

## Grundon/Viridor. Ford Parish Council objection to Environmental Permit at Ford

The previous planning consent for a much smaller gasification plant was agreed with a condition it met the R1 Status. That plant using the gasification system **has not been built**. Instead after a long period of time (2013) an application is being made for giant incinerator and we have been told that the smaller plant is not economically viable.

From reading all the concerns of the public, Local Parish and Town Councils, the people reject the **burning of rubbish** instead of enforcing recycling, recovery of putrefiable waste for anaerobic digestion etc. and have concerns as shown below.

**There are many reasons why the people oppose incineration, including because:**

- Incineration harms recycling
- Incineration exacerbates climate change
- Incineration is a barrier to the circular economy
- The UK already faces incineration overcapacity
- Incinerators harms air quality
- Incinerators are bad neighbours
- According to the Committee on Climate Change: *“Achieving significant emission reductions in the waste sector requires a step-change towards a circular economy, moving away from landfill and incineration (and the associated methane and fossil CO<sub>2</sub> emissions), and towards a reduction in waste arisings and collection of separated valuable resources for re-use and recycling”* (Source)
- Incineration results in high levels of greenhouse gas emissions. For every tonne of waste burned, typically around one tonne of CO<sub>2</sub> is released into the atmosphere, and around half of this is fossil CO<sub>2</sub> (Source). This means that incineration has a higher carbon intensity than the conventional use of fossil fuels, and significantly higher than what most people would consider ‘low carbon’.
- In 2019 the UK’s 53 incinerators released a combined total of around 13.3m tonnes of CO<sub>2</sub>e, around 6.6 million tonnes of which were from fossil sources such as plastic (Source). The 6.6 million tonnes of fossil CO<sub>2</sub> released by UK incinerators in 2019 resulted in an unpaid cost to society of more than £450 million (Source).
- Even when methane generation from the landfill of biogenic material is taken into account, over its lifetime a typical waste incinerator built in 2020 is estimated to release the equivalent of around 1.6 million tonnes of CO<sub>2</sub> more than sending the same waste to landfill (Source). When electricity generation

is taken into account, each tonne of plastic burned at that incinerator would result in the release of around 1.43 tonnes of fossil CO<sub>2</sub> ([Source](#)).

- Around half of the biogenic material sent to landfill does not rot down and therefore does not exacerbate climate change, whereas were the same waste to otherwise be incinerated then all of the biogenic carbon in the waste would be converted into CO<sub>2</sub> and released into the atmosphere ([Source](#), [Source](#), [Source](#)). Biostabilisation can be used to significantly increase the amount of biogenic carbon that is sequestered in landfill, meaning the landfill acts as a carbon sink for nearly all of the biogenic material which would otherwise be converted into CO<sub>2</sub> were the waste to be incinerated. Whilst incineration performs poorly against sending waste to landfill, it performs even worse when compared with sending waste that has been biostabilised to landfill ([Source](#), [Source](#), [Source](#)).
- Composition analysis indicates that much of what is currently used as incinerator feedstock could be recycled or composted ([see recycling section above](#)), and recycling what would otherwise be incinerated would result in significant carbon savings and other environmental benefits. Thus, incinerating waste comes with a significant 'opportunity cost' that has a significant adverse climate change impact ([Source](#)).
- In addition to greenhouse gas emissions that exacerbate climate change, incinerators emit many toxins and pollutants that harm local air quality. Emissions include dioxins, NO<sub>x</sub> and ultrafine particulate matter that can be harmful to both human health and the natural environment. There is not enough monitoring, not enough enforcement, and not enough transparency.
- **“There is no safe level for particulate matter (PM10, PM2.5), while NO<sub>2</sub> is associated with adverse health effects at concentrations at and below the legal limits.”**
- **— Air Quality: A Briefing for Directors of Public Health. Defra, Public Health England and the Local Government Association, March 2017.**

### Summary of Objections and conclusions

1. The application needs to be considered on its merits, not as a comparison to unacceptable schemes that have since been withdrawn;
2. The application material “down-plays” the impacts that would arise if consented;
3. The application makes a series of bold and unsubstantiated statements over policy compliance and how it has addressed concerns; 23885/A3/RS/dw - 13 - 14th May, 2021

4. The application overly relies upon the sites allocation to justify the application proposals and its impacts, dis-regarding many of the policy requirements that the allocation policy itself, together with wider policies of the Waste Local Plan, require to be addressed;
5. The proposals, if consented, would have a significant and unacceptable impact on the area and on the adjacent mixed use allocation;
6. There are deficiencies in the ES assessment and conclusions, making it an unreliable basis from which to determine the application, in particular relating to matters of: a. Landscape and visual effects; b. Transport impact; c. Noise and vibration; d. Air Quality, Odour and Dust; e. Social and community effects.
7. The proposed design is wholly unacceptable with insufficient efforts to propose a scheme that is acceptable in terms of its impact, form, mass, scale and design;
8. The proposals have failed to address concerns raised in the previous application in any meaningful way;
9. The applicants have failed to demonstrate a clear need for the proposed development;
10. The proposed development is contrary to the development plan. In accordance with s38(6) of the Planning and Compulsory Purchase Act 2004, the Planning application should therefore be refused., and no permit issued.