



# Consultee Response to SITA Additional Information

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

## *Sustainability*



**In Respect Of**  
Planning Application to Cornwall County Council  
Application No. 08/00203/WAS

## Sustainability

### Introduction

#### **Sustainability: Its relevance and importance to this application**

*“Development which meets the needs of the present without compromising the ability of future generations to meet their own needs”.*

*Ref: Our Common Future (Brundtland Report), 1987*

*“If something is sustainable it means we can carry on doing it indefinitely. If it isn't, we can't” - Jonathan Porritt*

*“There can be no sustainable development without sustainable energy development” – Margot Wallstrom, European Union Environmental Commissioner (2004)*

#### **Securing the Future 2005. HMG Sustainable Development Strategy**

Working definition:

*“The goal of sustainable development is to enable all people throughout the world to satisfy their basic needs and enjoy a better quality of life, without compromising the quality of life of future generations”.*

#### **Extracts taken from the Chapter Summaries**

*.. five principles – with a more explicit focus on environmental limits.*

*.. four agreed priorities – sustainable consumption and production, climate change, natural resource protection and sustainable communities,*

*and a new indicator set, which is more outcome focused, with commitments to look at new indicators such as on wellbeing.*

*“One planet economy”: sustainable consumption and production*

*Increasing prosperity, in the UK and across the world, has allowed many people to enjoy the benefits of goods and services which were once available to just a few. We have also made progress in cleaning up some of the worst industrial pollution. Nevertheless, the environmental impacts of our consumption and production patterns remain severe, and inefficient use of resources is a drag on the UK economy and businesses.*

What is required is a

- *Strengthening of UK and international measures to improve the environmental performance of products and services, including improved product design and*
- *A continued drive to improve resource efficiency and reduce waste and harmful emissions across business sectors, aided by the new Business Resource Efficiency and Waste (BREW) programme*

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- *new commitments on sustainable procurement in the public sector to make the UK a leader within the EU by 2009*
- *support for innovation to bring through new products, materials and services*
- *stronger partnerships with key business sectors such as the food, tourism and construction industries, and*
- *a review of our waste strategy, with increased emphasis on reducing waste at source and making use of it as a resource.*
- *Confronting the greatest threat: climate change and energy*

### **Regional Spatial Strategy**

*“Ensuring sustainability and minimising adverse impact on the environment are crucial aspects of the planning agenda”.*

(Dept of Communities and Local Government, DCLG)

*“The objective of regional spatial strategy is to contribute to the achievement of sustainable development”.* (DCLG).

Planning Policy Statement 1:

*“Planning for Sustainable Waste Management” draws on the five Principles of Sustainable Development from “Securing the Future”*

### **Waste strategy for England 2007**

All of the above, from National policies and guidance, down to regional have sustainable development at their heart.

Sustainable Development can be thought of as analogous to a three legged stool, i.e. environment, social and economic.

**The stool will not balance unless all 3 are equal.**

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### Comments On Response To Request For Clarification

#### Section 2.0 General comments

- 2.0 Given the above information re: the integration of sustainability within the planning system, the response to this request is disingenuous at best.

#### Section 3.0 Supporting Statement

- 1.4 Given that the status of the WDF is not clear, in that there is ambiguity as to its adoption status, the WDF cannot endorse anything.
- 1.6 Traffic impacts, specifically those associated with a single, central facility, is just one aspect that highlights how unsustainable the proposed CERC would be.

#### Section 4.0 Design and Access Statement

- 2.2 One aspect that has been used to help “sell” the concept of a centrally sited facility to the public, was the relative ease of creating rail access. As this would reduce reliance on road haulage, it would “enhance” the sustainability of the facility.

SITA’s response finally nails this lie.

#### Section 6.0 Need Assessment

- 1.5 SITA’s response that the target of 50% household recycling by 2020 is a challenging target for Cornwall , apart from being exceedingly arrogant, typical of the mindset that has got us to this unsustainable position. Currently, there is very little linkage between the producer (household) and solution (landfill). The only way to arrive at a sustainable solution is through community involvement and engagement, creating local interest, need and ownership. The centrally sited incinerator would totally destroy any opportunity for community engagement.

- 1.10 If the incinerator was built there would still be a need for significant landfill capacity in Cornwall, including special provision for hazardous waste.

There would be approx. 11,000 tonnes of fly ash, per annum, which is already acknowledged as requiring disposal at a suitably licensed facility.

Currently, the closest facility is in Gloucester.

SITA seem to believe that the bottom ash (b/a), approx. 50,000t/yr could be used as a secondary aggregate.

