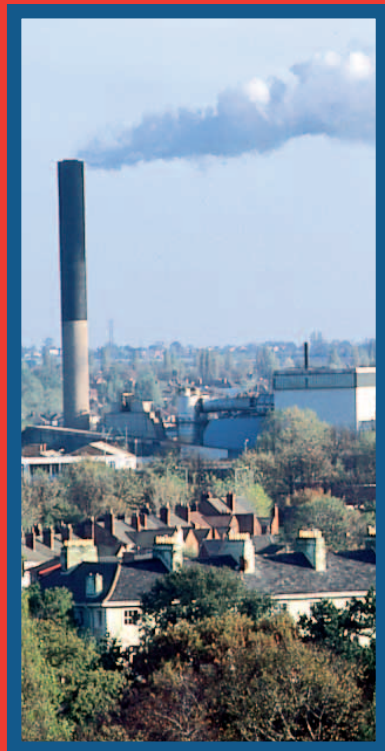


# How to win

Campaign against  incinerators



FRIENDS *of the*  
**earth**  
*for the planet for people*

Friends of the Earth How to win — Campaign against incinerators

# **How to win**

**Campaign against incinerators**

Written by Sarah Oppenheimer on behalf of Friends of the Earth

Cover photo: David Woodfall/Woodfall Wild Images

ISBN 1 85750 338 4

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Friends of the Earth works to protect and improve the conditions for life on Earth, now and for the future.

Friends of the Earth, 26-28 Underwood Street, London N1 7JQ

Tel: 020 7490 1555

Fax: 020 7490 0881

Email: [info@foe.co.uk](mailto:info@foe.co.uk)

Website: [www.foe.co.uk](http://www.foe.co.uk)

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# Introduction

## The need for a revolution in resource use

Friends of the Earth believes that we must create a healthier, fairer and better quality of life for ourselves and future generations. This means that we must learn to live within the **environmental limits** that our planet can sustain and ensure that everyone on Earth has a right to their fair share of the planet's resources.

We are a long way from this aim; the picture at present is not healthy. Burning coal, oil and gas is already causing the world's climate to change and levels of carbon dioxide continue to rise at rates that threaten to make this change catastrophic. Natural resources such as old growth forests are being consumed faster than they can renew themselves, while mining raw materials and getting rid of wastes are fouling our air, land and water. The gap between rich and poor countries has more than doubled since 1960 and most of the world's environmental problems are being caused by a small minority of its population – the 20 per cent of mainly Western people who consume over 80 per cent of the world's natural resources.

In order to live within environmental limits and allow others their fair share of the Earth's resources, richer countries need to consume less. Friends of the Earth has calculated that by 2050 the UK needs to churn out 88 per cent less carbon dioxide, use 73 per cent less timber and 15 per cent less water than we do now. We also need to use between 50-88 per cent less virgin minerals and metals (*Tomorrow's World: Britain's share in a sustainable future*, 1998, Earthscan).

Better resource management is a key way in which some of these targets can be met, and this will require a radical change in how we deal with our waste. Research has shown that up to 80 per cent of the UK household waste stream is currently recyclable. By developing a loop where resources are used, recycled and re-used, we reduce the need to extract so many new materials. Incineration, in contrast to recycling and re-use, does not tackle the question of resource efficiency. Waste is simply sent up in smoke, rather than seen as millions of tonnes of valuable materials. It allows us to continue with current over-consumption and wasteful habits, and is a step backwards from achieving sustainable development.

## Campaign against incinerators

Friends of the Earth has been campaigning on waste since the organisation was set up in 1971. Since that time it has produced various reports and research on the potential to recycle and compost the vast majority of the UK's household waste. Unfortunately, Government intervention in UK waste management has failed to seize the opportunities a secondary resources economy offers, including more job opportunities, reduced greenhouse gas emissions and a cleaner environment. Instead, waste management has focussed on improving standards at waste disposal sites, welcome though this is, rather than improving resource use efficiency. Until the UK begins to reduce resource use, through waste minimisation and high levels of recycling and composting matching those achieved elsewhere in Europe and North America, Friends of the Earth will continue to help communities campaign against the mass incineration of valuable resources.

### **The scope of this guide**

*How to win – Campaign against incinerators* gives you the practical advice necessary to help you campaign against the incineration of municipal or household waste in your area. It sets out the reasons why Friends of the Earth opposes the incineration of household waste and gives details of the procedures and actions required for opposing specific plans. It focuses on municipal solid waste (MSW – waste collected by local authorities which consists mostly of household waste), because although it is not the largest of the waste streams, it is the most visible and obvious. It is also the most diverse, composed of many different materials, making it difficult to deal with. It has been calculated that for every tonne of product made, 10 tonnes of materials have been used to manufacture it. Reducing, re-using and recycling MSW, rather than simply burning it, will therefore reduce a large amount of the commercial and industrial waste created in the manufacturing process for consumer products.

As people around the country refuse to put up with the senseless wastage and damage incineration causes to our health and the environment, the Government will realise that it must develop policies to allow us all to live in a sustainable and fair world.

## Introduction

- Part 1** provides details of the current waste management situation in England, Wales and Northern Ireland.
- Part 2** provides a comprehensive review of why incineration plans are not the answer to sustainable waste management.
- Part 3** gives you the information necessary to help you campaign successfully against the incineration of municipal solid waste.
- Part 4** provides you with the general basics of organising a campaign.
- Part 5** includes a glossary containing words highlighted in bold throughout this book.
- Part 6** includes useful addresses and further reading.



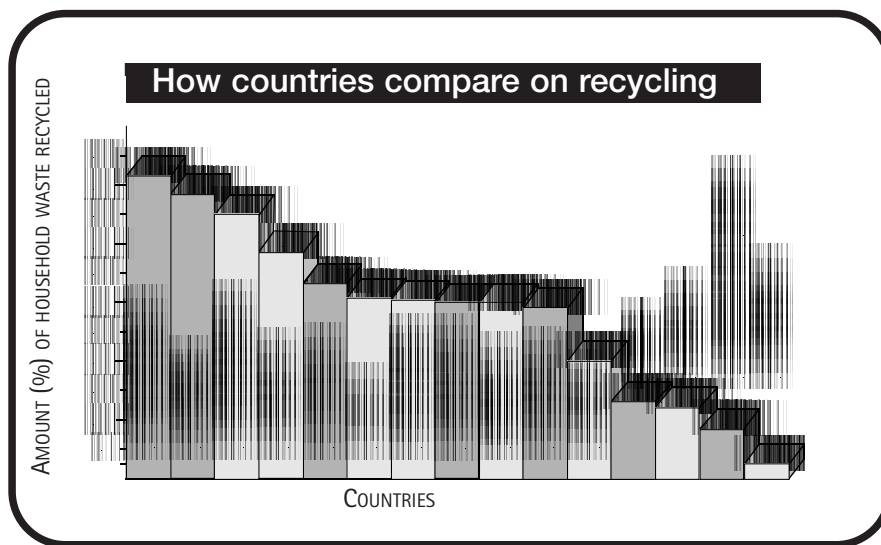


# The context

# Part 1

## 1 A critical time for waste management in the UK

The UK is currently among the worst in the developed world at recycling used resources. As the following tables show, our poor performance is put to shame by countries that are recycling municipal solid waste (MSW) at much higher levels.



In 1998/9 28 million tonnes of MSW were produced in the UK. Just 9 per cent was recycled or composted, while a further 8 per cent was burned, and 83 per cent sent to landfill.

We have in the past relied almost completely on landfill as a method of waste disposal. Even today in the 21st century, most of the products we use in everyday life, from batteries to fridges, to plastic bags, are simply dumped in large holes in the ground when we don't want them anymore. Up until very recently, there has been plenty of available space, and landfill has been the cheapest option available to local authorities responsible for waste management.

### Key point

The UK is currently among the worst in the developed world at recycling household waste.

## Campaign against incinerators

### Glass recycling 1999

Country rate, %	
⊙ Switzerland	93
⊙ Netherlands	86
⊙ Austria	84
⊙ Sweden	84
⊙ Norway	83
⊙ Germany	81
⊙ Finland	78
⊙ Denmark	63
⊙ France	55
⊙ Portugal	42
⊙ Italy	41
⊙ Spain	40
⊙ Ireland	35
⊙ UK	25

Source: FEVE

### Aluminium can recycling 1998

Country rate, %	
⊙ Switzerland	89
⊙ Sweden	87
⊙ Germany	86
⊙ Finland	84
⊙ Norway	
+ Iceland	80
⊙ Benelux	66
⊙ Austria	50
⊙ UK	38
⊙ Spain	21
⊙ France	19

Source: European  
Aluminium  
Association

## Part 1

### Steel recycling 1999

Country rate, %	
⊙ Germany	80
⊙ Netherlands	78
⊙ Austria	75
⊙ Belgium	70
⊙ Luxembourg	69
⊙ Switzerland	66
⊙ Sweden	62
⊙ Norway	59
⊙ France	47
⊙ Spain	32
⊙ UK	30
⊙ Finland	16
⊙ Italy	9.5

Source: APEAL

Friends of the Earth and others have long campaigned for more reduction, re-use and recycling of waste instead of disposal. Recently, following Friends of the Earth's campaigning, a new European Directive on Landfill has forced change on the Government, and we are now legally required by the European Commission to reduce the amount of waste we send to landfill. Specifically, the Directive requires that the amount of biodegradable waste (such as kitchen and garden waste, paper and card) sent to landfill be reduced to 35 per cent of 1995 levels by 2020. In most other EU states it is by 2016, but because of our huge reliance on landfill, the UK has been given an extension. The Landfill Directive also makes requirements on the disposal of hazardous waste, and bans the landfilling of tyres, liquid wastes and infectious clinical wastes.

### ⊙ ⊙ ⊙ Key point ⊙ ⊙ ⊙

The UK currently sends over 80 per cent of municipal solid waste to landfill. The new European Directive on Landfill now sets targets to greatly reduce this.

## Campaign against incinerators

### 2 The Waste Strategy 2000 for England and Wales

In response to the demands of the Landfill Directive, and other European directives on waste, the Government produced a National Waste Strategy in May 2000 which set out its views on the future for waste management in England and Wales.

In its strategy the Government sets out targets for reducing the amount of waste sent to landfill. Specifically:

- ⊙ we must recycle or compost 25 per cent of household waste by 2005, 30 per cent by 2010, and 33 per cent by 2015. These targets will be achieved by setting statutory performance standards for local authority recycling
- ⊙ we must 'recover value' from 40 per cent of municipal waste by 2005, from 45 per cent by 2010, and from 67 per cent by 2015. By 'recover value' the Government means recycling, composting, other forms of material recovery, such as **anaerobic digestion**, or energy recovery through combustion, gasification or pyrolysis
- ⊙ we must reduce industrial and commercial waste sent to landfill to 85 per cent of 1998 levels by 2015.

The Strategy requires that decisions on the type of waste management technique to use, including decisions on suitable sites for treatment and disposal, should be based on a local assessment of the **Best Practicable Environmental Option (BPEO)**. This requires managers to take decisions which minimise damage to the environment as a whole, at an acceptable cost in the long and short term. It is based on three key considerations:

- ⊙ the waste **hierarchy** places reduction as the most preferable option for managing waste. This is followed by re-use, then recovery through recycling, composting and energy recovery, and lastly

#### ⊙ ⊙ ⊙ **Key point** ⊙ ⊙ ⊙

The UK's new waste targets involve an increase in recycling to 33 per cent of household waste by 2015.

## Part 1

disposal. It is important to note that the strategy states that “incineration with energy recovery should not be considered before the opportunities for recycling and composting have been explored.”

