

Dear Minister,

I am appealing against the increase in capacity at RRRF on the following grounds:

GLOBAL WARMING

See headlines from the Climate Change Committee (CCC) report of 16 June.

“The UK is even less prepared to deal with climate change already hitting the country than it was five years ago, thanks to a "failing" government response, its own independent advisers have warned.

In a damning report published today, the Climate Change Committee (CCC) said government action to improve the nation's resilience was failing to keep up with the impact of warming and worsening climate risks already hitting the UK.

In fact, the threats the country is facing have actually worsened, chief executive of the CCC Chris Stark said, because the government's response so far has been "severely lacking".

"We've become more and more aware of the risks that we face," he told Sky News. "And yet we haven't seen a commensurate response from the government."

The CCC is urging government and the devolved administrations to act urgently to stop more people from dying or losing their homes, starting with the eight most urgent climate risks to the UK."

The addition of further capacity at RRRF can only add to a worsening situation.

You are of course aware that your department had already granted planning permission for a second incinerator at RRRF. With two incinerators RRRF will be by far the largest incineration site in London, if not the UK and Europe.

HEALTH

As well as the concerns for the nation's health raised in the CCC report, there is a particular aspect relating to London.

In a 2016 report of by the British Lung Foundation (BLF) concerning chronic obstructive pulmonary disease. (COPD). See:

<https://statistics.blf.org.uk/lung-disease-uk-big-picture>

The relevant section and data for London will be seen at: “*Regional variation in the risk of dying from lung disease.*” Where there is a link to an Excel spreadsheet:

<https://statistics.blf.org.uk/sites/default/files/relative-risk-of-lung-disease-areas-london-blf-june-2016.xlsx>

From the BLF report I have totalled the mortality rates by London Boroughs across the five listed lung diseases:

Asthma, COPD, Lung Cancer, Mesothelioma and Pneumonia.

The total mortality figures were then sorted, highest incidence per borough to the lowest. See **Attachment A; Lung disease total deaths**. The totals column in red is to the right of the spreadsheet in column M.

The data set was then matched against the siting of incinerators within London.

See **Attachment B London Borough Map, Incinerators in London**

Thames Water at Becton.

Cory at Belvedere.

Edmonton ECO Park at Enfield-Waltham Forest borders.

SELCHP in South Bermondsey Lewisham.

Colnbrook in Hillingdon

Thames Water at Thamesmead-Belvedere. (*Now de-commissioned but active at the time of BLF survey*).

Additional incinerators are planned or operating at Belvedere, Edmonton and Sutton. (See London Boroughs map).

The prevailing wind direction across London is from the South-West through to North West; You will note that from the map and data that the highest incidence of lung related deaths is generally within the boroughs where the incinerator is sited or approximately downwind. ie Barking & Dagenham, Newham, Tower Hamlets, Havering, Hillingdon, Greenwich, Bexley, Lewisham and Waltham Forest.

I accept that the findings may be co-incidental, but never-the-less a very strong co-incidence that needs further research. A counter claim could be that lung disease is more prevalent in the poorer boroughs eg Barking and Lewisham, but this does not apply to Waltham Forest, Hillingdon or Bexley. Pollution from heavy traffic could be cited as a cause, however other boroughs with high traffic volumes record lower death rates.

For further empirical evidence see: WHO Report of 2016 Health Risk Assessment of Air Pollution ISBN 978 92 890 51316©

I recommend that The BLF report and data sets be brought up to date to include the latest statistics including those boroughs where the more recent incinerators are or will be installed and/or down-wind from same. I recommend you provide the funds for BLF to do this and restrain from granting further permission at RRRF Belvedere until the new data is available to you.

POLLUTION STATISTICS

On making an assessment re pollution effects of the RRRF Belvedere incinerator you could be 99% reliant on data from Cory PLC which of course will be biased. I believe there are no independent or council owned pollution monitors downwind of RRRF in Bexley and only one in Havering and that is roadside.

I recommend that your department provide funds to install numerous particulate sensitive pollution monitors in strategic locations up to two miles and downwind from RRRF Belvedere and for that matter all UK based incinerators, then take readings over a two-year period to assess the overall effect of pollution from incinerators. After that time, you should be able with empirical evidence to make an informed decision. Without that evidence you could be endangering health and life.

ENVIRONMENT

The RRRF incinerator and other Cory installations is sited alongside a valued nature reserve which incidentally sits below the flight path to and from City Airport. Cory have made no attempts to mitigate the damaging effects of their projects; profit from incineration is their raison d'être.

On pre-construction literature relating to RRRF Cory promised a tree lined site, the reality is little or no environmental enhancement. (See attached photographs at C). They euphemistically marketed the second incinerator under "Riverside Energy Park"

Cory resisted and it seems Bexley Council concurred not to add greening to their new data centre sited alongside the nature reserve.

Although they have the space there is no sign or plans for solar panels or wind turbines.

Cory's concern for the environment is minimal and you should bear that in mind when reaching your decision. This is particularly concerning as Bexley Council have plans for over 10,000 new housing units less than 1Km from the dual incinerators

SUMMARY

I believe I have provided sufficient grounds for the increase in incineration capacity at RRRF Belvedere to be rejected or at the very least postponed until empirical evidence is analysed. The data collected from new and strategic placed monitors at Belvedere, Havering and other incineration sites would put

to rest once and for all the question “Does waste incineration contaminate the environment?” Without empirical evidence your department could continue to be responsible for making decisions that endanger us all.

You will also be aware that local MPs, the GLA were among thousands who signed petitions against the second incinerator in Belvedere, I believe their views should also be taken into account when applied to this new development.

Yours sincerely

