

SW/09/894 – Installation of a small scale biomass power plant within an existing building for the generation of renewable energy from low grade waste wood at Ridham Dock Road, Iwade, Sittingbourne, Kent

APPENDIX 1

IWADE PARISH COUNCIL

Chairman Planning Committee.
Peter Wilks, The Lindens, Maple Court,
Rodmersham, Sittingbourne, Kent, ME9 0LR.
Telephone 01795 472452, Email peter.wilks@homecall.co.uk

26th February 2010

Miss Angela Watts
Senior Planning Officer
First Floor
Invicta House
County Hall
Maidstone.
Kent ME14 1XX

Dear Miss Watts,

Application SW/09/TEMP/0042: Countrystyle HEAT & Power Ltd., Further Information Installation of Biomass Power Plant, Additional Information January 2009

The Iwade Parish Council (IPC) has considered the additional information supplied by WYG Environmental on behalf of Countrystyle Heat & Power Ltd., and we reiterate our concern that the emissions from the plant will be a serious health threat to the residents of Iwade. As we pointed out in our objection dated 1st December 2009, Iwade is frequently dusted with white powdered gypsum from the open air stockpiles of the Knauf Plasterboard factory adjacent to the Countrystyle site. The Countrystyle application for a scoping opinion listed 16 hazardous substances in the omissions, it includes mercury and a number of other heavy metals which are toxic to wildlife and humans.

The Additional Information answers the concerns of the IPC on page 9, however, we do not find them satisfactory and our objections remain. Answering points raised by the Environment Agency¹, WYG state that: *Bottom ash produced as a result of the thermal treatment process with the development has the potential to be classified as hazardous waste. As the plant is not yet operational it is not possible to fully determine the composition of the waste ash as this will depend upon the exact fuel stock and process efficiency* [my emphasis]

If the applicant does not know what fuel stock they will use, or the efficiency of the process how then can they claim that their emissions 'are not considered a risk to local residents'. See 4.1 below

4.1 Emissions 'WYG undertook dispersion' modelling of potential operational phase emissions as part of the Air Quality EIA. This considered the following:

- Atmospheric nitrogen dioxide (NO₂) concentrations at human receptors;
- Atmospheric particulate matter with an aerodynamic diameter of less than 10µm (PM10) concentrations at human receptors;
- Atmospheric oxides of nitrogen (NO_x) concentrations at ecological receptors;
- Atmospheric sulphur dioxide (SO₂) concentrations at ecological receptors;
- Atmospheric ammonia (NH₃) concentrations at ecological receptors;
- Acid deposition at ecological receptors; and,
- Nutrient nitrogen (NutN) deposition at ecological receptors.

¹ Section 5.0 Environment Agency paragraph 5.3

SW/09/894 – Installation of a small scale biomass power plant within an existing building for the generation of renewable energy from low grade waste wood at Ridham Dock Road, Iwade, Sittingbourne, Kent

Page 2

"The result of the dispersion modelling that there would not be any exceedences of the relevant Air Quality Objectives (AQOs), declared for the protection of human health, at any location as a result of emissions from the proposed development. Predicted increases in baseline concentrations were low at sensitive receptor locations for the majority of pollutant averaging periods and as such potential atmospheric emissions are not considered to be a risk to local residents. This opinion was reflected in the consultation response provided to KCC from Sarah Oakley."

The origin of the fuel to be used in the plant was questioned in our letter of objection 1st December 2009, the WYG response 4.2 Origin of Waste Wood refers us to Section 2.4 on page 6. Section 2.4 claims that Countryside has a planning permission (reference: SW/05/1392) to process 30,000 tons per annum of low-grade waste wood, this is not correct. As we pointed out, SW/05/1396 has a number of planning conditions restricting the throughput of the site; secondary aggregate recycling is restricted to 10,000 tons per annum by condition 28. As pointed out above, the operators do not know what fuel they will burn and euphemistically describe it as "low grade waste wood".