- ⊙ the **proximity principle** requires waste to be disposed of as close to the place of production as possible. This avoids passing the environmental costs of waste management to communities which are not responsible for its generation. It also reduces the environmental costs of transporting waste.
- ⊙ **Self sufficiency**: waste should not be exported from the UK for disposal, and waste planning authorities and the waste management industry should aim, wherever practicable, for regional self sufficiency in managing waste.

Despite these principles, the low recycling targets in Waste Strategy 2000 are not high enough to divert sufficient waste away from landfill to meet the requirements of the European Landfill Directive. Instead the Government thinks we will need to build scores of new incinerators and has set higher targets for ‘recovery’ of waste. In order to meet these recovery targets, many waste disposal authorities are planning large scale incinerators. These will burn the remaining two-thirds of MSW not recycled, and even take in waste from other authorities, meaning local people will have to suffer the environmental impacts of waste they have not produced.

The Government’s recycling targets will also not bring us into line with international best practice. Even if the targets are met, the UK will still be left at the bottom of the international recycling league. Friends of the Earth believes we should have much higher targets, and that we can meet the requirements of the EU Landfill Directive through recycling and composting alone.

### ⊙ ⊙ ⊙ **Key point** ⊙ ⊙ ⊙

The UK could meet the requirements of the EU Landfill Directive through recycling and composting alone. But because the Government’s recycling targets are not high enough, many councils are including incineration in their waste strategies.

## Campaign against incinerators

### 3 Northern Ireland

Northern Ireland is not covered by the Government Waste Strategy 2000. It has its own strategy which was published in March 2000.

- ⊙ The key target is to recover 25 per cent of household waste by 2005 and 40 per cent by 2010, of which 25 per cent must be by recycling or composting. The new strategy also instructs the 26 district councils to come together in groups to draw up sub-regional waste plans, with a maximum of four plans covering Northern Ireland as a whole.
- ⊙ The target for industrial and commercial waste is more demanding, aiming to reduce landfilling to 85 per cent of 1998 levels by 2005.
- ⊙ There are also targets for reducing the quantity of biodegradable MSW landfilled in line with the requirements of the Landfill Directive.
- ⊙ A range of secondary targets include measures for waste minimisation, recycled product specifications, electrical waste, tyres and construction and demolition waste.
- ⊙ Other key actions include the setting up of a market development programme for a wide range of wastes, an internal department audit of waste management practices, and voluntary sector specific targets for key waste streams, including 100 per cent recovery of scrapped tyres.

### 4 Wales

Wales is currently covered by the Waste Strategy 2000 but will be writing its own strategy in 2001-2. This will still include measures to meet the targets of the EU Landfill Directive, but will review the targets for waste minimisation, re-use, recycling and recovery. The strategy will also identify how targets should be delivered and review the policies and mechanisms for implementation.

# Arguments against incineration

## Part 2

Friends of the Earth believes that one of the ways to achieve better resource management in the UK is through the implementation of waste recycling policies. These policies will create a closed loop system where materials are used over and over again. The move towards incineration rather than recycling is not a long term sustainable solution. Here Friends of the Earth outlines its main arguments against incineration schemes.

### 1 Destroying valuable resources

Incineration of waste means that we use products once only and then destroy them. This represents a linear system of resource use, which is unsustainable when we live on a planet with finite resources. It results in the destruction of precious natural habitats, such as old growth forests in Russia and Scandinavia, which are cut down to supply the paper and wood trade. Five years of intensive research undertaken by the Taiga Rescue Network (organisations campaigning on forestry issues) shows that, due to intensive deforestation, only a fraction of the original old forests remain. Only 5-7 per cent of the European-Russian temporal forest is still intact, and the percentage is even lower in Scandinavia. Loss of habitat means that species, such as the golden eagle and grey headed woodpecker, are threatened with extinction. If wood and paper recycling was increased, there would be less demand for virgin timber and the pressure on these disappearing forests and their wildlife would be reduced.

#### Key point

Incinerators destroy valuable resources.



## Campaign against incinerators

### 2 Cutting off options for alternative waste management strategies

Because the construction and operation of a major incineration plant represents a huge capital investment, the owners will require a guaranteed supply of waste over about 20-30 years to make a profit. Contracts drawn up with local authorities usually require a continued supply of large quantities of waste, and financial penalties are imposed if this is not provided. This undermines local authority commitments to reduction, re-use and recycling. Councils will be unlikely to divert waste to recycling schemes when to do so may lead to them incurring financial penalties from incineration companies. The problem is even worse with new larger facilities that require enormous quantities of waste to feed them. For example, Cleveland County Council signed a 25 year contract to supply 180,000 tonnes of waste per annum for incineration which jeopardised future recycling schemes. The Assistant Director stated that councils “are already constrained by the contracts from doing even a modest amount of recycling” and the penalty clauses “mean that fundamentally we are into waste maximisation”. This is completely incompatible with the environmental benefits of high levels of recycling and composting.

#### Key point

Incinerators undermine councils' recycling schemes by demanding long term waste delivery.

### 3 Air pollution and human health

When waste is burned in incinerators, toxic fumes from the mixture of materials are given off. While the emissions from incinerators are subject to regulatory controls, this is not a guarantee that the standards set are adequate. In addition, inspection rates are very low, and there is always the chance of accidents and unauthorised emissions. Two of the most modern incinerators in Britain, the upgraded Edmonton in North London and SELCHP in South London reported 183 emissions infringements between 1995 and 1998. The standards that are set for incineration emissions also do not consider the cumulative and cocktail effect of different sources of pollution in the same area. In modern life there are many sources of serious pollution; any additions from incineration are undesirable.

## Part 2

Incineration of MSW creates emissions of **particulates**, heavy metals and **dioxins**. Particulates are very fine particles of invisible soot which have been associated with the exacerbation of chronic lung and heart diseases, such as asthma and emphysema. Dioxins are formed when materials containing chlorine are incinerated. They are known to cause cancer in humans and it has recently been estimated by the United States Environmental Protection Agency that they are 10 times more likely to cause cancer than was previously thought. They are easily captured in food chains, especially dairy products, as they accumulate in fatty tissue in the body. Toxic heavy metals, such as lead, cadmium, arsenic, mercury and chromium are also released during incineration. These have a variety of serious health impacts causing cancers, kidney and lung disease. Incinerators will also add to local traffic levels, and the associated heavy vehicle pollution.

### Key point

Incinerators produce emissions of particulates, heavy metals and dioxins, all of which are potentially dangerous to human health.

## 4 Toxic ash – landfill still needed

When mixed municipal waste is burned in an incinerator it does not disappear completely. A large amount of solid residue called **bottom ash** is left behind. This is about 30 per cent of the original weight of the waste and occupies 40-50 per cent of the space that compacted unburned waste would. This ash still has to be disposed of in landfill sites. Bottom ash may be toxic as it contains some of the heavy metals and dioxins present in the things that were burned, such as batteries. When it is landfilled these pollutants may eventually leak into groundwater from where it is virtually impossible to clean them up. Moreover in ash form, the toxins are more liable to leach than if they are in unburned waste. According to the EU Commission, leaching from landfills may well be one of the most important sources of dioxins in the future. This means that society risks creating huge mountains of ashes, containing very large amounts of dioxins, which will be left for future generations to deal with.

## Campaign against incinerators

Fine particles and polluting gases are also left behind after combustion. These are caught in the chimney by filter systems and are called **fly ash**. Incineration does not simply make the toxic substances in waste disappear, and as the filtration technology on incinerators improves (which helps to reduce the amount of toxic emissions to air), the concentration of toxic contaminants in the ash increases. Fly ash is undisputedly toxic, and although there is not such a large amount of it (about 3-5 per cent of the original waste by weight and about 5-15 per cent of all the ash produced), it has to be treated with great care. It is classified as 'special waste' and has to be landfilled in very careful circumstances.

### Key point

Incinerators produce toxic ash (the remainder of the MSW) which still has to be disposed of in landfill.

### The 'recycling' of incinerator ash

Incinerator companies have recently started to use bottom ash for construction purposes, claiming this is a type of 'recycling' and maintaining that the ash is inert. However there are many concerns about the safety of this usage. Research carried out in 1993 for the then Department of Transport looked into the chemical content of bottom ash from the incineration of MSW and its possible use in road construction. This concluded that due to the high concentration of soluble metals (eg lead, zinc and arsenic) and sulphates, incinerator wastes were not suitable for use in road works in their unbound state. However, the current specification used by the Highways Agency permits incinerator bottom ash to be used for road maintenance and construction in cement bound, lower strength road materials. Government research is continuing to extend the use of incinerator bottom ash in construction.

Serious concerns have been expressed that incinerator bottom ash is far from inert and contains dangerous levels of toxic heavy metals and dioxins which can leach out into the surrounding soils posing a threat to the water table, food produce and human health. There is insufficient evidence that the leaching of dioxins and heavy metals from these

## Part 2

construction uses can be adequately monitored or controlled, especially when rain, snow, ice and wind come into contact with the ash.

Despite these concerns, incinerator ash is still being used by Birmingham City Council for road building, and is being spread by the thousands of tonnes. In London, it has already been spread in Greenwich, Enfield, Waltham Forest and out into Essex. It is also being spread in Dudley and Stoke from the incinerators in these areas. Friends of the Earth believes that the **precautionary principle** should apply to its usage, and that spreading or using incinerator ash in roads or for construction poses an unacceptable threat to human health and the environment.

### **5 Climate change – debunking the myth of energy from waste**

When waste is burned in an incinerator, heat is produced which can be used to create electricity. Proponents of ‘energy from waste’ incinerators claim that the electricity created when waste is burned is a type of renewable energy as it displaces the equivalent amount of electricity to be generated at a power station from fossil fuels. However the truth is that incineration actually increases the emissions of greenhouse gases responsible for global warming compared to recycling. This means that energy from waste incinerators contribute to climate change rather than reducing it. Here’s why.

- ⊙ The level of energy capture in incinerators compared to the potential energy present in the waste is very low.
- ⊙ Incinerators burn fossil fuels when plastic is present in the waste stream (as plastic is made from oil).
- ⊙ When materials are destroyed in incinerators, new ones have to be made to replace them. The extraction and processing of virgin materials uses huge amounts of energy. For example, creating a tonne of aluminium cans, made from the raw material bauxite, takes around five times as much energy as producing a tonne of recycled aluminium cans. A Canadian study estimated that “on average, recycling saves three to five times as much energy as is produced by incinerating municipal solid waste.” (*Recycling versus incineration*, 1992. Sound Resource Management Group Inc.)

## Campaign against incinerators

The US Government Environment Department (EPA) has developed a model comparing the energy use of recycling and incineration for different materials, and Friends of the Earth has applied this model to components of the UK waste stream. It estimates that recycling and composting household waste might save up to 4.5 million tonnes of carbon emissions each year compared to an alternative scenario of incineration with energy recovery. This would be equivalent to the emissions generated by 55 billion kilometres of vehicle travel in the UK, some 12 per cent of all vehicle kilometres.

Clearly the energy captured from waste incineration is not renewable and recycling is much better for reducing climate change. When the entire life cycle of products is considered, it makes much more sense to recycle secondary materials than extract and process virgin ones. Put another way, capturing the materials in our waste stream is far more productive than merely capturing the energy.

Unfortunately for the last 10 years the UK Government has supported energy from waste schemes through a renewable energy subsidy mechanism. This is at odds with the current European Parliament definition of renewables which does not include energy from waste. Friends of the Earth believes it is totally inappropriate of the Government to subsidise incinerators in this way. It means that true renewable energy technologies, such as wind, solar, wave and water, are being starved of valuable funds. Very worryingly, it seems that the Government is trying to meet its targets for renewable energy electricity generation by including a process that is wasteful of energy and worse for climate change.

