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Mike Senior
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Dear Mr Senior,

Application Ref.	05/01520/PMFUL3
Applicant	Waste Recycling Group
Location	Eastcroft Incinerator, Incinerator Road Nottingham
Proposal	Expansion to provide an additional 100,000 tonnes waste management capacity

Thank you for your letter of 17 August informing us of the above planning application.

I write to you in my capacity as spokesperson for NAIL (Nottingham Against Incineration and Landfill). We are a local community based pressure group who formed in 2002 and have a core of supporters totalling over 300. We represent local residents from across Nottingham, many of whom unfortunately have to live in the vicinity of the incinerator.

Firstly we would request that you extend the deadline for the comments on the application to be received by your office. There is a lot of information to digest and we believe that this proposal will have a profound impact on the health of the residents of Nottinghamshire and the environment. Secondly we request that you hold some form of public consultation, the general public have been very ill informed about these proposals and the effects.

Incineration cannot play a role in any sustainable waste management policy. We are objecting to the application, the key objections being;

1. The overarching level of the Development Plan is Regional Spatial Strategy (RSS8), published by ODPM in March 2005. Policy 39 requires, amongst other things, all local authorities to achieve a minimum target of 50% recycling/composting by 2015.

The City will therefore have less municipal waste, not more, to send to the incinerator in future, therefore the waste will have to come from elsewhere.

2. Nottingham City has a recycling rate of only 8.8%, which is one of the lowest in the country. This expansion will further crowd out any attempts to increase this rate as incinerators require contracts to run at full capacity, so tend to 'crowd out' future improvements in recycling.
3. Nottinghamshire County Council have agreed to contract all of their municipal waste to Onyx for 26 years, therefore no additional waste will be available for WRG's incinerator from the County. Therefore the additional 100,000 tpa required by WRG's incinerator will have to be either;
 - (a) Waste imported from Derbyshire, Leicestershire and Lincolnshire; and/or
 - (b) Commercial and industrial waste.
4. WRG have failed to show a need for Derbyshire, Leicestershire and Lincolnshire to export their waste to Nottingham City for incineration. The presumption should be that these Counties should manage their own waste. The onus should be on WRG to demonstrate that exporting waste from these counties will be necessary.
5. WRG have invented their own version of the 'proximity principle', claiming that any waste from a 35-mile radius could be brought to Nottingham. But they should be working to the official version - stated in the Government's waste policy (Waste Strategy 2000, as amended in July 2005) as "disposing of waste at the nearest appropriate installation . . ."
6. WRG have listed over 60 types of commercial and industrial waste, which they wish to burn at the Eastcroft Incinerator (Environmental Statement, Appendix 3.1). But it is unlikely they would secure long-term contracts from the private sector, so they cannot demonstrate that there will be ongoing need to incinerate specific wastes, rather than recycle or re-use them.
7. WRG have failed to show that they are capable of managing a wide variety of non-municipal waste. (The Environment Agency have asked questions about the calorific values of the wastes listed in WRG's IPPC application, and have yet to decide what quantities of non-municipal waste they will permit to be incinerated at WRG's Eastcroft incinerator.)
8. WRG's own estimate is that the maximum pollution permitted each year within the Waste Incineration Directive limits (365 times daily limit) would be;
 - 400 tonnes nitrogen dioxide
 - 100 tonnes sulphur dioxide
 - 100 tonnes carbon monoxide
 - 20 tonnes particulates
 - 20 tonnes hydrochloric acid
 - 2 tonnes hydrogen fluoride
 - 20 tonnes volatile organic compounds
 - 100 kg mercury
 - 100 kg cadmium and thallium
 - 1 tonne other heavy metals
 - 200 mg dioxins & furans TEQ

These figures include emissions from all three lines, but do not include breaches of emission limits, which are permitted for up to 60 hours a year for each type of emission. These figures are also much higher than the actual current emissions.

9. The current chimney is a visual impact for the residents of the surrounding area particularly Sneinton, Bakersfield, St Anne's, West Bridgford and the Meadows. From this stack we can often see the toxic plume. If the proposals go ahead, the residents will be aware that this blight on their landscape will be permitted to emit far greater quantities of toxins and pollutants.
10. WRG estimate that there will be an extra 106 HGV traffic movements per day (total of 264) as a result of the expansion, bringing waste from up to 35 miles away. This will add to noise, congestion and pollution. Traffic is already the biggest problem for Councils' Local Air Quality Management Areas.
11. Recycling creates up to five times as many jobs than incinerators, much of which can be local.
12. Much of the waste could otherwise be recycled. Significantly more energy has to be consumed replacing these raw materials, in their extraction, transporting and manufacture, than is gained from recovering energy through incineration. In addition recycling conserves the earth's dwindling resources and produces useful materials
13. The proposed expansion will allow an extra 100,000 tpa waste to be burnt a year. This in turn will produce;

Total of 70,000 tpa bottom ash, (an increase of 30,000 tpa)
Total of 10,000 tpa fly ash, (an increase of 3,500 tpa)

WRG have not yet demonstrated that this will be disposed of in accordance with the proximity principle.

