



S.T.I.G.

St.Dennis Incinerator Group

June 2008

Social and Community

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)

Social and Community

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Social and Community

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Social and Community

Introduction

11.1 and 11.2

STIG Response

Both the EIA and the original 'scoping' exercise are flawed.

"potential effects" = GUESSWORK.

"Appropriate mitigation" = CHEAPEST OPTION for SITA, not best for people.

Legislation and Policy

11.3 to 11.9

STIG Response

Application goes against some, if not all of the quoted policies.

Waste Strategy 2007 identifies Anaerobic Digestion as the preferred option for recovering energy from waste.

What about pre-existing pollution from other industry: -

- Clay tips
- Clay dryers
- Power Station

There have been over 500 exceedances per year from "well run" facilities.

350 vehicle movements per day WILL "prejudice amenity" AND "highway safety".

What about the cumulative impact of existing pollution, Mass Burn Incinerator AND 350 vehicles every day? (1 HGV = 22 CARS for emissions - equivalent to approx 5,000 cars).

By the time the WDF is published it will be outdated, over-taken, no doubt, by new government legislation and EU Directives. It has already been affected by the Waste Strategy 2007.

Social and Community

There will be no restoration of farmland at the end of the waste contract, thereby permanently damaging food security.

How many PEOPLE not properties affected?

Just because no policies currently exist, SITA does not have the right to ride roughshod over our county.

Methodology

11.10 and 11.11

STIG Response

Desk-based studies and computer modelling have little basis in reality, they are both reliant on data imputed - rubbish in = rubbish out.

HIA – flawed.

HRA – flawed.

Hampshire and Brighton ARE NOT CORNWALL.

We are HUMAN BEINGS not “receptors”.

How can anyone make judgments on a community’s “capacity to adjust to changes”?

Local communities may ‘tolerate’ a great deal but there is always “the straw that breaks the camels back”.

Impact Assessment

11.12

STIG Response

This is SITA’s definition of what constitutes a “potential effect”.

Social and Community

Effect Significance

11.14

STIG Response

SITA doesn't KNOW so they've made it up - the people of Cornwall deserve so much more than guesswork provides.

Public Perception of Incineration/Energy Recovery

11.16 to 11.19

STIG Response

The OU study is out of date.

The public are now more aware of the rank stupidity of burning the planets finite resources and its associated risks to the environment and health.

There has been no debate in Cornwall "informed" or otherwise.

EfW is not technology specific - AD is a viable alternative with the added benefit it offers to the improvement of agricultural land and is the preferred technology for recovering energy from waste with the advent of the Waste Strategy 2007.

The Basis of Public Concern

11.20

STIG Response

Other sites are available in Cornwall. Do business objections carry more weight than public ones?

11.21

STIG Response

All apply at St. Dennis.

Social and Community

Emissions from Combustion Process

11.23

STIG Response

It is the effect of these emissions that causes grave concern.

The chemistry of emissions is dependant on the content of the waste burnt.

This is completely unpredictable - what is in the 'black bag'? And more worryingly - what is in the Commercial and Industrial waste?

Due to limited monitoring, 99% of the time, the level of DIOXIN emissions is unknown. DIOXINS have been identified as one of the most toxic substances known to science. It is intolerable that any local authority should even contemplate endangering its citizens in such a way.

Increasing the production of Dioxins also contravenes The Stockholm Convention.

Emission limits are tightened as more evidence of their effects becomes known - what will happen in Cornwall if the limits are such that they can never be met by Mass Burn Incinerators?

What will be the effect of 'Emission Taxes' which will INEVITABLY replace LATS?

11.24

STIG Response

There is a major time lapse from permit granting to operation. There will be changes in the St. Dennis landscape in the intervening time.

SITA ignores meteorology Data gathered from St. Dennis in favour of that of Camborne - how can this be "closest to reality"?

"certain parameters" **but NOT DIOXINS, PM2.5's and NANO-PARTICLES.**

Social and Community

11.25 to 11.29

STIG Response

What about pre-existing pollution levels?

Adding to the pollution burden with more dioxins will have a cumulative effect. What is known of the synergistic effect this will have?

