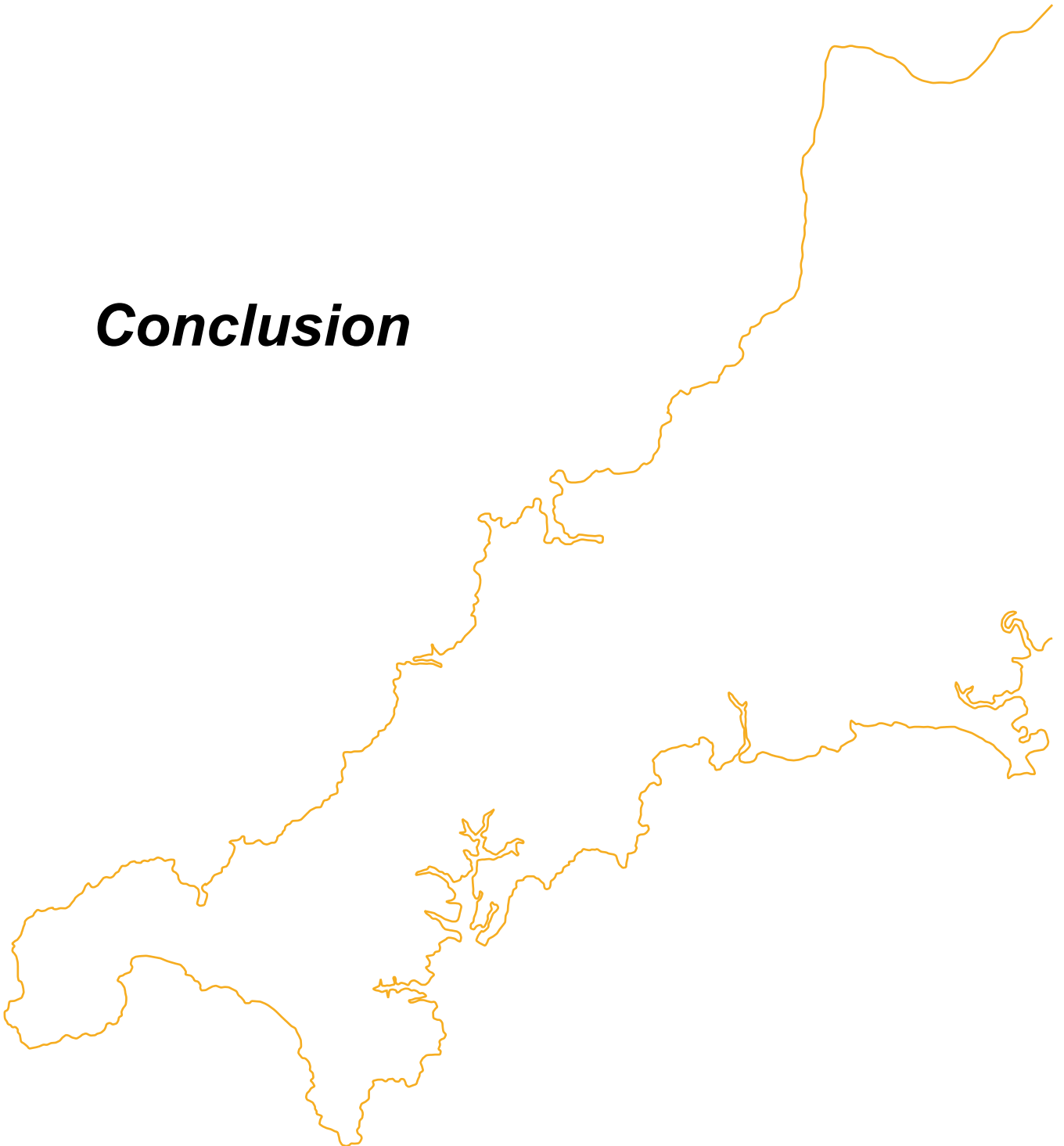




Consultee Response to CERC Environmental Permit Application

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

Conclusion



Conclusion

CONCLUSION

STIG maintains its objections to both planning and permitting applications on the following grounds:

Non Compliance with the Waste Hierarchy

The application is for a waste disposal facility. Waste will not be managed in accordance with the Waste Hierarchy.

With no separate provision for segregated food/bio-waste, limited plastics recycling, and non-existent waste minimisation programmes, it is inevitable and freely admitted by SITA that incinerator feedstock would comprise of RECYCLABLE materials.

STIG objects to the application on the grounds that proposals do not comply with the Waste Hierarchy. Incineration should not be used in preference to waste reduction, reuse, recycling and composting (including anaerobic digestion).

Non Compliance with the National Waste Strategy

The May 2007 National Waste Strategy encourages Local Authorities to use anaerobic digestion for biodegradable waste. Recent research demonstrates “that anaerobic digestion has significant environmental benefits over other options [including incineration]...” The digestate produced by anaerobic digestion has a range of potential uses on land, including as a fertiliser or soil improver. The building of a waste incinerator is bound to have a detrimental impact on recycling and composting rates.

STIG objects to the application on the grounds that waste incineration will result in non-compliance with the National Waste Strategy.

Non Compliance with the Proximity Principle

Under the Waste Framework Directive, National Waste Strategies should reflect the ‘proximity principle’. The proximity principle requires that waste be disposed of as close to its source as possible. The proximity principle also alerts waste producers and the general public to factors concerning quantity and disposal, which in turn encourages waste reduction. The Proximity Principle is an important factor in the assessment of waste disposal.

