

## RAINFORD PARISH COUNCIL

### Objection to planning application 22/00056/NEI

#### Demolition of existing building and erection of a purpose-built building (and ancillary structures) to house high treatment facility for the management of medical waste

**Rainford Parish Council is opposed to planning application 22/00056/NEI. The site is only 2 miles from the boundary with Rainford Parish. The objection is on the following grounds:**

Waste incineration makes air pollution and needs strong environmental controls. When waste is burned in incineration facilities it produces dangerous air pollutants including particulate matter (PM2.5 and PM10), carbon monoxide, acid gases, nitrogen oxides and cancer-causing dioxins.

- In general, 85% of the total medical waste stream in hospitals consists of the same mixture of discarded paper, plastic, glass, metal and food waste that is found in ordinary household waste.
- The remaining 15% is defined as infectious and it is this waste that must be sterilised before disposal
- A small percentage of that infectious waste, 0.3% of the total medical waste stream in hospitals, can be disposed of only by incineration because it is difficult to sterilise.

An incinerator is not essential at this location as the HGVs carrying any waste will have to travel some distance from where the waste is produced. If the need elsewhere, the incinerator should be built elsewhere, close to the production site.

Culzean W2E Ltd states it intends to burn up to 3,650 tonnes per year of hazardous waste, as well as smaller quantities of non-hazardous waste, mainly from medical facilities. Documents state the design means 400kg of waste could be processed per hour over a 24-hour period.

The application states

*"The site is located within an industrial estate and therefore suitable for this type of development. There are a number of existing waste and other industrial operations in the vicinity with several large-scale structures. **The existing site is permitted for waste management related use**".*

- The site does not currently have permission for a medical incinerator.
- The potential consequences for residents in the Kirkby, West Lancashire and St Helens areas if the Culzean W2E planning application for a medical waste incinerator in this location, is approved, are very clear and are not negated in any way from this planning application or the accompanying Environmental Statements.
- The site of the proposed incinerator is already very poorly managed with a number of companies conducting waste management businesses on it with a complete lack of consideration in regard to the effect that their activities have on local residents. Those activities include
  - the use of dilapidated and unsafe buildings,
  - unacceptable storage of waste materials and waste materials falling off vehicles associated with the site. To date no enforcement action has been taken against any of the offending businesses which leads to the conclusion that any new site will not be effectively monitored by LCC either.
- It is not a heavily industrialised site and presently nothing is burnt in the area. The company note that there are 4 biomass boilers which are not currently in use, but these use natural/non fossil fuels to create heat and nothing like what is being proposed.

Additional Reservations are:

#### **Potential Water Pollution**

- The nearby underground lake used for drinking water that is situated beneath the proposed site and which is documented in the report from united utilities. The application does not address this issue.
- The company states “The other pond is located within Woodward’s Plantation approximately 360m south-west of the site. *“This pond could not be visited during the walkover survey as it lies on third party land.”* Therefore, this still needs to be investigated.
- The company states that “A search of the site and surrounding has not identified any significant surface water bodies. As such, exposure via consumption of locally caught fish has not been included in the assessment.” However, there is a fishing lake within 1km.

#### **World Health Organisation Advice**

- The World Health Organisation (WHO) advises that incinerators should not be built in areas where food is grown or where animals are raised. Food is grown and animals are raised near the proposed site and this is not mentioned at all in the company’s report. There are many farms in the area where food, vegetables and animals are grown for the National Food Supply Chain.
- The farm S and S Askew who are also against the proposal are one such farm. They keep cattle, horses and sheep in fields nearby. [https://www.who.int/water\\_sanitation\\_health/medicalwaste/en/smincinerators4.pdf](https://www.who.int/water_sanitation_health/medicalwaste/en/smincinerators4.pdf)
- The WHO have estimated that 90% of human exposure to dioxins is through the food chain. The WHO report that long term exposure to dioxins is linked to impairment of the immune system, the developing nervous system, the endocrine system and reproductive functions. Chronic exposure of animals to dioxins has resulted in several types of cancer. Therefore, those living in the vicinity will be exposed via inhalation and ingestion to dangerous dioxins.

#### **Health risks to local people**

- There are several primary schools within the immediate vicinity and many others within 10km. With such uncertainty regarding the adverse health effects, consideration to siting an incinerator such as this near to schools should not be acceptable on any grounds.
- The Environment Statement does not give due regard to the very real fears of local residents as to the potential health risks associated with the use of this incinerator, in such a close proximity to a Primary School. The ES talks more about what it doesn’t have to cover and what it has already agreed to scope out of the application and ES. It is very disappointing that people’s concerns around health risks is not covered in any level of detail in the ES and it gives rise to concern that if those risks are not taken seriously now, how likely would they be if planning permission is granted?
- Background pollutant mapping is based on data from 2001 which surely has very little relevance in 2022.

#### **Impact on wildlife**

- There are numerous types of wildlife in the area and although an ecological report was undertaken on birds and bats, at the company’s own admission this was done in December when most would be hibernating.
- The company also failed to mention newts in the area. There are a number of ecological sites within 2km of the proposed development. In the report it states that “there are six statutorily protected sites (designated for ecological reasons) within 2 – 10km of the site. The non-statutory designated site Simonswood Moss BHS is located approximately 1km south of the proposed development site and is surrounded by agricultural fields. The BHS is an important roosting site for wintering birds.

**Increased traffic effect**

- There are discrepancies in hours of working between documentation. It is stated that 12 HGVs per day will visit the site which in effect means 24 HGVs travelling in the surrounding areas throughout the day.

Rainford Parish Council urge Knowsley Council to reject this application as the site is not suitable for the proposal, for many reasons.