacity is only available for two more years. SCC also has an interim contract in place for 100,000 at Allington EFW in Kent which can last until 2019. The only other reasonably local option is Hampshire and we have been told in very clear terms that they have no capacity available for Surrey's waste. Therefore long term capacity at nearby facilities cannot be relied on and the Eco Park is the first step in addressing this issue. The WDA will continue to assess need and capacity and will bring recommendations to members in the future. The fall back position would be reliance on landfill which may not be available locally, is environmentally unsustainable, and would cost Surrey taxpayers around £11m a year in landfill tax alone within four years if we did not develop new solutions.

Question: My particular question is: Why are Surrey County Council not learning from the Edmonton Eco Park experience and ceasing all proposals now?

Answer:

The energy centre at Londonwaste Eco Park has been operating since 1970 and needs to be replaced when it reaches the end of its life. SITA was a 50% shareholder in Londonwaste the operating company for many years and provided the technical expertise required to refurbish the plant and ensure compliance with the Waste Incineration Directive. The North London Waste Authority will need to replace its waste management infrastructure and has started a procurement process to do that. The county of Surrey currently has three landfills, however two of these will be closing shortly. Surrey County Council is seeking to develop waste management infrastructure to ensure it is able to divert waste from landfill and to protect the taxpayer from increasing and significant costs.

Question: My question is Rubbish from Spelthorne is being incinerated by Grundon at Colnbrook. How much capacity does Grundon have available now and the short, medium and long term to burn rubbish from Surrey?

Answer:

The Surrey Joint Municipal Waste Management Strategy (Policy 1) states that Surrey authorities will plan for net self sufficiency for dealing with waste in Surrey, through the provision of waste management capacity equivalent to the amount of municipal waste arisings. The WCWS projects the need for 160,000 residual waste treatment capacity even after reducing waste further and recycling at 70%. In the short term SCC is sending 20,000 waste to the Lakeside facility at Colnbrook, but this capacity is only available for two more years. SCC also has an interim contract in place for 100,000 at Allington EFW in Kent which can last until 2019. The only other reasonably local option is Hampshire and we have been told in very clear terms that they have no capacity available for Surrey's waste. Therefore long term capacity at nearby facilities cannot be relied on and the Eco Park is the first step in addressing this issue. The WDA will continue to assess need and capacity and will bring recommendations to members in the future. The fall back position would be reliance on landfill which may not be available locally, is environmentally unsustainable, and would cost Surrey taxpayers around £11m a year in landfill tax alone within four years if we did not develop new solutions.

Question: How and where will Trade Waste that is delivered to the proposed Eco Park at Charlton Lane to be processed?

Answer:

The Eco Park at Charlton Lane is designed to be a local, mainly municipal facility that will not accept large volumes of trade waste. Therefore only trade waste from local traders will be accepted. Trade waste that is unrecyclable will

be processed in the gasifier, trade food waste in the anaerobic digester and trade recyclable materials bulked at the recyclables bulking facility before being transported for reprocessing

Question: Our particular questions are:1. Given that much of the plant and combination of plant is cutting edge technology, can SCC confirm that no financial risks will be borne by the authority and that the cost of both Planning Applications will be met by SITA?2. Can we see a breakdown by tonnages of the total current and planned Surrey waste split between recycling, food, and “black bin bag” by treatment at which waste plant location?3. Leading on from the last question, if the Eco Park goes ahead what are the plans for the other Waste Collection Sites based in Surrey?4. Given the probable lengthy gestation building period can we be assured that the current CRC plant will continue to operate as normal, and that there will be no adverse effects on the operation and collection of other waste in Spelthorne? 5. Will the existing arrangement where Spelthorne’s domestic waste is taken to the Grundon site in Colnbrook continue? If so, will other Surrey Local Councils also send waste to Grundon, either at Colnbrook or at other waste treatment sites either in Surrey or in other counties?6. Can you confirm that SCC will agree to a restrictive covenant on the additional land that has been recently purchased to prevent any further building or further works other than landscape planting?7. If the proposal for the Eco Park is rejected by SCC will it be retained as a bulk transfer station, (assuming that planning permission is re-granted) and will the existing HGV movements continue causing the high pollution levels in the area? If the existing landfill arrangements continue will the Spelthorne residents see an increase in their Council Tax?

