

Bexley Natural Environment Forum response to Cory's new incinerator plans. 29/5/18.

Our Proposal

- Please tell us your views about our proposals.
- Do you think more of London's waste should be treated in London?
- Are you in favour of making greater use of the river?
- Do you support maximising reliable renewable energy generation for London and the UK?

You have asked some 'policy' questions here. Our position is that:

- We support the reduce, re-use, recycle hierarchy, and wish to see the UK honour its Aichi convention on the conservation of biodiversity commitment to bring resource consumption down to a sustainable level by 2020. That means shifting from a three planet to a one planet economy, with a concomitant and significant reduction in 'waste'.
- We wish to see the UK move rapidly towards a modern, circular, zero waste economy in which non-recyclable materials are no longer produced and incineration is ended and everything is made for long life, ease of repair and is then re-used, recycled or composted.
- By the same token we wish to see energy conservation and increase efficiency as the number one priority, with renewables fulfilling the remaining need. We do not favour covering everywhere with wind turbines etc. to power an ever-increasing energy demand in which much of the energy is then used in a profligate and inefficient manner.
- We believe that all of London's waste should be re-used and recycled by the means producing the least negative environmental impact, which will usually be as close as possible to source to minimise transport energy costs and maximise local jobs.
- Any long-distance transport should be by the least environmentally damaging means. In cases where this means by river, we would support river. In this instance we oppose any increase in lorry movements in Bexley to feed an incinerator.
- We note that Cory continues to try and conflate incineration with 'recycling' and 'renewable' energy e.g. 'Cory Riverside Energy is progressing plans that would help convert more of London's non-recyclable waste into low carbon renewable energy.' Incinerating non-recyclable waste is by definition NOT producing energy from a proper renewable resource. It describes the residue as 'recyclable ash' but nationwide a lot of this appears to be stockpiled or land-filled if it doesn't wind up in roadway foundations. Incineration is a linear process.
- Incinerators are costly. When the non-recyclable products are phased out, or even before that, we are concerned that greater incinerator capacity could undermine recycling by gobbling up otherwise recyclable materials in order to be able to keep operating at 'economic' levels.
- There are still serious concerns about harmful pollutants in the gasses released by incineration and in the ash. A letter in the Daily Telegraph on 24/5/18 from the Professor of Nanotechnology at the University of Buckingham criticised the Environment Agency for nodding through a massive new incinerator without addressing the production of PM1 and ultrafine particles which are now recognised as being the most damaging to health, despite the recent government emphasis on tackling air pollution.

- We therefore object to the construction of further waste incineration capacity in the UK and see it as a distraction from moving swiftly to a zero-waste economy and as diverting resources from that task.

Regarding the detail of the proposals:

- The positives are that Cory appears to intend to stay within the existing developed footprint (we trust that this will remain the case), install some genuine renewable energy and make better use of 'waste' heat.
- We are dismayed by the prospect of yet more very large buildings right next to Crossness Nature Reserve, to add to the recently-approved 4-storey data centres on Borax fields, further reducing the 'big sky' feel of what little is left of the marshes, and the view from inland to the river. It would appear that despite the high wildlife value of even the existing remnants of the marshes at both Erith and Crayford, neither private interests nor Bexley Council are prepared to say enough is enough and stop putting in and approving development applications that will either reduce the remaining open ground and/or have other negative impacts on their character.
- Regarding the current design option, No. 2, a curved roof building similar to the existing structure and similar to Thames Water's Crossness Sludge Powered Generator would appear to be the least visually intrusive and most aesthetically pleasing, but it would provide the smallest area for solar panels. Option 3, the stepped roof building may be the best compromise if stepped down towards the reserve, so that it is less visually imposing.
- We are concerned about shading effects on parts of the Nature Reserve and the Reedbed at the Great Breach Dyke outfall and expect to see modelling of this in any final application. That modelling needs to include all four seasons, not just the summer.
- There is considerable light pollution from the existing facility. This total amount of this from within the Cory boundary should not increase as a result of this development, if approved, and should ideally be reduced.

2. The Local Environment And Community

- Are the social, environmental and economic factors that we have identified the right ones to take into consideration in finalising our proposals for an integrated Energy Park?
- Is there anything that you want to make sure we consider as part of our proposals?
- Do you have any comments on how the electrical connection route might affect you? (Different options are labelled 1, 1A, 2A and 2B. You can refer to the routes by these labels, use recognised road names or draw a sketch to tell us about a particular location).
- Irrespective of which design option gives the greatest solar panel capacity, can solar be retrofitted to the existing incinerator? Has Cory looked at the huge area of roof space on neighbouring 'sheds' and considered renting roof space to retrofit solar arrays on those as well, perhaps with a profit-sharing deal involved? If weight is an issue, are lightweight thin-film cells an option?

- To avoid further direct disruption to the Nature Reserve, we support the Norman Road cable routing option.
- Any 'laying down area' for construction materials and equipment must not encroach onto the Nature Reserve or other semi-natural/open mosaic habitat.
- Notwithstanding any other issues, given the continual erosion of what is physically still marshland, or geographically part of it, in the area (including thanks to Cory) and the general wildlife crisis in the UK, we expect to see Cory voluntarily offering significant 'mitigation' in its final proposal. This should include sustained funding for the Nature Reserve, for further wildlife improvements for the dykes in Thamesmead, living roof space on local buildings (we are still pushing for this in the Cory data centre, and perhaps Cory could look at funding retrofit on neighbouring shed roofs in line with our proposal about solar arrays – the two could readily go together) and for schemes to reduce waste and increase re-use of materials within Bexley and the Boroughs which send their refuse here.

Chris Rose. Vice-chair Bexley Natural Environment Forum (the umbrella organisation for Friends of parks and open spaces groups and wildlife conservationists in Bexley)