

Application - RRRF Nathan Way Belvedere DA17 6JY - London Borough of Bexley

I am a [REDACTED] a designated area of deprivation with higher numbers of those with COPD, children with life limiting illnesses and registered Carers, within the North of Bexley borough. This is about [REDACTED]. The RRRF incinerator is sited next to the Crossness wildlife park with its rare bird and bee species. Local roads are single carriageway with only 1 local dual carriage road in the area the A2016 / A206, which feeds the Dartford Tunnel and the M25. The nearest major road junction to the site was proposed to be re modelled due to traffic queues when Boris Johnson was Mayor of London. A new roundabout (The Fish at junction with Queens Road) and not a flyover as originally proposed; was installed. Delays are persistent on this major route, with much traffic idling especially at peak times. When there are almost daily accidents / delays at the tunnel or the A2 junction then local roads are clogged, creating more pollution. The Cory documents state that for the increase in capacity few new heavy goods vehicle journeys to and from the site will be required. At the REP Enquiry it was stated that 'bottom ash' and 'Waste Water were transported by road. The RRRF summary states that 'bottom ash' will be by barge. I would ask that an actual description of road traffic movement effects due to increased RRRF tonnage is clearly defined. This may be within existing permitted movement targets but every **extra lorry is adding further to pollution levels locally.** (EIA Document ref 3.1.73 ' *This is because the transport of any additional inputs and outputs to and from RRRF can be accommodated within the existing limits already imposed on road transport movements through the 2017 Permission.*')

The Guardian on 31/7/2020, quoted a Greenpeace report in which the data raises concerns over air quality and the health of vulnerable people. "*Waste incinerators are three times as likely to be situated in the most deprived and ethnically diverse areas of the UK, it has been revealed, raising fears about the impact on air quality and the health of vulnerable people. Data obtained by Unearthed, the investigative arm of Greenpeace, found that areas in the top 20% for deprivation host nearly one-third of the waste incinerators in the UK.* This report written by Sarah Laville, illustrates my concern that no new capacity should be consented at the Norman Rd site. The Mayor of London was a leading objector at the Belvedere REP incinerator planning Enquiry. However consent for the new plant was granted in April 2020. The Mayor recently said: "*Reducing the environmental impact of managing London's waste is important in becoming a zero-carbon city. I do not consider that London needs additional incineration capacity to manage its non-recyclable waste if my waste and recycling targets are met.* (Source: <https://www.theyworkforyou.com/london/?id=2021-05-30.1435.h&s=incineration+section%3Almq#g1435.r0>)

The 'Road Run Off Water Quality Study December 2019' reported in the Guardian on 23.12.2019. highlighted the toxic effects on water from driving in the capital's most congested areas. The report stated that '*Hundreds of pollutants, including heavy metals, are routinely found in road runoff... and they can kill fish or other aquatic life and cause long-term damage to rivers – and potentially to human health.*' The included map showed that there is pollution and "Red Line" concerns in Bexley borough rivers. The area is also on the City airport flight path with aircraft taking off and slowing for descent. A Heathrow Airport Study published in Environment International (reported in Evening News Friday 3rd Jan 2020.) states -*Traffic emissions remain the biggest source of ultrafine particles. At airports they occur when planes are taxiing into position, flying low and especially when taking off. While there are EU restrictions on PM 2.5 vehicle emissions, the same controls do not exist for aircraft.* Again this adds to local pollution levels.

Excess capacity already exists in the Incineration industry, with more plants in the planning stages. In Parliament an Early Day Motion; 'Moratorium on Waste Incineration Capacity', saw MPs from all of the main political parties set out the case that we should not be building new incinerators. (<https://edm.parliament.uk/early-day-motion/51049/moratorium-on-new->

waste-incineration-capacity.) A Westminster Hall debate on commercial & industrial waste on 28th January 2020 also raised concerns over excess incineration capacity.