Answer: [See questions from Shepperton Residents Association](#)

Question: My particular question is:: I have recently read that many UK incinerators are running at 60%, due to LACK of rubbish. So why are we having this forced on us? Surely it would make sense to use underused incinerators elsewhere? Unless of course it is purely a money making/corporate exercise for Sita and SCC?!

Answer:

The Surrey Joint Municipal Waste Management Strategy (Policy 1) states that Surrey authorities will plan for net self sufficiency for dealing with waste in Surrey, through the provision of waste management capacity equivalent to the amount of municipal waste arisings. The WCWS projects the need for 160,000 residual waste treatment capacity even after reducing waste further and recycling at 70%. In the short term SCC is sending 20,000 waste to the Lakeside facility at Colnbrook, but this capacity is only available for two more years. SCC also has an interim contract in place for 100,000 at Allington EFW in Kent which can last until 2019. The only other reasonably local option is Hampshire and we have been told in very clear terms that they have no capacity available for Surrey’s waste. Therefore long term capacity at nearby facilities cannot be relied on and the Eco Park is the first step in addressing this issue. The WDA will continue to assess need and capacity and will bring

recommendations to members in the future. The fall back position would be reliance on landfill which may not be available locally, is environmentally unsustainable, and would cost Surrey taxpayers around £11m a year in landfill tax alone within four years if we did not develop new solutions.

Question: My particular question is:: 1) According to the Environment Agency, the available capacity around the UK for incineration in 2008 was 8.6m tonnes for England and Wales, with a total throughput of 5.2m tonnes. This is an underutilisation of some 40%. Economically, and environmentally this is not a viable solution on many fronts. Underutilisation means downtime for incineration plants and partial running, this causes inefficiencies in the burn processes, increased output of toxins that cannot be captured in the stack, and increased maintenance costs caused by the stop / start nature of the flows. In most cases the throughput to the existing plants has dropped year on year, meaning that less waste is being burnt across various waste streams (on average), again this means that utilisation is actually getting worse, with the worst performing sites only running at 21% capacity. Incineration, specifically for Municipal waste is showing a downward trend, in terms of volumes disposed of, with 2006 being 74% of capacity and 2007 and 2008 dropping by a further percentage point year on year. So again this shows that the available capacity is not being utilised as it should be and the usage of this style of facility is in decline. So why add to the national capacity when it is not currently being utilised to its fullest extent? Indeed the more local issue of underutilisation has been raised before, and the offer from Grundon to take the waste in Slough will cover not only the proposed SITA limit, but another 27% on top of that, and that is before Slough even reaches any limitations. Would Surrey like to comment on the legal issues that stop them from doing this, along with the question I raise in point 2 below?2) Pressure of Business - The problem SITA has, of being able to get planning permission to ensure it does not default in a contract signed in 2009 with the Waste2energy group, should not become one for Shepperton Residents. If the board of the company have signed a contract that are struggling to complete, then they should not look to be forcing this into areas that clearly do not want this. How many other sites has SITA had permission granted and denied the use of for this type of facility around the UK, and thus how close are they to completing their agreement with Waste2energy?3) Gasification is a false promise in respect of recycling. The fact that gasification will REDUCE recycling is a myth, and thus means Surrey and more importantly Spelthorne miss their government targets, is significant enough. However the simple fact that for each item burnt, it will require a 6 fold amount of energy to replace the item. This is simply not green or ECO. It is more efficient to recycle the waste into the required streams and reuse, than it is to burn and then reproduce. Given that in many countries, incineration is now seen as a poor implementation for waste removal, should the ECO Park not be built under the real Eco banner and provide a better recycling facility and not a facility that will increase greenhouse emissions and cause missed targets?

Answer:

The Surrey Joint Municipal Waste Management Strategy (Policy 1) states that Surrey authorities will plan for net self sufficiency for dealing with waste in Surrey, through the provision of waste management capacity equivalent to the amount of municipal waste arisings. The WCWS projects the need for 160,000 residual waste treatment capacity even after reducing waste further and recycling at 70%. In the short term SCC is sending 20,000 waste to the Lakeside facility at Colnbrook, but this capacity is only available for two more years. SCC also has an interim contract in place for 100,000 at Allington EFW in Kent which can last until 2019. The only other reasonably local option is Hampshire and we have been told in very clear terms that they have no capacity available for Surrey's waste. Therefore long term capacity at nearby facilities cannot be relied on and the Eco Park is the first step in addressing this issue. The WDA will continue to assess need and capacity and will bring recommendations to members in the future. The fall back position would be reliance on landfill which may not be available locally, is environmentally unsustainable, and would cost Surrey taxpayers around £11m a year in landfill tax alone within four years if we did not develop new solutions.