The IPC understands that that the most likely waste available is an accumulation of scrapped domestic kitchen units, old tables (and similar). The waste wood which is collected from waste dumps is made up of chip board, mdf board, melamine laminates, other plastic laminates, old painted board. All of which contain a cocktail of toxic chemicals in the glues, resins and paint. Old paint is likely to contain lead, urethane, mercury, chrome, and other toxic chemicals. Members of the Fire Brigade have to wear breathing apparatus to protect themselves from toxic gases when fighting industrial and domestic fires.

The IPC notes that in Section 4.2 the WYG detailed dispersion modelling does not include heavy metals or any of the above toxic chemicals which will be present in the emissions when waste domestic units are incinerated. It is inevitable that some ash and particulates from the incineration process will be carried from the site either directly as wind blown material from chimney or from the ash handling and ash storage areas or from carry over on to the dry access roads. In addition particulates are likely to find their way into surface water drainage systems by carry over from vehicle movements. The impact upon the neighbouring Swale Estuary is largely dismissed and not assessed appropriately

The emissions from the incineration process will be carried by the wind across the marshes to Iwade and Sittingbourne. We know from our present experience that complaints about the gypsum pollution fall on deaf ears. The white powder is clearly visible on cars and windows yet the environmental health authorities have never taken any serious steps to stop the nuisance. Emissions from the Biomass incineration consisting of particulates PM10's and PM20's will be invisible to the human eye, nevertheless they are a serious threat to the health of local residents.

4.4 Ecological Impacts. The IPC remains concerned that there will be bioaccumulation of heavy metals in the mudflats of the Swale. YWG state in the Appropriate Assessment that: *This site qualifies under Article 4.2 of the Directive (79/409/EEC) by supporting populations of European importance of the following species which are listed on Annex 1 of the Directive: Avocet, Little Tern, Mediterranean Gull, Bar-tailed godwit, Golden Plover, Hen Harrier, and also qualifies by supporting other migratory species.* The tidal channel of the Swale is in close proximity to the Countrystyle site and as the operators do not know what fuel they will be incinerating we are surprised that the Environment Agency and Natural England have not expressed concern. The Western Boundary of the Swale SSSI Ramsar Site is coterminous with the sea wall and of the Countrystyle Site called the Block Works on the Swale Adopted Plan Inset Map 12. The sea wall is also the Saxon Shore Way, the chimney of the Biomass plant will be about 100m from the sea wall. Any emissions from the chimney and or dust escaping when handling the filters and ash will be carried on the prevailing wind over the sea wall onto the Swale bank, the feeding ground of birds. After high water as the tide ebbs and the mud is exposed, many hundreds of Dunlin and other waders feed on the benthic micro invertebrates, molluscs and

SW/09/894 – Installation of a small scale biomass power plant within an existing building for the generation of renewable energy from low grade waste wood at Ridham Dock Road, Iwade, Sittingbourne, Kent

Page 3

bivalves exposed by the falling tide. (See the Countrystyle Environment Impact Assessment by YWG Figures 12.1 to 12.18).

The Swale Estuary is a shellfish water, designated as such in European Legislation. No consideration at all is given to potential impact by bioaccumulation on this area, the produce of which eventually finds its way into the human food chain

The writer has been privileged to stand on the Saxon Shore Way just north of the Block Works two hours after high water and witnessed a solid line of Dunlin and other waders feeding as the tide recedes over the mud flats. The Saxon Shore Way crosses the Ridham Dock Road near the Dock Entrance and it is suggested that members of the planning committee visit the sea wall where they might be fortunate to see the wide variety of waders such as the rare Avocet, Black-tailed Godwit, Golden Plover listed in the Appendix C – Appropriate Assessment. Table 1, feeding.

Hoping that the response of the Iwade Parish Council may be of interest to the officers of Natural England and Environment Agency I am sending copies to Mr Nigel Jennings and Mr Niall Connolly.

Yours Sincerely

Peter Wilks

Peter Wilks.

copy: Nigel Jennings, Natural England
Niall Connolly, Environment Agency