



**S.T.I.G.**

**St.Dennis Incinerator Group**

**June 2008**

## **Sustainability**

### **Consultee Response to CERC Planning Application**

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

**Applicant**  
Sita Cornwall Ltd.

**Application Reference**  
08/00203/WAS

**Address of Proposal**  
Land at  
Rostowrack Farm  
St.Dennis  
St.Austell  
Cornwall  
PL26 8DX

**Proposal**  
Construct and Manage a  
240,000 TPA Energy Recovery Centre  
( Mass Burn Incinerator )

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## Sustainability

### Introduction

#### Living within environmental limits

Incineration of valuable resources, which have, literally cost the Earth in creation, extraction, processing, transport and production, does not help society to live within environmental limits. Rather it perpetuates a cycle of destruction and unsustainable consumption, in a world of shrinking resources. SITA does not appear to include any 'dirty' MRFs in their waste facilities provision. This omission will mean that any recyclable materials concealed amongst other waste will be incinerated.

Removing society from the consequences of producing unnecessary waste by not abiding by the Proximity Principle:

- Does not help to limit waste production.
- Removes responsibility away from the producer.
- Encourages a throw away society.

#### Ensuring a strong, healthy and just society

A strong, healthy and just society is not facilitated by the imposition of a 240,000 tonne mass burn incinerator upon one single community, effectively making that community the scapegoat for all the waste from the entire County. Neither is it facilitated by a 120m stack that will emit pollutants, dominate the skyline, and destroy remaining open vistas and a visual amenity that is valued and enjoyed by residents and visitors alike.

Visible from some 15km and inescapable for local residents, it will: -

- have a detrimental effect on the public perception of the area.
- a psychologically damaging effect on the local population. Young people, growing up in the area, will feel their village is not valued or respected but is merely regarded as a dust bin for Cornwall. This may affect their self esteem, engender a sense of shame about where they live and foster a negative attitude towards their environment. This may have serious repercussions for the future.
- undermine the health and well being of local residents.

#### Achieving a sustainable economy

The economy of Cornwall is not best served by a single Mass Burn Incinerator in the middle of the County. SITA is a French owned company; profits from their operation will not remain in the local economy. They have given the construction contract to

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two Japanese companies, Takuma Co Ltd and Itochu Corporation and profits from the construction will not remain in the local economy. Other companies involved so far have come from Bristol and Bournemouth; their profits will not remain in the local economy. SITA has cited a lack of local builders which may lead to SITA employing construction workers from abroad and therefore their salaries may not remain in the local economy.

Around 50 new jobs will be created when it is operational. Of those, some 40 will be unskilled, at the lower end of the pay scale. Only their incomes will represent an increased benefit to the local economy.

The cost of fuel to transport waste the length and breadth of the County will continue to escalate as oil prices soar and supplies diminish. Fuel shortages are already forecast. How will deliveries of waste be sustained, in this event? Businesses that remain oil dependent will be vulnerable, as witnessed by the recent Hauliers action drawing attention to the precarious state of their industry.

### **Promoting good governance**

Some two years ago, coinciding with Councillor Paynter's "Worried About Waste" meetings, to promote Incineration to local communities, Somerset announced 50% reductions in landfill by the simple expediency of composting food waste. Shropshire has also opted for Anaerobic Digestion as their main strategy to reduce emissions from landfill. If Cornwall County Council had taken this approach Cornwall would not be facing LAT fines for not meeting its targets for diverting biodegradable waste from landfill and taxes for every tonne sent to landfill.

SITA and CCC, have adopted a policy which does not address the issue of biodegradable waste, thereby incurring unnecessary penalties for council tax payers, increasing greenhouse gas emissions and reducing landfill capacity. They have not provided the proven and, infinitely, more sustainable technology of A.D. This can hardly be described as good governance.

### **Using sound science responsibly**

Residual waste is, by its nature, unpredictable in content and continually changing.

Therefore, so is the chemical nature of incinerator emissions.

Some modelling methods may seriously underestimate the levels of pollutants released by incineration.

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Has modelling taken into account secondary particulates formed as the products of combustion rise up the stack?

How will the releases of fine particulate (PM2.5) be prevented when considering the exact nature of the constituents released, by combustion, of all materials, including plastics, paper, textiles and wood?

What scientific studies does the applicant cite that determines the means to predict the: -

- exact composition and quantity of emissions, at any given time.
- potential of constituents to combine.
- their variable products, in combination.
- toxicity levels of these products and by-products, alone and in combination.
- the potential for bio accumulation of these products and by-products.
- the effects of bio accumulation on human health and the biosphere, in the long and short term.

Where no incontrovertible evidence can be produced the Precautionary Principle must prevail.

