

Meeting with Matthew Dean,
Chair, Environment Select Committee, Wiltshire Council.
23rd July 2018.

Hills Waste Solutions Limited is proposing a 160,000 tonnes gasification incinerator at Northace, Westbury. Hills has a existing consent from September 2015 (14/12003/WCM) which it is currently applying to modify (18/09473/WCM) and an application (18/03816/WCM) which was refused consent 18th July 2018.

The Issues.

- By thermally ‘combusting’ the waste, very large quantities of Carbon are being released into the atmosphere. This is against the requirement to reduce carbon emission under the Climate Change Act.
- Dust particles (carbon soot) are emitted. The diameter of the particles (PM) is tiny, measured in microns. They are invisible to the eye. The outside of the particles is coated with toxic materials (arsenic, chlorine, lead, mercury etc. which are present in the waste). If breathed in, the tiniest of these particles - PM1.0 microns and particularly ‘ultrafine particles’ measuring PM0.1 microns - enter the blood stream, causing disease. They are a serious, recognised health risk (DEFRA and PHE).
- The EU Waste Emissions Directive (WID) only regulates (requires filters to be installed to remove the particles from emissions) for particles down to PM2.5 in size. All particles below PM 2.5 are emitted to atmosphere.
- The Environment Agency, which regulates emissions to atmosphere via the Environmental Permit Regulations, has no legal powers to require filters to be fitted which can remove particles sized below PM2.5. Therefore such filters will not be fitted. Technologically, such filters exist and are commercially available.
- All emission plumes come to ground under clearly known weather conditions. When this happens, the exposed public breathe in the undiluted emission.
- Hills has not produced a comprehensive ‘Plume Grounding Emission Model’, nor a Model which uses (Westbury) local meteorological data. Therefore the frequency, duration and location of these plume grounding events has not been evaluated.
- The Environment Agency does not normally examine the likelihood of plume grounding events, nor the consequences, in its Environmental Permit procedures. This issue therefore is likely to remain unassessed.
- The A350 in Westbury is an Air Quality Management Area due to breaches of NO₂ levels and, by implication, PM levels (which have not been measured, only inferred). The proposed incinerator will routinely emit NO₂ thus increasing ambient NO₂ levels upon emission by 8.0µg m⁻³ and PM upon emission by 0.25µg m⁻³ which will likely intensify the breach of the AQMA.

The Issues (continued).

- Wiltshire Council's updated draft Waste Management Strategy makes incineration with energy recovery a "strategic" waste management option. This encourages the use of incineration with energy recovery. It also means that such plants are located near centres of population (strategic sites 'should be sited within 16 miles of significant settlements' e.g. Trowbridge).

The Solutions.

- In planning terms: Remove the 'strategic status' of incineration with energy recovery in the updated draft Waste Management Strategy. This means such incineration would become discretionary in planning terms rather than obligatory, and would enable incineration sites to be located away from significant centres of population.

- In planning terms, refuse incineration on the grounds that its carbon emissions make it inconsistent with 'sustainability criteria' (ref. relevant NPPF).

- In planning terms : CP42 Standalone renewable energy installations ". . . .proposals will need to demonstrate how impacts on the following factors have been satisfactorily assessed, including any cumulative effects, and taken into account
vii. Residential amenity, including noise, odour, visual amenity and **safety**. . . .
[emphasis added]"

- In planning terms : CP54 Air Quality Strategy. Main Aim "Wiltshire Council working collaboratively will seek to maintain the good air quality in the county and **strive to deliver improvements** in areas where air quality fails national objectives in order **to protect public health** and the environment[emphasis added].

- In planning terms : : CP55 Air Quality "Development proposals which by virtue of their scale, nature or location are likely to exacerbate existing areas of poor air quality **will need to demonstrate** that measures can be taken to **effectively mitigate emission levels in order to protect public health**, environmental quality and amenity. Mitigation measure should demonstrate how they will **make a positive contribution** to the aims of the Air Quality Strategy for Wiltshire and, where relevant, the Wiltshire Air Quality Action Plan"[emphasis added].

Stephen Eades and David Levy

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23rd October 2018.