### Key point

Incinerators do not provide a renewable source of energy through capturing the energy produced by burning waste. The incineration of recyclable material actually results in even more fossil fuel energy being consumed because more of the same materials will need to be used to replace them.

## Part 2

### 6 Lost job potential

The development of a recycling or secondary resources industry offers enormous potential for sustainable job creation. A recent study by Waste Watch and UK Waste (*Jobs in Waste*, October 1999) suggested that up to 45,000 jobs could be created in recycling and composting if the Government were just to meet its recycling target of 30 per cent by 2010. Such sustainable 'green collar' jobs can play a vital part in local economic development, and reprocessing plants for the materials collected, such as paper, plastics and metals, can encourage regional regeneration. In Germany where the recycling industry is huge, the merchant bankers Dresdner Kleinwort Benson commented that "By 1995, recycling had become a giant industry...on a par with the insurance industry in Germany and well ahead of sectors, such as telecommunications and engineering. It dwarfs the retail and steel sectors."

Incinerators by comparison offer just a few jobs during construction, and even less for maintenance once they are built. By pursuing an incineration policy, local authorities are cutting themselves off from not only the environmental, but also the employment benefits that a recycling industry offers.

#### Key point

Incinerators offer very few jobs. The recycling industry however offers enormous potential for substantial job creation.

### 7 Costs

Recycling is a declining cost industry, and although initial investment is required to fund the transition to a new system, these costs decrease year on year as the collection schemes and new reprocessing capacity become established. The more that is recycled, the less money is wasted paying for disposal.

In the short term, incineration may appear a cheaper option than recycling but overall it is a much more capital-intensive and costly approach. Incinerator developers claw back their investment and make a financial

## Campaign against incinerators

gain through their long term contracts with local authorities. This means that ultimately the local tax payer is contributing to their profits, while the local and wider environment is degraded.

Environmental costs are not usually included in financial calculations, but a report by consultants ECOTEC for Friends of the Earth, Waste Watch, and UK Waste (*Beyond the Bin*, 2000) suggests that when environmental costs are considered, recycling just 20 per cent of municipal solid waste reduces the cost of environmental damage by as much as £200 per tonne.

### Key point

Incineration is a much more capital-intensive and costly approach than recycling.

## 8 Noise, traffic and visual impact

Incinerators can be very noisy operations, with the loading and unloading of wastes and ash, noise from the furnace, and the loud drone of fans. This noise can be a significant nuisance to people living or working nearby.

Increased traffic moving waste and ash to and from the incinerator may also be a big headache for local residents, with many lorries going past each day. An average sized plant handling 200,000 tonnes of rubbish per annum will mean 13,000 lorry loads a year. The impact on local roads will also be severe, and there may be a need for some sort of road works to provide trucks with access to and from the plant. This can also result in increased use of the road by any user.

Inappropriate siting of an incinerator can result in damage to the landscape, and it may be regarded as an eyesore. The tall chimney stack could wreck a landscape or townscape view.

## Part 2

### From the frontline

#### The scandal of incinerator ash in Byker, Newcastle

Tyne Bridge Friends of the Earth has been closely involved in the campaign to stop the expansion of the Byker Reclamation Plant in Newcastle. In 1999, the group became aware of plans to double the amount of waste incinerated at the site. Tyne Bridge Friends of the Earth decided to organise a series of meetings where various experts, including a foetal toxico-pathologist and an environmental consultant talked to local residents about the possible impacts of the plan.

Press coverage began to grow, as did the number of local people involved in the campaign. A petition was started, and stalls held in various locations to inform people what was happening. It soon became clear that the people of Byker had been unhappy with the incinerator for years, and were willing to support the campaign to fight it.

The Council finally agreed to a public meeting to discuss the issues and proposals. Following extensive campaigning, leafleting, press stunts (including setting off a distress flare in a chimney of tyres outside the Civic Centre) more than 200 people turned up to the meeting and made it clear to the Council representatives that they didn't want the incinerator, but they did want a full public inquiry into the plans. As a result, a working group of residents, other concerned people, various agencies, and Council representatives was set up to re-examine the issues and proposals, and present a report.

Meanwhile, a toxic time-bomb was ticking away. Campaigners found out that since 1994 the Council had been using a mix of bottom and fly ash from the incinerator as path material for allotments and at a number of other sites around Newcastle. In all, 2,000 tonnes had been spread city wide. Despite repeated claims by the Council that the ash was safe, some testing showed high levels of heavy metals. It was only after intense campaigning pressure and constant press coverage that the Council agreed to carry out tests on the ash around the city through the University of Newcastle Upon Tyne.



## Campaign against incinerators

The results were devastating. The final report showed that on some sites, the levels of dioxins in the ash were almost 800 times the background level in Newcastle. Sites which had not had ash dumped also showed raised dioxin levels, suggesting that chimney stack emissions had contaminated them.

This is believed to be the worst case of dioxin contamination to have ever occurred in Britain. As a result the Council was forced to advise allotment holders to keep children under two away from the sites, not to eat eggs or poultry from the affected sites, to carefully wash and peel vegetables before eating them, and not to grow any more crops.

The Council is now carrying out further soil tests, and tests on allotment produce and The Environment Agency is carrying out an investigation with a view to prosecution. The campaign has since hit the national headlines in various papers, as well as appearing in a *Panorama* programme.

The campaign carries on still. The ash issue will certainly run for months, if not years. In the meantime, the working group continues its deliberations, the campaigners continue to keep local people informed, as well as trying to keep press coverage focussed on the issue, and persuade the council to call a public inquiry, or preferably scrap the incinerator plans and start again.

The key moment in the whole campaign was the public meeting. At that point it became clear to the Council that trying to dismiss the campaigners as crack-pot greens unrepresentative of local opinion, was never going to work. The battle isn't won yet, but people power means victory is within sight, and with continued support, waste incineration will hopefully end on Tyneside.

**Nick Boldrini, Tyne Bridge Friends of the Earth**

# Campaign against incinerators

## Part 3

If you are concerned about an incinerator proposal in your area or want to influence your council's policies on incineration, you'll need to first understand the steps that take place to make a proposal a reality. You'll also need to know the best stages at which to direct your campaigning efforts. This chapter looks at all the stages involved and how you can campaign effectively to stop an incinerator being built.

### 1 The major stages

Before you begin campaigning, it is important to confirm exactly what is happening and which stages are already underway. These stages do not necessarily follow each other neatly, but are often inter-dependent and simultaneous. Not all stages are open to public influence and your campaigning efforts should be targeted around the policy setting stage, and the planning permission application stage.

#### **The policy setting stage**

This is when a relevant strategy and/or plan for waste disposal in the area is developed, eg waste local plan or unitary development plan. These plans will be influenced by the National Waste Strategy.

#### **Preparing the waste disposal contract**

The local council agrees a contract for managing its municipal waste through a process of competitive tendering to a waste disposal company that provides the waste service. These contracts can be crucial to the viability of an incinerator project, as incinerators need a long term supply of fuel (ie rubbish). Very often contracts last 25 years which means the council has to provide waste for burning for a long time to come, undermining its efforts at recycling.

#### **Application for planning permission**

This happens when a waste disposal company submits a formal application for a new incinerator at a specific site (often following informal discussions with the relevant parties). The planning system must

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allow for public consultation, and also consider the waste management strategy and any previous identification of suitable locations for waste management facilities, as well as factors, such as traffic generation, noise and loss of amenity.

### Top Tip

To be most effective, target your efforts around the policy setting and planning permission application stages at county level.

Your local council will be able to give you details about the current situation on all of these stages.

### Application for a pollution control permit

Applying for a pollution control permit is necessary before an incinerator can start operating. Details of emission limits and related matters can affect the design of the plant, and have to be agreed with the pollution control authority, usually The Environment Agency. Pollution issues are relevant to local people and useful in arguing for alternative waste management strategies. The permit process allows public scrutiny, but is unlikely to give much weight to non-expert opinion. Other permits may be needed, such as a water abstraction licence or trade effluent permit for discharges to sewer.

### Top Tip

Finding out about pollution issues related to the incineration proposal is vital in helping to sway public opinion to your side.

Contact The Environment Agency for details about whether a permit has been applied for.

### Finally...

It is also useful to talk to as many informed people as possible to get valuable background information on the processes and politics involved. These people may include other campaigners, professionals in the waste industry or other council employees.

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It is also important to check that all consultations are carried out according to the rules. The earlier you are involved the better, but it is never too late. Even if an incinerator is already operating in your area, it is still worth talking about alternative ways of dealing with the waste in the long term future, and trying to get agreements with the operator for better standards.

### **2 The policy setting stage: waste plans**

The time when waste strategies and plans are being formulated is a key stage for campaigning. The policies contained in them comprise one of the major factors taken into account when decisions are made on whether or not to grant planning permission for an incinerator. If you start early enough, you may actually be able to prevent any plans for a municipal waste incinerator being developed well before a planning application is submitted. Elected councillors are sensitive to public opinion, and they may seek alternatives to incineration if they are persuaded that it is politically unacceptable.

#### **England**

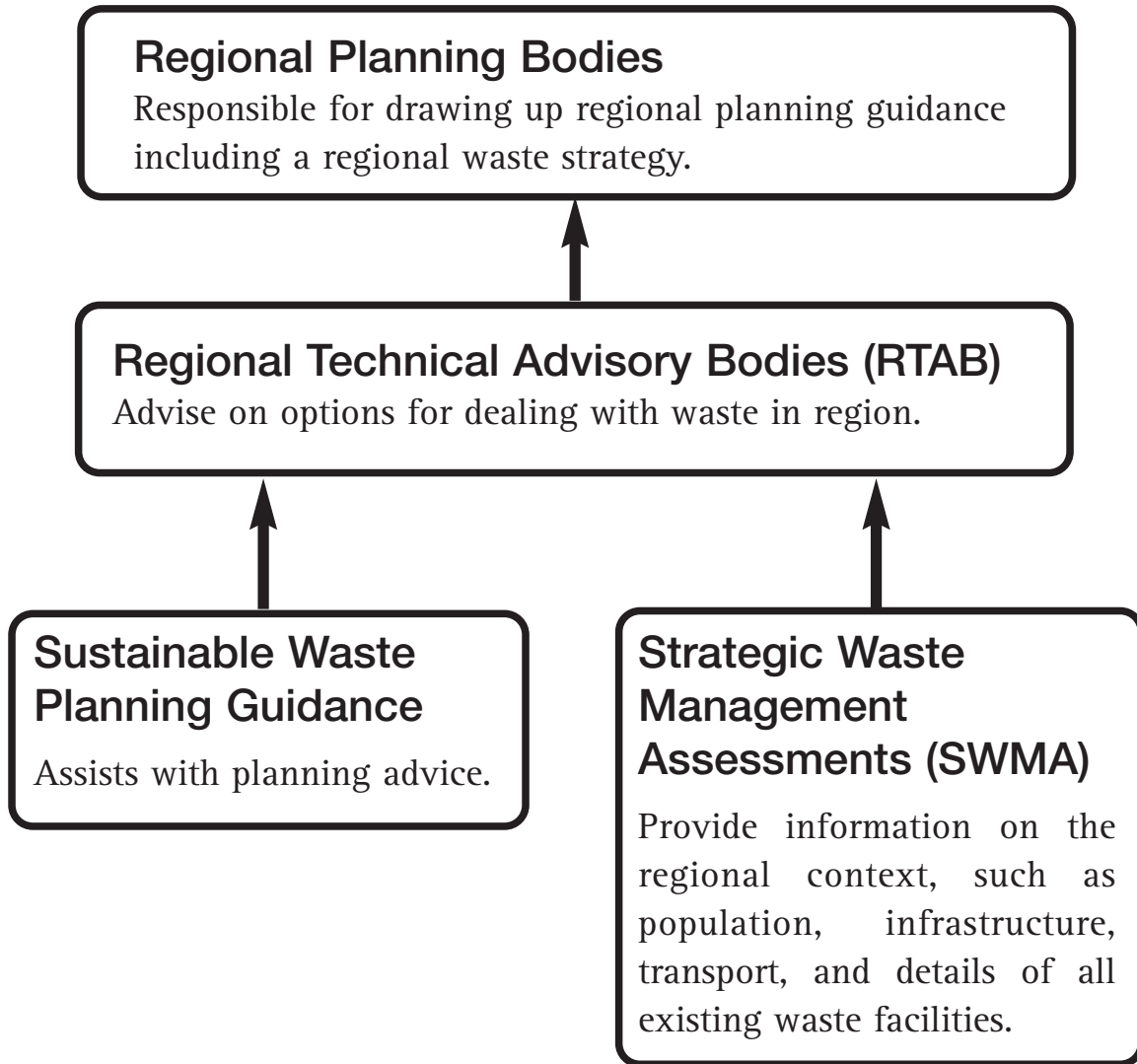
##### **Waste planning at the regional level**

Campaigning on waste planning at regional level is a new area and formal methods may not yet be established. It is currently still not as important as county level waste planning but we have included it here because it is still important to understand the processes involved.

