

## **BUTTINGTON INCINERATOR APPLICATION (BROAD ENERGY WALES)**

### **Campaign by BilG (Buttington Incinerator Impact Group)**

#### **1. Introduction**

1.1 This is a summary of some of the things that worked for us in our fight against an incinerator application from Broad Energy (Wales). This incinerator was to be located in Buttington, a village in Mid Wales close to Welshpool and to the English border. Buttington and its surrounding rural area has fewer than 1,500 residents.

1.2 The proposal emerged in 2016, with a public information event by the developers, Broad Energy Wales, in December 2016. The application was eventually refused by the Welsh Government in July 2022 on the grounds of Sustainability and Landscape and Visual Impact.

1.3 BilG comprised 10 local people. We did not have formal roles and between us we volunteered for the roles that arose. Our campaign lasted, on and off, for 5 years and in the crucial final year, we were subject to Covid restrictions.

1.4 We did not carry out any fund-raising, although we did have one significant donation from a resident. Our only significant expenditure was a few hundred pounds on posters and we shared this cost between us. We did not see a need for consultants, and indeed would have struggled to fund external support. In retrospect, this was absolutely the right decision for us. UKWIN was an excellent source of information and advice.

1.5 In the course of the application, the Welsh Government placed a Moratorium on further large-scale incinerators (10 MW or more). There is, however, an “exceptional circumstances” clause and the Planning Inspector’s recommendation of refusal was reached without any reference to the Moratorium. The final decision was taken by a Welsh Government minister.

1.6 We campaigned hard but this was not at the expense of the many hundreds of hours that we spent on examining the various iterations of the planning application, producing responses at each stage of the process, and to formulating the case to present to the Planning Inspector.

#### **2. Key Points from Our Campaign**

Reflecting on our experience, we have identified a number of things that helped with our campaigning, including:

- Helping people to express their objections by providing a web-based multiple-option pro forma that enabled individuals to create and send a personalised email of objection in as little as 2 minutes. The majority of the 700+ objections received by the Welsh Government followed this route.
- Operating a website ([Buttingtonincinerator.co.uk](http://Buttingtonincinerator.co.uk)) and a very active Facebook page.
- Making leaflet drops to every household in the parish.
- Engaging with local politicians and councillors
- Challenging every press-release and claim made by the Applicant (for example, the repeated assertions that this was low cost, low carbon renewable energy, and that the development would benefit the local economy).
- Holding local meetings including a well-supported demonstration outside the local school. (all within Covid limitations).

- Campaigning beyond our local community and emphasising aspects which affected a wider area e.g. transportation and visual.
- Doing the unexpected (one of our group cycled repeatedly up and down a local mountain to the equivalent height of Everest, to secure wider publicity including TV coverage).

### 3. Preparing the Formal Objection

- Four of our group spent many hundreds of hours analysing the Planning Application (3,000+ pages) and the subsequent documents produced by the Applicant (a few hundred more pages).
- We responded in detail and comprehensively, including such specialist areas as Impact on Heritage. Although we thought the final decision would not be made on these issues, we judged that this demonstrated our seriousness and required the Applicant to spend time in considering the points made.
- We read all the relevant national and local policies and identified conflicts between the application and these policies.
- We contacted a wide range of people and organisations involved with waste in Wales to ensure that we understood the policies and also that we had accurate information about what was actually happening (for example on waste generated and how it was processed).
- We conducted our own analysis of data relating to need and future projections, independent of the figures being put forward by the Applicant.
- Whilst we put forward the general case against incineration, we presented it very much in the context of our incinerator and local circumstances.
- We focused very much on the future, not just the present. We looked at the trajectories for a diminishing supply of available waste in the catchment area as reuse and recycling increases in line with the goal of Zero Waste by 2050.
- We made sure that we had evidence for all our statements and we provided references for everything. In parallel, we closely scrutinised the evidence (and lack of it) produced by the Applicant.
- We aimed to present clear, simple and straightforward arguments. We were confident that it was the quality of arguments, well-supported by evidence, that was important, not the number of words.
- We avoided being overwhelmed by the great quantity of material that came from the Applicant's consultants. In fact, it seemed to us that the greater the volume of material submitted, the greater the likelihood of inconsistencies both within and between the individual reports. But again, it was necessary to read all reports with care, highlighting any areas of conflict.
- In the case of the Buttington application, the Applicant, as well as quoting from reports from their consultants within their substantive submission, included these reports as appendices. We carried out a detailed analysis of these appendices looking for instances where the Applicant's submission omitted information in the appendices which was not helpful to their case. We also looked for instances where information was spun to support a particular argument. In a similar way where the applicant cited a meeting as a source of evidence, we

were able to track down the minutes referred to and to check whether these were fully reflected within the submission.

#### 4. Examples of Challenge re Sustainability

##### *The Applicant's Case for "low carbon"*

- We made a detailed study of what waste went to landfill in Wales and what mitigation measures were in place to reduce greenhouse gas emissions. This gave us a strong basis for contesting the data used in the WRATE analysis which was based on standardised, theoretical figures with a predictable result. We made the case that the incinerator would produce large quantities of carbon in absolute terms and we challenged the Applicant to provide information on the composition of their waste as evidence for the level of carbon emissions.

##### *The feasibility of Carbon Capture*

- We demonstrated that Carbon Capture would not be a realistic or financially viable possibility in our location.

##### *Generation of energy in the form of heat*

- We argued strongly that there was no realistic possibility of finding local customers for energy in the form of heat. It is accepted in the industry that recipients of waste heat need to be willing to take it on a 24/7 basis (i.e. it can't be turned on and off at the tap).

##### *The Case for Need*

- We looked in detail at available waste in the catchment area, what was already contracted and what would be available in the future as re-use/recycling increased. We looked at existing and proposed incinerator capacity (the permitted capacity). We came to very different conclusions from the Applicant and presented these with as much clarity as possible.

##### *The Incinerator's location in relation to its catchment area*

- We were able to argue strongly that the location did not conform to the Proximity Principle. We focussed heavily on the environmentally damaging effects of transportation.

##### *The Job Creation argument*

- Although the job creation argument gained traction with some local residents, we were able to demonstrate that the Applicant's claims were speculative and that there were negative implications for the local economy

##### *Planning Conditions*

- In order to counter our objections, the Applicant offered planning conditions which we considered unrealistic and which did not conform to the 6 tests for planning conditions (<https://www.gov.uk/guidance/use-of-planning-conditions>). We argued strongly for the withdrawal of these conditions.

#### 5. Finally

Our submissions to the Inspector's Hearings on Sustainability and Air Quality (limited to 3,000 words) can be found at <https://www.gov.wales/sites/default/files/publications/2021-12/buttington-quarry-representation-bilg-hearing-statement-9-12-2021.pdf>