There are “strict limits” but exceedances occur almost every day.

The 350 vehicle movements (every day) are the equivalent of an extra 5,000 cars - what is the cumulative effect of this new environmental burden on the area?

Health Impacts

11.30 to 11.33

STIG Response

What about the synergistic effect?

It may be “unlikely” but it is NOT impossible. We are already over-burdened by pollution.

We try to minimize the “risks of day to day” living, SITA is seeking to add to these risks.

5 hospital admissions is 5 too many - will our over-stretched health service cope?

The Clay Area has the highest rate of childhood asthma in the county. The annual cost to the NHS for asthma treatment in the UK is over £8,000,000.

“various epidemiological studies” NOT ALL - ELLIOT, SIX CITIES 1, SIX CITIES 2 , SAINT NIKLAAS, KNOX (as quoted elsewhere in the application) and many others all link the incineration of waste process to increases in a multitude of illnesses.

Social and Community

Transport Issues, Including Possible Import of Waste from Other Areas

11.34 to 11.36

STIG Response

The “proximity principle” is ignored - waste will be transported from all over the county to St. Dennis.

There will be 350 vehicle movements every day giving an emission figure equivalent to approx. 5,000 additional cars.

6 district Anaerobic Digesters would significantly reduce fuel miles, comply with the “proximity principle” and deal with 68% of MSW.

Conflict with Material Recycling

11.37

STIG Response

Doesn't have to “guarantee minimum level” as C & I waste replaces ‘lost’ MSW.

The short-fall of Cornish MSW (due to increased recycling) will mean that C & I waste will be utilized from the start - this too could be recycled.

11.38

STIG Response

68% of MSW is BIO-DEGRADABLE and can therefore be treated by ANAEROBIC DIGESTION.

Mass Burn Incineration is NOT THE ONLY OPTION.

A reduction in packaging and a switch to bio-degradable products for the remainder coupled with A.D. offers far greater benefits to the future sustainability of the planet.

Landfill does not cease with the introduction of Mass Burn Incineration it is merely that the content and amount changes.

Social and Community

11.39

STIG Response

ANAEROBIC DIGESTION is RECYCLING AND ENERGY RECOVERY. It is now the preferred technology for recovering energy from waste as identified in the Waste Strategy 2007.

11.40

STIG Response

These high rates exist because of the increased VARIETY of waste recycled. In the UK, RECYCLABLE does not equate to RECYCLED.

11.41

STIG Response

Mass Burn Incineration is the next worse option to landfill in the waste hierarchy.

Without “dirty MRF’s” there is no guarantee as to what is burnt.

Local Amenity Issues

11.42

STIG Response

The proposed development is huge and it will DOMINATE the landscape.

It bears no relation to existing physical or built landscapes.

Twin 120m stacks with a possible 221m visible plume will severely affect the local amenity and have implications on the wider perception of Cornwall.

11.43

STIG Response

St. Dennis will be very AWARE - so will prospective incomers - when the read their surveyors search reports.

Social and Community

11.44

STIG Response

Public perception - one mans' "smoke" is another mans' "steam plume".

How close to the plant were they?

How long had they been resident?

How was their health before?

How was their health after 5, 10, 15 years residence?

Property Values /Investment Climate

11.45

STIG Response

St Dennis is already at the lowest end of the property market. Vendors are already having offers made at £30-40k below asking price because searches are showing up the proposed Mass Burn Incinerator.

11.46

STIG Response

CORNWALL IS NOT HAMPSHIRE.

Management and Operational Concerns, Including Odours

11.47

STIG Response

What does this mean - if it's cheap enough, they'll do it?

11.48

STIG Response

Operated strictly for profit, not for the greater good.

Social and Community

The EA is not trusted due to the ineffectualness of its emission regulations with over 500 exceedances every year; it is obvious that they are not stringent enough.

Disposal of Residues

11.49 and 11.50

STIG Response

25-30% by weight remains of the waste burnt. Therefore there will be 11k tonnes of HAZARDOUS WASTE and 49k tonnes of “aggregate” and landfill.