In each of the nine English regions (including London), there are regional planning bodies responsible for drawing up regional planning guidance (RPG), including a regional waste strategy. These bodies will be advised on options for dealing with waste in their region by the regional technical advisory bodies (RTABs). The RTABs consider land use planning provisions, identify guide figures for waste streams to be managed and levels of transportation across regional boundaries. (The Government's view is that most waste should be treated or disposed of within the region in which it is produced.)

In turn the RTABs will be informed by the strategic waste management assessments (SWMAs) developed by The Environment Agency. These

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provide information on the regional context, such as population, transport infrastructure and geology, as well as data for all the different waste streams, and details of all existing waste facilities. The SWMAs will also use a life cycle tool to look at environmental effects of different municipal waste management scenarios.

The RTABS will also be assisted by sustainable waste planning guidance developed by the Department of the Environment, Transport and the Regions (DETR). You should try to influence the members of the RTABs, who have a key role in advising the regional waste strategies. Find out who the members of the RTAB are, and push for representatives from NGOs or the recycling industry. Find out exactly who within the regional planning body is responsible for waste planning, and together with other interested parties, such as community recycling organisations or other

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environmental groups, you could arrange a meeting with them and the RTAB to discuss your views. In some regions, a representative from the voluntary sector or an environmental organisation may have a seat on the planning body itself and could be a useful ally for influencing the regional waste planning process.

### Top Tip

Talk to as many informed people as possible. This will give you valuable background information about your particular incineration proposal.

### Waste planning at county level

This is the level at which you should focus your campaigning. It is the most important stage for fighting incineration, as it is at this point that sites are identified. Once a development plan has been finalised it is very hard to campaign against sites that have already been approved.

The waste planning process is carried out by the planning departments of local councils known as local planning authorities (LPAs) which exist at both county and district levels.

In two tier local government where there are both county and district plans, waste is covered in the structure plans, local plans and waste local plans.

- ⊙ The structure plans are formulated at county level. They contain general strategies for all types of land use and set out the broad strategic planning framework. There is a structure plan for each county.
- ⊙ Local plans are drawn up at the district level and contain details about specific proposals for the siting of developments.
- ⊙ Waste local plans detail the siting of waste management facilities and are produced at county level (sometimes combined with minerals plans). First required in 1991, they should cover a period of at least 10 years, and be reviewed every five. However in many areas they still have not been drawn up.

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In unitary authorities and metropolitan areas, such as London boroughs or other large urban areas like Birmingham or Manchester, there is a one tier government and a single unitary development plan (UDP) is drawn up. This combines all the different plans mentioned above. In London, the Mayor has certain powers relating to planning, and has to draft a spatial development strategy (SDS), which is a London-wide development plan to which each London borough's UDP must conform.

The most important plans for waste campaigning are the waste local plan, and the relevant parts of the structure plans and unitary development plans.

The following waste policy documents and regulations will influence the content of waste plans in your area.

- ⊙ The National Waste Strategy 2000 (see Part 1).
- ⊙ European Waste Policy and Directives.
- ⊙ Regional planning guidance and the regional waste strategy in your region.
- ⊙ Strategic waste management assessments for each region.
- ⊙ Planning Policy Guidance Notes (PPGs): PPG 10 on planning and waste management, PPG 12 on development plans and PPG 23 on planning and pollution control.
- ⊙ The Town and Country Planning (Development Plan) (England) Regulations 1999.

### Other types of waste plans

Other documents to do with waste may be drawn up in your area, but not written by the planning department. However their contents will be given weight when deciding planning applications. These include recycling plans drawn up by the authority with responsibility for waste collection, and municipal waste management strategies. The latter are required by the new National Waste Strategy to be developed at county level by all local authorities in England. They should be drawn up by the waste collection and waste disposal authorities in co-operation. These are intended to be

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comprehensive practical documents that contain clear objectives and timescales for action on municipal waste management, setting out a strategic framework for collection, treatment and management options (reduction, re-use, recycling, composting, landfill and incineration).

### 3 Lobbying the local planning authority on waste plans

You can be involved in the planning process in two ways: by joining in the formal process, and by campaigning around it. Part 4 describes tactics for informal campaigning, which are vital for the success of your fight, while this section tells you how to become involved in the formal process.

#### Top Tip

Focus your campaigning at county level waste planning as this is the level at which incineration sites are identified.

#### Formal involvement

Ring the planning department of your local council to find out what stage the process is at in your area and what the dates are for public comment. Follow up with a letter asking to be added to the planning authorities consultation database so that you are consulted automatically at all the important stages. There are three main stages in producing a waste plan:

- ⦿ the pre-deposit consultation draft
- ⦿ the deposit draft
- ⦿ the plan inquiry.

Ideally you should exert influence right at the start of the planning process, before draft plans are even written, although this may not always be possible. Write to the council letting them know your views on how municipal waste should be managed in your area.

#### The pre-deposit consultation draft

This is the first stage in the procedure for passing a plan, and the local authority will consult with bodies such as the DETR, The Environment



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Agency, English Nature and any members of the public and interest groups. There is often a six week consultation period, and this is where letters of objection are needed. You should identify the parts of the plan you object to, why you object to them and the changes you would like to see. The more letters the council receives at this stage the better.

### **The deposit draft**

This is a more formal draft and is advertised in the local paper. Objections are submitted on council forms. You do not have to respond to the whole plan – it is better to respond to a few points thoroughly in the order they appear, explaining your objections specifically and suggesting any new areas of policy not included. At this stage the authority may decide on revision or withdrawal of some of its proposals, which again must be consulted on in the same way.

### **The plan inquiry**

The plan inquiry is presided over by one to three independent inspectors appointed by the DETR. They hear the council's and objectors' cases and make recommendations relating to all the matters considered. The local authority must then draw up a statement of the post inquiry modifications it intends to make, giving reasons for any recommendations not acted on. It must make the statement publicly available, and you can object to the modifications or to the Council's failure to modify where the Public Inquiry Inspector recommended it, but you cannot go back and object to the original plan. Finally, the authority must give at least 28 days notice of its intention to adopt the plan, advertise and send copies to the DETR.

While participating in this formal process, it is a good idea to network with other groups and if you have similar concerns perhaps submit a response to a waste local plan as a county-wide coalition. If submissions are separate, it is important they don't contradict each other, so talk to others to agree common policy where possible. Networking with neighbouring local authorities and councils is also worthwhile, as they will want to ensure that as little waste as possible is exported to their area for disposal. This applies especially to the surrounds of urban areas, most of which export waste. Objections from neighbouring County Councils may be useful if your point of view coincides with theirs.



## Stages of local waste plans



### Stages of preparation

- ⊙ **Draft plan** District council draws up draft proposal and planning policies
- ⊙ **Consultation** Draft plan published, sent to official consultees and publicised in the area
- ⊙ **Plan revised** Comments and representations considered. Plan altered and approved by councillors
- ⊙ **Deposit and objections** Deposit plan published and publicised, objections and supporting representations submitted in minimum six week deposit period
- ⊙ **Negotiation and modifications** Planning officers try to overcome objections and put forward modifications to the plan
- ⊙ **Local plan inquiry** Inspector hears council's and objectors' cases
- ⊙ **Inspector's report** Report sent to council, which decides what changes to make
- ⊙ **Modifications and objections** Inspector's report and council's proposed modifications to the plan published, objections submitted in minimum six week period, council considers objections
- ⊙ **Further inquiry** If necessary, inspector hears objections to modifications and reports to council
- ⊙ **Plan adopted** Council publicises intention to adopt plan formally and after 28 days votes to adopt, when it becomes a statutory plan.

### Opportunities for action by general public

- ⊙ Discuss your concerns and views on development with councillors and planning officers
- ⊙ Submit comments to council and lobby councillors
- ⊙ Submit objection / representation form and lobby councillors
- ⊙ Discuss objection with planning officers
- ⊙ Draw up statement and / or speak at the inquiry
- ⊙ Lobby councillors
- ⊙ Submit fresh objection / modification
- ⊙ Draw up fresh statement and / or speak at the inquiry

**Source:** Speer and Dade (1998) *How to stop and influence planning permission.* Stonepound Books.

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### Top Tip

Consider networking with other people/groups who share your concerns when participating in the formal consultation process. This gives your case more legitimacy.

### Arguments to use in your objections to the plans

Because planning law is precedent-led (ie, outcomes from previous cases), and not governed by exact rules, you can have a go at arguing many things. You should aim to ensure that the policies in the plan are based on the right principles. They should put emphasis on the reduction, re-use and recycling of waste by aiming to:

- ⊙ contribute to waste avoidance by considering the waste generation from new developments
- ⊙ ensure the supply of sites for recycling, composting and re-use
- ⊙ constrain the availability of sites for incinerators and landfill. Watch out for suggested locations for waste disposal facilities. It is very important to try and keep specific sites out of the plan, so that it is much harder later on if anyone comes up with a concrete proposal for an incinerator.

You can suggest model policies for the plan such as those shown in the box on the right.

You can comment on the way in which the Best Practicable Environmental Option (BPEO) has been determined in the plan, bearing in mind the key considerations for it: the waste hierarchy, the proximity principle and self-sufficiency (see Part 1). Make sure the policies in your local plan are in accordance with the waste hierarchy, and that all the opportunities for recycling and composting have been explored before incineration with energy recovery is considered. Make sure waste is managed as close to the place of production as possible, avoiding passing costs to communities not responsible for the waste, and avoiding the environmental impacts of transportation.

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### **Model waste plan policies**

#### **Overall strategic policy and the waste hierarchy**

Proposals for waste disposal and other types of waste management facility should be considered within a hierarchy of priorities:

- 1 waste avoidance; 2 repair and re-use; 3 material recycling and re-use;
- 4 disposal with energy recovery and minimum environmental impact.

The authority will apply strict environmental protection standards to all waste treatment, disposal or waste management facilities.

#### **Waste avoidance**

The authority will not normally grant permission for development which cannot demonstrate compliance with waste reduction and recycling objectives.

#### **Re-use and recycling facilities**

The authority will promote the re-use and recycling of domestic and commercial waste by:

- ⊙ allocating recycling, composting sites and anaerobic digestion operations
- ⊙ protecting existing and new recycling and re-use industrial sites
- ⊙ requiring new development to make provision for separated storage for collection of recycled waste
- ⊙ providing kerbside recycling collections for every household.