Where there is overcapacity then feedstock needs to be transported a greater distance, adding to traffic pollution. The existing Belvedere site capacity is greater than the local need. Some waste is received from the Wandsworth waste transfer station and Tilbury. RRRF feedstock is also expected to come from commercial and business sites at Canary Wharf, again increasing the carbon footprint. In a separate, non-Cory owned facility, there is a suggestion of incinerator feedstock being sent by train from Neasden to Swindon for processing.

A UKWIN report in May 20220 covered the existing incinerator capacity in the table below. (This excludes the 620,000 at the Edmonton site which has proposals for extension.)

Incineration Capacity Within and Around London (Excluding Edmonton)

Location	Operator	Capacity (tpa)	Status
Riverside Energy Park, Bexley, South East London	Cory	805,920	Consented
Riverside (Belvedere), Bexley, South East London	Cory	785,000	Operational
Sittingbourne, Kent	Wheelabrator	657,000	Commissioning
Tilbury Energy Recovery Facility, Tilbury Docks, Essex	Tilbury Green Power	650,000, inc. biomass	Consented
Rivenhall, Essex	Gent Fairhead	595,000	Construction
Stewartby, Bedfordshire	Covanta / Veolia	585,000	Consented
Allington, Maidstone	FCC	560,000	Operational
Lewisham (SELCHP), South East London	Veolia	488,000	Operational
Colnbrook (Lakeside), Slough	Viridor	450,000	Operational
Greatmoor, Buckinghamshire	FCC	345,000	Operational
Ardley, Oxfordshire	Viridor	326,300	Operational
Sutton, South London	Viridor	302,500	Operational
Thames Gateway	Chinook	200,000	Commissioning
Former Brickworks, Horsham	Britaniacrest	180,000	Consented
Keypoint, Swindon	Rolton Kilbride	150,000	Consented
Hoddesdon, Hertfordshire	Hoddesdon Energy	113,000	Commissioning
Chineham, Hampshire	Veolia	110,000	Operational
Milton Keynes	AmeyCespa	93,600	Operational
Shepperton, Surrey	Suez	60,000	Commissioning

Incineration Capacity Totals (excluding Edmonton)	
Operational capacity in and around London	3,450,400 tonnes per annum
In commissioning	1,030,000 tonnes per annum
Under construction	595,000 tonnes per annum
TOTAL EXISTING INCINERATION CAPACITY	5,085,400 tonnes per annum
Consented, but not yet under construction	2,370,920 tonnes per annum
TOTAL EXISTING AND EMERGING CAPACITY	7,456,320 tonnes per annum

Pollution in London -Particulate matter. The Videalert.com website on 18.5.2020 stated “*Fine particulate matter (PM2.5) –is emitted directly from combustion sources or formed in the atmosphere from complex chemical reactions. It is one of the primary pollutants because it is linked to asthma, lung cancer and deaths from cardiopulmonary diseases.*” This can be generated by industry but also from road dust such as tyre crumb,

bodywork and paint flakes, so electric vehicles are not exempt. Any extra capacity at the RRRF will add further traffic generated pollution to the local area. (Whilst most refuse is delivered by barge, extra pollution is added by the low grade diesel used in running the barges.)

Emissions from the incinerator can include small quantities of heavy metals ; Arsenic etc. These in combination from 2 operations could be hazardous to health. Metallic air pollutants are causing a 'silent heart disease epidemic', states Professor Maher from the University of Lancaster (reported in Air Quality News 7/7/2020,) : *'It's been known for a long time that people with high exposure to particulate air pollution experience increased levels and severity of heart disease. Our new work shows that iron-rich nanoparticles from air pollution can get right inside the millions of mitochondria inside our hearts...the structures which generate the energy needed for our hearts to pump properly. We found these metal particles inside the heart of even a three-year-old, this indicates that we're setting heart disease in train right from the earliest days, but only seeing its full, clinical effects in later life. It's really urgent to reduce emissions of ultrafine particles from our vehicles and from the industry before we give heart disease to the next generation too.'*