11.51 to 11.53

STIG Response

APC = 11,000 tonnes of HAZARDOUS WASTE, transported to Gloucestershire. Every year with the added risk of RTA'S during transportation.

It is also not fair to burden yet another community with our waste.

Outside Company Making a Profit Out Of the Community

STIG Response

Profit will always come before people.

Population

11.58

STIG Response

$\frac{1}{5}$ of the population of Cornwall (over 100k) live in Restormel, which is an enormous amount of people at risk from emissions.

11.59

STIG Response

Restormel has a high proportion of young people, who are more likely to suffer ill effects from emissions.

Social and Community

China Clay Industry

11.60 11.62

STIG Response

48 jobs at a Mass Burn Incinerator will not make up for the loss of over 800 from 'the Clay Industry'.

Agriculture

11.63

STIG Response

The proposed site is GREENFIELD on a working farm.

The farm will permanently lose 7.7 ha of land from food production.

There will be no restoration.

Employment Structure

11.64 to 11.66

STIG Response

Tourism is vital to the economy of Cornwall.

Restormel has 1.5 million visitors every year. Public perception of Mass Burn Incineration will severely affect the numbers of visitors we receive, and the resulting job losses across all sectors of tourism would be devastating for Cornwall.

Local Businesses

11.67

STIG Response

St. Dennis lost its bakery last year (07),

We will lose one of its takeaway's this year (08)

The Bank is open for just 6hrs per week.

Our Post Office is under-threat.

Social and Community

Unemployment

11.68 And 11.69

STIG Response

These job losses will not be replaced by the Mass Burn Incinerator.

Earnings

11.70 and 11.71

STIG Response

The proposed site is in an ECONOMICALLY DEPRIVED area; the imposition of a Mass Burn Incinerator will not alter that fact. In fact it may well serve to WORSEN this deprivation.

Qualifications

11.72

STIG Response

Were SITA hoping we would be too illiterate to defend ourselves?

Health

11.73 to 11.77

STIG Response

Pre-existing health inequalities due to current pollution - is it fair to increase these with a Mass Burn Incinerator?

The emissions from 350 vm every day will also be detrimental to health.

With a massive increase in traffic, more RTA's are inevitable. Only two areas were studied and these proved to have significant accidents already:- 75 RTA's - 100 casualties, 4 serious accidents – 2 deaths.

If the study was more encompassing, e.g. Covering ALL routes into St. Dennis from ALL points of Cornwall, the figures would be even more depressing, especially when considering the increase in traffic during the tourist season.

It will only be a matter of time before “discernable clusters” become self-evident.

Social and Community

Social Indicators

11.78

STIG Response

St. Dennis is a socially deprived area in “the most deprived quartile of the Country.” This will not be improved with the siting of a Mass Burn Incinerator.

It is polluting the poor.

There is a callous policy of building incinerators in deprived areas, where the health effects are likely to be greatest - THIS IS SOCIAL INJUSTICE.

House Prices

11.79

STIG Response

These are already low and are being seriously affected by the prospect of a Mass Burn Incinerator blighting house sales.

Community Facilities

11.80

STIG Response

There are almost 250 children at St. Dennis CP School and Happy Days Nursery.

There are other children who live in the village, but attend other schools in the area.

Our Post Office is under-threat.

The Fire Station is not 24hr - it operates under retained Fire Fighter conditions.

The Community Library operates for just 6 hours per week.

The Clay Practice Surgery covers 3 villages - St. Dennis, Roche and Bugle.

With the inevitable increases in ill-health, will the Doctors be able to cope?

Social and Community

The village Play-ground and Recreation Ground will have full view of the Mass Burn Incinerator and is in a direct line for emissions (as is the school play-ground).

Growth in Business

11.81

STIG Response

Having a Mass Burn Incinerator at its heart will not improve things. It may also have a serious impact on the success of the regeneration of St. Austell.

Investment and Regeneration

11.82 and 11.83

STIG Response

A Mass Burn Incinerator will have serious implications in this area.

Regional Economic Strategy

11.84

STIG Response

What has this to do with a Mass Burn Incinerator?

It will NOT improve OUR participation in the economy.