You could argue that if authorities allocate sites for landfills or incinerators but not for recycling and composting facilities they are in breach of the waste hierarchy.

#### **Waste transfer facilities**

The authority will expect waste transfer facilities to make provision for separation of recyclable waste from the waste stream and to be located on rail or water transport links where such links exist.

#### **Landfill sites**

The authority will not permit new landfill capacity development unless it can be demonstrated that the waste cannot be managed through measures to promote avoidance, re-use and recycling, and that no recyclable waste will be landfilled.

#### **Incineration**

The authority will not permit the development of new incineration capacity unless it can be demonstrated that the waste cannot be managed through measures to promote avoidance, re-use, recycling and composting.

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You can also argue against the need for waste disposal facilities. In order to do this it is helpful to find best estimates of amounts of waste arising in your area, and current amounts of disposal capacity. These should be in waste disposal plans available from the planning authority, or the municipal waste management strategies. You should argue that policies are needed for much higher levels of waste prevention, re-use and recycling. As explained in Part 1, about 80 per cent of the municipal waste stream is currently recyclable or compostable, and many countries around the world are already achieving high rates.

### Wales and Northern Ireland

In Wales, all local authorities are unitary and therefore have unitary development plans, which should be the focus for campaigning. The individual PPGs for policy areas do not apply, and instead there is a general planning guidance note for Wales and a series of Technical Advice Notes.

In Northern Ireland the responsibility for planning does not lie with local authorities in any form, but is split between two government departments, the Department of Regional Development and the Department of the Environment. Waste planning is under the remit of the Department of the Environment. The appropriate level at which to focus a campaign is at the subregional waste plans, which are expected to be finalised by 31st March 2001.

### From the frontline

#### The Essex waste incineration battle

*Essex Friends of the Earth has led a hugely successful five-year campaign overturning proposals for up to six incinerators in the county. Instead a recycling/composting strategy has been adopted, with the target of 40 per cent by 2004 and 60 per cent by 2007.*

Essex Friends of the Earth knew that once energy from waste (EfW) incineration is included in approved waste local plans and structure plans, and sites named, developers have a strong case for planning approval, and it is extremely hard to reject planning applications. The

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group wanted to change the Essex County Council draft waste plan to exclude incineration and become recycling-intensive instead. To do this, it began consolidating arguments, finding out about incineration, recycling potential and informing the public.

When the county council set up three Essex Area Liaison Groups (ALGs), with two thirds community members, and one third councillors, an Essex Friends of the Earth member joined each ALG. This was a crucially important decision as the council's presentations and seminars repeatedly left out any facts relating to the air and water pollution from incinerators, or the problematic disposal of the one-third ash residue. Instead waste was communicated as a massive problem, with landfill running out, recycling not happening, and EfW "the only solution".

At the ALG's experts seminar Essex Friends of the Earth invited an expert on dioxin effects and heard from Dorset's recycling officer about how that county was expecting to reach 40 per cent recycling by 2000. The final meetings revealed that the majority of ALG members thought a recycling rate of 48 per cent could be achieved by 2005. Members demanded urgent investment in recycling and composting facilities and kerbside collections. Incineration was very unpopular but the second draft waste plan remained virtually unchanged and still proposed burning double the amount of domestic waste Essex produced. Only the 2015 maximum recycling target was changed from 25 per cent to 40 per cent.

In June 98, Essex Friends of the Earth ran a waste seminar on resource use, incineration pollution, recycling potential, good practice recycling and composting, anaerobic digestion, and reprocessing in Kent and Essex. Fifteen councillors attended, council recycling officers and local recycling businesses also gave presentations. Councillors became enthused and Colchester, Chelmsford and Braintree Councils formed a consortium to oppose the Essex County Council's Waste Plan. They set up urgent waste training for councillors and officers - eventually 11 of the 12 Essex district councils joined the consortium. Together they decided to employ consultants Ecologika to write an alternative Recycling Plan for Essex with separate strategies for each district.

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Throughout the campaign, lobbying councillors was vital. By September it paid off when one Lib Dem county councillor, who had attended Friends of the Earth's waste seminar and three evening workshops, persuaded his party to come out against incineration in a blaze of publicity. At November's planning meeting the Labour group came out against the plan for the first time, but as the Conservatives were in control of the county council, campaigners were unable to stop the draft Essex Waste Plan going 'on deposit' in December unchanged. From then on all Friends of the Earth's letters and press releases ended: "The Conservatives are the only group supporting incineration now". All the stops were pulled out when the deposit draft plan went for public consultation over Christmas. An unprecedented 9,400 objectors lodged 22,000 objections. But the County Council and Conservatives still refused to withdraw and rewrite the plan before going to public inquiry.

In May 1999, campaigners arranged a waste rally outside County Hall and a seminar with speakers from all parties, waste experts and people from the protesting communities. This received blanked media coverage and one month later the Conservatives finally caved in. Essex County Council signed up to a new waste strategy and a 'working together' agreement with the consortium of district councils. They agreed to targets of 40 per cent recycling and composting by 2004, and 60 per cent by 2007, with research into the most environmentally friendly means of dealing with the residues. However, the Waste Plan was still not withdrawn and rewritten, although a schedule of amendments was drawn up, weakly suggesting incineration only as a last resort.

At the public inquiry, it was demonstrated that business as usual would mean a rise from the present £34 million a year to £43 million; an incineration strategy would cost £50 million and a recycling intensive strategy would cost £35 million. The inspector's report recommended that the plan should identify many small sites suitable for recycling and composting, and could have included a presumption against incineration. The battle continues.

**Paula Whitney, Essex Friends of the Earth**

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### 4 Preparing the waste disposal contract

The waste disposal contract is drawn up by the council and the waste disposal company providing the service for managing its MSW. This is not open for public consultation but it is important for you to know what it contains and which company holds the contract.

### 5 Application for planning permission

Once a specific proposal for building an incinerator has been made by a waste disposal company, you should get engaged in opposing the planning application.

First of all you must establish all the facts about the proposal, including:

- ⊙ the location of the proposed plant
- ⊙ the identity of the proposed developer and operator
- ⊙ whether planning permission has been applied for or granted
- ⊙ whether an operating permit has been applied for or granted
- ⊙ the quantity of waste proposed for the incinerator
- ⊙ how the proposal fits with the waste planning policy.

You can find most of this information from:

- ⊙ the Planning Register, held by the local planning authority – You have a right under the Environmental Information Regulations 1992 to see environmental information held by the local authority
- ⊙ The Environment Agency
- ⊙ the landowner or occupier
- ⊙ the would-be developer and operator.

It will also be helpful to contact friendly organisations, such as other local environmental groups, and visit the site.



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Almost all incinerators will need planning permission before they can be built. This is given by the planning department of the local authority (local planning authority – LPA) at county council or unitary authority level. The actual permission takes the form of a document specifying the person/company to whom permission was granted, the date it was granted, a description of the site, and any number of conditions which the LPA thinks are appropriate and with which the operator must comply. In Northern Ireland there is no local planning authority, and permission comes from the regional offices of the planning service, an agency within the Department of the Environment.

Planning permission is usually the first stage for a developer, and is needed before an application for a license to operate can be granted. It offers the best opportunity for members of the public to have a formal input into decisions. If you can get planning permission refused you have won your battle.

### Top Tip

If you can get planning permission refused, the waste disposal company can go no further and you will have won the battle.

### The decision process

The LPA's decision on a proposal will not be arbitrary, and must refer to the relevant waste plans described earlier. It is a legal obligation to ensure the decision is in accordance with these plans, but as well as local policy, the decisions will be influenced by a combination of existing national and European guidance, and the merits of an individual proposal.

The LPA's decision will therefore be based on the following:

- ⦿ the Government Waste Strategy for England and Wales 2000
- ⦿ central government guidance contained in Planning Policy Guidance Notes (PPGs)
- ⦿ regional planning guidance (RPGs)

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- ⊙ existing county and district waste management policy described in the development plans
- ⊙ the requirements of relevant European Directives
- ⊙ previous court judgements in relation to appeals on similar cases
- ⊙ the merits of the individual proposal as described in the planning application
- ⊙ landscaping, access, loss of amenity and sustainable development.

Once a planning application has been made by the developer, the LPA is under a legal duty to advertise it in the local press. They must also either post a site notice in at least one place on or near the land for at least 21 days, or serve a notice on any owner or occupier of any land adjoining the land. The LPA is then required to determine the application one way or the other within eight weeks of the date on which the application was received, or 16 weeks if an environmental statement is required. (This is a formal statement of environmental impact, submitted with the planning application and/or the integrated pollution prevention and control (IPPC) application. It is generally necessary for incinerators with a capacity of 75,000 tonnes per year or more.)

### **Public inquiries**

In particularly contentious cases, the planning application may be “called in” by the Secretary of State, who will then make the decision. This may happen for an important issue that has effects beyond the local authority, or that could give rise to substantial regional or local controversy. The applicant for planning permission can also appeal to the Secretary of State for an Inquiry to be held if the LPA rejects a proposal or fails to determine it within the required time. Inquiries are presided over by a Planning Inspector, who makes a recommendation to the Secretary of State on the application.

A public inquiry attracts more publicity to a planning application for an incinerator and offers a good opportunity for opposition views to be expressed and convince everyone of the public antipathy to the project.

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### Objecting to a planning application for an incinerator

Your formal objection, submitted to the LPA, is one of the most important means by which you can persuade the LPA to reject the application. You should encourage as many people as possible to submit a letter of objection to the proposal, since such representations from the public are a powerful influence.

#### Be quick

Once a planning application has been submitted, the LPA has eight weeks in which to make a decision to allow the development or reject it, (16 weeks if an environmental statement has been submitted). As well as seeking the views of interested organisations and statutory “consultees”, the LPA will also consider the views of any other individual or group who wishes to object to the proposal. Objections must usually be given within 21 days of the application being submitted, but the period can be as little as 10 days. This will limit the detail you can go into, but the LPA may be persuaded to extend the period of consultation if there is sufficient feeling in the community.

#### Top Tip

Once a planning application has been submitted, the local planning authority usually has eight weeks to reject or accept it, so move quickly with your objections.

If you are very pressed for time, try submitting an outline of your objections and follow up with more detail as soon as possible. The decision may go to public inquiry and then you will have a lot more time to work on your objections.

#### Gathering information for your objection

- ⦿ Obtain a copy of the application and the accompanying environmental statement from the local authority.
- ⦿ Find out the views of the statutory consultees with whom the LPA is legally obliged to consult. If they have objections this could support your case, and you should let them know your concerns.

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Statutory consultees may include: the district council; the Highways Authority/Department of Transport; neighbouring planning authorities; English Nature or the Countryside Council for Wales; The Ministry of Agriculture, Fisheries and Food; The Health and Safety Executive. Try to get the council to consult other non-statutory consultees who may have something to say but may not be aware of the application.

- ⊙ Obtain a copy of the waste plan, structure plan or unitary development plan from the county or metropolitan planning department (if this is not too expensive).
- ⊙ Try to obtain the municipal waste management strategy from the waste officer of your local authority.
- ⊙ Find out the planning history of the site from the LPA. It may have been designated for a specific purpose other than waste disposal, or it may be that similar proposals were rejected in the past.
- ⊙ Obtain copies of the relevant national planning guidance which may be available in the local library. You only need copy the relevant pages.

### What to say in your objection, and how to say it

Your objection should be in writing, preferably typed, but there is no specified format. Send it to the LPA and distribute it to all the councillors on the planning committee considering the application. To make it easy for the planning officer writing the report on all objections, you should have summary points to emphasise what is important. (Make sure you get a copy of the officer's report to see that they have represented you correctly.) Submit the objection in the name of your campaign group, and also send it out with a press release to the local media.

