



## BICKERSTAFFE PARISH COUNCIL

**FURTHER RESPONSE to Application Number LCC/2022/0003:**  
**Demolition of existing building followed by erection of building and ancillary**  
**structures to house high temperature treatment facility for the management of local**  
**waste**

**Land at Tower House, Simonswood Industrial Park, Stopgate Lane, Simonswood**

Further to Bickerstaffe Parish Council's (BPC's) original objection to Application **LCC/2022/0003**, and following the publication of further reports, BPC would like to add further responses below.

BPC considers that the proposals do not comply with policies in the Joint Lancashire Waste & Minerals Plan as follows:

***Policy DM 4 - Energy from Waste***

The PC is concerned that the proposal does not comply with DM4, as it does not fully utilise the heat/energy that will be generated as the incinerator will operate 24/7, whereas the wash plant does not.

We are also concerned that some key actions that should be in place to satisfy DM4 are being dealt with using planning conditions rather than being assessed as part of the application, and that these conditions could be breached, or removed entirely under a subsequent planning application.

Planning Condition 3 requires that a cable will be laid to the wash plant, but does not specify that it is to be connected to anything: how does this comply with policy?

Also, this does not cover the eventuality that the ownership of one or both of these companies could change, with the result that the power is no longer used by the wash plant, and that the heat is then discharged to the environment, contrary to policy DM4. Should there be a legal agreement clause between LCC and Culzean that can also be enforced against any future owners?

Planning Condition 4 also deals with issues pertinent to DM4, requiring that if the wash plant ceases to operate, a Combined Heat and Power Review is to be submitted within 6 months. Assuming that LCC would be informed of the closure of the wash plant, it is not clear how this would ensure that the excess heat would continue to be captured, especially if no suitable alternative purchaser for the electricity can be identified. Would the incinerator then be required to cease operation? Surely this requirement for a CHP review should have been submitted as part of the application?

**Policy DM2 - Development Management**

BPC disagrees that appropriate information has been provided to show that social and environmental impacts can be eliminated, or reduced to acceptable levels.

As noted by Atkins, the application HHRA relies on data from municipal waste incinerator studies (US 2000). This work is over 20 years old; surely if incinerators have improved since then, and health impacts are now reduced, then there would be more recent data that could be used. As Atkins note in their final report, medical waste is of a different composition to municipal or wood waste, but neither Oaktree nor Atkins have identified any studies on medical waste incinerators that could have been used.

Atkins also note that the HHRA uses modelling that excludes the highest results for a number of pollutants, but accepts that this modelling has been accepted by the



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Environment Agency, and does not challenge further, rather referring this to the permitting authority to consider.

We do not believe that this is an issue that should simply be left to the permitting authority (WLBC), or that monitoring data should be requested once the incinerator is operational in order to test the assumptions being made; this would be tantamount to treating the local residents as an experiment. The assertion that because permits have been granted using similar data is not evidence that this type of incinerator is safe.

Scientific studies which look at the effects of pollution on human health are continuing, and we would expect that as the understanding evolves, the regulatory regime will respond to this evidence. Is this the case?

### HHRA

BPC also believes that insufficient attention has been paid to the impact on food grown in the area. There are organic farmers in the area and their soil certification may well be lost if this incinerator is allowed, thus affecting their livelihood.

The assumption made in the HHRA stating that farmers have a 40 year working life is incorrect: the average age of UK farmers is 59, with almost 40% being over the age of 65 with farms being passed down the generations. Farmers often work and live at their childhood homes consuming locally grown food, and working outdoors for the majority of their lives will be increasingly expose them to toxins harmful to health.

The HHRA does not consider the impact on health for people who grow their own food, keep poultry or consume locally shot game. They will have greater exposure to toxins in the local environment, and the impact on young and unborn children will be greater still. It is estimated that around 33% of UK households with gardens now grow their own fruit or vegetables, and it has been reported that large numbers of chickens are now kept by 'backyard' keepers.

There are several regular game-shoots in Bickerstaffe on the Lord Derby estate.

### Reduction in Carbon Emissions

It has been stated that this incinerator will reduce road miles as medical waste produced locally has to travel to Wrexham or Oldham. We believe this claim is incorrect.

The distance travelled by waste is due to the contracts which exist between medical facilities and waste management companies rather than the absence of a more local plant. There is now an overcapacity of incinerators in the UK, partly because more waste is being recycled, but also because these have been built by companies as part of the normal competitive environment, rather than in response to need. Some incinerators that have been granted permission and permits are not currently operating because a lack of feedstock (waste), making them uneconomic to run.

So given that there is already more than enough UK capacity, and there is market competition, there is no guarantee that Culzean would win contracts to deal with locally produced waste at Simonswood, thus the incinerator is surplus to demand.

It is just as likely that any contracts would result in an increase in road miles if waste was to be transported from across the UK, and possibly from abroad.

### Other Issues of Concern

Ash/char handling – there is very little information about how residual ash would be dealt with. Would this be loaded onto sealed containers within the building? Is there potential for this material to blow into the local environment? This is to be dealt with by planning condition 5, but surely this should have been submitted as part of the application so that it could be considered by interested parties?



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Emissions monitoring – there is no information about monitoring of emissions. Residents are concerned that there is a lack of transparency around breaches by incinerators which are already in operation, and that this could be the case with this plant.

Natural England(NE) comments – the NE letter of 05/09/22 states that a Habitat Regulations Assessment is required before they can respond to the application. Has this been made available yet?

United Utilities comments – Planning Condition 13 does not include the text as requested by UU in their email of 06/09/22.

To conclude, there are far too many disturbing unresolved within this application:

- non-compliance with policies including the Joint Lancashire Waste & Minerals Plan
- a lack of procedural accuracy in the detail of this application
- failure to submit the required information including the Habitat Regulations Assessment
- lack of assurance to residents that the proposals have adequate measures in place to protect public health and safety with residues
- no information about how residual ash will be dealt with
- out-of-date evidence provided by the applicant to support the proposals
- grave cause for concern over the implementation of emissions' regulations
- potentially polluting the environment and soil for commercial and home growers potential problems future issues for the County Council and Borough Council in regulating and monitoring the proposed facility
- this process poses detriment to residents' wellbeing
- the facility is not needed in this area and has not been proven as safe
- it would increase carbon emissions through unnecessary road transportation.

Therefore Bickerstaffe Parish Council sincerely urges you to refuse this application on behalf of local residents for all the preceding reasons.