

SUBMISSION FROM THE GREENWICH-BEXLEY ENVIRONMENT ALLIANCE

EN010093 - Riverside Energy Park Project. At Belvedere. Our Ref: 20022234

We are opposed to the construction of a further incinerator in Belvedere (DA17) on the following grounds:

Evidence indicates that incineration is detrimental to good health especially among children and could lead to premature deaths.

Incineration greatly contributes to global warming.

The inequitable siting of incinerators and other waste disposal sites in South East London and DA17 where it will be sited adjacent to an important nature reserve and among green walks.

HEALTH

A recent report issued 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>

Also See **Attachment A; Relevant Risk.**

From the BLF report we have totalled the mortality rates by London Borough 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 B; 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 C The siting of 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*).

There may be other incinerators that we are unaware of and we know three additional incinerators are planned for 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.

We 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 Westminster with high traffic volumes records the lowest death rates ie c50% lower than Barking. Hillingdon may be explained by the siting of Heathrow.

We asked BLF for an historical breakdown of the data i.e. before and after the construction of the incinerators and, also based on a ward or post code basis; BLF could or would not supply that information to us. The data sets and map were also forwarded to the Environment Research Departments at Imperial and Kings College London, we await their response.

Other evidence regarding health issues can be found at:

www.durhamenvironmentwatch.org/Incinerator%20Health/CVHRingaskiddyEvidenceFinal1.pdf

<http://www.alternative-energy-news.info/negative-impacts-waste-to-energy/>
Extract from the report:

The adoption of alternative cleaner methods for the disposal of municipal garbage is necessary. According to the United Nations Environment Programme (UNEP), incinerators are the leading source of dioxin into the global environment. The EPA, in a recent study, identified dioxins as the cause of many cancers, the worst component being TCDD (also known as Agent Orange).

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, 12th May 2019 pg12.*) Some of these allergens may be largely due to indoor climate.

Conclusions:

It should be incumbent for Cory PLC and other operators to explain the higher incidence of lung related deaths close to or downwind from incinerators, and/or to fund independent research into the matter.

Before construction of further incinerators investigation needs to be undertaken by experts who would be more familiar with the subject matter.

The possible incidence of deaths from lung disease and the siting of incinerators needs to be brought further into the public domain.

Planning and construction of further sites should be curtailed until this new evidence (or co-incidence) is proven or otherwise.

GLOBAL WARMING

It is self-evident that all forms of incineration contribute to global warming. We could write long screeds about the problem we have to live with, however the series of pictures at **Attachment D** paint a thousand words. The pictures were taken at various times over the recent past and clearly illustrate the effect on global warming emanating from the current Cory incinerator and surrounding industry; (More below under Inequitable siting). The pictures were taken during daylight hours; however, the Cory incinerator appears to operate disproportionately overnight. Please examine their work logs for detail.

The industry in and around Belvedere is clearly making a major contribution to global warming arguably the highest within London. A marginal respite has been offered by the shut-down (temporary?) of the Thames Water Incinerator. The introduction of a new Cory incinerator can only bring us back to square one or beyond.

More evidence on incineration and climate change:

www.energyjustice.net/incineration/climate

www.ukwin.org.uk/files/pdf/UKWIN-2018-Incineration-Climate-Change-Report.pdf

Conclusions:

Waste incineration makes a major contribution to global warming and if we are to protect the planet for ourselves and more importantly our children; we should curtail further development of incinerators.

Cory at Belvedere occupy a large estate and waterfront providing excellent communications and natural infrastructure from the river Thames. Naturally Cory wish to generate energy to increase their profits, their estate offers major opportunities to install solar panels, wind generators and tidal power, but they have made no apparent attempt to do so.

In the age of innovation, it should be possible for Cory to adapt their existing incinerator to generate further electrical power, thus negating the need to build a second with all the consequences for further polluting the environment and increasing global warming.

The Inspectorate should consider; Have Cory deliberately timed the launch of their new incinerator to match the closing of the nearby Thames Water incinerator thus attempting to mitigate the overall environmental effect?

INEQUITABLE SITING OF INCINERATORS

This is where you may accuse us of nimbyism, however our back yard in Belvedere (DA17) is already known locally as 'London's dustbin'.

We have for years been the site of the Southern Outfall Sewer and sometime downwind from Thames Water at Becton and their overwhelming stench, now under some measure of control but never-the-less still in the air.

Where in the UK has there been or to be two incinerators so closely sited? Most boroughs do not have any incinerators eg 23 London Boroughs. Yet Bexley will have in the north of the borough **two incinerators within one Council Ward**.

Also, in the north of the borough is a major council recycling facility run by Veolia and adjacent to the ward the nearby Greenwich recycling centre. Westminster Waste Management are planning a major recycling facility within Belvedere. See:

<https://www.bexleytimes.co.uk/news/belvedere-recycling-plant-plans-submitted-to-council-1-5936064>

North Bexley is under the flight path of the London City Airport a further pollutant.