The integrity of the Biosphere and its inhabitants must be sustained.

### **Natural and Cultural Environment**

**2.a To conserve and protect the quality and volume of water**

**2.b To protect land from contamination arising from waste management facilities**

#### **STIG Response**

During construction there will be considerable and significant effects on the natural environment. There will be clearance of vegetation and removal of soil from the site. There will also be a section of wet woodland area that will be removed when the construction of the haul road and bridge over the River Fal takes place. The construction work in the vicinity of the River Fal could result in an environmental pollution incident and would cause an impact on the ecology of river, for example, the smothering of the river bed or toxic effects on invertebrates, otters and fish that inhabit the river.

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The operational effects of acid and nitrogen deposits on the adjacent Breney Common, Goss and Tregross Moors are also of concern. Although the stack has been increased to 120 meters no guarantees can be given to prevent contamination of these SAC and SSSI sites.

There is also the 11,000 tonnes of toxic fly ash which will be sent to landfill in Gloucestershire; no guarantees can be made that there will not be accidents during transportation resulting in toxic contamination to the environment.

### **2.c To conserve and enhance biodiversity at all levels**

#### **STIG Response**

As recently as the 1950's colonies of thousands of bats could be seen but today even our most common bat, the Pipistrelle, appears to have suffered serious decline. It is thought to be the result of many factors: -

- Toxic chemicals can be fatal to bats.
- General habitat destruction.
- Changes in agricultural practices reducing the number and variety of insects.
- In Great Britain, all bats are fully protected under Schedule 5 of the Wildlife and Countryside Act (1981) as amended, and by the Conservation (Natural Habitats etc) Regulations (1994).

Also;

Reptiles are particularly vulnerable to disturbance and will be at risk during the construction process.

Dormice have become extinct in at least half of their UK habitats in the last 100 years and continue to decline. The dormouse is now listed as 'near threatened' on the IUCN Red List and is protected by EU Law.

Otter numbers in England declined dramatically in the late 1950s and 1960s. Pollution was a key issue, but habitat loss, and disturbance were believed to impact too. Otters can be found on all the river catchments in Cornwall. They use the rivers, streams, ditches, leats, canals, wetlands including the reed beds, moors, wet woodland and still-water bodies including reservoirs.

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### **Preferred Option 28 - Protected Species**

The County Council's Preferred Option is a policy referring to protected species. It states that an application for a waste management facility is likely to cause harm to protected species or their habitat will be subject to careful scrutiny and will only be permitted where the protection of the species or habitat can be secured. It is an offence to kill, injure or disturb species. The proposed development proposals may affect their habitats and it is therefore important to protect these species through additional controls on development.

#### **2.d To limit the impact of waste management infrastructure on air quality**

##### **STIG Response**

There will be significant increase in traffic and will cause dust during the construction of the incinerator. When the incinerator is in operation there will be up to 350 additional vehicle movements per day which will have a negative affect in an already poor air quality area.

#### **2.e To promote high standards in the operation, management and restoration of waste management facilities**

##### **STIG Response**

According to a letter from Mrs Judy Proctor of the Environment Agency in Bodmin and David Buckle of SITA Cornwall UK the IPPC (Integrated Pollution Prevention and Control) permit has not been applied for.

In a recent article published by UK Health Research it states that since the downgrading of IPPC in 2000 relaxation in the quality of fuel allowed to be burnt in power stations, cement Kilns and other industrial processes, including incinerators, has lead to a massive increase in toxic PM2.5 emissions. There are already two sources of PM2.5 pollutants in the area and no solid evidence has been produced with this planning application to say what happens when particulates from all three processes mix with the clay dust that is so visibly present in the atmosphere.

#### **2.f To protect and where possible improve, the appearance and character of townscapes, and to conserve the openness of the countryside and other built and natural assets for the benefits of residents and visitors**

##### **STIG Response**

It is freely admitted in the application documents that a Waste Treatment Plant of such magnitude must have an effect on the surrounding countryside and area. An

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area of 15km radius will be affected by this application in one way or another. No amount of mitigation can overcome the visual impact this plant will have on the village and surrounding areas.

### **2.g To protect and where possible enhance the county's historic archaeological and architectural assets**

#### **STIG Response**

Rostowrack is first recorded in 1086 with the farm probably being of early medieval origin. The field boundaries of the farm are Cornish hedges and are a particular archaeological resource both in themselves and for the potential of the former ground surface surviving beneath them. Effects on archaeology will occur during construction. The relocation of 331m of existing Cornish hedge will constitute a large change and will have a substantial impact. The proposals will also result in significant visual changes. The limitations on pre-consent evaluation work will mean that the preservation in situ of any remains will not be possible and may result in the less desirable option of preservation by record i.e. excavation.

