

From: [PMO](#)
To: [Wylfa Newydd](#)
Subject: RE: IACC Deadline 2 Submission : Local Impact Report - Waste Management (email 19)
Date: 04 December 2018 20:18:45
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[Waste Management.pdf](#)

Please note, a number of emails will follow in relation to the LIR – we will confirm the final e-mail.

Pnawn Da/ *Good afternoon,*

Gweler ynghlwm cynrychiolaeth CSYM mewn perthynas â'r uchod / *Please see IACC's representation in respect of the above.*

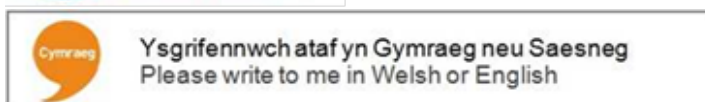
Bydd fersiwn Gymraeg yn cael ei ddarparu cyn gynted a phosib / *A Welsh version of the submission will be provided in due course.*

Cofion/ *Regards,*
Manon

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Mae'r neges e-bost hon a'r ffeiliau a drosglwyddyd ynghlwm gyda hi yn gyfrinachol ac efallai bod breintiau cyfreithiol ynghlwm wrthynt. Yr unig berson sydd i'r hawl i'w darllen, eu copio a'u defnyddio yw'r person y bwriadwyd eu gyrru nhw ato. Petaech wedi derbyn y neges e-bost hon mewn camgymeriad yna, os gwelwch yn dda, rhowch wybod i'r Rheolwr Systemau yn syth gan ddefnyddio'r manylion isod, a pheidiwch datgelu na chopio'r cynnwys i neb arall.

Mae cynnwys y neges e-bost hon yn cynrychioli sylwadau'r gyrrwr yn unig ac nid o angenrheidrwydd yn cynrychioli sylwadau Cyngor Sir Ynys Môn. Mae Cyngor Sir Ynys Môn yn cadw a diogelu ei hawliau i fonitro yr holl negeseuon e-bost trwy ei rwydweithiau mewnol ac allanol.

Croeso i chi ddelio gyda'r Cyngor yn Gymraeg neu'n Saesneg. Cewch yr un safon o wasanaeth yn y ddwy iaith.

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Ynys Môn

THE ISLE OF Anglesey

Wylfa Newydd Local Impact Report

Chapter 11: Waste Management

December 2018

PINS Ref: EN010007



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1.0 Waste

1.1 Context

1.1.1 The development of Wylfa Newydd will create a need to manage new arisings of Municipal Solid Waste (MSW), Commercial and Industrial (C&I) waste and Construction and Demolition (C&D) waste. The proposed arrangements to managing these wastes has been published by Horizon in its DCO application. The proposed approach is set out in the following documents:

- a) 6.2.16 Volume B - Introduction to the environmental assessments B16 - Waste and materials management¹;
- b) 6.3.6 ES Volume C - Project-wide effects C6 -Project-wide effects – Waste and materials management²; and
- c) 6.3.30 ES Volume C - Project-wide effects App - C6-1 - Local and regional waste management facilities³.

1.1.2 Matters concerning waste are important to IACC as the waste planning authority and waste collection and disposal authority. To fulfil its statutory waste disposal responsibility, IACC is a partner member of the North Wales Residual Waste Treatment Partnership (NWRWTP), which has procured a long-term residual waste treatment solution for municipal waste at Parc Adfer. Each partner local authority will have separate waste reception and haulage arrangements in place to transfer residual waste to the new facility at Parc Adfer.

1.1.3 In respect of spatial planning, IACC has an obligation to consider long-term waste management needs via relevant planning policy.

1.1.4 Both in its waste planning role and in making the strategic planning response to Horizon's proposals, IACC is concerned to ensure waste management matters are understood and mitigation is provided to ensure that no additional net pressure is placed upon the waste authorities because of the construction and operation of Wylfa Newydd.

1.2 Project Proposals – Horizon Position

1.2.1 Horizon's waste and materials management assessment considers the potential impacts of off-site waste disposal and off-site recycling / composting at the three project stages i.e. construction, operation and decommissioning.