A cross party Westminster Hall Debate on Air Pollution in London was held 27. 4. 21. (Hansard vol 693 col 96WH.) *"This debate (called by MP Munira Wilson) is focused on London, where a staggering 99% of the population live in areas where particulate matter exceeds WHO limits. Up to around 4,100 early deaths each year in London can be linked with air pollution". (MP Ruth Jones explained further that "The UK legal limit for PM_{2.5} is more than twice as high as the World Health Organisation recommendation. Scientists have not been able to identify a level of PM_{2.5} that is harmless to breathe, so we need the strongest possible action.")*

Munira Wilson also said *"The Conservative Government stated in 2019, when they published their clean air strategy, that "exposure to the pollution still present in our atmosphere is one" of "the UK's biggest public health challenges, shortening lifespans and damaging quality of life for many people."*

Central London is one of the most polluted places in the UK and is currently the main area failing to comply with the legally binding limits set by the EU, which the UK is committed to. The MP referred to the case of Ella Adoo-Kissi-Debrah, who lived around 12 miles from Bexley, The coroner in Ella's inquest stated last week that "there is no safe level for Particulate Matter" and called for a change in the law And this is what I am doing today... ..

The Environment, Food and Rural Affairs Select Committee report to Parliament of 11th February 2021 urged the Government to put improving air quality 'at the core' of the post-pandemic rebuild. *"The House of Commons Environment, Food and Rural Affairs Committee today calls on the Government to address alarming levels of poor air quality in England, highlighting a 'strong and established' case for tackling air pollution, shown to disproportionately affect those from lower socioeconomic backgrounds."* The report requests government to *"Commit to making legal clean air targets more stringent. The report sets out the Government's 'moral case' for doing so; highlighting that the most disadvantaged communities, who contribute the least to air pollution, suffer the most from its effects. It also raises concerns that the current Clean Air Strategy, 'lacks the ambition to fully address' the challenges posed by poor air quality, and that targets carried over from EU law could be 'easily amended'. The Environment Bill must therefore be amended to include a specific target to reduce levels of fine particulate matter (PM_{2.5}) in line with WHO guidelines. Long-term targets for other key pollutants, including NO₂ and ammonia, must also be set."*

In the above extracts it is clear that there is a growing will to uncover the effects of pollution. Particulates are now seen as hazardous to health. Yet those levels quoted on Particulate

emissions in the Cory RRF application are stated as ‘insignificant.’ **I feel that any extra RRRF capacity is harmful to local vulnerable people and should be refused.**

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RE _ Environmental Impact Assessment Report, Non-Technical Summary

Incorrect description of view to north of the RRF site - Dagenham Dock.

2.2 Application Site Description

2.2.4 *‘Further north, on the opposite bank of the River Thames is an area characterised by manufacturing, including the Ford Motor Company works, and associated car and lorry parking.’*

At the previous REP enquiry an industrial impression was given of the opposite bank of the Thames towards the Ford factory. I advised the Enquiry team that I feel this is not strictly true, as it is not a large scale operation now. There are no cars being made as vehicle assembly ceased in 2002. It is a commercial vehicle parts operation with a much reduced workforce. Around it will be housing sites and riverside homes, where pollution on prevailing winds might be an issue in the future.

“The former Stamping Plant was vacated by Ford in 2013 and has since been identified by the Mayor of London as a strategic opportunity area for a mixed-use community. Benefitting from a rail connection to Fenchurch Street in just 19 minutes. Plans for the mixed-use development include schemes to commemorate the industrial importance of the site, drawing on its 90 year heritage as a major car manufacturing plant, and integrating with the neighbouring 3,000-home Beam Park development”. This information is corroborated by the following – Extract from Website ‘bdailybulletin’; by Billy Wood on 26th September 2016.

“Work on 2,650 new homes at former Ford Dagenham site gets underway. Demolition work has got underway on the site of the historic Ford Stamping Plant in Dagenham for a new 2,650 home development.” The company are proud of the wildlife site that has been created within the original site Ford's Dagenham Estate: “A Haven of Flora & Fauna | Ford UK <https://www.ford.co.uk/experience-ford/sustainability/fords-dagenham-estate>

“A Haven of Flora and Fauna As unexpected as it may seem on a busy industrial site, Ford’s Dagenham estate is home to a rich variety of flora and fauna. More than 50 types of birds now nest on the site.”

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