The marshland of North Bexley is often found to be contaminated from previous industry, gasometers and armament factories eg radon gas emissions. See:

<https://pa.bexley.gov.uk/online-applications/propertyDetails.do?activeTab=constraints&keyVal=NYMTZQBE0MU01>

The existing and new incinerator are/will be adjacent to a nature reserve and upwind from another at Rainham in Essex, this is surely endangering these scarce natural habitats. However, we leave our naturalist friends at BNEF and elsewhere to provide the detail of their worthy cause.

Conclusions

North Bexley (DA17) is already contaminated and it is inequitable for it to endure further unhealthy and unwelcome development.

The plan to build a further incinerator c1km from land designated for 11,000 plus new homes together with schools and creche would not only endanger the lives of existing residents but those yet to move to the area. Fifteen storey tower blocks with balconies are envisaged at about the height of the incinerator chimneys, this is surely incompatible. We do not believe it is environmentally sustainable for housing in the modern era to be sited alongside incinerators, let alone two.

The need for housing is at crisis point, the need for incinerators is not as we move towards reducing our waste from packaging and plastic materials. Bexley Council lead the way in recycling our waste, yet seem indifferent to the construction of a further incinerator.

RECOMMENDATIONS

In the interests of maintaining the health of our children and to stop global warming do not grant permission for an additional incinerator to be built in DA17 or elsewhere.

We declare personal interests in our submission:

Several of our family members and friends are asthmatics and/or have recently died from heart and lung disease.

We live within sight of or close to the incinerator site and will often be downwind from a third.

Tony Fairbairn MA

On behalf of the Greenwich-Bexley Environment Alliance

19 May 2019

RELATIVE RISK OF LUNG DISEASE BY LONDON BOROUGHs JUNE 2016 BRITISH LUNG FOUNDATION

LOCAL AUTHORITY	Asthma Admissions	Asthma 2 Mortality	COPD Admissions	COPD - Mortality	Lung Cancer Registrations
Barking and Dagenham	1.363	0.9858	1.688	1.61	1.339
Barnet	0.9391	0.8229	0.825	0.6936	0.7654
Bexley	0.5636	0.8009	0.9791	0.9742	0.9966
Brent	1.884	1.41	0.8585	0.6394	0.8648
Bromley	0.6425	0.6735	0.7853	0.8241	0.8134
Camden	1.053	0.8015	1.667	1.167	1.118
City of London	0.7011	1.003	0.5963	0.7691	1.004
Croydon	1.366	0.993	1.197	1.065	0.8802
Ealing	2.061	1.319	1.191	0.8603	0.7639
Enfield	0.92	1.059	0.8519	0.8651	0.7385
Greenwich	0.82	1.008	1.292	1.566	1.242
Hackney	1.444	1.098	1.594	1.147	1.145
Hammersmith and Fulham	1.265	0.9552	1.533	1.118	1.071
Haringey	1.107	1.251	1.115	0.8185	0.947
Harrow	1.188	0.9873	0.7163	0.649	0.7237
Havering	0.7989	0.7792	1.064	1.169	1.15
Hillingdon	1.334	1.284	1.039	1.07	0.8956
Hounslow	1.361	1.365	1.268	1.066	1.046
Islington	1.569	1.055	2.118	1.389	1.429
Kensington and Chelsea	0.9513	0.8614	0.7309	0.666	0.727
Kingston upon Thames	0.8398	1.114	0.657	0.8519	0.6937
Lambeth	1.254	1.066	1.393	1.309	1.152
Lewisham	1.293	0.7914	1.62	1.367	1.272
Merton	0.945	1.083	0.921	0.8476	0.8948
Newham	2.117	1.498	1.847	1.468	1.054
Redbridge	1.446	1.47	0.8744	0.7701	0.7838
Richmond upon Thames	0.8029	1.079	0.7218	0.8234	0.7915
Southwark	1.186	1.006	1.924	1.379	1.248
Sutton	0.9739	0.9029	0.8627	1.016	0.9714
Tower Hamlets	1.123	1.372	2.485	1.638	1.54
Waltham Forest	1.715	1.278	1.253	1.182	1.062
Wandsworth	1.061	0.7805	1.297	1.111	1.164
Westminster	0.8229	0.7891	0.8631	0.6724	0.955

Background to the data:

This data displays relative risk for lung conditions across London Boroughs (relative to all UK = 1), adjusted. Therefore, you can divide one relative risk by another and interpret the ratio eg: "Residents of Newham with asthma than are Bromley residents [of a similar age and gender]".

Note that for this comparison it relates to the whole population of each borough, not just to those who are affected. A threefold increase could be due to a higher prevalence of asthma in Newham, or to a higher rate of admissions. The relative risks are all adjusted for age and sex, any differences between areas can't be attributed to population differences. However, they are not adjusted for other factors such as socioeconomic status or ethnic factors in the differences.