### ⊙ ⊙ ⊙ **Top Tip** ⊙ ⊙ ⊙

You should produce your objection in writing, preferably typed, with summary points. Keep your points brief and concise.

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Limit your objections to the current application, and concentrate on the material planning considerations, making it clear which consideration each of your comments refer to. Material considerations are fairly broad and include relevant legislation and guidance, including the Waste Strategy 2000, waste plans, landscaping, access, impact on a neighbourhood, loss of amenity and sustainable development. Try to express all problems in terms of the public interest rather than private interest. You should explain clearly why the proposal would be harmful, and quote relevant national and local planning policies where useful. Make your points brief and concise. The objection should be based on the key considerations that will influence the LPAs decision, and these issues are discussed in more detail below.

### **Things to consider when planning your objections**

As well as the arguments detailed in Part 2, there are other things to consider when writing your objection to an incinerator application.

#### **Does the application contain all the relevant information?**

Legislation in the Town and Country Planning Order 1995 requires that an application must include information on a range of issues, including:

- ⊙ the nature of the waste
- ⊙ the amounts of waste to be treated or disposed of
- ⊙ access to the site and the time-scale of operations
- ⊙ an up to date and accurate map showing the proximity of the proposed site to residential areas.

If this information has not been provided then you can call for the application to be thrown out, and get more time to build your campaign.

#### **Consistency of the proposal with the development plan and waste policies**

Look carefully at components of the development plan to see if there are any contradictions. Check that the structure plan and the waste local plan are in harmony with each other and with the proposal. You should quote

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verbatim any passages from these documents that support your objection. You can also criticise any weaknesses in the component plans, such as if they are out of date, of poor quality, or have not even been written. If this is the case then you can call for the planning application to be rejected on the grounds that there is no comprehensive planning strategy for waste disposal in the area.

### **Consideration of the BPEO (Best Practicable Environmental Option)**

Check that the developer has shown that for each individual waste stream incineration is the BPEO (see Part 1 for an explanation of this). If properly implemented the BPEO principle would dictate that the potential for recycling and composting the waste should be considered. Has such an analysis been presented?

### **Necessity for the incinerator**

The need for an incinerator should be considered in two ways with respect to waste generated and achievement of the recycling targets in the Waste Strategy 2000, and with respect to the availability of alternatives including other incinerators or landfill sites in the region. A new municipal waste incinerator cannot be justified if the local authority does not have provisions to at least meet the recycling targets, and if they have failed to consider alternative waste management options.

Lack of proven need may be harmful also because excess capacity in one area would result in waste being attracted from elsewhere, and thereby contravene the proximity principle. Need must also be demonstrated in order to overcome the intrinsic harm from waste disposal such as nuisance or pollution threats.

Your objection should aim to prove that there is no need for the incinerator and press for waste minimisation and recycling. If you can, find out how much waste is produced and disposed of in your area. Find out what type of waste is intended for disposal at the site, and where it is to come from. Also investigate what existing incineration, landfill and recycling capacity there is, and compare the local recycling rate with higher levels being achieved elsewhere.

## **Campaign against incinerators**

### **Pollution control issues and air quality**

The planning permission and operation licence for an incinerator are designed to be complimentary, as both aim to prevent damage to the environment. Although the operation licence covers the prevention of pollution from a site, pollution control issues are still relevant to planning applications and must be taken into consideration.

Authorities should consider the impact of individual incinerators and also the cumulative impact if one is proposed near to other sources of pollution. This cumulative impact is not considered by the licence authorisation and can only be regulated through the planning system. Once you have made a case on the need for the planning authority to consider the effects of pollution from the site, you can then draw attention to the potential health effects from pollutants, (see Part 2) particularly those for which the greatest uncertainties exist, ie dioxins and fine particles.

You should also indicate how future land use in the area would be affected by pollution. Concerns about potential health effects in the vicinity are likely to affect the desirability of future development in the area around the incinerator. Property prices may be affected, especially as the state of knowledge improves on the health effects of the pollutants being emitted. Existing businesses could be damaged, with food processing particularly vulnerable, and concerns about the suitability of adjacent land for agricultural and dairy use could be raised as a result of pollution from incineration plants.

### **Habitat conservation and agriculture**

An incinerator development could affect nature conservation through visual intrusiveness, noise, traffic, litter and air quality, or it might be near or on agricultural land. These are both things that should be protected by the planning system. The proposed site may affect designated areas, such as Sites of Special Scientific Interest, National Nature Reserves, Special Areas of Conservation, Special Protection Areas or Ramsar Sites. There are various other designations including Areas of Outstanding Natural Beauty and National Parks, and if any of these are affected that should be highlighted in your objection. Consider the direct and indirect impacts, such as emissions and possible impact on food quality or contamination, visual intrusion, traffic generation and disturbance of the site.

## **Part 3**

### **Local and national transport policy**

National planning guidance on transport states that an increase in traffic is a material consideration, especially where the capacity of a road is near to being exceeded. The proposal should also be consistent with the Local Transport Plan (LTP) which all local authorities must produce, detailing their planned transport developments over the next five years.

Your objection should highlight that the movement of waste to the proposed site, especially by road, may pose considerable risk to the surrounding area. Large numbers of lorries may cause traffic congestion, lead to delays and increase the risk of accidents, as well as causing damage to the road itself. The transport of waste may also adversely affect developments along the route, such as houses, schools and hospitals, through noise, smell and dust generated, as well as the threat of accidents. Vibration from heavy lorries may damage nearby property. Increased traffic in residential areas can be considered a nuisance to residents. Depending on the type of waste transported, there may be problems of waste material or incinerator ash spillage along the route. This could happen through day to day operations or through an accident.

### **Visual intrusiveness**

An incinerator is a bulky construction with tall chimney stacks. It might need 2-3 hectares of land, be 30-45 metres high, with an 80 metre chimney. Consider how this will affect the character of the neighbourhood or open space. It could wreck a view across a valley or dominate a small row of terraced houses.

### **Potential nuisance**

The potential for the incinerator to cause or increase nuisances, such as smell, dust, litter and noise should be highlighted in the objection. The developers will attempt to show how these nuisances will be controlled, but you may be able to undermine their assurances if you can find examples of other incinerators where the suggested control measures have failed.



## Campaign against incinerators

### From the frontline

#### Fighting the Belfast Incinerator

In 1996 Belfast City Council called for tenders for their 20 year waste disposal contract. This resulted in two planning permission applications to build incinerators. One came from a company called NIGEN, for an incinerator burning 200,000 tonnes each year situated at Belfast docks. The other was from Belfast Waste Services, also to be situated at the docks. Belfast FOE immediately objected to both proposals but didn't object to the third tender, a materials recovery facility /landfill proposal as there had to be an alternative to incineration.

The campaign was mainly against the NIGEN proposal and the objective was simple; to get a public inquiry and have the proposal stopped. The campaign was fought on many levels: public opinion, political opinion, and the planning system.

One of the most important aspects of the campaign was building alliances with other objectors. The objectors were not the usual suspects of green groups but included the harbour commissioners who owned the site of the proposed incinerator and the Northern Ireland grain traders whose main grain storage facility was adjacent to the proposed site. This alliance ensured lobbying was carried out at all levels, from publicly on the streets to behind the scenes at business lunches. Public awareness was increased through letter writing, leafleting, petitions, stunts and getting the public and community organisations to send in objections to the planning service calling for a public inquiry. Political support was achieved by sending briefing documents to all Belfast City Councillors and making a presentation to the council.

The proposal went to public inquiry in April '97. The Northern Ireland Waste Strategy was in the very early stages of preparation and Friends of the Earth was able to argue that any decision on a facility of this size would be a material consideration in any waste plan and to give the go ahead would undermine the final waste strategy. The Department of the Environment announced a moratorium on any major waste planning applications until the strategy was finalised.

## Part 3

The Northern Ireland Waste Strategy was released in March 2000 and no public announcement has been made about the incinerator proposals since, but NIGEN's incinerator will never be built and Belfast Waste Services proposal will not get built in its present form. By using the planning process to delay things Friends of the Earth succeeded in getting Belfast City Council to scrap their tendering process. In addition, the harbour commissioners and Northern Ireland Electricity took NIGEN to court saying that building an incinerator breached their lease as the land was for electricity generation only. They won the case. NIGEN appealed to the High Court and lost again. The judge ruled that incineration was for waste disposal, not electricity generation. NIGEN then lost all will to continue with the proposal.

Friends of the Earth also worked as a member of the independent advisory group for the Northern Ireland Waste Strategy that now ensures that any council wanting to use incineration must also demonstrate how they will meet their recycling targets. The main lessons from this campaign are build alliances with other interests, especially those with finances, have an alternative to incineration and fight from as many angles as you can to help to attain your objective – to win.

Cathy Maguire, Belfast Friends of the Earth

## 6 Application for a pollution control permit

Since incinerators have the potential to create pollution through air emissions, through liquid discharges to sewer, and through the disposal of contaminated ash to landfill, they are subject to regulatory controls and need a licence before they can operate. The Integrated Pollution Prevention and Control (IPPC) system is administered by The Environment Agency (the Department of the Environment in Northern Ireland), and covers larger and more polluting processes, including most incinerators. The terms of an authorisation to operate includes details of the quantity and quality of discharges to sewer and controlled waters, and the quantity and composition of ash requiring disposal, energy consumption, noise and vibration and light. The air emission standards for dioxins etc are derived from European Directives, and discussed in Process Guidance Notes (PGNs) issued by the Environment Agency.

## **Campaign against incinerators**

The information a company submits in support of an application for IPPC authorisation should all be available for public inspection, and be placed on the public register as soon as possible after it has been received by the Environment Agency. A decision will be made within four months, but in practice the proposed design and operation of a large incinerator is likely to be developed during a long period of liaison between the applicant and the Agency. After this it is more likely that authorisation can be granted immediately the plant is ready to be brought into commission.

The IPPC system is supposedly designed for a high degree of public involvement in the decision-making procedure for granting applications. The Environment Agency is obliged to consider any representations from the public it receives, and also those from a number of statutory consultees, including the Health and Safety Executive, the district council, English Nature and the Ministry of Agriculture, Fisheries and Food.

In practice, the Agency is far less likely to be persuaded by public opposition than the planning authorities are. This is because they are only interested in comment on operational matters, which are likely to be very technical. The Agency will be reluctant to accept that any member of the public is better qualified than they are on technical issues.

However it is still worth getting involved in the IPPC consultation process because your representations are likely to result in tighter conditions within the authorisation, and will also serve to highlight the shortcomings of the IPPC system itself.

### **How to oppose an application for a licence to operate**

You must make your representation within 28 days of the application being advertised. To help you do this you should:

- ⊙ obtain a copy of the application from the public register held by the Agency
- ⊙ find out which Environment Agency Officer will make the decision and when
- ⊙ get a copy of the Local Planning Authority Officer's Report

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- ⊙ obtain the views of interested bodies, such as the statutory consultees and other members of the public, which should be on the public register. Express your concerns to these other interested parties and ask them to answer particular queries. If they have reservations, ask them directly if they support or object to the application.