Question: What is the updated cost projection for the construction and commissioning of the facility should it be given the appropriate planning permission?

Answer:

SITA will shortly be going to market for the construction of the Eco Park. The exact cost will be known following completion of the construction tendering process. The Estimated capital cost for the construction of the Eco Park is circa £50 million. It is important to emphasise that the cost of continuing to rely on landfill will far outweigh the cost of developing the Eco Park

Question: Who bears the responsibility for ensuring the project comes in or below budget should it be given the appropriate planning permission? Who will pay for any cost overruns should the project be given planning permission? What contingencies have been included in current costings?

Answer:

SITA UK is responsible for ensuring that the project is delivered within the agreed timescale and budget. In general, any cost overruns will be the responsibility of SITA UK or the sub contractor.

Question: Has an independent review been carried out of the cost and financing of financial assessment been carried out of this project? If so, by whom? If no independent review of the cost and financing of the project has been carried out and the report made available to the general public, in the interest of allowing a fair and transparent consultation processes, when can local residents be provided with the necessary details to allow them to carry out their own assessment?

Answer:

The costs of the proposed Eco Park will be finalised once the construction tender process has been completed. An independent value for money assessment will then be undertaken by the council's financial advisors, Deloitte. This will be reported to the council's Cabinet early in 2011 and the Cabinet report will be available to the public.

Question: Are Surrey residents paying for the entire cost of the project from their council tax payments? a. If not, can the additional sources of funding and scale of funding be clearly and simply identified along with any conditions attached to these financial sources.

Answer: The financial responsibility for disposing of municipal waste and providing community recycling centres rests with Surrey County Council. The contract between Surrey County Council and SITA Surrey requires SITA Surrey to provide and operate infrastructure to deal with municipal waste. The cost of providing and operating these waste facilities is recharged to Surrey County Council over the life of the contract. Surrey County Council's sources of funding are the general government grant, PFI grant and council tax

Question: What is the total projected spend for the complete operating life of the plant(s) and what assumptions have been made to come to this figure a. Looking at this total spend, what alternative options have been considered in detail for a spend of this size, such as more promotion of recycling? b. What alternative costed scenarios for various modes of waste disposal across the county have been considered, including small local digesters that far are more compliant with the proximity principle of waste management, digesters dealing with sewage, farm, supermarket, restaurant waste together with domestic food as a combined source, and large cross border existing or planned incineration/CHP plants? 10. What costed assessment has been made of transportation costs in ton-miles of all commodities from source to final disposal going through the site gate?

Answer:

SITA will shortly be going to market for the construction of the Eco Park. The exact cost will be known following completion of the construction tendering process. The Estimated capital cost for the construction of the Eco Park is circa £50 million. It is important to emphasise that the cost of continuing to rely on landfill will far outweigh the cost of developing the Eco Park.

Question: What energy balance has been carried out between the useful power exported compared with the total energy consumed in the manufacture of all the materials of construction and the construction itself including all transportation?

Answer:

The carbon balance report for the application compares site operation to disposing of waste at landfill, rather than site construction and manufacture of the constituent parts of the facility.

Question: Is there an option for Surrey Waste Management Ltd in the future to walk away from the contract should the operation of the plant become uneconomical through improved recycling or changes in environmental legislation or similar event.

Answer:

If the plant were to be built then it would be operated by SITA until the end of their contract in 2024. There is no provision within the contract for SITA to walk away from the plant in the event of insufficient volumes of waste due to increased recycling or increases in costs due to changes in law.

Question: Who will actually own the plant? Surrey County Council?

Answer:

The plant will be built, owned and operated under lease by SITA until the end of their contract with Surrey County Council in 2024. The facility will then become the property of Surrey County Council

Question: The current contract with Surrey Waste Management is due to end in 2024, some 10 years before the claimed end of the useful life of the proposed facility. What plans are in place now to manage any transition should Surrey Waste Management be unsuccessful in any commercial retendering process?

