

Submission of Oral Comments made by Simon Nicholson on behalf of RAIN (Residents Against INCinerators) at the Issue Specific Hearings on Wednesday 25th and Thursday 26 th January 2023 and the open floor hearing on January the 24th 2023.

Throughout the process of this application, it has been felt that the lack of initial consultation from the applicant and publicity has meant that many residents are still not aware of this application hence the lack of people attending the open floor hearings. I am still receiving enquiries from concerned residents - two today 3rd of February - as to why they haven't been notified about this incinerator before now?

The further we progress through this application process it is becoming more and more obvious that the initial awareness campaign carried out by the applicant in the initial stages of this proposal was not fit for purpose and I request that the application process currently in train is suspended until a full and thorough awareness campaign is carried out by the applicant. N.B. I still haven't had a credible explanation as to why I hadn't received the initial consultation document despite many requests to do so. Saying in an inspectorate led meeting that they gave me one when I attended consultation hearings in 2021 at "Fenestra" in Flixborough is skirting round the issue. 90% of the primary human receptors of the plume didn't receive one!

The following are further areas of concern:

The railway:

The railway is a fantastic environmental highway and also a suspected multiple roost site for bats. The results of the bat survey carried out on behalf of the applicant seem flawed. If the volume of bats detected is taken as correct and the sparsity of roosts is correct, may I suggest there are a large volume of roosts that remain unaccounted for. Locating these is imperative as opening the railway will mean rebuilding two road bridges which are known foraging and roosting sites of large size. (When the bats come out of hibernation in March/April we will be carrying out our

own survey to establish a more factual representation of bat activity in the area. Can I also say that the number of species of bats recorded is beyond amazing according to local opinion!).

Ownership of the railway is shared between RMS Port Flixborough and Vossloh Rail. Vossloh Rail own Dragonby sidings, which we are led to believe by the applicant, is going to be expanded and recommissioned. Having spoken to Vossloh Rail themselves on the 23rd of January 2023, I can confirm that, according to their office, the only conversation that has been repeatedly had with Vossloh Rail is in relationship to ownership. They are aware of the incinerator proposal but are totally oblivious that any permissions are being sought to include Dragonby sidings expansion or recommissioning as a part of the proposal. I am aware that planning can be applied for on land not owned by the applicant as the whole application is based on this premiss, but it would be common courtesy to at least let them know the outline of what they are applying for.

Another part of the railway that has been overlooked is informing the residents of Dragonby directly of their proposals which should have been paramount as part of the consultation process at the proposal stage 18+ months ago as some residents live in very close proximity to the sidings.

The River:

The River Trent is a fickle beast at Flixborough. The tidal range ensures that the loading and unloading times for vertical lift loading/unloading of containers is limited to a very small window of 3-4 hours max on the highest tides so a max of 6-8 hours in 24 hrs. Realistically this tidal window could be much reduced on a lower tide. Having spoken at length on this subject with Colin Hammond representing the applicant, he gave me the following weights and volumes. It was stated that each ship would hold 4 - 5,000 tonnes net cargo weight - i.e. what the boat can carry and not taking into account the weight of the ship.

Each container would have a tare weight of 2.2 tonnes. The load per container (of RDF) would be 3.75-4 tonnes.

However information received from the shipping manager John

Richardson at Grove Port (for verification), he suggests that the maximum boat length is 100m (this relates to the turning of ships in the river), maximum gross weight (including the weight of the ship) would be 3,800 - 5,000 depending on tide. Mean net cargo weight including containers is approx 3,000 - 3,800 tonnes taking neap and spring tides into account. These weights are restricted by the ships draught and the water depth on the varying tides.

Road:

The local road network has not been surveyed either for current volume percentage of capacity or for the maximum capacity. There is also no carbon emissions data according to Highways England or North Lincs Council both of which I have consulted with personally. I have requested NLC and also the CPRE to see if this can be done.

A lot of the background and local effects have been detailed in my other submissions.

