

## ***Riverside Energy Park Statement of Objection***

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**1. Necessity** - There are already 3 incinerators within 5km of Belvedere. There are 32 London Boroughs where at least 24, (some of which are also riverside), do not have a single incinerator. Why should this local area be more blighted than any another London borough, when the waste being incinerated here in Belvedere, is from the whole of London and **not** just local refuse? (The new facility would provide incineration of commercial restaurant waste from the central London area.) Apparently the existing incinerator on the Cory site, which is the largest in London, is not operating at full capacity. (So is there a need for a further incinerator. Would pollution levels rise further if it were at capacity, even without a further incinerator?) However, Cory has applied for increased vehicle operation and movement ability at the site. "Cleaner Air for London - Mayor's Air Quality strategy 2015"; sets out the Mayor of London's commitment to reducing air pollution. A new incinerator operation would be counter to this. Since that document was produced, awareness among government ministers of the dangers of pollution has increased markedly. In the last month, Parliament has declared a climate emergency. BBC News: UK Parliament declares climate change emergency: (<https://www.bbc.co.uk/news/uk-politics-48126677>)

In a Westminster Hall debate on 9<sup>th</sup> April 2019, John Grogan MP stated "*there is a case for a moratorium on incineration. We have quite enough incinerators to deal with residual waste at the moment.*"

**2. Safety**- With what could be 2 adjoining Cory incinerators and the Thames Water sludge burning facility opposite the Cory site in Belvedere, there may be a risk of any fire or explosion spreading rapidly. Also in close proximity, there are large scale warehousing and storage operation sites. (Such as Asda distribution, adjacent at Hailey Road, also Ocado

depot , and Iron Mountain data storage unit in Belvedere.) There is a planning application from Westminster Waste; a London wide operator; for a waste recycling operation at Mulberry Way, Belvedere. There are already 2 major waste contractors operating in the north of the borough: Erith Metals at Manor Rd and Veolia's waste operation adjacent to Bexley council's main waste and recycling centre on the A206.) Should the Westminster Waste application for Belvedere be approved, this would pose another potential fire risk close to the Cory site. The resources available at the small local fire station would not be adequate in any way to deal with an emergency. (One previous fire in a paper warehouse at Erith involved 16 Fire Brigade vehicles, from around London.) Bexley borough does not have a major A&E unit or main hospital to deal with casualties from such incidents.

Data from the Environment Agency shows a trend towards increasing deployment of the Thames Barrier, upstream from Belvedere, to protect against increasing risk of tidal flooding of the Thames. Should this trend continue there is an increased flood risk to any down river operation, such as the Cory site . This could result in infrastructure damage, waste or contaminants being washed into the river etc. The Bexley Local Plan ( scoping report 11A consultation document February 2019 page 55 fig 17) shows flood zones. The document highlights "*areas with a degree of flood risk, (from rivers) including the opportunity areas in the North of the borough*", (which encompasses Belvedere).

A further possibility, given the incinerator's status as a 'National Infrastructure project', is the opportunity for attack by a lone terrorist. Adding a 2<sup>nd</sup> incinerator there would seem to double the risk from any potential attack. An action could greatly increase pollution and other hazards in the locality. The area is difficult to secure from intruders as there is a designated public footpath and riverside walkway adjacent to the site. On May 15<sup>th</sup> the Metro (page 9) stated – "*A trespasser is on the run after he was caught strolling through the grounds of the Tower of London late at night. The man fled when guards approached him and was last seen*

*climbing down onto the Thames foreshore*". (He was not apprehended despite there being an army unit based at the Tower.) Recently, disruption has been caused by public use of drones over airports. The Metro also reported on the same day – *"Drone missiles were used in attacks claimed by Yemen's Houthi rebels on a petrol pumping station at a Saudi Arabian oil project on the Red Sea and 2 in Riyadh yesterday."* This illustrates that the fact the technology is available to dissident groups. For this reason alone, it would appear to be against the public interest to place 2 incinerators on the same site.