It will NOT regenerate the most disadvantaged areas.

It will NOT make OUR communities sustainable or successful.

And it DEFINITELY WILL NOT “PROMOTE AND ENHANCE WHAT IS BEST ABOUT THE REGION”.

Social and Community

Tourism

11.85 to 11.87

STIG Response

A Mass Burn Incinerator in Restormel will seriously affect this industry. It will certainly DETER visitors and the 'knock-on' effect will have a Devastating effect on the whole economy of Cornwall.

Summary of Social and Community Characteristics

11.88

STIG Response

We are: -

- POOR
- UNEDUCATED
- IN BAD HEALTH
- SOCIALLY AND ECONOMICALLY DEPRIVED

A Mass Burn Incinerator will not improve these inequalities; it will have a seriously detrimental effect on our lives and our futures.

Sensitivity of Receptors

11.89

STIG Response

Shows that Restormel is completely the WRONG AREA for a Mass Burn Incinerator.

Future Baseline

11.90

STIG Response

It is unlikely to improve and a Mass Burn Incinerator is likely to make things worse.

Social and Community

Potential Effects during Construction

11.91 to 11.93

STIG Response

There will be little or no employment prospects for local people.

255 outside workers will give rise to resentment and possible local conflicts during the 3 year estimated construction.

There will be undue strain on local services with minimal benefits.

33 months of construction noise, traffic and dust - 6 days a week - WILL have an adverse effect on the local people AND amenity.

Potential Effects during Operation

11.94 to 11.96

STIG Response

There will only be 48 permanent jobs.

What are "local people" - local to St. Dennis or to Cornwall as a whole?

There will be NO local benefit - St. Dennis will get all of the pain for none of the 'gain'.

Population

11.97

STIG Response

Unlikely to increase after all WHO WOULD WANT to move into a village with a 240ktpa Mass Burn Incinerator in its midst?

Social and Community

Human Health

Background

11.98 to 11.101

STIG Response

A recently published study (2008), commissioned by the FRENCH Government, concluded that there was a 20% INCREASE IN CANCERS in people living near Incinerators.

The 'latest generation' of Mass Burn Incinerators have not been operational long enough for the health effects to be obvious. However by 2012, this will have changed and more published studies will, once again, conclude that even the 'new and improved' facilities still have the ability to harm both the environment AND human health.

'Improved' technology has only made emission particles smaller, harder to monitor and more damaging to human beings. They have not solved the problem; exposure to PM2.5's and nano-particles is still a major concern.

5 hospital admissions and 1 death brought forward - it is only a "minor effect" if it is not you or your loved ones affected.

How can they be so dismissive of people?

Health Impact Assessment and Health Risk Assessment of the CERC

11.102

STIG Response

Both of the assessments are inadequate and deeply flawed.

Social and Community

Health Risk Assessment

11.103 to 11.109

STIG Response

Twin 120m stacks (396ft) will have an emission zone of 28miles.

Were the additional pollutants assessed in conjunction with pre-existing Pollutants to get a synergistic effect?

A great many people 'grow their own' or only eat locally sourced food, it is wrong to only consider the Farmer as at most risk.

Dispersion modelling is only as good as the data imputed, if data from St. Dennis is ignored, how can the modelling be even remotely accurate?

“Assumptions” are NOT GOOD ENOUGH where people’s lives are concerned.

1 additional cancer sufferer is 1 TOO many.

We MUST NOT IGNORE the high asthma rates in the Clay Area.

Health Impact Assessment

11.110 to 11.113

STIG Response

The HIA is flawed.

In the past we tolerated lead in petrol, CFC’s and second-hand smoke. With increased knowledge of their obvious ill-effects, our society has rejected these things as it will with incineration.

What “community benefits” will there be and can anything redress the balance of the loss of lives and health?

Social and Community

Traffic

11.114

STIG Response

There will be 350 vehicle movements every day, with all the associated emissions and disturbance.

With deliveries between 7am and 5pm, how will they avoid “peak times” especially during the increased traffic of the tourist season?

A serious RTA involving tourists and a SITA HGV will hardly be good publicity for the Cornish Tourist Industry.