The number of vehicles leaving the site appears to be undervalued. In 6.2.13 Traffic and Transport - Revision: 1 available from

[https://infrastructure.planninginspectorate.gov.uk/wp-content/uploads/projects/EN010116/EN010116-000754-6.2.13%20ES%20-%20Chapter%2013%20-%20Traffic%20and%20Transport%20\[Revision%201\].pdf](https://infrastructure.planninginspectorate.gov.uk/wp-content/uploads/projects/EN010116/EN010116-000754-6.2.13%20ES%20-%20Chapter%2013%20-%20Traffic%20and%20Transport%20[Revision%201].pdf)

the survey needs to include vehicles going in both directions. Also what percentage of vehicles leaving or arriving on the site would be loaded or empty as this may drastically affect the number of vehicle movements. It also omits any reference to movement of plastics in and out, chemicals used to “clean” the plastics during processing, dirty “cleaning chemical” transport to and from site?

I also made reference to “a landowner with close interests to the site” in my questioning. Can Mr Bradley - the applicant - explain why he told the interested party “don't worry about the rail or river as they are only a smoke screen and everything will end up going by road”!

In the main construction, the excavation to get full bunker depth will go into the fluvial gravels due to its location and risks any contaminated soils will be washed into these fluvial gravels and contaminate a wider area. The same can be said of piling. By carrying out both these processes regardless of method, the act of crossing the different strata levels will create a vertical pathway between these layers and allow any contamination to percolated down the fluvial gravel layer.

If the excavation soil is contaminated it will need removing from site and replacing, that will increase traffic. What will the effect be on local traffic volumes and the carbon footprint.

I must highlight the test diggings that have been recently carried out between Ferry Road West and the proposed site location. It was quite disturbing to see only a few inches between the water table and ground surface in some trenches while the trenches were open thus showing the fine balance between land and water in the proposed area.

Of what benefit is this project going to have to the people and wildlife that have to receive the pollution, smells and noise?

What chemicals are used to clean the plastics? Where are those chemicals stored? Where are waste chemicals stored and disposed of?

In the proposed manufacture of concrete blocks from the bottom ash, how are the potentially explosive metals to be removed completely? The applicant states that the weathering of bottom ash will be done within a covered shed where the concrete blocks are manufactured. What process does this involve? Having researched this it appears that “leaching out embedded toxins” is the only way to weather the substrate to a satisfactory level. How can this happen inside the confines of the block plant? Also where and how will these toxins be collected and processed and what will then happen to these toxins? Will these toxins be potentially gaseous or odorous? If so, how will this be controlled and where?

What will happen to in excess of 90 % of carbon not captured in the CCS process? The applicant insisted that CCS would not happen for “several years after the project is completed” contrary to earlier statements that all the separate processes in the application would be commissioned when the incinerator is lit. This cannot happen as the “weathering of the bottom ash will take 6 months” by their own admission.

In relation to emissions what particle sizes will be emitted through stack?

Has EPR Energy been considered? They have a current incineration plant adjacent to AB Agri and have their emissions and plume been considered regarding cumulative effect when overlaid with the proposed developments plume? At ISH on the 25th of January noted the close proximity of the proposed development to the existing EPR energy development was noted, and the potential for the NLGEP development to provide cumulative air quality impacts if pollution from both sources follow the prevailing wind was brought up. This EPR energy development has permit number UP3232SX and is operated by EPR Glanford Limited under the name "Glanford Power Station" at Flixborough Industrial Estate, DN15 8SD (easting 486000; northing 414800).

As set out in the Excel spreadsheet (extracts which accompanies this submission), the Environment Agency's 2021 Pollution Inventory records that Glanford Power Station released the following pollutants in 2021:

- * 2,190 kg of Particulate matter (PM2.5)
- * 196,000 kg of NO_x (Nitrogen oxides (NO and NO₂) as NO₂)
- * 22.9 kg of Chromium
- * 15.6 kg of Copper
- * 18.3 kg of Nickel
- * 12,900 kg of Chlorine and inorganic chlorine compounds - as HCl

There does not appear to be any reference to this existing source of emissions in the NLGEP Applicant's Air Quality Assessment [APP-053] or in the Environmental Statement report on Cumulative Effects (6.2.18) [APP-066].