### Things to include in your representation

- ⊙ Ask if the potential for recycling has been fully explored.
- ⊙ Insist that the IPPC authorisation takes into account the cumulative impact and cocktail effect of all polluting emissions from the plant and existing sources of pollution in the area. This should involve monitoring of air, soil and vegetation.
- ⊙ Insist that the application provides information about existing ambient pollution concentrations.
- ⊙ Insist that the application demonstrates that the technology used is the best available, not entailing excessive cost. If the emission standards are less stringent than could be possible, argue that the best available techniques should be considered where higher standards are achieved elsewhere.
- ⊙ Raise the question of the applicant's competence. Highlight any pollution or convictions for waste disposal offences at other sites they run as a reason why the company should not be allowed to operate the proposed plant. This information is held by The Environment Agency on the public register. You can also ask the company directly about its other sites, and if it fails to come clean about its pollution record, you can expose it later.
- ⊙ If the Agency does decide to grant the authorisation, they will include a number of conditions with which the operators must comply. You can highlight matters you feel should be the subject of conditions, such as ash analysis, regular pollution testing and accurate records. (Try not to imply you approve of the application if they are met.) Make sure combined heat and power (CHP) is added

## **Campaign against incinerators**

to improve the energy efficiency of any plant. It is also important to press for feedstock control of the waste which enters the incinerator – hazardous materials, such as metals, batteries and PVC plastics should be removed, as these make the ash even more toxic and cause emissions of heavy metals and dioxins. If the incinerator is built the matters you have raised may improve environmental standards, and any breaches could form the basis of a future campaign to get the site closed.

# The basics of Part 4 organising a campaign

At its simplest, campaigning is about getting organised to change something. We have the right to be involved in decisions that change our lives and unless we exercise that right, those in positions of power can do what they want to with a minimum of public opposition. We want change – whether it’s getting a pedestrian crossing near to the local school or tackling a local incinerator – so people are getting together with other people and making their views known.

This section deals with the basics of how to get started and organised. It provides basic information on how to use your power to change things and to win.

## 1 Find people to give you people power

Campaigns are rarely won by individuals; they are won by groups of concerned people. The more people you involve in your campaign and the more tasks which can be shared, the greater your chances are of campaign success.

Getting more people involved in your campaign will:

- ⊙ give your group greater credibility
- ⊙ enable you to get your message across to a greater number of people
- ⊙ provide you with a larger pool of people with particular skills or interests

### ⊙ ⊙ ⊙ **Top Tip** ⊙ ⊙ ⊙

The more people you involve in your campaign and the more tasks which can be shared, the greater your chances are of campaign success.

## Campaign against incinerators

- ⊙ give your group a regular income, for example if people pay a small membership fee.

To start your group, get together and decide on a plan of action. You will need to:

- ⊙ clarify your aims
- ⊙ decide how much time you can all spare and how often you want to meet
- ⊙ decide on a campaign name
- ⊙ make a list of people the group can approach to write letters, attend meetings, or make telephone calls
- ⊙ write down a list of other contacts who might be useful.

Having established a core group, you now need to let others know you exist, know how to find you and know a bit about your campaign. Campaign publicity should always state what your group does, how to contact you, how to join and what people can expect when they join.

## 2 Make meetings work... with time for fun too

Meetings are your public face. At a meeting you will be judged by people who are interested in your campaign. If people come to one meeting and never again, your meetings are not working for new people. And if your meetings are not working for new people, they are probably falling well short of the needs of the rest of the group too.

Regular campaign meetings should be the most effective time your group spends together. Making your meetings work effectively for everyone is a clear sign that the group is thinking ahead, wants to succeed in its campaigns, and is attracting new members. Developing a standard yet flexible format for meetings will allow your group to do everything it wants and needs to do in two hours and still have time for an after meeting social/drink. Good meetings can make all the difference between a group feeling motivated and dynamic or a group getting stuck in a rut. The success of your group meetings is in your control.

## Top Tip

Good meetings can make all the difference between a group feeling motivated and dynamic, or a group feeling stuck in a rut.

### 3 Get organised: the basics of setting up a group

Now that people are interested and working together, the next step is to establish a campaign group. Getting your organisation right will make your campaigning more effective. It will help your group achieve objectives, save time, win campaigns and thrive in the longer term. Time spent now on getting the best structure for your group will pay off many times in the future. To keep a group running it is important that you work as a team:

- ⊙ have realistic expectations
- ⊙ have a common sense of purpose
- ⊙ have a common sense of identity
- ⊙ encourage involvement
- ⊙ encourage people to be active and voice their opinion
- ⊙ value everyone's contributions
- ⊙ recognise limitations
- ⊙ make time for fun.

### 4 Spread the work load

Groups can fail if one job involves far too much work which tends to be either the chair or co-ordinator. Avoid depending on one person. It is unfair to the individual concerned, may lead to them doing a bad job or burning out, and can disempower other members of the group. An active campaign group could divide the co-ordinator role between two or more people. Useful appointments include:



## Campaign against incinerators

- ⦿ a campaigns co-ordinator who co-ordinates the work of small task-groups (if they exist) or individual campaigners; represents the group externally (eg, on council forums or in the media); monitors media coverage; oversees the group's strategy and steers new members towards appropriate campaigns
- ⦿ a group organiser who receives information on behalf of the group and distributes it promptly; is the first point of contact with the public; maintains group resources; ensures that meetings are recorded and action points followed up and steers new members towards appropriate organisational jobs
- ⦿ other potential roles include a press officer, membership secretary and a treasurer.

Another way to organise your group is to split roles into individual tasks which means more than one person can do what would otherwise be one person's job. Overall, ensure you structure your group to meet your campaign needs.

### ⦿⦿⦿ **Top Tip** ⦿⦿⦿

Structure your group to meet your campaign needs.

## 5 Manage your membership

Members come and go so always be on the lookout for new blood. Public meetings and events are good places to recruit members. Build on your group's successes and keep your messages locally-relevant in order to attract members:

- ⦿ when holding or attending public meetings, build in time to call for more active and general support.
- ⦿ advertise tasks for specific roles on large sheets of paper such as "Wanted" posters. This enables people to approach you, as well as allowing you to target specific skills

## Part 4

- ⊙ if you have set up an event with the aim of getting media coverage for your campaign, build in a call for new members. If you know the event is definitely being covered by the local paper/radio/TV, follow it up with letters to local papers about your campaign, ending by asking for help and funds
- ⊙ build on success – people are attracted to groups that are seen to be successful. When dealing with members of the public be positive and sell your successes. As the saying goes, nothing succeeds like success.

### ⊙ ⊙ ⊙ **Top Tip** ⊙ ⊙ ⊙

To recruit members, build on your group's successes and keep your messages locally-relevant.

## 6 Draw up a campaign plan

A campaign plan should help increase your group's chances of success and identify the most effective course of action to take. In real life nothing is straightforward. Situations change rapidly, and campaign plans need to be redesigned as necessary. The following are the basic steps:

- ⊙ decide on your campaign aim and objectives – your aim spells out what the campaign wants to achieve overall, objectives are the stepping stones for how you get there
- ⊙ identify your targets – the people or institutions which can bring about the changes you are campaigning for
- ⊙ develop your key messages
- ⊙ know your facts
- ⊙ choose your tactics – your choice of tactics depends not only on who your target is, but on the issue, the timing, what stage the campaign is at, opportunities for influence and how much pressure you want to apply

## Campaign against incinerators

- ⊙ mobilise the public – the majority of campaigns are won because of public pressure. Look for easy, straightforward ways the public can get involved in your campaign
- ⊙ develop a media strategy – when planning campaigns, consider how to use the media to get your messages across, and gain maximum exposure at prime opportunities
- ⊙ draw up schedules for main activities/events
- ⊙ draw up a summary of what needs to happen by when with clear priorities. Know who your allies are, and work with them Who else is doing something similar to you? Can you link up with other community groups?
- ⊙ identify fundraising opportunities – every campaign opportunity is a possible fundraising opportunity
- ⊙ review, evaluate and monitor your campaign. When and how will you judge whether the campaign has been successful?
- ⊙ “We won!”– when you do have a campaign victory, take time to celebrate your success. Victories are significant milestones, and marking them can re-energise your campaign. Always be prepared to win.

## 7 Money – getting it and managing it

The first rule of fundraising is that, “You don’t get what you don’t ask for”. Don’t be afraid to ask for funds to run your campaigns. There are several ways of raising money for your campaign and they are not all mutually exclusive. For example you can organise a fundraising event, hold a street collection or run a raffle. You can also fundraise from trusts – there are more than 20,000 grant-making trusts and foundations in the UK. While most mainly give to national organisations a significant number are for local grant-making bodies. The Directory of Social Change produces guides about local trusts and ways to fundraise.

Once the money starts to roll in, you’ll need to think about how to manage

## Part 4

it. There are financial and legal issues to consider. For example, there is a legal obligation to record all monies received and notes must be kept of who has given personal donations. Other tips include:

- ⦿ appoint a treasurer
- ⦿ get a bank account
- ⦿ when you receive or pay out money record it at once and write out a receipt
- ⦿ file receipts – keep all receipts in an envelope, filed or clipped together
- ⦿ balance the books at the end of the month or quarter
- ⦿ annual accounts – the point of balancing the books is to make sure that at the end of the financial year the group’s account books and bank account tally
- ⦿ legal issues – most voluntary groups will be characterised under the heading of “Clubs, societies and associations”. Some may be registered as separate legal entities. Unfortunately there is no automatic exemption from tax. The Inland Revenue Guidance leaflet IR46 sets out the position with regard to Income and Corporation tax and can be obtained from your

### ⦿⦿⦿ **Top Tip** ⦿⦿⦿

Don’t be afraid to ask for funds to run your campaigns – you don’t get what you don’t ask for.

local tax office.

## 8 Get the message across

## Campaign against incinerators

As campaigners we are competing for people's attention in a noisy, busy world and against people who have large media and advertising budgets. You do not need a big budget to get people's attention though it can clearly help. What you do need to do is pay attention to planning and preparation.

### What do you want to say?

Before you set up a street stall or print a leaflet, try to write down the basics of your message in one or two short sentences. Unless you can explain your campaign to someone who knows nothing about the issue, it will seem small, complicated and irrelevant.

**Why are you telling people?**

**Top Tip**

To get your message across, plan and prepare well ahead.

What exactly do you want people to do when they have seen your poster, read your leaflet or have visited your street stall? Whenever possible, your communications should contain a clear call to action eg joining your group, sending a letter, boycotting a product, donating money or attending a public event.

### Who are you telling?

"The public" is a fuzzy term. Your communications will be much more effective if you target specific people. For example, if your message contains a health aspect, why not display leaflets at the local gym or swimming pool? If food, the obvious place is outside a supermarket.

### How are you going to tell them?

Once you have worked out who your audience is, and your basic message, decide on the best way to get your message over. Stalls, posters and leaflets are just a few ways of communicating to the public. There are many other techniques, such as using stickers or postcards. The main thing to remember is that everything should back up your core message, be attractive, be succinct and grab attention.

### 9 Look good

To communicate a campaign message you need to think about how design can help you. For example, if you want to produce a leaflet, newsletter or poster your job will be to make

#### Top Tip

When designing materials for your campaign, establish up front what the aims of the materials are. This is known as a brief.

your

product so attractive that it stands out or entices someone to pick it up. You will need to make it easy to use by arranging the text and pictures so that people are guided through the publication without confusion about which section they should read, or look at, next.

Whether you are designing your own materials or commissioning a designer it is important to establish what the aims of the publication are supposed to be. This is known as a brief. To do this for a poster, work out:

- ⊙ the purpose of the poster. Is it promotional or is it going to communicate a hard-hitting message?
- ⊙ who the poster is aimed at?
- ⊙ where the poster will be displayed?
- ⊙ how the poster will be reproduced (eg, photocopying/printing?)
- ⊙ are there any logos to be included?
- ⊙ how people will know who is talking to them, what details, phone numbers and web addresses will be included?