**3. Harm to public Health** - It is reported that – *"Children in the UK have the highest. reported symptoms of asthma, allergic rhinitis and eczema in the world."* (Source- *Allergy and Free From Guide, 12<sup>th</sup> May 2019, pg12.*) Some of these allergens may be due to their indoor environments. However, Dr Helen Brough, a consultant paediatric allergy specialist at the Portland Hospital stated that *Pollen particles are now more allergenic... Pollutants such as diesel can also break down pollen cells, making them smaller so they can get into the lungs and trigger asthma attacks in asthmatics and other people who are allergic to pollen.*

(Daily Mail, May 7<sup>th</sup> 2019 p.m. 49.) Any burning of waste releases some harmful particles and chemicals into the air. It does not seem reasonable in terms of local health, to add further to the 2 existing outputs of hazardous substances at the same Belvedere location. Predicted trace levels of noxious chemical emissions such as Nickel and Arsenic are quoted in the Cory application within Environmental Statements (vol 6: Metals Emissions -3.3.13 The individual emissions concentrations for metals considered in the HHRA are presented in Table C.3.2

It is worth examining whether these elements would become a significant hazard to public health if their output levels were doubled by the operation of 2 incinerators on a single site.

I live in Slade Green, (*Slade Green and Northend Ward*) which is 2.9 miles from the Belvedere incinerator site, also in the north of Bexley borough. Bexley has one of the lowest levels of access to GPs in London. In this Ward, there are higher numbers of young and older

people than is typical for the Bexley borough. There are higher numbers with life limiting illness, more carers and more people claiming Disability allowances. (Those living with COPD are particularly at risk from air pollution.) It is a designated area of Multiple Deprivation. The “Slade Green Big Local” community group was awarded £1 million by the National Lottery as one of 100 designated deprived communities in England. The website – [www.sladegreenbiglocal.wordpress.com](http://www.sladegreenbiglocal.wordpress.com); states - *“It is one of the most deprived areas in London. There are a high proportion of single parent families on low incomes and many residents have low literacy and qualification levels”* . The Bexley Local Plan ( Scoping Report pg 25) states *There is a clear strip of deprivation across the north of the borough particularly in Thamesmead, Northend and Erith.* As a vulnerable neighbourhood, any increase in pollution, is unreasonable and would exacerbate local healthcare needs which are already underserved.

**4. Traffic Pollution** - Although Cory stated at the community engagement event that 90% of traffic is to be brought to site via river transport, there will still be road freight movements. (Application documents quote the lower figures of 70 and 75% by river.) Extra road vehicles, in congested single carriageway roads, will exacerbate traffic problems and reduce air quality. The ‘Bexley Plan’ projects 8,000 new homes for Slade Green and 2,000 for Erith. Their construction, and later occupation, will add to existing congestion in the area. The A206 is the only dual carriageway road through the area, from Woolwich to the Dartford Tunnel. The council does not locally monitor the A206 for NO<sub>2</sub> pollutants. (Only one side road – Whitehall Lane - has a monitor.) Slade Green Forum conducted NO<sub>2</sub> tube testing, finding Nitrogen Dioxide levels at Northend Road (A206) almost double the EU maximum of 40 mg (NO<sub>2</sub> diffusion tubes, used by community groups in London, are intended to provide an indication of pollution levels.)

Frequent congestion at Dartford Tunnel onto the M25, causes delays in Slade Green roads. The Tunnel approaches have NO<sub>2</sub> levels above EU limits. There are around 300 incidents of delays of over 30 minutes yearly at The Tunnel area. (Kent County Council traffic evidence -Howbury Freight

Inquiry 2018.) Increased traffic from the Cory site would further add to the congestion and pollution. Cory state that electricity generated by the new facility, would feed into the local grid at Littlebrook near the Dartford Tunnel; at least 6 miles from Belvedere. Digging up the main A206 road to run power cables to Littlebrook would cause more congestion and pollution. The building of a 2<sup>nd</sup> incinerator is not a viable proposition taking health and local access routes into consideration.