¹ Examination Library reference APP-[081]

² Examination Library reference APP-[093]

³ Examination Library reference APP-[117]

1.2.2 Horizon's overall position is as follows:

Off-Site Disposal

1.2.3 The proposed development will generate the following amounts of non-hazardous and hazardous waste material, which will require off-site disposal:

- a) Construction phase – off-site disposal of a total of 9 830 m³ of non-hazardous waste and 16 500 m³ of hazardous waste.
- b) Operational phase – off-site disposal of an annual total of 25 m³ of non-hazardous waste and 385 m³ of hazardous waste.
- c) Decommissioning phase - 1 320 m³ of non-hazardous waste and 2 355 m³ of hazardous waste in relation to the associated developments; and 1 737 000 tonnes (2 631 820 m³ using the established conversion rate of 0.66t/m³) of non-hazardous waste and 300 tonnes of hazardous waste (455 m³ using the established conversion rate of 0.66t/m³) in relation to the Power Station.

1.2.4 It is assumed that the materials requiring off-site disposal, will, as a worst case, require landfilling. With this in mind, Horizon makes an assessment of the permitted landfill capacity within North-West England (both hazardous and non-hazardous void-space). This is detailed as follows:

- a) 39 335 000 m³ of non-hazardous landfill capacity (paragraph 6.3.11 of document C6); and
- b) 6 481 000 m³ of merchant hazardous landfill capacity (paragraph 6.3.11 of document C6).

1.2.5 Horizon's position in respect of off-site disposal is that, with the exception of the waste generated during decommissioning of the main Power Station, all of the waste predicted to be generated at the construction, operational and decommissioning phases represent less than 1% of non-hazardous and hazardous waste landfill capacity in North-West England. Thus, although the sensitivity is high (because landfill), the magnitude of change is negligible (less than 1% of capacity), therefore the overall effect on the receiving waste management facilities is considered to be minor.

Off-Site Recycling and Composting

1.2.6 In its documentation, Horizon assumes that the proposed development will generate the following amounts of material, which will require off-site recycling and composting:

- a) Construction phase – 6 700 tonnes of green waste; 2 620 tonnes of food waste; and 49 140 tonnes of recyclable waste.
- b) Operational phase – 170 tonnes of food waste*; and 660 tonnes of recyclable waste.
- c) Decommissioning phase – 133 785 tonnes +27 045 tonnes of recyclable waste in relation to the associated developments; and 1 737 000 tonnes of non-hazardous waste and 300 tonnes of hazardous waste in relation to the Power Station.

1.2.7 It is assumed that the materials requiring off-site reuse / recycling will be done so within the North Wales catchment area. With this in mind, Horizon makes an assessment of

the permitted non-hazardous reuse / recycling / composting capacity within North Wales. This is detailed as follows:

- a) Composting facilities – 168 996 tonnes per annum capacity in North Wales (paragraph 6.5.30 of document C6⁴);
- b) Anaerobic digestion facilities – 86 499 tonnes per annum capacity in North Wales (paragraph 6.5.34 of document C6);
- c) 374 999 tonnes per annum reuse and recycling capacity in North Wales (paragraph 6.5.39 of document C6).

1.2.8 Horizon's position in respect of off-site recycling and composting is that, with the exception of the waste generated during decommissioning of the main Power Station⁵, all of the waste predicted to be generated at the construction, operational and decommissioning phases represents a small enough percentage of the overall available capacity, that the magnitude of change is considered to be low (or can be made low if material is to be disposed of over a protracted period of time, as is the case of material generated during the construction phase). This, coupled with the fact that the sensitivity of managing this waste is low (because reuse / recycling / composting), means that the overall effect on the receiving waste management facilities is considered to be minor in every case relating to off-site reuse and recycling and off-site anaerobic digestion and composting.

Impacts and Evidence base

1.2.9 Wylfa Newydd will benefit the economy of the island. There is significant potential value of waste to the economy both in terms of benefits to its supply chains, the cost benefits of minimising its production as well as recycling and re-use of product.

1.2.10 Using recycled materials can reduce the consumption of virgin material which helps to manage supply risks, minimise price volatility and improve sustainability. These positive impacts will only accrue to the island and North Wales however if the capacity of local recycling and reuse facilities is able to meet the needs of Wylfa Newydd.