Answer:

The contract between SITA and Surrey Waste Management contains specific provisions on hand back and the process of hand back will commence in 2022. During the hand back period, the council would undertake an assessment of the remaining useful life of the assets within the contract, including the proposed gasification plant. As these assets would be owned by the council at the end of the contract in 2024, it is likely that the council would undertake a tender exercise and let a contract for the operation and maintenance of all remaining assets including the gasification plant.

Question: What provision has been made for the clean up of the site following the end of the plant's useful life.

Answer:

Decommissioning is an aspect specifically covered and conditioned in an Environmental Permit regulated by the Environment Agency, rather than the Planning and Development Control system. An Environmental Permit application is being prepared but has yet to be submitted to the Environment Agency.

Question: As I understand the process, there are three by products going to be produced that have a commercial value; compost, hardcore ash that can be used by the construction industry, and electricity. Who will get the income (not the profit) generated by these three commercial by-products? Surrey County Council or Surrey Waste Management?

Answer:

Income from sales of electricity, digestate and any value from ash will be collected by SITA Surrey and be used to reduce the operating costs of the plant. This will in turn reduce the amount Surrey County Council has to pay SITA Surrey for operating the plant.

Question: Would all the parties be prepared to ring fence the income (not profit) generated by the facility for the benefit of the directly local community?

Answer:

Income from sales of electricity, digestate and any value from ash will be collected by SITA Surrey and will be used to reduce the operating costs of the plant. This will in turn reduce the amount Surrey County Council has to pay SITA Surrey for operating the plant. However, in addition to the on-site Environmental Enhancement Area, SITA proposes to make a one off financial contribution of £75,000 to a fund for local environmental enhancement projects. Any organisation or member of the public would be able to apply for money from this fund in respect of implementing an environmental improvement project within the geographic wards of Halliford and Sunbury West or Laleham and Shepperton Green.

Question: My question is: Has this £50M project been, or likely to be, put out to tender? If not, why not? There are other commercial concerns capable of carrying out the build.

Answer:

In 1999, SITA Surrey, which was then called Surrey Waste Management were awarded a 25 year Public Finance Initiative contract to deal with Surrey's municipal waste. The contract was awarded following an extensive tendering exercise.

Question: The residents of St Andrews Close are very concerned at the possible increase of the volume of traffic and additional pollution this will cause. Already trees have been felled because of the effect on them by the current level of pollution. St Andrews Close and surrounding area are in the middle of a triangle: the dual carriageway going to and coming from Walton; Charlton Lane and the M3 motorway, although the noise from the vehicle using Charlton Lane drown out the noise from the M3. Already the noise levels at the bottom of our gardens can be unbearable. As we understand it, there will be less commercial vehicles using the ECO Park but, what is not widely known, is that for the park to operate 24 hours per day, 40 additional staff will be employed which will increase the amount of domestic vehicles going into and coming out of park!! So the noise levels will not subside but in our opinion increase.

Also another worry for the residents of the surrounding areas is, although the housing market is not very stable at the moment, what if the price of our houses devalues even more because of living near the ECO Park. Who is going to recompense us? We have the following questions for you: 3 Who will recompense us if house values fall even more because of the park? 4. Can Surrey County Council/Spelthorne Council promise us that Charlton Lane will not be developed into a larger road (i.e. dual carriageway, or main causeway)? 5. If the planning application is taken to Judicial Review, who will pay the costs of Surrey Waste Management in this process? Sita, Surrey Waste Management or Surrey County Council.

Answer:

A detailed noise assessment has been undertaken taking existing background noise levels and adding predicted operational noise levels on top of background levels. This noise assessment has shown compliance of the proposed Eco Park not only with British Standard BS4142 noise levels, but also the much more stringent Surrey County Council noise guidelines.

The proposed Eco Park is designed to be an attractive facility, including a carefully designed stack, which would reduce its visual impact. There would also be benefits of enhancements to the local landscape and a reduction in heavy goods vehicle traffic compared with the existing operation. We therefore do not believe that the Eco Park will affect house prices in the area.

Surrey County Council pays for all of the planning application and permitting costs because the site is owned by it and the facilities will be owned by it. If the planning application is challenged, there may be some additional costs to bear. However the cost of not building the Eco Park and relying on landfill as a solution will be a far greater cost for Surrey County Council in the long term.