If you've got any questions on using the stats then please contact: press@blf.org.uk

ATTACHMENT A

Lung Cancer 2	Mesothelioma	Mesothelioma 2	Pneumonia	Pneumonia 2
Mortality	Registrations	Mortality	Admissions	Mortality
1.465	1.006	1.805	1.221	1.805
0.7816	0.9849	0.8207	1.393	0.8207
1.087	0.9122	1.445	1.12	1.445
0.8593	0.984	0.6964	1.365	0.6964
0.8386	0.93	1.168	0.9079	1.168
1.047	1.017	0.7981	1.331	0.7981
0.8798	0.883	0.8465	0.8546	0.8465
0.8576	0.958	0.8872	0.9478	0.8872
0.8682	0.9362	0.7664	1.29	0.7664
0.9497	0.9375	0.7333	1.221	0.7333
1.264	1.233	1.138	1.152	1.138
1.202	1.067	0.776	1.464	0.776
1.105	0.9952	0.8598	1.508	0.8598
1.049	1.01	0.8217	1.209	0.8217
0.7078	0.9285	0.6867	0.879	0.6867
1.079	1.122	1.799	0.9705	1.799
1.01	1.01	1.378	1.272	1.378
1.06	1.026	0.7341	1.267	0.7341
1.51	1.044	0.8466	1.709	0.8466
0.7525	0.9499	0.7716	0.949	0.7716
0.8433	1.026	1.102	1.042	1.102
1.241	1.024	0.7465	1.011	0.7465
1.235	0.9844	1.115	1.388	1.115
0.8262	0.9586	0.9245	1.145	0.9245
1.205	1.08	1.43	1.461	1.43
0.8178	0.9282	0.9891	1.063	0.9891
0.8364	1.079	0.8579	1.075	0.8579
1.227	1.021	0.7962	1.141	0.7962
1.023	0.9668	1.232	1.147	1.232
1.486	1.085	1.165	1.678	1.165
1.033	0.9476	1.059	1.124	1.059
1.097	1.014	0.95	1.197	0.95
0.8208	0.9768	0.6136	1.153	0.6136

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Lung Disease Total Deaths

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1.486	1.085	1.165	1.678	1.165	6.826
1.079	1.122	1.799	0.9705	1.799	6.6252
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1.023	0.9668	1.232	1.147	1.232	5.4059
1.227	1.021	0.7962	1.141	0.7962	5.2044
1.241	1.024	0.7465	1.011	0.7465	5.109
0.8178	0.9282	0.9891	1.063	0.9891	5.0361
0.8433	1.026	1.102	1.042	1.102	5.0132
1.202	1.067	0.776	1.464	0.776	4.999
1.06	1.026	0.7341	1.267	0.7341	4.9592
1.105	0.9952	0.8598	1.508	0.8598	4.8978
1.097	1.014	0.95	1.197	0.95	4.8885
1.049	1.01	0.8217	1.209	0.8217	4.7619
0.8576	0.958	0.8872	0.9478	0.8872	4.69
0.8386	0.93	1.168	0.9079	1.168	4.6722
1.047	1.017	0.7981	1.331	0.7981	4.6117
0.8262	0.9586	0.9245	1.145	0.9245	4.6058
0.8682	0.9362	0.7664	1.29	0.7664	4.5803
0.8364	1.079	0.8579	1.075	0.8579	4.4546
0.8798	0.883	0.8465	0.8546	0.8465	4.3449
0.9497	0.9375	0.7333	1.221	0.7333	4.3404
0.8593	0.984	0.6964	1.365	0.6964	4.3015
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MENT B

LOCAL

AUTHORITY

Barking and Dagenham

Newham

Tower Hamlets

Havering

Hillingdon

Greenwich

Bexley

Islington

Lewisham

Waltham Forest

Sutton

Southwark

Lambeth

Redbridge

Kingston upon Thames

Hackney

Hounslow

Hammersmith and Fulham

Wandsworth

Haringey

Croydon

Bromley

Camden

Merton

Ealing

Richmond upon Thames

City of London

Enfield

Brent

Barnet

Kensington and Chelsea

Harrow

Westminster

SITING OF INCINERATORS IN LONDON

ATTACHMENT C



PICTORAL EVIDENCE

ATTACHMENT D

When making their decision the Inspectorate should be aware of the environment into which the new incinerator will be introduced.



Image courtesy of Cory Environmental

This is how Cory currently project themselves. Note the trees and the tiny wisp of steam



The reality, picture of 17 May 2019. Hardly a tree in sight.

PICTURES TAKEN FROM UPPER BELVEDERE LOOKING NORTH OVER THE MARSHES, NATURE RESERVE AND INDUSTRIAL AREA.



The reality of global warming in the Belvedere Ward (DA17)



Recent pictures of the present Cory Incinerator
Note the steam billowing in various directions.
With contaminates?

