



Department
for Environment
Food & Rural Affairs

I have downloaded these key points **and added my comments in red** from some of the details in their report on the Incineration of Municipal Solid Waste.

At the end of July 2021 there will be new government legislation on incineration, so I am asking of behalf of all the residents in the area that the decision as to whether or not to build this incinerator is delayed until this new legislation has been passed, in the hope that it will give greater protection from the toxins and other harmful effects on the human population, greater protection to the local agriculture to stop the toxins from entering the food chain and to prevent the water pollution from entering the river Arun, the sea and from adding one more (all be it tiny) nail in the coffin of Global Warming.

Key Issues

When considering the planning implications of an incineration facility the other issues that will need to be considered are common to most waste management facilities.

The key issues are therefore:

- Plant/Facility Siting;
- Traffic;
- Air Emissions / Health Effects;
- Dust / Odour;
- Flies, Vermin and Birds;
- Noise;

- Litter;
- Water Resources;
- Design Principles and Visual Intrusion;
- Size and Landtake;
- Public Concern. **(especially as Arun Planning are simultaneously trying to build 1,500 houses and 2 schools in the shadow of the incinerator).**

Plant Siting

Facilities are likely to require good transport infrastructure. **Such sites should either be located close to the primary road network or alternatively have the potential to be accessed by rail or barge**

Unlike a number of other new waste treatment processes incineration proposals are likely to have very exacting siting and design requirements. **This is due in part to negative public perception** but also to the scale of operations which will often require sites that are capable of accommodating large built structures and associated infrastructure.

Emissions of many parameters need to be monitored continuously. This enables process operators to comply with the emissions limits set out in operating permits, which as a minimum reflect those in the Industrial Emissions Directive (IED). Some substances, including dioxins, furans and some metals, cannot be measured continuously **or it may be prohibitively expensive to do so.**

Emissions of oxides of nitrogen from a typical incineration over a period of an hour are approximately the same as emissions of oxides of nitrogen from a typical motorway 7 km in length over a one hour period. **And that's just the nitrogen. What about the rest of the toxins?**

Health Protection Agency

While it is not possible to rule out adverse health effects from modern, well regulated municipal waste Incinerators with complete certainty, any potential damage to the health of those living close-by is likely to be very small. **Thats**

not good enough, any self respecting person in a position of power such as yourselves should be voting for the best of health standards for your residents. It is well documented that the health effects include different forms of cancer, respiratory illnesses and birth defects, especially of the Incinerator workers and children living near these facilities are among the groups that have been shown to experience these diseases more frequently.

Flies, Vermin and Birds

The enclosed nature of waste incineration operations will limit the potential to attract vermin and birds. **However, during hot weather it is possible that flies could accumulate, especially if they have been brought in during delivery of the waste.** Effective housekeeping and on site management of tipping and storage areas is essential to minimise the risk from vermin and other pests. In some operations waste heat from the process may be passed through fresh inputs waste so temperatures exceed levels at which flies can survive.

Effective housekeeping and on site management of tipping and storage areas is essential to minimise the risk from vermin and other pests. Waste storage time in some Incineration plant is designed to be less than the breeding cycle of vermin such as rats. **But what if it is not and we have rats breeding like the flies?**

Noise

The main contributors to noise associated with incineration are likely to be:

- Vehicle movements / manoeuvring;
- Traffic noise on the local road networks;
- Mechanical processing such as waste preparation;
- Air extraction fans and ventilation systems;
- Steam turbine units;
- Air cooled / other condenser units.

Litter

Any waste which contains plastics and paper is more likely to lead to litter problems. With Incineration, litter problems can be minimised if good working practices are adhered to, vehicles use covers and reception and processing are undertaken indoors. **But what if this is not adhered to?**

Water Resources

The greatest potential for pollution to surface/ground water is linked to the arrangement for delivery of waste, the collection of processed materials and the treatment of flue gases using chemicals. Any wash down waters or liquid within the waste will need to be managed using a drainage system on site. The level of water usage will be specific to the technology and therefore **it is not possible to provide detail on the nature of the effluent that might be generated and how it should be managed.**

Construction

Construction of any building will have an effect on the visual landscape of an area. Visual intrusion issues should be dealt with on a site specific basis and the following items should be considered:

- Direct effect on landscape by removal of items such as trees or undertaking major earthworks. **The proposed site will be on a flat flood plain, so will be visible from many of our most treasured views.**
- Site setting – is the site close to listed buildings, conservation areas or sensitive viewpoints; **This site is close to all of the above.**
- Existing large buildings and structures in the area; **There aren't any so it will stand out like a sore thumb.**
- The potential of a stack associated with some air clean up systems for mixed waste processing operations may impact on visual intrusion;
- Appropriate use of landscaping features (trees, hedges, banks etc.) not for screening but to enhance the setting of the facility;
- The number of vehicles accessing the site and their frequency;

- Many of these facilities are housed in 'warehouse' type clad steel buildings, however use of good design techniques can help minimise visual intrusion.

Public Concern

In general public concerns about waste facilities relate to amenity issues (odour, dust, noise, traffic, litter etc.). Public concern founded upon valid planning reasons can be taken into account when considering a planning application. **NOT CAN – BUT MUST BE TAKEN INTO ACCOUNT**