Question: My particular question is: I support the Charlton Lane Eco Park project in principle, because, if the processes and logistics are acceptable, it will be a win-win situation of much reduced landfill and “free” energy from the calorific value of non-recyclable waste – one third that of coal. However, it is a big “If”. In view of the major complexities involved, what are the competencies of Council Officers and Counsellors to arrive at a safe conclusion?

Answer:

The council has an experienced waste management team with strong governance arrangements and is supported by external planning, technical and financial advisors. The council's contractor, SITA is part of GDF SUEZ Group which is a major international waste and utilities company and has access to wide ranging expertise in operating energy and waste plants.

Question: My particular question is: Why do so few people in TW17 area know details about the proposed "Eco Park"? Why are Spelthorne so good at telling us how much Council Tax we are to pay but not about plans, exhibits

etc. that will not only make Shepperton an absolute no-go area for people looking to buy property, but that is likely to cause serious damage to existing residents' health, land, animals, wildlife and overall environment?

Answer:

The views of local residents are important to us and so we carried out comprehensive pre-application strategy to inform residents from an early stage of the proposed development. This includes:

- Leafleting 7,000 homes with conceptual information about the proposed development in early April, including the contact details so residents can make contact or ask for more information.
- Regular updates of the SITA Surrey and SCC websites when new information becomes available.
- Holding a two-day public exhibition in April, which was staffed by eight team members able to provide information on the proposal, the planning context, and technical information. This was attended by around 200 people.
- Writing individual responses to the 60 comments that were left behind following the exhibition.
- Setting up a community liaison group of interest residents and parties, which has met on five occasions now. Each meeting has had a presentation from an expert covering a subject of interest to the group. These include a presentation on the results of our traffic assessment and one on surface water management, after members of the group requested them.
- Responding to individual comments as they appear, either by email or over the phone.
- Presenting to more than 40 Charlton Village residents at Sunbury Golf Centre in May and a larger group of the Lower Sunbury Residents Association with Surrey County Council in March.
- A dedicated technical meeting for residents with a technical interest, knowledge or background attended by residents and SITA experts in gasification and anaerobic digestion. This was held in July.
- Sending out a six-page information newsletter updating residents on our application, providing feedback from the first exhibition, updating residents on how our plans have progressed and inviting residents to the next two day exhibition. This was sent to 10,000 residents. The newsletter also invited residents to comment with a free post comment card.
- A follow up four-page newsletter was sent a month later to 11,800 homes across the area, again with a freepost comment card.
- Holding another two day drop-in session in September, giving more detail about the proposed development that was promised at the last exhibition.
- Attending a Spelthorne Borough Council overview and scrutiny committee meeting where residents pre-submitted questions for SITA

Surrey and Surrey County Council to answer in a public sphere. All questions will also be answered in writing.

- Presenting to and answering questions from around 150 Shepperton residents at a public meeting.
- We are proposing to hold another two day drop-in session at the end of November month to give residents another chance to speak to us about our plans, taking the total number of open days to six since April.

The planning application for an Eco Park comes from SITA Surrey on behalf of Surrey County Council, so while Spelthorne Borough Council are important consultees, the council is not actively involved in the plans.

It is worth noting that the Environment Agency, the regulatory body for the waste management industry has strict regulations and we would not be allowed to operate anything that posed a significant risk to human health.

Question: The Best Way to spend £50 million this project has been quoted by Surrey County Council as costing around £50 million. That a lot of tax payers' money. If the project does not go ahead what other waste reduction measures would Surrey County Council invest in totalling £50m?

Answer:

If the Eco Park did not proceed, Surrey would continue to landfill residual waste at an ever increasing cost. By 2014 landfill tax alone will have increased from the current £48 per tonne to £80 per tonne. The council, working with the eleven districts and boroughs has a current programme of waste minimisation campaigns which centres around behaviour change in areas such as buying unnecessary food or over packaged goods. Surrey County Council has also introduced a van permit scheme at its community recycling centres in order to reduce abuse of the sites by traders. As part of its world class waste solution, the council has planned to reduce the amount of waste produced by 30,000 tonnes and to ensure that there is no increase in the amount of waste produced each year. Increasing funding in this area would undoubtedly enable greater awareness raising of the importance of waste minimisation and could lead to greater reductions. However not all waste can be avoided and minimising waste is a voluntary activity. Therefore there are no guarantees as to how much more waste could be reduced with additional funding in this area or whether this would be sufficient for it to be cost effective.

