Urbaser Balfour Beatty's response to leaflets distributed by Gloucestershire Vale Against Incineration (GlosVAIN)

This leaflet was prepared at the time of the first public exhibition to provide a balance of information

"The Coalition Government withdrew PFI funding for this and six other projects because 'these projects would no longer be needed.' (DEFRA, June 2011)"

Our response: PFI monies were withdrawn because the Government felt that the current pipeline of other projects would deliver the UK's minimum obligations to divert waste from landfill. This does not address the need to divert waste from landfill in Gloucestershire itself. Gloucestershire County Council (GCC) carried out a thorough review of this procurement project and felt that it should continue regardless of the availability of PFI credits as the project still represents good value for money. GCC estimates that the project will save the county's tax payers £150 million over the life of the contract through the avoidance of landfill costs.

"Smaller facilities using environmentally sounder solutions in various locations around the County would be better for our environment, our health and our pockets."

Our response: A larger number of smaller facilities would be more expensive for Gloucestershire's tax payers. Planning risk would be greater as there may not be a larger number of suitable and available sites around the county. The construction and maintenance of a larger number of facilities would also involve higher capital costs.
Javelin Park has very good transport links which wouldn't necessarily be available for a number of smaller facilities. Smaller facilities are also more difficult to monitor, manage and control.

"Shorter contracts would be more flexible and allow newer technologies to be deployed as and when available, funded by landfill tax savings."

Our response: The facility proposed by Urbaser Balfour Beatty is

being designed to be flexible and accommodate a broad range of waste composition. Shorter contracts would be more expensive and introduce uncertainty and risk; they would create the need for additional procurement processes, which would be a continuing burden for the local authority.

Questions posed by Gloucestershire Vale Against Incinerators

Q. What will an incinerator look like and how big will it be?
A. The facility is currently being designed to fit into the local environment. This public exhibition marks the beginning of our consultation process in which we will be seeking feedback from the community on our proposals, including the design of the facility.

Q. How tall with the building and chimney be?
A. The building will be around 40-50 metres tall; the chimney will be around 60-80 metres tall.

Q. How will the residual heat be used?
A. The facility will be CHP enabled, meaning that it will be ready for neighbouring businesses to use the heat. We are currently identifying potential users for this heat.

Q. How will electricity generated be fed into the grid, considering that there is no local connection?
A. A bespoke grid connection will be developed for this site.

Q. At what distance and in which direction will the chimney gases reach the ground?
A. The emissions from the facility will be well within the limits set by the European Waste Incineration Directive. Detailed modelling will be carried out taking local weather conditions into consideration, which will demonstrate that the impact on the ground is very small.

Q. Can you be 100% certain that the incinerator won't affect health?
A. A Health Impact Assessment will be undertaken to assess potential impacts. Strict and highly regulated operating procedures and controls will ensure that the facility does not have an adverse impact on human

health. Please see page 4 for the Health Protection Agency's position.

Q. Where will the toxic fly ash be sent?
A. Residues from the air pollution control system would be transferred to a suitably licensed facility. We are currently assessing options for disposal or recovery of this material, which is not toxic but is classified as hazardous due to its high alkilinity.

Q. How much lorry traffic will there be?
A. We are currently undertaking detailed transport modelling to minimise "waste miles". As the site is close to the main road network the majority of the waste will be brought in via the M5. Only local refuse and recycling collection vehicles will be passing through the local villages, as currently happens. Routing agreements will ensure local villages do not have large waste trucks passing through. In addition lorry movements will be scheduled to avoid peak traffic periods.

Q. How will the local community be advised of operational problems such as emissions over the limit from the chimney?
A. The plant will be required to operate within certain emission limits which have been identified to not have a significant impact on human health or the environment. The Environment Agency will carry out continuous monitoring and spot checks of the facility, and Urbaser will be required to notify the Environment Agency if any emissions exceed legal limits. The Environment Agency has the power to shut the facility down if it is not satisfied that the facility is operating safely.

Q. How much low frequency noise will there be?
A. The process itself is not noisy although motors that drive fans and pumps do create some noise. The noise will be reduced by the use of acoustic enclosures. Strict limits on noise are likely to be imposed and the plant will have to demonstrate compliance with these. Noise increases will be barely perceptible.

Q. If there isn't enough municipal waste to fuel the incinerator, where will the waste come from?
A. Any shortfall in available municipal waste will be made up by waste

from businesses in the local area.

MYTHS

Incineration costs more and is bad for the tax payer

The proposed energy-from-waste facility will save the tax payer £150m over the 25 year period. GCC's procurement process did not specify incineration and other technology providers had the opportunity to bid. Energy-from-waste offered the best value for money for Gloucestershire because it provides a robust proven technology, generates renewable energy and maximises diversion of waste from landfill.