Plant Design and Operation

11.115 to 11.118

STIG Response

Without a “dirty MRF” how will SITA control what is being burnt?

Does not allow for system failure - exceedances are commonplace.

What would constitute “abnormal operating conditions”? (Especially as exceedances are regular features of Mass Burn Incinerators).

Does the EA rely on SITA's information or does it complete its own INDEPENDENT assessment?

PM2.5's and NANO-PARTICLES cannot be adequately monitored or removed.

SITA proposes to build a massive facility, by its very nature it will be full of combustible materials. There will be 30,000ltrs of fuel on site at all times. In the event of a fire or explosion, how are our local (retained) fire-fighters supposed to cope?

There will be much public anger and resentment if a house fire goes un-fought and lives are lost as a result of our 'local boys' being too busy fixing SITA's mistakes.

Social and Community

Property Prices

11.119 to 11.124

STIG Response

Cornwall is NOT Sussex OR Hampshire. Their demographics and nature are very different. It is unrealistic to compare us.

None of the Mass Burn Incinerator sites quoted here are equitable to the site at St. Dennis's GREENFIELD site.

One would imagine that these new housing developments were built on land which had its value blighted by its proximity to the Mass Burn Incinerator, thereby making it more attractive to developers in the first place. There is nowhere to build in St. Dennis so.....?

Effects on Business and the Local Economy

Regeneration and Inward Investment

11.125 to 11.132

STIG Response

As food processing and manufacture are major employers in Cornwall, "concerns about food contamination" could have a major effect in these industries.

It will prevent new firms from coming to Cornwall and the effect on the wider perception of Cornish food could force our current businesses to 'pull-out' of the county all together, which would have a devastating effect on the whole economy - far beyond those directly affected.

Local Businesses

11.133 and 11.134

STIG Response

Why is SITA implying that its Mass Burn Incinerator will 'save' 28 jobs at the Goonvean Clay Dryers?

Social and Community

The loss of these jobs would be a major blow. However their survival WILL NOT be guaranteed JUST BECAUSE of the Mass Burn Incinerator being sited there.

Tourism

11.135 and 11.136

STIG Response

Spoil heaps, resulting from clay extraction, have become an accepted part of the 'natural landscape'.

Twin 120m stacks with a possible plume of 221m, visible for 47% of daylight hours - what a sight to greet the eyes of tourists who come to Cornwall for our beaches, fresh air and wonderful countryside!

SITA CANNOT predict how tourism may be affected. Holiday makers choose Cornwall as a clean, green, healthy destination. A Mass Burn Incinerator, clearly visible from many viewpoints, is not going to be compatible with this aim.

Many visitors come to Cornwall to escape from the heavily polluted areas they live in - if they live near an incinerator, they are hardly likely to want to 'holiday' near one.

A Mass Burn Incinerator will be potentially devastating to our county which depends on the tourist trade in all its forms and associations.

Local Agriculture

11.137 to 11.140

STIG Response

Unless they were already near to a Mass Burn Incinerator, why would they need "production criteria"?

The permanent loss of 7.7 ha of grazing land should not be tolerated in the wake of a world food crisis. We should be INCREASING food production in this country - for our own food security and to reduce food imports and food miles.

Dioxin contamination of milk produced by cows grazing near incinerators in France has led to thousands of litres of milk being destroyed.

Social and Community

It should be remembered that this is a TENANTED Farm and its OWNER also owns the Goonvean Clay Dryers. The site would not otherwise be available.

Amenity

11.141

STIG Response

Cannot be true - EVERY industry has SOME complaints!

11.142

STIG Response

All the explanations are very convenient aren't they.

11.143

STIG Response

How often will the "roller doors" actually be shut? With 1 waste lorry arriving every minute it doesn't seem likely that it will close AT ALL between 7am and 5pm. However, if the doors ARE continually going up and down, won't they just serve as a 'giant fan' wafting dust and odours outside?

If the door is "closed when there are no waste deliveries occurring", doesn't it mean they will be OPEN from 7am to 5pm?

11.144

STIG Response

What is meant by "cleaned periodically"?