1.2.11 Although Horizon have identified neutral / negligible impacts upon the full range of waste management infrastructure. IACC is unable to agree with these conclusions in that it disagrees with the robustness of the assessment, and in particular, the size of the study area adopted – see section 'Gaps in Information'.

Economic

1.2.12 An approach that is based on the nearest appropriate installation principle to support the implementation of the waste hierarchy is welcomed.

1.2.13 Whilst it is agreed that capacity of local waste management facilities may be limited, IACC is concerned that a study area extending into north-west England cannot be justified. IACC believes that the potential of local facilities and the opportunities to

⁴ Examination Library reference APP-[093] and paragraphs 6.5.34 and 6.5.39.

⁵ In respect of the decommissioning of the main Power Station site, no assessment is made of the effects that generated wastes may have on the localities' waste management infrastructure (see paragraph 16.1.5 of document B16 [APP-081] and paragraph 6.5.81 of document C6 [APP-093]).

minimise long distance transportation of wastes have not been adequately assessed and that the project may not meet the provisions of extant national waste planning policy – and specifically the need to dispose of waste as locally to the source as possible. . To rely upon a wider area which includes the north-west of England would be contrary to the policies of Planning Policy Wales, TAN21 and the Anglesey and Gwynedd Joint Local Development Plan.

- 1.2.14 For instance, ES Volume C - Project-wide effects C6 – Project-wide effects – Waste and materials management⁶ paragraph 6.5.34 assesses the magnitude of change to anaerobic digestion and in-vessel composting capacity in North Wales as ‘small’ yet there is no expression of the current throughput of these facilities and whether the figures for 2016 still apply. The assessments of capacity for re-use, recycling and off-site disposal are likely to be similarly flawed and a negative effects may arise as the need to manage waste as locally to the source of arisings as possible is not met. IACC has noted the absence of transfer facilities from the assessment. These facilities have significant impacts upon the number and distance of waste movements as well as holding the potential for modal shift. These concerns do not appear to have been considered in the ES chapter and nor are they – despite references – justified elsewhere in Horizon’s submission.

Highways and Transport

- 1.2.15 Linked to the above, the lack of a thorough consideration of local management facilities.
- 1.2.16 IACC considers that there are significant opportunities to reduce the number and distance of waste movements. The potential to minimise movements or achieve modal shift have not been investigated.

1.3 Policy Position

Joint Local Development Plan 2017

- 1.3.1 Criterion 1 of Policy PS 9 Wylfa Newydd and related development, which is the overarching Policy for the Wylfa Newydd Project, expects the proposal to be shaped by any relevant Policies in the Plan and any relevant supplementary planning guidance.
- 1.3.2 Based on the issues raised in relation to the safe and free flow of traffic on highways criterion 3 of Policy PS 9 is also of particular relevance as it sets a requirement to minimise adverse transport impacts to an acceptable level during various stages in the life of the power station.
- 1.3.3 Based on issues raised below in relation to the need to monitor the developments associated with Wylfa Newydd that generate MSW and/or commercial and industrial waste, it is considered that criterion 16 of Policy PS 9 is also of particular relevance as it sets an expectation for a robust monitoring framework to review the full range of impacts and the adequacy of mitigation measures.

⁶ Examination Library reference APP-[093]

- 1.3.4 The following provides a schedule of other Policies that are considered relevant to issues raised above.
- 1.3.5 Strategic Policy PS 2: Infrastructure and Developer Contributions states that the Councils will expect new development to ensure sufficient provision of essential infrastructure (either on-site or to service the site) is either already available or provided in a timely manner to make the proposal acceptable.
- 1.3.6 Policy ISA 1: Infrastructure Provision states that a contribution may be sought where proposals generate a directly related need for recycling and waste facilities.
- 1.3.7 Policy TRA 4: Managing Transport Impacts is concerned that proposals should be planned and designed in a manner that promotes the most sustainable modes of transport.