Incineration is inflexible and a long-term burden

Shorter contracts would be more expensive and introduce uncertainty and risk; they would create the need for additional procurement processes which would be a continuing burden for the local authority.

Incineration is inefficient and emits CO_2

Waste in landfill sites generates methane which is a potent greenhouse gas 23 times more powerful than CO_2 in its contribution to global warming. The facility will displace the need for fossil fuels by generating electricity from residual waste, providing an overall carbon saving compared to landfill. There is a proposal for an industrial development on the adjacent site and we hope to establish the potential for heat export to this and other heat users in the area. As energy prices continue to rise, the likely demand for affordable heat will result in additional heat users being attracted to neighbouring sites. It is important to note that this plant is for dealing with residual waste, leftover after recycling and composting have taken place. Plastic bottles should be recycled in the appropriate facilities.

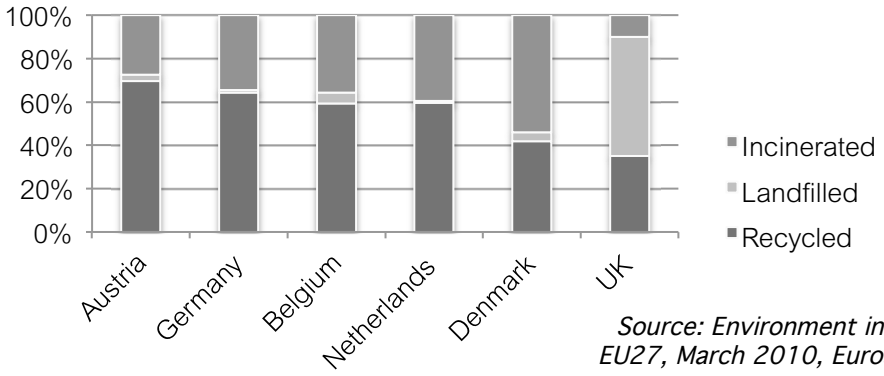
Incineration destroys valuable resources

Incineration uses residual waste to generate energy rather than burying it into landfill. Residual waste is leftover following recycling and composting, something that householders in Gloucestershire can directly influence.

After reducing our waste, and recycling and composting, the waste

hierarchy identifies energy recovery as the next step to sustainable waste management. Other countries with high levels of recycling such as Austria, Germany and the Netherlands also have a significant number of energy-from-waste facilities and the positive relationship between recycling and energy from waste is well established.

Waste management in Europe



Source: Environment in the EU27, March 2010, Eurostat

Additional benefits of the scheme include the creation of 200-400 construction jobs and around 30 permanent skilled jobs in the operational period. We are also committed to training and apprenticeship schemes for local people, providing an additional boost to the local economy.

Incineration is bad for health

The Health Protection Agency recently published its report on EfW's and human health stating, "The evidence suggests that air pollution from incinerators makes up a fraction of one percent of the country's particulate emissions. Industry and traffic account for more than fifty per cent."

"The Health Protection Agency has reviewed research undertaken to examine the suggested links between emissions from municipal waste incinerators and effects on health. While it is not possible to rule out adverse health effects from modern, well regulated municipal waste incinerators with complete certainty, any potential damage to the

health of those living close-by is likely to be very small, if detectable. This view is based on detailed assessments of the effects of air pollutants on health and on the fact that modern and well managed municipal waste incinerators make only a very small contribution to local concentrations of air pollutants."

The HPA's view is that:

Incinerators that are well run and regulated do not pose a significant threat to public health.

Incineration creates toxic waste

The Incinerator Bottom Ash (IBA) will be recycled as aggregate, displacing the need to quarry virgin materials. Various metals will also be recovered for recycling. IBA is not toxic – it is classified as inert waste as it is made up of materials such as ceramics, glass and rubble which do not burn.

Air Pollution Control Residue (APCR) is classified as hazardous due to its high alkalinity caused by the lime which is used to clean the gases. The APCR will be transferred to a licensed facility. We are currently assessing options but this will be either a disposal or recovery facility. The location of this facility is yet to be determined. This facility would be licensed and regulated by the Environment Agency.

An incinerator would have massive visual impact

We are currently in the process of designing the facility, taking into account the local history and environment. Energy-from-waste facilities by their nature are quite large buildings, however our design will seek to minimise the visual impact of the facility. We are working closely with GCC and the Design Council to ensure the design is sympathetic to its local surroundings. The visual impact will be assessed during the planning process. The layout of the facility will be orientated to minimise the visual impact from key viewpoints.

Images will be available at the time of the second exhibition; we will be seeking feedback from the community on the design at that point. The visual impact will be then be assessed during the planning process.

In addition, the layout of the facility will minimise the visual impact from key viewpoints. Regardless of the technology it is the design that determines whether the facility blends in with its environment or not.