



31 October 2022

My Ref: 20032010

Your Ref: EN010116

The Planning Inspectorate
National Infrastructure Planning
Temple Quay House
2 The Square
Bristol, BS1 6PN

For the attention of Mr Edwin Maud

Dear Sir

Re: North Lincolnshire Green Energy Park Limited Development Consent Application

I write in connection with the above application for a proposed Waste Incinerator Plant (EFW) located at Flixborough in North Lincolnshire.

I object on three main grounds, Need, Sustainability and the Environment.

Need

In its emerging **Local Plan**, North Lincolnshire (NL) at **Section 13.15 Local Waste Needs Assessment**, it concludes “The assessment shows that NL has sufficient capacity to accommodate waste arisings within NL over the Plan period” (to 2038) “taking into account the Waste Framework Directives 2008 and the NPPF and National Planning Policy for Waste”

If, as expected, the reduction of plastics in packaging and in particular recycling of plastic is extended then there could even be a surplus of capacity toward the end of the Plan period.

The National Waste Strategy (2013) clearly points towards a zero-waste economy.

Hence there is no Need for this Waste Incinerator and the application should be dismissed

Sustainability

Identified in NL emerging **Local Plan** at **Section 13 Sustainable Waste Management, 13.1** states “Waste is viewed as a resource rather than something is to be disposed of”

At **Section 13.2** states that the NPPF and the NPPW stress a positive approach to planning for waste management and delivering sustainable development in accordance with the Waste Hierarchy (as set out in “Waste (England and Wales)

Regulations 2011) lists Prevention, Preparing for re-use, Recycling, Other Recovery, Disposal.

Just one example of “Waste as a Resource”, is the major improvement in recycling of soft plastics, such as Cling Film, Bread Bags, Pet Food Pouches, Crisp Packets, Salad Bags and Fruit and Veg Packaging. These are now actively collected by main Super Markets, Food Stores etc, and recycled back into products NOT sent to landfill or incineration.

The development of the type of incineration plant proposed is extremely expensive and will require extensive financing, such finance will only be forthcoming where a developer can show **a Guaranteed Waste Stream for a minimum of 25 to 30 years.** To lock such a vast quantity of a **Resource - 600,000/700,000 tonnes annually over 25 years (17,500,000 tonnes)** into incineration, flies in the face of sustainability and makes the ambition in the NWS (2013) of a zero-waste economy unsustainable.

This proposed plant will hold back the aspiration to Prevent, Re Use and Recycle, and fails to protect the Worlds dwindling resources.

The application should be dismissed on the grounds of unsustainability and in conflict with Sustainable Waste Management Protocols

Environment (Specifically Human Health)

The Applicant has set out the emission dispersal modelling and assumed pollutants within threshold levels.

This is an extremely technical subject requiring knowledge and skills not normal found outside the field of experts. However, as recognised in NL’s emerging **Local Plan at Section 11 “Creating Sustainable Communities and Better Places”** it is noted that air pollution and poor-quality air arising from Industrial activity has a serious negative impact on health. At Section 11.17 “It is therefore important that our new Local Plan sets out the framework for planning decisions that will contribute to an improvement in the health of local residents. Some key challenges are ---- pockets of poor air quality” (bullet point 6).

The applicants table of emission pollutants from the main incinerator stack shows a list of a seriously harmful mix of chemicals and metals, all of which the applicant will claim as controlled within legal parameters. But what happens when the control processes fail or break down. Does the process be shut down immediately, does it require human intervention, is the failure automatically signalled, what guarantee can the applicant give to assure local residents’ that they will never be exposed to the lethal concoction of chemicals outlined in their emissions list.

Burton upon Stather (BuS) is located some 70 meters above the proposed site on the limestone outcrop known as the Lincolnshire Edge. The prevailing wind is from the south west direction, meaning that the direction of the incinerator stack emission cloud will be directly to BuS. The BuS Primary School hosts around 250 children daily and lies at the south west corner of the village, right in the prevailing wind direction from the proposed incinerator.

The village of Flixborough, together with the hamlets of Normanby and Thealby are similarly located within the main stack emission zone.

No incineration operation can give guarantees that control processes will not fail/breakdown, potentially giving rise to uncontrolled emissions. Given the close, elevated position of the highlighted areas within the main stack emission zone any such failures would give rise to serious health concerns..

There seems little justification for the risk to the Environment (Humans) posed by the proposed waste incinerator and therefore the application should be dismissed.

In conclusion and given the arguments outlined above, there is no Need for the proposed incinerator and the proposal to incinerate waste is totally Unsustainable in Waste Management terms, I can only hope that the Planning Inspector will see that this proposal is unnecessary from all prospective, not least the unnecessary risk to the Environment (Human Health), and dismiss the application.

**Alan Craddock
Burton upon Stather Resident**

ANC NLGEP IP submission 241022