14. The Waste Local Plan (WLP) Policy W2.1 states that "Waste Management Proposals will only be permitted where they represent the best practicable environmental option . . ." BPEO is defined as "the outcome of a systematic consultative and decision making procedure . . ." (WLP section 2.21).

It should also be judged against the waste hierarchy and the proximity principle (section 2.19).

WRG have failed to demonstrate, through a consultative procedure or otherwise, that exporting waste from Derbyshire, Leicestershire or Lincolnshire to Nottingham is the BPEO for those waste streams.

WRG have also failed to demonstrate that burning a wide variety of commercial and industrial wastes in a moving grate furnace is the BPEO for those wastes.

15. WLP Policy W3.1 requires a balanced assessment between the need for waste management facilities and the environmental disruption, which may arise.

WRG have so far failed to establish any clear need for a third line at their Eastcroft incinerator. Nottinghamshire have stated a clear intention to contract all of their waste to Onyx, not WRG. WRG have stated that they are not currently seeking contracts outside of the County. They cannot state with any certainty what other wastes they will burn. Therefore, with such a weak case for 'need', the emissions listed in point 8 above, together with traffic impacts, should more than outweigh the need.

16. WLP Policy W6.1 does state support for increased capacity at the Eastcroft incinerator. But this is based on the assumption that it would result in more of Nottinghamshire's waste being managed higher up the waste management hierarchy (WLP section 6.12). As Nottinghamshire County Council have decided not to manage their waste in this way, the rationale for Policy W6.1 should be reconsidered.
17. Incinerators are poorly regulated, the emission levels set by the Environment Agency (EA) are levels which are only 'technically' or 'economically' achievable, they are not based on safe levels. There are no safe levels for many of the toxic and cancerous substances released by the incineration process. This point is accepted by the EA, (Report HC 39-1, Delivering Sustainable Waste Management).

Only a handful of the hundreds of poisons released in to atmosphere, land and water are constantly monitored. Dioxins are classified by The World Health Authority as the most cancerous substance known to science, yet these and many other highly poisonous chemicals are only spot measured by WRG every six months and independently measured by the EA only once per year. The annual overall emission levels are then 'assumed' from these spot measurements and peaks are not accounted for.

A Belgian study has shown that dioxin levels, if continuously monitored, may be 30-50 times greater than current monitoring would suggest.

Eastcroft has regularly breached its authorised emission levels, there have been four since March this year.

In a report by Greenpeace in 2001 'Criminal Damage: A review of the performance of municipal waste incinerators', Eastcroft was listed as the fifth worst Incinerator, in terms of the number of self-reported breaches, between 1999-2000 it reported 53 breaches.

In March this year dioxin levels released into the atmosphere were found to be 900% of the maximum allowable level, authorised by WRG's IPC Licence (number AH0653).

Waste Recycling Group clearly cannot operate their current plant within the IPC Licence, this strengthens the case to oppose the expansion.

18. There have been numerous reports and investigations into the effects of incinerators on human health, in Europe and around the world. These reports link incinerators to many health problems such as cancer (amongst children and adults), birth defects, and adverse impacts on the respiratory system, heart disease, immune system effects, increased allergies and congenital abnormalities.

For your information, I enclose a copy of a Greenpeace International report (summary) 'Incineration and Human Health'.

19. The Prime Minister has repeatedly stated that climate change is the greatest threat we face, incinerators release both global warming and acid rain gases. Life cycle analysis shows that the global-warming gases avoided by incineration are many times less than the quantity avoided by recycling.
20. Waste reductions, re-use and recycling along with composting of biodegradable waste are far superior to incineration, in terms of their impact upon health and the environment.

There are many unanswered questions and concerns regarding these proposals, we therefore request that WRG's proposal to expand the Eastcroft Incinerator should be rejected.

Yours sincerely,

Mr J Beresford MIIE

www.nail.uk.net

Abbreviations

BPEO - Best practicable environmental option
HGV - Heavy goods vehicles
IPPC - Integrated Pollution Prevention Control
tpa - Tonnes per annum
WLP - Waste Local Plan
WRG - Waste Recycling Group