Question: Planning Consent for the use of the Charlton site as a waste transfer station is up for renewal in 2016. If the proposed waste processing plant does not go ahead there would be an opportunity to reduce the activity at Charlton – even to zero if desired. Spelthorne's doorstep collection of recyclables and residual waste goes directly to Grunions at Colnbrook for processing without passing through the Charlton site; and there are plenty of other sites around Surrey identified in the Surrey Waste Plan to which the rubbish from surrounding boroughs could be directed. What difficulty would it

present for Surrey CC if the planning consent for SITA was withdrawn in 2016?

Answer:

The current facility at Charlton Lane comprises a community recycling centre, for members of the public, a waste transfer station for residual waste and a bulking and baling facility for recyclable waste. The community recycling centre is the busiest centre in Surrey and provides a place for local residents to bring their household waste and recycling. On average about 9000 visits are made to the site each week by members of the public, most of whom live in the Spelthorne area. If the site were to close then a replacement would have to be found somewhere in the local area or this were not possible, residents would have to travel to the nearest alternative facilities at Woking, Lyne near Chertsey or Leatherhead. The existing waste transfer station and bulking facility is currently the largest in Surrey and handles residual waste from Spelthorne, Elmbridge and Runnymede as well as residual waste and recyclables from outlying community recycling centres. If the waste transfer station were to close and a replacement site could not be found in the local area then the waste would have to be directed to alternative the nearest alternative waste transfer stations at Epsom, Leatherhead or Guildford. However as these sites are already operating at near maximum capacity and it may not be possible to accommodate all the displaced waste at these sites in which case transfer and bulking capacity would have to be sourced at alternative locations. In summary the closure of Charlton Lane would increase the distance and journey times for local residents wishing to dispose of their waste and recyclables and increase the cost of collecting and disposing of waste which would have to be met by the council tax payer.

Question: My particular question is: There are other ways of eliminating waste without a knee jerk reaction to meeting the latest EU targets on landfill by building incinerator plants. Why if these incinerators threaten the health of thousands living near them and all those working at them is the idea still being contemplated. We should be united in eliminating them!

Answer:

The council's world class waste solution proposes measures to reduce the production of waste at its source, recycle or compost 70% and recover energy from the remaining 30%. The aim is to avoid landfill completely as it is the most unsustainable and environmentally damaging way of dealing with our waste. A 100% recycling rate would require all waste to be recyclable and for 100% of residents to consign 100% of their waste to a recycling scheme. Unfortunately not all waste materials are recyclable. Often this is because there is no demand for the material, for example treated wood and laminates, MDF and chipboard and some types of plastics and carpets or waxed paper and card as well as composite materials such as plastic coated paper. At present there is no economic process to recycle these types of materials into new products. In addition, participation in recycling schemes is voluntary. Therefore not everybody will take part in a recycling scheme and of those

participating, not all of them will place all their materials in the recycling container. In 2004, leading consultants and academics were appointed by the Government to undertake a comprehensive study of the impact of waste management on the environment and human health. The report which is entitled 'Review of Environmental and Health effects of Waste Management: municipal solid waste and similar wastes' concluded that the treatment of municipal solid waste has at most a minor effect on health in this country particularly when compared with other health risks associated with ordinary day to day living and in particular risks to human health from thermal treatment are small in comparison with other known risks.

Question: What level of residual waste is considered in the justification for the gasification plant. The Welsh Assembly study is based on a residual waste of 6.7%.

Answer:

The proposed gasification plant would treat 60,000 tonnes of residual waste per year, which is about 11% of the 525,000 tonnes per year of total municipal waste arisings in Surrey which will be left after waste reduction measures have been implemented.

Question: The revised waste strategy states that there will be 0% waste to landfill by 2013/2014. Please confirm what the total plan is for the expansion or replication of the Eco Park at Shepperton so that there is overall no waste to landfill by this date.

Answer:

As part of the council's World Class Waste solution, further facilities are planned to be built within Surrey. These include redevelopment of the existing community recycling centre and waste transfer station at Leatherhead, new waste transfer stations and material bulking and recovery facilities at Redhill and an In-Vessel composting facility for green waste at a location yet to be identified. Currently around 100,000 tonnes per year of residual waste is being sent to the Allington energy from waste plant in Kent and this contract can continue until 2019. The council would consider the need for further facilities in Surrey to replace out-of county capacity if and when the Eco Park is developed.