I have started the conversation with the applicant for clarification of the plume and associated data and methodology and been asked by the examiner's support officer to forward any info that I have by the deadline. I am still in consultation with the applicant and the plume specialist and will update as close to the deadline as that final information becomes available.

In relation to the contents of the plume from both EPR Energy and the application for the NLGEP incinerator, in the Rule 6 letter, it states specifically in bullet point two in the long-term and point one in the shorter term:

1. Air Quality

- The extent to which the construction of the Proposed Development and the associated changes to traffic movements would affect air quality with respect to sensitive receptors (human and ecological) from the construction of the Proposed Development and the associated traffic;
- The extent to which the operation of the Proposed Development and plant emissions would affect air quality from the operational process emissions including odour, the approach to amines and operational traffic emissions; and
- The appropriateness of proposed mitigation and extent to which such mitigation should be controlled and secured through any Development Consent Order (DCO).

Therefore any increase in emissions of any type would exacerbated, by the cumulative effect, the combination of existing and proposed emissions and their effects on human and ecological receptors directly. But also in the plume “fall out” indirectly as this fall out will be on prime agricultural land providing direct uptake into the food chain. Any mitigation unless controlled in an as yet unforeseen way can mitigate the long term effects of such emissions on all types of receptors, as indicated in a long term study, recently published, undertaken near Pisa, Italy, which shows how incineration affects human health relative to the build up of contaminants including pm2.5 - pm1's in soil, fauna and crops over the long term from waste incineration. This study

reveals some very surprising facts as to the increases in life-limiting conditions in the fallout area. I can supply this study if requested as there has not yet been a study done in the UK on this subject, surprisingly. The the conclusions the study arrive at show how important this study is in relation to what weight is given to the cumulative effect of pollution on areas local to incinerators and could very well influence the acceptance or rejection of the DCO as the incinerator sits at the heart of the application.

Mr Aumonier used an example at the ISH of wrapped cat litter and suggested that this was something that would have to be incinerated rather than digested or sent to landfill. As this example is of low organic content minimal calorific value and mainly inert (fuller's earth) it would be far better going to land fill surely? Unless the cat litter was wood or paper based then it would be suitable for digestion as it would be solely organic.

Mr Aumonier also stated there would be no organic content in the RDF and all recyclables would be removed at the waste transfer end of the transport chain. This would be monitored at this point also. Mr Aumonier also stated that monitoring would be carried out at the incinerator plant as well. This monitoring seemed to be non-specific. Can this be clarified? Also Mr Aumonier stated that sub-standard RDF would be refused. There needs to be a defined monitoring and enforcement of RDF content and quality to ensure robust and enforceable standards both at the supply and delivery ends of the transport chain. For instance, what is the method of testing the quality of RDF if it arrives in sealed containers and is tipped directly into a 10 metre deep pit? If the contents of that container is substandard, what means of refusal is then available? Sampling would have to be made to ensure only high quality RDF that is acceptable at the incinerator is delivered. My suggestion is it would have to be done away from the negative pressure area of the intake bunker to ensure the quality is being maintained as described by Mr Aumonier. This then throws up more questions regarding odours, rodent and gull contamination, wind borne littering and other associated issues.

Finally, Mr Aumonier at the January hearings and Mr Hammond at the initial consultation, both stated that neither organic nor recyclable waste would be burned as RDF. Can I ask what the incinerator will be burning after these elements have been removed?

In summary:

There appears to be a lot more evidential work needed to provide the full picture. At the end of the day, it looks as though the main transport will be by road and will cause extra noise, pollution, damage to the local infrastructure, human receptors and ecology with impressive but inaccurate evidential statements used.