Wylfa Newydd SPG

- 1.3.8 Objective 7 includes for reference to the sustainable management of waste (in accordance with the waste hierarchy and established waste management strategies for the Island) whilst Section 4.8 considers the topic of waste in more detail. It states that Wylfa Newydd should support the delivery of Towards Zero Waste, the overarching waste strategy for Wales and recognises that there is a need to ensure that adequate and appropriately sited/designed facilities are in place to manage waste arising from the construction and operation.
- 1.3.9 GP17 states that The Wylfa Newydd project promoter (Horizon) should ensure that sustainable waste management principles are incorporated into the construction and operation of the Wylfa Newydd Project. In line with national requirements. It calls for a Site Waste Management Plan for all sites to promote the sustainable management of waste and that the project promoter should ensure the timely provision of any waste management infrastructure required to support the construction and operation of the main site, associated and related developments in line with the Site Waste Management Plan. In addition, the SPG calls for a collection optimisation review which should look at any changes in the distribution of population clusters and the degree to which this puts stress on the collection and disposal systems.

1.4 Gaps in Information

- 1.4.1 IACC considers that Horizons assessment of waste and materials management contains a number of information gaps that need to be addressed:

Forecast of Future Waste Arisings

- 1.4.2 Tables C6-3; C6-4 and C6-6 of document C6⁷ summarise the non-hazardous and hazardous waste arisings during the construction phase of the project. Paragraph 6.5.22 of the same document however, states that whilst silt will be generated for the development of the drainage system, the volume of silt to be

⁷ Examination Library reference APP-[093]

generated is not known. This is a potentially significant gap in data that requires filling so that a full assessment of effects during the construction phase can be carried out.

Calculation of Waste Management Capacity

- 1.4.3 Table C6-1 of document C6 and the supporting Appendices (Local and Regional Waste Management Facilities and Waste Management Facilities in North Wales⁸), establishes prevailing waste management capacity in North Wales using data from Natural Resources Wales (NRW) and the issue of environmental permits. IACC considers this to be a flawed approach to establishing capacity as permits, unlike planning consents, are issued using a 'banding' system i.e. up to 4,999 tonnes; up to 24,999 tonnes etc. whilst planning consents are for specific waste quantities. Using permits to establish capacity levels runs the risk that capacities are over-stated (and corresponding effects in the EIA are under-reported). In this context, failing to use extant planning consents to establish waste management capacity to validate the permits is a significant data gap.
- 1.4.4 It is also considered that in establishing existing waste management capacity, reliance has been placed on out of date / inaccurate information, which has resulted in some significant gaps in the reporting of baseline capacity levels. For example, in the Appendix C6-1 Local and Regional Waste Management Facilities and Waste Management Facilities in North Wales, reference is made to there being x1 anaerobic digestion facility and x2 in-vessel composting facilities. However, the North Wales Waste Planning Monitoring Report (April 2016) notes that in North Wales two anaerobic digestion facilities have been developed; one in Denbighshire and another in Gwynedd. The Gwynedd facility, is mentioned in Appendix C6-1, however, there is no reference to the Denbighshire facility, which, according to the April 2016 Monitoring Report, has the capacity to deal with up to 22,000 tonnes per annum food waste. A further anaerobic digestion facility at Mona on Anglesey has a capacity of 49,500 tonnes per annum. This predominantly accepts dairy waste and chicken waste but could receive other food waste depending upon available capacity.
- 1.4.5 Furthermore, Appendix C6-1 (reference 6.3.30 ES Volume C Project Wide Effects APP C6-1), capacity in Gwynedd and the Isle of Anglesey is listed for non-hazardous landfill sites (there is no hazardous landfill capacity). Notwithstanding this, the listed references (Fridd Rasus Landfill and Llwyn Isaf Landfill) are somewhat out of date. The North Wales Waste Planning Monitoring Report (April 2016) notes that Fridd Rasus no longer has any permitted void and Llwyn Isaf is not listed at all. The same document goes on to list three further non-hazardous landfills across North Wales, which have not been considered in the Horizon documentation i.e. Bryn Posteg (Powys); Hafod (Wrexham); and Llanddulas (Conwy). Reference to both permits and planning permissions are required to evaluate site capacity.
- 1.4.6 A final point in relation to the calculation of waste management capacity relates to the need to identify available capacity – which the documentation, generally fails to achieve. Both the EIA chapter and the associated appendices look at permitted capacity, but does not confirm how much of this capacity is available, what is the throughput at each of these sites and how much headroom do they have to accept

⁸ Examination Library reference APP-[117]

additional waste? This is both a gap in data and an underlying flaw in the assessment of available capacity to deal with arisings.