## **Climate change, energy and natural resources**

### **3.a To maximise the use of previously developed land and prevent irretrievable loss of best and most versatile agricultural land**

#### **STIG Response**

As stated the site is Greenfield agricultural land and does not positively contribute to this objective.

### **3.b To ensure development does not irreversibly sterilise important mineral reserves and other natural resources**

#### **STIG Response**

No Comment.

### **3.c To maximise opportunities to minimise the production of the principal waste streams**

#### **STIG Response**

The following quote is taken from a letter written by REZOLVE to councillors in January 2006

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*'The perceived size of the incinerator is creeping up from 200,000 tonnes per annum to nearer 300,000 tonnes per annum. The length of the contract has crept up to 30 years in total. The provision of MBT treatment plants is being removed. There are now no stated recycling targets (not even minimum targets which should certainly not fall below those currently being achieved in Cornwall). These changes have happened with no open debate or strategic context.'*

### **3.d To maximise opportunities to minimise the production of special and hazardous waste**

#### **STIG Response**

Transportation of this hazardous waste to a landfill site in Gloucestershire does not comply with the **Regional Spatial Strategy for the South West**.

### **3.e To maximise opportunities to re-use, recycle, compost and recover waste products and their use wherever appropriate to reduce consumption of primary materials**

#### **STIG Response**

As there is no intention to provide 'dirty MRF's' in this application the statement 'Recyclables will have been extracted from the waste stream prior to this process is inaccurate as it depends on households to reduce, re-use, recycle and compost **NOT** SITA.

The area already has surplus aggregate from the China Clay Industry and SITA have not provided any evidence to support the statement made in 3.10.

Cornwall County Council will, in the next several years, become responsible for both waste disposal and collection of waste in the county. To date they have stated that it is not cost effective to include the collection of paper, kitchen other green waste from households in the county.

### **3.f To maximise contribution towards achieving targets for the generation of renewable energy, with regard to the waste hierarchy**

#### **STIG Response**

The incinerator is not expected to be built and running until 2012. The figures quoted are to be met by 2010. The use of the heat supply to the china clay dryers can only be used for the life span of the industry which is at best uncertain.

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### **3.g To prioritise those waste management practises that minimise contributions to climate change**

#### **STIG Response**

See Carbon Balance Report.

## **Economy**

### **4.a To recover value from waste wherever this is environmentally acceptable and economically feasible**

#### **STIG Response**

The 16.6MW of electricity will be sold to the National Grid by SITA. The heat will go to the china clay industry Imerys and Goonvean, will these companies be offering any guarantees of jobs for the life of the incinerator? The only economic beneficiaries appear to be SITA, Imerys and Goonvean.

The level of disruption to both fauna and flora will be significant in the construction and operational period of the plant, access road and haul road.

### **4.b To manage the waste management process efficiently with the aim of delivering best value**

#### **STIG Response**

If biodegradable waste was collected and composted local authorities would not incur these financial penalties and would also produce a saleable commodity.

### **4.c To identify a network of suitable sites for waste management facilities for all waste streams, especially the principal ones, that are of high quality and appropriate in scale and number to local needs**

#### **STIG Response**

What with the trend towards recycling and the evitable trend towards the reduction of packaging the need for a centrally sited incinerator will diminish. Recycling and composting is not only more environmentally friendly it is also more economically sensible than incineration.

The design of the building element is very limited in that the building only acts as a cloak. A building larger than the Coliseum in Rome and sited in a rural area that will dwarf two villages and the large china clay industrial buildings can hardly be classed as 'a facility that fits its setting and contributes to a distinctive sense of place'.

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### Community

#### **5.a To limit the environmental impacts of waste treatment facilities on the local population**

##### **STIG Response**

The potential effects on the local population are immense. The majority of other incinerators run by SITA are within industrial areas and well away from residential receptors. The incinerator proposed for St Dennis is less than 500 meters from local housing and no amount of landscaping will mitigate the effects of this massive building on the villages of St Dennis and Treviscoe.

The joining of the haul road and access road onto the main route into Treviscoe will create a dangerous junction and is likely to cause an increase in accidents. It does not state if the clay industry vehicles will be using the haul road or if they will still travel along the existing road over Trerice Bridge.

#### **5.b To empower all sections of the community to participate in the waste planning process and understand their role in it**

##### **STIG Response**

The Site Liaison Group may be in a position to make their views known by raising questions and points of concern but they have little or no power to change the view of a multi million pound organisation such as SITA.

A central incinerator sited in the heart of Cornwall does little to alert waste producers and the general public to factors concerning quantity and disposal which in turn does little to encourage waste reduction or to promote education of the majority of the people who live and work in Cornwall.