



Consultee Response to CERC Environmental Permit Application

Consultee
St.Dennis Anti Incinerator Group (S.T.I.G.)

Social and Family



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1. KEY FAILURES

SITA's application to the Environment Agency for a permit to operate a mass burn incinerator is fundamentally flawed and therefore a permit should not be issued.

The key failure areas of the application within this section are:

- A Mass Burn Incinerator would create significant Additional Pollution adding to Existing Pollution from Clay Industry.
- Failure to address dispersion of current pollution, due to topography and micro-climate.
- Failure to address dispersion of Incinerator pollution, due to topography and micro-climate.
- Failure to address the continually changing topography of Clay Country: It's implications for the reliability of Emissions and Climate modelling undertaken by SITA.
- Failure to address the relationship between the varying heights of local dwellings and the height of the twin-stacks of the Incinerator.
- Failure to address the relationship between the heights of local schools and the height of the twin-stacks of the Incinerator.
- Failure to address Safeguarding for the community in the event of exceedences.
- Failure to address the actual lifestyles of residents.
- Failure to address the effects on health and psychological well-being, on residents.
- Failure to address the mounting epidemiological evidence that shows significantly elevated levels of disease in communities living around Incinerators.
- Failure to address the issue of PM 2.5s and nano-particles. The implications of increasing levels of pollution and toxicity resulting from the incineration process on the health and well-being of future generations.
- Failure to address any provision for mitigation of pollution in homes.
- Failure to address any provision for mitigation of pollution in Schools.
- Failure to address pollution emanating from HGV transport to and from site.
- Failure to address combined effects, from all sources of polluting emissions.
- Failure to address the affects on existing health problems from increased pollution burdens.
- Failure to address accumulation of pollutants in soil, crops, animals and humans.

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- Failure to address greenhouse gas emissions.
- Failure to address the effects of Climate Change on weather patterns, sea levels and landscape formations.
- Failure to apply the Proximity Principle.
- Failure to apply the Precautionary Principle.
- Failure to apply the Waste Hierarchy.
- Failure to address consequences of protracted shutdowns.
- Failure to address noise.

Social and Family**2. INTRODUCTION**

- 2.1 Both SITA's planning application and EA permit application, only pay lip-service to the effects a Mass Burn Incinerator will have on the communities it is being imposed upon.
- 2.2 It is vitally important that that any concerns raised, are treated with the respect they deserve and are answered in a clear, fully researched, independent and un-biased way.

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3. SOCIAL CONCERNS

- 3.1 Pollution produced by the Clay Companies (Goonvean and Imerys) does not disperse from our village because of the interaction of the topography and micro-climate. What confidence can residents have that two 120 metre stacks will be sufficient to disperse toxic emissions from their valley?
- 3.2 It would appear that no studies have been undertaken with regards to many locations that will face onto the proposed development (including but not exclusively: - Hendra Road, Hendra Prazey and Treviscoe). As residents there will have the Incinerator literally in their backyard, how will it affect their health and psychological well-being?
- 3.3 There has been scant regard to the landscape and topography of St.Dennis. Little has been made of the relationship of the heights of local residences and in particular schools (St.Dennis and Whitemoor) and the height of the twin-stacks of the Incinerator. As the site is at the bottom of the valley bowl, the playground at St. Dennis CP School is, in effect, just some 60 metres under the stacks. Given this fact, should not the pupils at the school have been used in the same 'worst case scenarios' that applied to 'the Farmer' 100 metres from the site?
- 3.4 Pollution exceedances are typical in the industry and therefore somewhat inevitable here. Will any safeguards be in place, so that in the event of Dioxin and Furan exceedances, the schools could be evacuated if necessary?
- 3.5 There is mounting epidemiological evidence that show significantly elevated levels of several diseases including asthma, cardiovascular problems, cancers and malformations in babies born into communities living around Incinerators. PM 2.5s and nano particles get deep into the lungs and can pass around the body in the blood stream. New studies expose the risk of such toxic particles crossing into the developing foetuses of pregnant mothers. These can lead to children being born and growing up with physical and emotional problems. St. Dennis CP School already has 30% of pupils classed as having Special Needs. If this is in any way connected to the level of pollution its catchment area currently experiences, what are the implications of increasing levels of pollution and toxicity as a result of the Incineration process and the health and well-being of future generations of school children?

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- 3.6 "Every Child Matters" is Government policy, and must surely be a consideration here?
- 3.7 Would SITA provide HEPA filter systems to the schools to help alleviate some of the parental concerns?
- 3.8 Would SITA provide HEPA filter systems for any householder who felt they required one?
- 3.9 Lorry movements already disturb clay dust that has settled on our roads. What are the implications of: -
- 3.9.1 The health of residents with regards to the co-mingling of clay dust and Incinerator emissions and disturbance by greatly increased amounts of lorry movements?
- 3.9.2 The effect on the ecological environment of these combined factors added to diesel emissions and rain water run-off from the road systems?
- 3.10 Little regard has been given to residents with existing health problems. There are people who suffer with M.E. and impaired immune systems in the village and surrounding areas. What will be done to alleviate the concerns they have in relation to their physical and psychological health?
- 3.11 Incinerator Emissions contain dioxins, which have been identified as one of the most carcinogenic substances known to science. As numerous studies have concluded that the risk of getting cancer increases in those living near Incinerators (including the 2008 study commissioned by the French Government that found that the increased risk was 20% more than those not living near an Incinerator), and the fact that cancer care is being moved out of Cornwall, what assurances, if any, can be given to the population that they will be safe?
- 3.12 Residents are very concerned by the lack of research carried out by either our PCT or the HPA. It would seem that neither party has remembered the oath of "first, do no harm". They have not sought out all the available scientific data that clearly states that contrary to what SITA or DEFRA would have us believe, not even 'properly run and WID compliant' Incinerators are completely safe. Should not both the duty of care and precautionary principle applied here?

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- 3.13 In the event of shutdown for maintenance or other reasons, waste could be stockpiled, rotting, until the situation has cleared. What will be the effects of the fugitive odours and inevitable fly infestations on the health and well-being of those people affected?
- 3.14 The residents of St.Dennis and the surrounding areas feel severely let down by the attitude shown towards them by both SITA and 'our' County Council. Will the Environment Agency restore in them the faith that they do matter and the social and environmental injustice that they already endure will not be allowed to continue?