

The Planning Inspectorate

Ref. Cory Riverside Energy Park

– DCO meeting 19 9 2019

Mrs M J White

registration ID (20022277).

Dear Sir,

I am opposed to the installation of a second incinerator at the existing Cory waste treatment site in Belvedere, on the grounds of harm to local air quality; from pollution caused by increased traffic and emissions from the site. Vulnerable adults and children along with native rare birds and wildlife may be adversely affected.

However if the inspector is minded to agree consent to Cory, I would like to put forward concerns which could be addressed in the Development Control Order.

Cory advised on the site visit, that the new REP stack filters have a greater retention rate for particulates leading to less emissions overall, compared to the original facility . As the current incinerator site is not at full capacity, I would request the updating/replacement of the stack filters, once the second site is operational.

Drawings of the site layout in the initial phase of the existing RRP site showed tree and bush screening to the site buildings. This environmental measure was never put in place, thus reducing wildlife habitat retention opportunities. (*There are breeding Skylark on that land every year, as well as Linnet and Cetti's Warbler (all red list species). Ringed Plover have nested there in the past too, and the open mosaic habitat was found to be regionally important for its invertebrate fauna.*) Similarly, the original 2016 outline plan for the 2 Data centres, which are integral to the whole site, when submitted to Bexley Council, showed a "Green Wall" design to these buildings. Conditions included full height green walls to both minimise the visual impacts –as these buildings will be either side of the vehicle access route to the Reserve – and to offset some of the ecological impacts. Green roofs were also requested in an attempt to provide alternative nesting habitat for the displaced bird species. A green roof was suggested on one building for continued Skylark nesting, which requires tussocky grassland, and a brown roof on the other for the ringed plovers who require the more shingly habitat with sparse vegetation that used to be there. This is important in order to provide a visual softening aspect to the Data buildings for visitors on the Thames Path riverside walkway and at the Nature Reserve adjacent to the site. The detailed plan revision shows small green walls on the lower floor. These would not minimise the visual impacts as they will hardly be visible behind the 3m high security fencing proposed. No living roofs are now included on revised plans for the main buildings. The tiny substitute sedum roofs for the security hut and

bike sheds would be of very little benefit to the wildlife being lost due to this development.

One of the most important factor of "Green Walls" is their use in pollution absorption. It seems a very retrograde step in an industrial area to withdraw this environmental benefit. (These measures are now being installed outside some South London primary schools fronting on to major traffic routes, to help filter traffic pollutants.) Prof. Ian Mudway of Kings College, has stated that *the impact from pollution and traffic shortens everyone's life*. His research with 2,400 children in London (including a Charlton primary school,) shows that traffic pollution stops children's lungs growing properly. *By 8 to 9 years old, children from the most polluted areas have 5 to 10 percent less lung capacity, that may never be regained.* (Prof. Mudway addressed Charlton residents in 2015 and locally at Abbey Wood Community Centre in 2016, on these research findings.) Since that time, local traffic has increased greatly with the advent of more offsite distribution Centres or 'Common Stock' facilities sites. Asda, Morrisons/ Ocado are off the A2016 at Church Manorway, close to the Cory site, together with a national music distributor. All these lorries are using the A2016 day and night, 7 days a week. It is not in the interest of local people for this research to go unheeded by Cory; in the removal of a proposed anti-pollution measure from their detailed Data Centre plans. Traffic flow analysis for the A2016 site junction and truck movement planning could also reduce some traffic induced pollution.

Whatever environmental measures are agreed, I request these to be applied over the whole site in both old and new areas, in order to ensure the site lighting, fire precaution measures etc. are the most up to date, least intrusive and harmful to both local people and wildlife. (A total site wide fire prevention review, to encompass the proposed and existing incinerator facilities, is recommended. Whilst recent reported incidents are not connected to Cory owned sites, a review would be prudent in the light of the recent pre incinerator sorting bunker fire and other Viridor recycling site incidents that were reported in Private Eye August 2019. Where any greening measures are put in place for the whole of the Cory site, such as replacing the original design's mature trees, these will not succeed without a specific care and watering plan. (Planting improvements at the Erith Riverside area last year were wasted, when the contractors did not return to water and maintain the grass etc. which then all died.)

Yours faithfully

Mrs. M J White

Attached - Private Eye report

INCINERATORS

Pants on fire

INCINERATOR operator Viridor must consider its PR company Madano to be the “fourth emergency service”, so often does it have to call in the reputational firefighters. Incidents at Viridor waste plants in south London and Cheshire last month brought the number of fires at company sites to 14 in little more than three years.

Viridor execs called the spin doctors almost as quickly as the fire brigade when a blaze took hold at Beddington Lane, Sutton, on 11 July (pictured). The London Fire Brigade (LFB), called at 10.23am, sent four fire engines and 25 firefighters, finally declaring the fire “under control” at 7.24pm. No one was hurt, though locals reported headaches and breathing problems.

But that wasn’t the story Viridor and Madano wanted out there. The firefighters had been at the scene for barely an hour when a Madano PR man was on the phone to a local journalist to stress that the fire wasn’t at the “ERF” (“energy recovery facility” – they never use the nasty word “incinerator”), but at a “co-located” recycling centre.

But this was not the case. A reporter from specialist magazine *ENDS* (Environmental Data



photos of the fire “and said police would be called if we did not leave”. They wrote: “Staff said there was ‘nothing to see’, despite the £205m site clearly being on fire behind them.”

The fire actually took place in a sorting shed adjacent to the incinerator, used by Viridor to sort flammable from non-flammable material – a practice introduced after an unsorted gas cannister exploded in its incinerator near Heathrow in 2009.

Sutton council is one of four boroughs in south London which co-funded the incinerator. With thick black smoke still rising from Beddington Lane, Sutton council tweeted that it was a “small fire”; it had already been put out by the fire brigade (this was around 1pm); that there was no risk to the public or environment; and that it was effectively caused by the public carelessly putting lithium batteries in their recycling.

Services) was told at the scene that the incineration plant itself was on fire. *ENDS* only amended its online report after being contacted by a “Viridor spokesman”. Viridor staff blocked the *ENDS* journalist from taking more

The council’s attempt at managing the message appeared to echo that of Madano. Since the LFB didn’t begin an investigation until nearly 20 hours later, it’s hard to know how Viridor, Madano or Sutton could say with such certainty how the fire started. But the batteries line will have helped shift the blame from Viridor, which had built its sorting shed next to an incinerator without fitting sprinklers.

Viridor has 10 incinerators in the UK. There have been five fires at Viridor incinerators and waste-treatment plants in 2019 alone. The latest was at Runcorn on 12 July, the day after the Beddington blaze, with previous call-outs at Bargeddie (Glasgow), Crawley, Rochester, Bristol, Thetford, Bolton, Taunton, Ashford, Perth, St Helens, Lancing and Chichester. The Chichester fire, in March, took seven days to extinguish.

A community air quality monitoring group in south-west London has lodged a complaint with the Health and Safety Executive about the Beddington Lane fire, urging the watchdog to prosecute.

The LFB recorded the Beddington fire as a “serious” incident. Viridor’s monthly pollution report only mentioned a “small fire” and gave no estimate of how much material had burned or the level of pollutants released into the air. The 11 July incident was reported by Viridor as not exceeding any pollution limits.