Question: Increase in reduce, reuse and recycling levels beyond 2013/14 - is the plan to run down the volume of materials that are taken in the plant after this date or increase the transport distances from which waste will be transported? Please quantify this amount.

Answer:

Awaiting reply from Surrey County Council

Question: How many jobs will be created in the park and how many of these will be in reuse, repair and remanufacturing, recycling, energy disposal (including energy and material recovery) and landfill respectively? How will the park link to increase in high-value reuse and remanufacturing locally in Surrey, Hampshire and South London? What space on the park is allocated for job creating reuse, retrofit and repair enterprises? What percentage of the product coming into the park will be reused, what percentage recycled and what percentage downcycled or used to generate waste? How will the EcoPark maximise carbon saving by maximising the embodied carbon retained in the products?

Answer:

The proposed Eco Park is only the first link in the reuse chain, in that it will provide a specific area for re-useable items to be deposited by the public and remove these items from the waste stream. Any repairs / remanufacturing of these materials will have to be done off-site. There are currently 18 people employed at the existing site, which will increase to 60 under the Eco Park proposals, with four to five posts specifically related to reuse at the community recycling centre and two of SITA Surrey's existing waste minimisation and education team relocating from an office in Dorking to the Eco Park Visitor & Education Centre. It is too early to tell exactly how much material will be drawn out from the waste and recycling streams for re-use.

Question:

Please confirm the amount of capital expenditure for the gasification plant, the maintenance budget, and the level of contingency for unforeseen costs. Please confirm what comparison has been done with additional revenue expenditure to minimise residual waste - which would allow us to operate within our existing landfill capacity in Surrey Has a comparison with a MBT (mechanical biological treatment) plant been carried out. Please present the cost comparisons. Please confirm what modelling has been carried out as to the impact of the extension of the Carbon Reduction Commitment to cover the gasification plant (note - it is around twice as carbon emitting per unit of electricity of generated as a coal fired power station), or the introduction of greater pollution taxes - or the introduction of an incineration tax so that the UK Waste Hierarchy complies with the European Waste Directive passed in December 2008.

Answer:

SITA will shortly be going to market for the construction of the Eco Park. The exact cost of the gasification plant and other elements of the Eco Park will be known following completion of the construction tendering process. The estimated capital cost for the construction of the Eco Park is expected to be around £50 million. The county council, together with the district and borough councils are already investing in minimisation measures to reduce the amount of municipal waste that has to be dealt with in Surrey. The recycling target of 70% by 2013/14, which has been set as part of the Surrey Joint Municipal

Waste Strategy, already goes well beyond what has been proposed in other parts of the UK. Even high levels of minimisation and recycling, there will be an amount of waste that needs to be disposed of. This will comprise a mixture of waste that can't be avoided, can't be recycled and potentially recyclable waste that has been placed in the black bag by residents. Landfilling this left-over waste is the least desirable environmental option. It will also be a very costly option, given the increase in landfill disposal costs. Mechanical Biological Treatment (MBT) plants are intermediate treatment processes.

These plants can recover a small amount of additional recyclable material but typically this is only around 5% of the input tonnage. The remainder of the output is either turned into a waste derived fuel or sent to landfill. MBT plants were considered by the council in 2006, however with a strategy which already involves high levels of 'front end' recycling, it was not considered to be a cost effective option. This is because, to avoid landfill, there would still be a need to construct a thermal treatment plant to recover energy from the waste derived fuel. The Carbon Reduction Commitment relates to energy use by business and public bodies. The proposed gasification plant would be a net energy producer. Recovery of energy from waste in a thermal treatment plant has significant carbon reduction benefits compared with landfilling that waste.

The Surrey Joint Municipal Waste Management Strategy aims to reduce to the very minimum, the amount of waste that requires treatment or disposal. In terms of the Waste Hierarchy and European Waste Framework Directive, it is preferable to recover value from this relatively small fraction of waste, rather than landfilling it. Thermal treatment processes such as gasification and energy from waste incineration are an accepted part of managing waste this left over waste in the UK and other parts of Europe. Thermal waste treatment processes are highly regulated and controlled to ensure that there is no harm to health or the environment. There is no indication that the UK government proposes to introduce an incineration tax and if it did so, this would be counterproductive to its aim of reducing reliance on landfill as a means of disposal