

# **HIGH TEMPERATURE TREATMENT FACILITY FOR MEDICAL WASTE**

## **BY OAKTREE ENVIRONMENTAL LTD.**

Simonswood Parish is a very small parish but the parish councillors are very concerned about the welfare and quality of life for our residents.

Unfortunately, we do not have the knowledge to comment on any of the technical aspects of this report and we do rely on Lancashire County Council and West Lancashire Borough Council to protect the interests of their ratepayers.

Simonswood Parish Council instigated the '2022 Open Meeting' with Culzean after declining a zoom meeting offered and indeed even suggested the venue for this meeting.

Although Oaktree seem to disregard any historical references to problems with this industrial site, these are very genuine concerns which we feel should be addressed. Simonswood Industrial Estate is classed as a Waste Transfer Site but at the moment there are excessive, illegal mounds of waste stored on the site and very little movement of waste out. It has in fact become a waste storage site.

Simonswood, Knowsley, Bickerstaffe and Melling have to cope with excessive amounts of HGVs, dirt and noise on a daily basis and it has to be appreciated that even one more plant on the estate is too many for them, especially one that is toxic and could prove to be detrimental to health and agriculture and is a genuine concern.

### **COMMENTS FROM SIMONSWOOD PARISH COUNCIL:**

#### **DOCUMENT - ADDENDUM TO PLANNING STATEMENT AND ENVIRONMENT STATEMENT – HIGH TEMPERATURE TREATMENT FACILITY FOR MEDICAL WASTE**

##### **1.2.1. and 2.2**

Indicates that there is a revision to the site drainage plan but on the actual planning application form (section 13) there is still a tick in the box for connection to the main sewer and existing drainage system, is this an error? Have United Utilities and the EA agreed to the proposals, to change from having an underground effluent tank to now having a bunded tank and are they happy with the responses from Oaktree to their concerns? Additionally, United Utilities response requires a Hydrogeological Risk Assessment be carried out in association with the construction of this plant, but this does not seem to have been answered in Oaktree's report.

##### **1.2.1. and 2.3**

Increase in stack height to 26 metres, this been recommended by the Atkins report but why were Culzean stating that their original height of 14 metres on the planning application was completely safe, when now that is not the case. This gives rise to the professionalism in the operation of this facility.

We would like to request that LCC communicate with Knowsley Council (Mr Ian Gaskell) with regard to Sonae and their figures regarding fallout – v – height of the emissions generated by Sonae and the areas affected by this fallout.

We appreciate that LCC commissioned the Atkins report and as a result the stack will now be higher due to their calculations, but we are still concerned as this proposed plant will be surrounded by buildings and illegal bunds of waste (which now have trees growing on them) which will affect the fallout.

### 3.2 Waste Types.

This is the first mention of the types of waste to be accepted despite questions being asked at the ‘Open Meeting’ (instigated by Simonswood Parish Council) and no answers given. Why were we not told of this previously? Now the applicant has outlined what waste types are to be accepted, are there any provisions in place in the case of an emergency on site for spillages, accidents etc. and will there be security on site to guard these dangerous wastes before incineration?

These waste types give concerns for the high risk of contamination to both the operators and the surrounding residents.

### 3.5. Waste Catchment Area

Again we asked this question at the open meeting and were not given any answers and now it is in a catchment area of 25 miles. It is indicated that Aintree/Fazakerley Hospital **could** be the focal point for sourcing of the medical waste not **would** be, which indicates some doubt as to whether this will happen. If this is the case, will it make the proposed operation completely unviable? Or will waste be sourced from outside the 25 miles? Has any market research been carried out within this 25-mile radius to indicate that this plant is needed? Has the applicant put in place any pre-contract or actual contract suppliers and, if so, with whom in the 25-mile radius?

A further concern is the integrity of bag arrival and how will the applicant police the secure arrival of bag materials.

Also, whilst we appreciate that the carbon footprint will be reduced in relation to existing similar plants and that a nearer plant would be a better proposition, - it would also increase the carbon footprint in and around Simonswood and West Lancashire which already has an extremely high carbon footprint level! It would also surely reduce employment in the other plants which have been used previously for disposing of this waste.

## **ENVIRONMENTAL NOISE ASSESSMENT**

We now refer to this document: -

### 1.3. Hours of Operation

This is the first mention of any hours of operation (Note: Section 19 of the Planning Application has not been completed – is this an error??) To our knowledge there are no other waste operations on this Estate operating on a continual basis, 24 hours per day, 7 days per week – would this be setting an unacceptable precedent with adverse effects on nearby residents? And the times of the proposed HGV movements i.e. between 06.00 and 20.00 hours is far too intrusive especially in the winter months. In the view of Simonswood Parish Council this is totally unacceptable to the welfare and

wellbeing of its' residents, especially given the present lack of control on the estate at the moment

### **MEDICAL WASTE INCINERATION PLANT, - HUMAN HEALTH RISK ASSESSMENT**

This report is dated 8 July 2022 and it is headed as an 'Incineration' Plant and the terminology used inside it also continually refers to an '**Incinerator**' which contradicts the applicant's revised view that this is not an Incinerator –which asks the question is this document relevant to a 'High Temperature Treatment facility?'

### **MEDICAL WASTE INCINERATION PLANT – DISPERSION MODELLING ASSESSMENT**

This document also dated 8 July 2022 but again refers to an Incineration Plant throughout especially in the No 7 Conclusions section.

#### **2.4.1.**

This states that there are no Sites of Special Scientific Interest (SSSI) within 2km of the site and no Special Areas of Conservation, (SAC), Special Protection Areas (SPAs) Ramsar sites within 10km of the site. There are no ancient woodland areas or Local Nature Reserves within 2km of the site.

Can we please refer Lancashire County Council to?-

Woodlands Plantation which is mentioned in the West Lancashire District Plan

Shacklady's Plantation which has a tree preservation order in place  
Simonswood Moss a NUTURA 2000 site (Planning permission for a replacement barn next to the Moss was recently refused on the grounds of being less than 500 metres from a site for feeding and roosting pink footed geese.

### **QUESTIONS FROM SIMONSWOOD PASRISH COUNCIL**

1. Are there any similar plants in operation for an assessment to be considered and, if so, where are they?
2. With a figure of only 4,000 tonnes of waste per year which equates to 10.9 tonnes per day (if the plant was operating 24/7) is this the total processing capacity of this plant per annum and is it economically viable justifying employing 12 people on a full time basis. - Raising the question is there going to be more than 4,000 tonnes per year? And how will this amount be monitored/weighed and policed?
3. Will West Lancashire Borough Council have the appropriate resources and expertise to monitor and police this operation on a 24-hour basis, 7 days a week, 365 days a year?
4. This derelict building appears to become a nesting site for Seagulls and as gulls are a protected species can we request this that this is investigated fully before any work commences.