Given that the proposed site is adjacent to the “Cornish Alps”, source of a secondary aggregate that is well known and used, with stockpiles of many

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hundreds of millions of tonnes, STIG would suggest that they might well have to pay people to take it off their hands.

However, even by SITA's own figures they will have to landfill approx 12,500 tonnes of bottom ash per year.

In addition, because of concerns over mixing water with the bottom ash, there is the possibility that **all** will be considered contaminated and therefore require disposal at a licensed hazardous waste site.

SITA are likely to be faced with having to export well over 60,000t/yr of hazardous material.

Apart from the horrendous financial costs, no doubt to be reflected in gate charges and our council charges, the cost to the environment does not bear thinking about.

The residents adjacent to the landfill site near Gloucester are already protesting about the problems they are facing now. They should not be expected to endure the extra burden of 60,000t a year, from Cornwall, plus an unknown quantity from Devon's 4 incinerators (3 Devon County + 1 MOD mooted for Devonport), and anywhere else that may be jumping on the incinerator bandwagon.

Apart from the financial and environmental cost of exporting our problem, how can it be fair to export a problem that we, in Cornwall, have created, relying on others to deal with the consequences? If we create a problem, we should be responsible for its solution.

It should not come as a surprise then, when Cornwall is told to provide our own hazardous site, incurring more costs and consequences, for Cornish taxpayers, whilst lining the pockets of a few.

No doubt the Proximity Principle would suddenly be remembered and invoked here, and St Dennis or a neighbouring locality, would be expected to host that too.

There appears to be no shortage of obliging landowners in the area, ready to sell the health and well being of entire communities, for 30 pieces of silver.

### 1.11 Recycling figures above 50% a challenge?

Yes, but perfectly feasible when all the local employment opportunities are factored in. SITA's problem is that it is viewing the issue from a "big stick" perspective, rather than on an incentive basis.

## Section 9.0 Carbon Balance

- 4.3 SITA's response means that we are expected to take their word for it, when common sense, tempered by work done on behalf of the Institution of Civil Engineers, suggests that dispersed facilities, following the proximity principle, will achieve a more positive Carbon Balance.

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Without any means of verifying SITA's figures surely CCC ought to ignore them?

- 4.4 The assertion, once again, that landfill is the "only known alternative" to the proposed incinerator must be nailed once and for all as untrue.

They listed a number of alternative treatment processes in the Cornwall Options Appraisal but listed as least favourable, Anaerobic Digestion.

Biffa have provided, under PFI, to Leicester City Council a waste management and treatment system that uses AD. All putrescible material, including sewage sludge, goes through the AD plant and they are licensed by the Environment Agency to dispose of the treated digestate to agricultural land.

Both Cornwall County Councillors and Council staff have been made aware of this on numerous occasions.

Therefore, there ARE known alternatives. We ignore them at our peril.

### Section 10.0 Sustainability Statement

- 5.3 As stated above, SITA would have to landfill many thousands of tonnes of material each year therefore the development should have included the missing objectives.
- 5.6 As previously discussed, it is understood that the fly ash will be toxic and therefore hazardous, so SITA's response does not make sense.

### Section 12.0 ES Introduction

- 1.1 Why is the efficiency being referred to as 65% when, in (8.0 (3.9)), it is referred to as 25%. In addition, the energy value of the steam used to produce electricity is counted as an output, when in reality it should be counted as an input. Creative accounting?

### Section 22.0 Social and Community Effects

- 11.1 How is using obsolete technology promoting innovation?

With the blight this facility will place on St Dennis, it will drastically reduce social mobility, as people will find it difficult, if not impossible, to sell their properties at anything approaching a market price. Property values here are already considerably lower than elsewhere in the County.

Further devaluation, which would directly result from the presence of this massive incinerator, would effectively trap people wishing to move to another area.

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There will be an Exodus of those who could afford to sustain such a loss.

Those forced to remain will be left in a Ghetto.

This will include all those forced to rely on Social Housing.

Given how unsustainable the whole facility will be, how can it help in the planning for sustainable and successful communities?

How can it help to promote and enhance what is best in the region?

- 11.5 Local businesses, in particular those dependent on tourists and passing trade are bound to be adversely affected by this development.

This is bound to lead to a loss of employment.

### Section 26.0 Land Use

- 15.1 Given the poor sustainability of the proposal, in particular the sheer waste of resources that will literally be burnt, any loss of valuable agricultural land can only exacerbate the issue.

### Section 28.0 Other Issues

It is not true that we are faced with two choices, i.e. incineration or landfill.

There are more benign, non-thermal, proven technologies readily available.

### Conclusion

It would appear that SITA and their advisors know the cost of everything, but the value of nothing. They know how to spell sustainability but are total novices in terms of its application in this context.