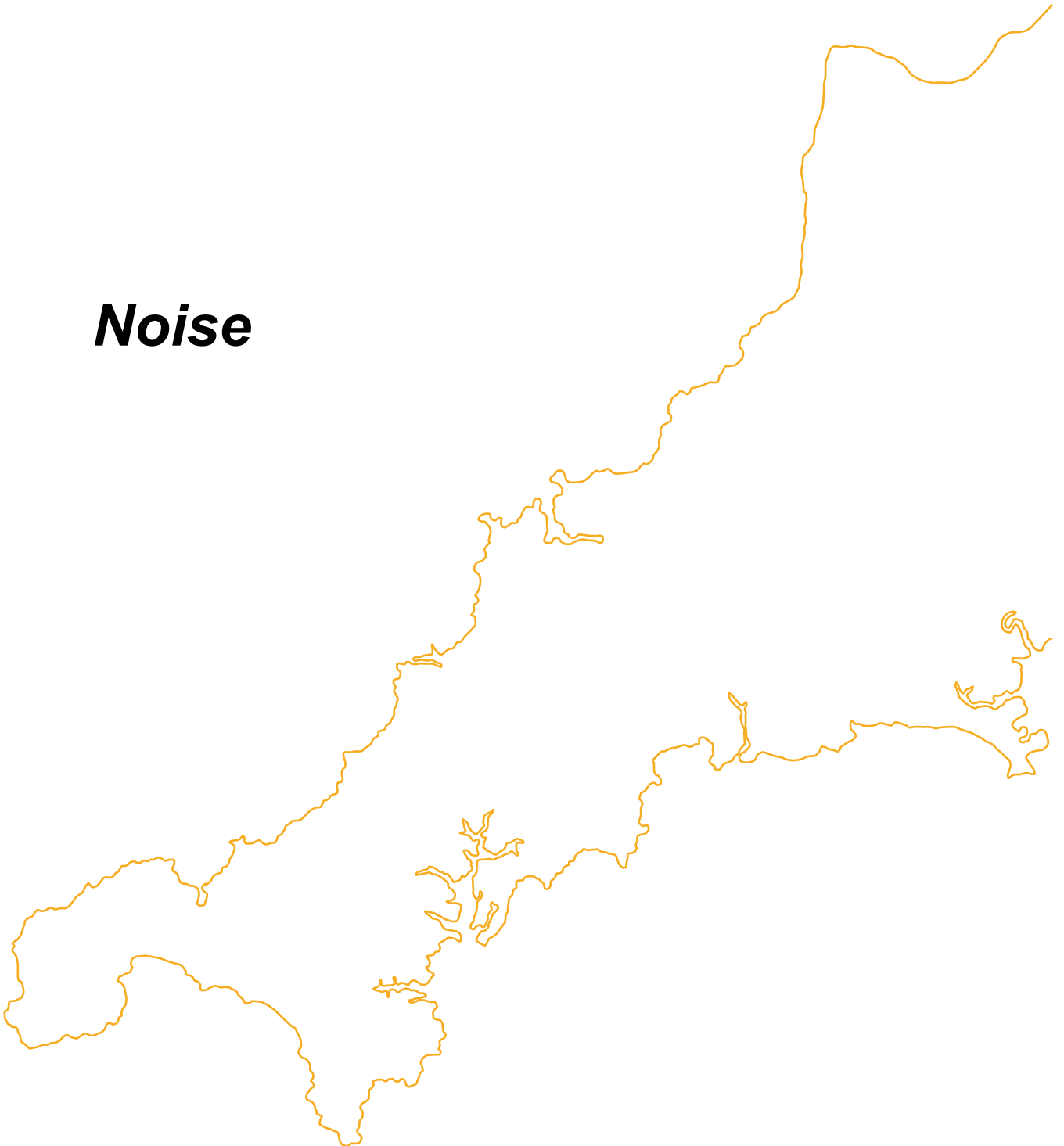




# Consultee Response to CERC Environmental Permit Application

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

## *Noise*



Noise

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## Noise

# 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:

- Failure to address health risks as identified by WHO.
- Failure of logging devices and flawed modelling data.
- Inadequate noise monitoring (only 5 sites).
- Failure to address Schools in monitoring.
- Failure to address the laws of physics - sound travels.
- Failure to address the topography of St. Dennis.
- Failure to address the amplification of sound created by topography of landscape.
- Failure to address possible changes to landscape and their effect on noise generation.
- Failure to address St. Dennis micro-climate.
- Failure to address construction traffic noise.
- Failure to address routing of construction traffic.
- Failure to address internal noise at nearby residences.
- Failure to address tonal noise emanating from twin-stacks.
- Failure to address vibration from construction traffic.

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- Failure to address vibration from operational traffic.
- Failure to address pre-existing noise disturbance.
- Failure to address deterioration of equipment and transportation and increasing noise generation.
- Failure to address shift-work patterns of residents.
- Failure to address airport flight-path.
- Failure to address effects on fauna.