STIG objects to the application on the grounds that the proposals do not comply with the proximity principle.

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Disposal of Hazardous Waste

In the Regional Spatial Strategy for the South West Policy W3 Hazardous Waste states:

“At present there are two hazardous waste sites in the SW region – one near Swindon and one at Gloucester. Permission for the latter is due to expire and a degree of uncertainty therefore prevails over its future. Neither exists for any reason other than historical accident, and while both may be reasonably well sited to meet needs generated from surrounding regions, they are not well located relative to the western peninsula of the south west region.”

STIG believes that the creation of toxic fly ash as a product of incineration is unnecessary due to our firm belief that there is a lack of need for an incinerator. As such there should not be a situation whereby toxic fly ash is inflicted on any community and certainly not a community as far away as Gloucestershire, which would result in further unnecessary transportation emissions.

Lack of Need

The applicant provides no convincing evidence of need. Regardless of whether or not a credible case could have been made in 2002 to justify this application, it must now be considered in light of the current and likely future situation. As such, the applicant provides no convincing evidence of need. In fact, the figures provided by the applicant demonstrate that any incinerator would have to rely upon Commercial and Industrial Waste. This waste could be imported from outside of the County, in violation of the proximity principle.

STIG objects to the application on the grounds that evidence of need has not been supplied.

Site Selection

The site of Rostowrack Farm was included in site searches as under the Minerals Local Plan 1997 the land is identified as an area that can be used to house an *ancillary to the China Clay Industry*.

It was progressed further by CCC due to the Rt. Hon. Evelyn Boscawen's willingness to lease the land to CCC for the development of a mass burn incinerator.

STIG objects to the application on the grounds that it is a misuse of land and contravenes The Minerals Local Plan. An incinerator is not an ancillary to the china clay industry. Moreover, a better reason for the choice of a green field site will have to be advanced, apart from the fact the owner is prepared to lease the land.

Site

The green field site Rostowrack Farm is in close proximity to the village of St.Dennis (400yards). The scale of the proposed plant and its ancillaries will dominate the

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surrounding residential area and change, forever, the nature of the local environment.

STIG objects to the application on the grounds that the proposed development is in such close proximity to the village of St.Dennis, that its effects cannot be mitigated successfully or acceptably. Furthermore it will be an intrusion on the areas of SSI/SSSI and a NNR.

Nature Conservation

STIG does not feel that adequate attention has been given to the application's potential negative impacts on local nature habitats and biodiversity.

STIG objects to the application on the grounds that the risk posed to nature conservation is unacceptable, and that the site is unsuitable for the development proposed due to its close proximity to Sites of Scientific Interest, Sites of Special Scientific Interest, a National Nature Reserve (NNR) and The River Fal.

Furthermore no guarantees can be given to the protection of protected Species or local wildlife.

Traffic and Transport

Waste miles will increase as waste from across the county is sent to St. Dennis.

The proposed development is predicted to generate hundreds of extra vehicular movements a day, which will traverse both strategic and local road networks. The proposals also require the construction of a new road to access the site.

STIG objects to the application on the grounds that it will increase traffic pollution and place unnecessary strain on the strategic and local road networks. The access road will cut across a buffer zone, in place to protect the villages of St. Dennis and Treviscoe from encroaching industrialisation from the Clay Industry.

Waste Transfer Stations

It will be necessary to construct and operate a number of Waste Transfer Stations throughout the County to service the Mass Burn Incinerator.

STIG objects to the applications on the grounds that SITA has provided insufficient details regarding these Waste Transfer Stations in either of their applications, and the fact that these ancillaries will impact adversely on the human and ecological environments at the chosen sites.

Un-sustainability

Resources such as paper, card, textiles, garden waste and some plastics, which could have been easily recycled and used again, are lost once burnt.

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This means more raw materials, and more fossil fuels, will have to be mined and processed to produce, and transport, similar products again.

Given the Earth's finite resources, this is not a sustainable process.

STIG objects to the application on the grounds that it will destroy valuable resources as the requirements of incineration, are effectively in conflict with any strategy that seeks to reduce the use of virgin resources, and increase re-use and recycling.

Health

Little consideration has been given to effects of pre-existing pollutants combining with new ones created by the Incineration process, on both the human and the local environment.

Neither has the question of the unpredictable products of synergy been addressed.

Incinerators produce dioxins, recognised as the one of most carcinogenic substances known to science.

STIG considers spot monitoring of emissions of dioxins, furans and heavy metals to be an unreliable indicator of actual levels.

The true dimensions of the toxic threat will always be underestimated by "currently available knowledge" therefore the Precautionary Principle must be applied.

STIG objects to the application on numerous grounds, including that SITA has interpreted the term "Best Available Techniques" far too narrowly, to the exclusion of alternative waste treatment systems that offer far greater benefits and environmental protection in both the short and long-term.

STIG objects to the application on the grounds that increased HGV emissions together with Incinerator emissions will add to an existing pollution burden, and the incineration process poses an unacceptable threat to health.

STIG urges the Environment Agency to:

- Refuse this application.
- Refuse to permit other mass burn incinerators in the UK.
- Take the lead in promoting more environmentally sustainable and benign alternative technologies.