Assessment of Effects

- 1.4.7 There is a further gap in information in the assessment of effects in that whilst the waste and materials management effects of decommissioning the associated developments is included (page 36 onwards of document C6), such effects in relation to decommissioning the main Power Station site are excluded.
- 1.4.8 Paragraph 16.1.5 of document B16⁹ states that ‘An assessment on the capacities of the receiving waste management facilities to receive waste materials during decommissioning have not been included in the assessment presented in Chapter C6 and would be made at the appropriate time’. This is echoed in paragraph 6.4.27 of chapter C6.
- 1.4.9 It is unclear why this part of the assessment has not been carried out.

1.5 DCO Obligations and Requirements

- 1.5.1 For the reasons outlined above, there is insufficient clarity and certainty on the potential impacts of Horizon’s proposals associated with MSW and C&I waste at all phases of the proposed project.
- 1.5.2 IACC working with the North Wales Minerals and Waste Planning Service will need to monitor the developments associated with Wylfa Newydd that generate MSW and/or commercial and industrial waste. IACC therefore requires a DCO requirement that prior to the commencement of development a monitoring and mitigation strategy is developed by Horizon. It should establish such monitoring, with a trigger point for mitigation and/or compensation if a material burden is placed on existing waste management infrastructure in North Wales. The funding of the monitoring service, and of any resulting compensation/mitigation measures should be the subject of a DCO Obligation.

1.6 Summary

- 1.6.1 The IACC does not agree with Horizon’s assessment of effects and considers that they have been under-assessed.
- 1.6.2 The proposed development will have a potentially negative effect on local waste management infrastructure and its ability to absorb any non-hazardous or hazardous waste generated during the construction, operation and decommissioning phases.
- 1.6.3 To assess the extent of this effect, it is considered that a more robust (and complete) assessment is required in respect of forecasting future waste arisings, including identifying what available capacity there is in close proximity (as detailed above) and unimplemented permissions.

⁹ Examination Library reference APP-[081]

- 1.6.4 Over and above the gaps / inaccuracies in data already discussed, it is also considered that the assessment, as carried out by Horizon is fundamentally flawed in respect of the off-site disposal of hazardous and non-hazardous waste in which case potentially negative effects may be under reported
- 1.6.5 This is because all other parts of the assessment i.e. that relating to on-site use of waste and materials; off-site composting of waste; off-site anaerobic digestion and in-vessel composting of waste; and off-site reuse and recycling of waste, are all carried out in the context of the capacity within North Wales to accommodate any waste arisings. However, the assessments which relate to the off-site disposal of hazardous and non-hazardous waste have been carried out in the context of North-West England's ability to absorb waste arisings. This approach is contrary to established Welsh planning policy (and the proximity principle, which requires waste to be managed as close as possible to its source of generation); and results in an inconsistent overall waste and materials management assessment, which evaluates one part of the waste stream against local / regional waste management infrastructure and other parts, against a much larger waste infrastructure catchment area (which given its size and inevitable large permitted capacities, will always result in 'not significant' effects being reported).
- 1.6.6 This issue of 'casting the assessment net too widely' has very recently been picked up by the Planning Inspectorate (PINs) in respect of the Scoping Report submitted in respect of the DCO application for the expansion of Heathrow Airport. The assessment of construction waste impacts defined a regional catchment for the assessment i.e. the south-east of England. PINs Scoping Opinion¹⁰ to this suggested approach was as follows:
- a) *"For the construction phase, waste and material resources shall be assessed based on the boundary of the DCO Project having regard to the South East and London regional areas. **The spatial scope should not be drawn so wide that the assessment of effects on existing and future waste capacity is underrepresented.**"*
- 1.6.7 This stance by PINs re-enforces the position of the IACC, that to consider the North-West of England as part of the capacity baseline when evaluating the effects of off-site disposal of waste generated by the Wylfa Newydd project, would mean that any negative effects would be under-reported.

¹⁰ Scoping Opinion: Proposed Expansion of Heathrow Airport (Third Runway) Case reference TR020003, June 2018 [\(Link\)](#)

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