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## 2. INTRODUCTION

- 2.1 The main health risks from Noise as indentified by the World Health Organisation (WHO) are:
- Pain and hearing fatigue.
  - Hearing impairment including tinnitus.
  - Annoyance.
  - Interference with social behaviour (aggressiveness and helplessness etc.).
  - Interference with speech communication.
  - Sleep disturbance and all its consequences on a long and short term basis.
  - Cardiovascular effects.
  - Hormonal responses (stress hormones) and their possible consequences on human metabolism (nutrition) and immune system.
  - Impaired performance at work and school.
- 2.2 Given the serious health implications from the adverse effects of noise, it is most discouraging to read how little regard SITA and its consultants have shown in this area.
- 2.3 Their data is based on just 5 ('sensitive receptor') monitoring points and ignores a basic law of physics - that sound travels.
- 2.4 As personally witnessed by the Borough Planning Officer, Borough and County Councillors AND the Public at a site visit in July, the topography of the site has the effect of amplifying sound. The activities at the A.F.C. football ground (as part of the village carnival sports day) could be clearly heard at the proposed build site (much to Councillors surprise).
- 2.5 It is therefore safe to assume that noise from the activities at the Incinerator facility will have a far more pervasive effect than SITA's assessment would have us believe.

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### **3. QUESTIONS TO THE EA PERMITTING OFFICER**

- 3.1 Given that meteorological data from Camborne (36KM away) was used for modelling, in preference to that of St. Dennis, what credence can this give to the stated effects of noise on the immediate area?
- 3.2 What consideration was given to the micro-climate of St. Dennis and its effect on the absorption or NON-absorption of sound?
- 3.3 As no consideration has been given to Construction traffic noise, which will last at least 33 months and possibly as much as 44 months and as such can hardly be classed as 'temporary', what confidence can local residents have that they will suffer no ill-effects OR noise nuisance during this time?
- 3.4 Has it been assumed that all residences in the area are double-glazed?
- 3.5 Has any consideration been given to the number of residents who are employed on shift-work and who will therefore suffer 'night-time' disturbance outside of the 'norm'?
- 3.6 Under "certain atmospheric conditions" noise from the A30 (3KM away) can be heard at the proposed site. Is this why only attended data collected during 'favourable' weather conditions was included in the ES?
- 3.7 As only two days (approx. 10 hrs in total) of attended monitoring was undertaken, how robust can this data be, and what are the effects on modelling when such minimal data is imputed?
- 3.8 Given that nearby residences already suffer disturbance from existing industry, why should they be expected to tolerate any further industrial encroachment onto their homes and families, especially one that will offer no benefit to them?
- 3.9 As the 'logging device' at Green Meadows in Trecice malfunctioned and no data was able to be retrieved, does this not mean that, yet again, SITA'S assertions on human environmental effects are based on flawed data?

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- 3.10 No internal sound monitoring was undertaken at nearby residences (La Mount etc.), only "desk-top" studies, so how can assumptions be made on (a) how pre-existing noise affects the people, and (b) how any increases in noise levels will affect the quality of life and 'peaceful enjoyment' homeowners are expected to have by law?
- 3.11 Why was no monitoring undertaken at St. Dennis CP School? As it will be only 60 metres under the stacks the school will surely suffer effects from tonal noise emanating from the top of the twin stacks.
- 3.12 How will vibration from operational traffic (at least 350 vehicle movements everyday, year round), combined with pre-existing traffic, affect the structural integrity of nearby residences?
- 3.13 As each HGV passing by has a rated decibel level of 106db, and there will be a considerable amount of this traffic, at what stage is it anticipated that noise levels will become intolerable for nearby residents?
- 3.14 Have all figures used been based on newly operational equipment and transportation, has any consideration been given to the deterioration over time that will be inevitable and therefore increase noise disturbance?
- 3.15 All construction noise appears to be considered only in isolation. In reality any number of activities may be ongoing at any one time. Why are no combined figures for possible noise levels given?
- 3.16 What consideration has been given to the fact that the proposed site is on the flight-path for Newquay Airport and that this aircraft noise adds to the 'ambient' noise levels?
- 3.17 What consideration has been given in regards to 'break-out' noise from the facility and its effects on nearby and distant residences?
- 3.18 No planning considerations regarding noise have been given, is this adequate?
- 3.19 A strict regime of management, on-going maintenance and monitoring will be needed, can we have any confidence in the robustness and effectiveness of these areas?

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- 3.20 Given that the EA has identified 'symptomatic mis-management' at other SITA operations in the UK, what confidence can the population have that it will be any different at a SITA operated Incinerator in Cornwall?
- 3.21 610 metres of Ancient Hedgerows that provide a wealth of habitats for both flora and fauna are to be destroyed, and replaced by new hedgerows that are sterile environments. How likely is it that they will enjoy any re-habitation, especially as increased noise and activity in the area will surely deter any fauna from returning?
- 3.22 The WHO "Burden of Disease from Environmental Noise" study is due to be published in December 2008. If there are resulting EU directives put forward to reduce the effects of industrial noise in residential areas, will the proposed development be able to meet such requirements?
- 3.23 The EA can revoke an operating permit at anytime (but always AFTER the fact). As the proposed development could have a serious impact on the surrounding environment (SAC's, SSSI's etc.), the revoking of a permit may be too little too late - the damaged caused may be irreversible. What are the implications of this fact?
- 3.24 As the Environmental Statement, that SITA's planning application is based on, does not meet Environmental Impact Assessment regulations, should not the planning application be immediately withdrawn?