11.145

STIG Response

SITA CANNOT say with any degree of certainty that the people of St. Dennis WILL NOT suffer "adverse effects". Without being a resident 24/7-365 after operation commences, only the local residents will know the effects and by then it will be TOO late.

Social and Community

Site Liaison Group

11.146 to 11.148

STIG Response

This has been systematically misinformed. “Understanding of the energy recovery process” is all very well, but it is hardly equal to actually living with a Mass Burn Incinerator permanently on your doorstep.

Will the Site Liaison Group have any ‘powers’ should planning permission be granted?

The planning application continuously states that there will be “no adverse effects”. If that is really the case, why are such mechanisms necessary?

Environmental and Quality Management Systems

11.149 to 11.151

STIG Response

Who are the ‘stake holders’ - Cornwall County Council or the people of Cornwall?

How can SITA “seek to minimise the volume of waste generated” and still feed a 240ktpa Mass Burn Incinerator?

By taking waste from all over the county (and C&I waste from anywhere), how can they ever hope to “minimise the environmental impact” of transport use?

Community Facilities

11.152

STIG Response

St. Dennis doesn’t have any and it is highly likely to stay that way.

11.153

STIG Response

Sounds very much like the offer of a financial inducement (BRIBE). How much and for how long?

Social and Community

South West Regional Economic Strategy

11.154 to 11.155

STIG Response

Mass Burn Incineration is NOT innovation; it is an outdated solution to an age-old problem. Innovation would mean:- ANAEROBIC DIGESTION, MBT, PLASMA GASIFICATION.

If these technologies were utilized instead of incineration, Cornwall would truly be at the forefront of the 'Green Revolution'.

48 jobs is not much of an improvement.

St. Dennis is currently a "successful" community - it will cease to be so once it has the STIGMA of a Mass Burn Incinerator and is thought of as the 'dustbin of Cornwall'.

How can a massively intrusive Mass Burn Incinerator - visible from many points of the county hope to "promote and enhance" what is best about the South West?

Education and Training

11.156 to 11.160

STIG Response

Will they be made aware of the "proximity principle" and how a single Mass Burn Incinerator for the whole county contravenes that principle?

What will the "small educational resource" consist of?

48 jobs, which will not necessarily go to local people, will have a negligible effect on skills or training opportunities.

Waste Management

11.161 to 11.163

STIG Response

The permanent loss of resources that have the potential to be recycled (but currently aren't - in the UK at least) is not a sustainable solution. Landfill sites will still be required, only the amount and type of waste will change.

Social and Community

If Mass Burn Incineration is so effective why would it be necessary for new landfill sites?

68% of MSW is bio-degradable therefore this should be treated by ANAEROBIC DIGESTION, thereby removing LAT fines.

AD also produces heat and electricity AND soil conditioners that would improve the agricultural quality of farmlands, creating greater food security - surely a far more beneficial option. This would also comply with the Waste Strategy 2007.

No MSW can be imported but Commercial and Industrial waste CAN be imported from anywhere. Therefore any place that has the intelligence and foresight not to opt for incineration themselves can inflict their waste on Cornwall, with no regard to the environmental or human health consequences.

Recycling

11.164

STIG Response

How will it be insured that no recycling collected will end up being burnt?

What about the recyclable portion of C & I waste - will that be burnt automatically?

Mitigation

11.165

STIG Response

These measures are not good enough. The true effects will not be apparent until the Mass Burn Incinerator is operational and by then it will be TOO late. Even if the risks are "small" that will be of little comfort if it is YOUR child who is "unlucky" enough to get leukaemia.

Social and Community

Residual Effects

11.166

STIG Response

255 construction jobs – “absolute certainty” of no importance, benefit or significance to St. Dennis.

48 permanent jobs – “absolute certainty” of no importance, benefit or significance to St. Dennis.

“Discounted Heat”, will not “safeguard” the 28 jobs at Goonvean and it is wrong to imply that it will.

What are the “educational resources” and who will benefit?

It would be hoped that SITA’s staff were always properly trained.

What would be the amount of this “community fund”?

What type of “local projects”?