Find out if your leaflet or poster is going to work well by trying it out on your audience before it is printed. Don't just check that there are no spelling mistakes or wrong phone numbers. Ask your tester if they can tell you what the key message is. You may find that your family's first impressions are very helpful.

## Campaign against incinerators

### 10 Get your message across through the media

Media coverage is by far the quickest, cheapest and most effective way to reach the people you want to hear your message. A local newspaper is read by thousands. A national news programme is watched by millions. Even the most committed person distributing leaflets cannot reach so many in so short a time. Media coverage can also raise the profile of your campaign and help put pressure on decision makers. Top tips include:

- ⊙ every media organisation works to deadlines. Find out what they are
- ⊙ know who they are: find out the names of key journalists in your area, what areas they cover and if you can, their pet subjects
- ⊙ know what they want. Journalists want news stories – a key ingredient is something involving local people or local personalities. Other elements include controversy; previously unpublished facts.

The media finds out about many stories from press releases so you need to know how to write them. Simple rules to follow to increase the chances of your press release being read by the news editor are:

- ⊙ use headed paper. Make up a press release template, which you can copy and use again and again
- ⊙ use the campaign logo (if you have one) and the name of your group in large writing at the top
- ⊙ give key details. Put the date and time of publication at the top
- ⊙ think pictures – if your press release advertises a demonstration or other visual event, put the words “Picture Opportunity” on it, and give a date, time, and clear address (with map if necessary) of the event
- ⊙ stay in touch. Put full contact details at the bottom of each page with telephone numbers
- ⊙ put the page number at the top of each page of your release
- ⊙ make it interesting. Try to grab the News Editor’s attention with a clever, appropriate headline

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- ⊙ put all the key facts in the first paragraph. The first sentence of every news story tells you who, what, when and where. The rest of the story will expand these facts and try to answer the questions why and how
- ⊙ use short sentences and clear English throughout. Avoid using jargon
- ⊙ Include a snappy quote from the key campaigner
- ⊙ add a section called “Notes to Editors” at the end if you need to. This is for more detailed information, explanations about toxic chemicals, acronyms, references and so on
- ⊙ keep the press release short – two sides of A4 in a fairly large typeface is really the maximum. Aim to use just a single side of A4

### ⊙ Top Tip ⊙ ⊙ ⊙

⊙ send it out – distribut

Get your message out to the media – it’s the quickest, cheapest and most effective way to reach large numbers of people.

by fax is by far the best method

- ⊙ follow it up – ring key journalists (or news desks) to make sure they have received it, and find out if there is anything else they want to know.

For more information on all the issues covered in this section, see Friends of the Earth’s *How to Win – A Guide to Successful Community Campaigning*.





# Glossary

# Part 5

## **Anaerobic digestion**

A process where biodegradable material is encouraged to break down in the absence of oxygen. Materials are placed into an enclosed vessel and in controlled conditions the waste breaks down into digestate and methane gas.

## **Best Practicable Environmental Option (BPEO)**

In theory BPEO will be the outcome of a systematic decision making process which emphasises the protection and conservation of the environment. For a given set of objectives, the BPEO establishes the option that provides the most benefits or the least damage to the environment as a whole, at an acceptable cost, in the long term as well as the short term.

## **Bottom ash**

This is the residue that is left behind in the incinerator furnace after combustion. For municipal waste it is approximately 30 per cent of the weight of the incoming waste, and is likely to go to landfill.

## **Dioxins**

This is the name given to a large number of related chemical compounds which contain carbon, hydrogen and chlorine. They are persistent, which means they do not break down in the environment or our bodies very rapidly. Dioxins are toxic to humans in a number of ways and there is no safe threshold level for exposure. They are known to cause cancer in humans and it has recently been estimated by the United States Environmental Protection Agency that they are 10 times more likely to cause cancer than was previously thought. They are easily captured in food chains, especially dairy products, as they accumulate in fatty tissue in the body. Dioxins are formed when materials containing chlorine are incinerated.

## **Environmental limits**

The idea that there are environmental limits is based on the view that every country should have a fair share of the Earth's resources. The limits also depend on the ability of the environment to absorb pollution,

## Campaign against incinerators

on the level of damage caused to wildlife or habitats by the use of different resources, and how much we can consume without threatening the long term supply of a resource.

### Fly ash

This is the residue that is collected around the cleaning technology of an incinerator chimney. The cleaning system typically consists of filters to absorb pollutants and remove fine particles. These make up the fly ash, which is highly toxic and needs to be treated with great care and landfilled in very special circumstances. As the filtration technology on a plant improves, so the concentration of contaminants in the fly ash increases.

### Hazardous/ special waste

This is defined as any waste that is dangerous to life, has a combustion flashpoint of 21 degrees centigrade or less, or is a medical product. It includes any waste that contains substances listed in Schedule 1 of the 1980 Control of Pollution Regulations.

### Life cycle analysis

This is a way of examining the total environmental impact of a product or system through every

step of its life – from obtaining raw materials, to manufacture, use, transport and recycling, landfill or incineration.

### Municipal solid waste - MSW

This is the waste collected by local authorities and consists mainly of household waste, but also includes some trade waste from local shops and offices. Most MSW is about 90 per cent household waste, but the composition will vary depending on the area. For example in Westminster where there are many shops and offices, only 35 per cent of the waste collected by the local authority comes from households.

### Particulates

These are very fine particles of invisible soot which are released whenever combustion occurs. They have been associated with the exacerbation of chronic lung and heart diseases, such as asthma and emphysema. The particles produced by incineration are much finer than natural dust, and are measured as PM10s, particulate matter around 10 micrometers in diameter. The smaller the particles, the greater the extent to which they are able to penetrate the lungs and come into close contact with the blood stream.

## Part 5

### **Pollution control permit**

This is a permit needed for an incinerator to operate, and it gives details of emission limits and other pollution-related matters.

### **Precautionary principle**

When an activity raises threats of harm to human health or the environment, precautionary measures should be taken even if some cause and effect relationships are not fully established scientifically.

Adopting the precautionary principle includes taking action in the face of uncertainty; shifting burdens of proof to those who create risks; analysis of alternatives to potentially harmful activities; and participatory decision-making methods.

### **Proximity principle**

This suggests waste should be disposed of as near to its place of production as possible

### **Sustainable development**

Development which is sustainable will meet the needs of the present without compromising the ability of future generations to meet their own needs.

### **Waste disposal contract**

This is the contract between the council and the waste disposal company contracted to manage the council's municipal waste.

### **Waste hierarchy**

This is outlined in the Government Waste Strategy 2000. It suggests that the most effective environmental solution is to reduce the amount of waste generated, ie reduction. Where further reduction is not practicable, products and materials can sometimes be used again, either for the same or a different purpose, ie re-use. Failing that, value should be recovered from waste, through recycling, composting or energy recovery from waste. Incineration with energy recovery should not be considered before the opportunities for recycling and composting have been explored. Only if none of the above offer an appropriate solution should waste be disposed of.

# Useful contacts

# Part 6

## 1 Useful addresses

**The Community Recycling Network**  
Trelawny House, Surrey St,  
Bristol BS2 8PS  
Tel: 0117 942 0142  
Website: [www.crn.org.uk](http://www.crn.org.uk)  
Email: [crnmail@crn-org.uk](mailto:crnmail@crn-org.uk)

**Communities Against Toxics**  
PO Box 29, Ellesmere Port, Cheshire  
CH66 3TX  
Tel/Fax: 0151 339 5473

**Ecologika**  
88 Albion Drive  
London E8 4LY  
Tel: 020 7923 7253

**The Environment Agency**  
Head Office, Rivers House, Waterside  
Drive, Aztec West, Almondsbury,  
Bristol BS12 4UD  
Tel: 0845 933 3111  
Website: [www.environment-agency.gov.uk](http://www.environment-agency.gov.uk)

**Friends of the Earth**  
**Head Office**  
26-28 Underwood St, London N1  
7JQ  
Tel: 020 7490 1555  
Fax: 020 7490 0881  
Email: [info@foe.co.uk](mailto:info@foe.co.uk)  
Website: [www.foe.co.uk](http://www.foe.co.uk)  
**Northern Ireland Office**  
40 Wellington Park, Belfast  
BT9 6DN  
Tel: 028 9066 4131

**Cymru Office**  
33 The Balcony, Castle Arcade  
Cardiff CF1 2BY  
Tel: 029 2022 9577

**Regional offices**  
Midlands: Tel 0121 643 9117  
North-West: Tel 0151 707 4328  
South-West: Tel 0117 942 0128  
East Anglia: Tel 01223 516551  
South-East: Tel 01273 777299  
North-East: Tel 0113 242 8150

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Tel: 01222 395548  
*In Northern Ireland:* 16 Arthur  
Street, Belfast BT1 4GD  
Tel: 028 9023 8451

**WasteWatch**  
Europa House Ground Floor 13-17  
Ironmonger Row, London EC1V 3QG  
Tel: 0870 243 0136  
[www.wastewatch.org.uk](http://www.wastewatch.org.uk)

**Women's Environmental Network**  
PO Box 30626, London E1 1TZ  
Tel: 020 7481 9004  
Fax: 020 7481 9144  
Email: [info@wen.org.uk](mailto:info@wen.org.uk)  
Website: [www.gn.apc.org/wen](http://www.gn.apc.org/wen)

## Part 6

### 2 Useful reading

*Beyond the Bin – the Economics of Waste Management Options.* ECOTEC Research and Consulting Ltd for Waste Watch, Friends of the Earth and UK Waste. 2000. This research compares the environmental costs of recycling, landfill and incineration.

*Creating Wealth from Waste,* Robin Murray, Ecologika & DEMOS 1999. This book sets out a programme for zero waste in the UK, demonstrating how a new approach to waste can create sustainable jobs and play a vital part in local economic development.

*Don't Burn or Bury It* – FOE 1997. A briefing on alternatives to landfill and incineration.

*How To Win – A Guide To Successful Community Campaigning.* FOE 2000. Tips and ideas on how to make your campaign work.

*The Incineration Campaign Guide* – FOE 1997. This guide goes into greater detail about many of the issues covered in this booklet. Although parts of it are out of date, it would make useful further reading for any campaigner against incineration. It can be found at Friends of the Earth's website on: [www.foe.co.uk/industry\\_and\\_pollution](http://www.foe.co.uk/industry_and_pollution)

*Incineration Legal Briefing* Friends of the Earth. 2000. This briefing provides useful advice on the opportunities for mounting a legal campaign against

incineration.

*Jobs from Waste – Employment opportunities from recycling.* Waste Watch, October 1999. A report on the number of jobs increased recycling could create.

*Recycling Works – employment, economic and environmental benefits from improved resource use.* Friends of the Earth and the Community Recycling Network 1998.

*Re-Inventing Waste: Towards a London Waste Strategy.* Robin Murray, Ecologika 1998. This lengthy report outlines in detail how a recycling intensive strategy for London's waste could be achieved.

*Up in Smoke* – a briefing paper on why Friends of the Earth opposes incineration. FOE 1997

*The Northern Ireland Planning System: A Users Guide.* FOE Northern Ireland 1997

# Support Friends of the Earth

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## How to win: campaign against incinerators

This publication from Friends of the Earth is filled with all the practical advice necessary to help you campaign against the incineration of household waste in your area. It sets out the reasons why Friends of the Earth opposes incineration and gives details of the procedures and actions required for opposing specific plans. Essential reading for anyone wishing to fight new incineration proposals in their area.

Friends of the Earth inspires solutions to environmental problems which make life better for people

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Friends of the Earth,  
26-28 Underwood Street,  
London N1 7JQ  
Tel: 020 7490 1555  
Fax: 020 7490 0881  
Email: [info@foe.co.uk](mailto:info@foe.co.uk)

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