

What the Environment Agency says we can take account of .

1 relevant regulatory requirements

The ERP Act of 2016 says that " burning under 40 tons of waste does not require strict conditions" in a research facility such as a university. This shows an awareness of scale. The regulations show an exception to "one size fits all" in the case of under 40 tonnes. If all incinerators were the same size outside university research, it would be logical for the same regulation to fit all, but this mass incinerator is three times the size of others and would deal with over 500,000 tons of waste a year. It needs different regulations relevant to its size.

2 information on population and sensitive sites

The population has increased considerably and there are 5 primary schools close to the proposed incinerator. Research on **particulates** too small to filter out with bag filters (see Professor Vyvyan Howard) reveal that these are especially dangerous for the health of expectant mothers and young children. The problem is likely to be like the asbestos one, spread over a wide area.

Sensitive sites? While the permit showed awareness of the significance of Ampthill Park as historically important, it failed to mention the *Bunyan Trail*. Bunyan's *Pilgrims' Progress* is a classic which brings visitors from across the world , to the museum in Bedford and the Bunyan Trail to see what inspired the writer as a travelling tinker. The *House Beautiful* was the since ruined Houghton House. A sense of how beautiful it must have been in Bunyan's time can be guessed at from its staircase, preserved as the main staircase in the Swan Inn, Bedford. The view from Houghton House will be spoilt by looking down on a mass incinerator. And climbing that hill could be a health hazard from particulates from that dubious plume.

3 Comment on whether the right process is being used for the activity, for example whether the technology is the right one.

The word "right" is a value judgement For those who think that the best way to deal with waste is to burn it, the "right" technology is an incinerator. But it will not be able to operate without an environmental permit. For environmentalists the long term "right" aim is to be sustainable, designing out waste in the choice and use of raw materials. The word "right" in environmental terms, differs from a planning "right", as locally it should improve air/water/soil quality, and health. Kings Lynn in its decision against an incinerator said its health cost locally could be £650 million over the lifetime of the incinerator (as reported in the Environmental Audit Committee 2011). As regards global warming and climate change Covanta's application stated emissions would amount to 320,000 tonnes CO₂e a year , then revised that down to 176,000 tonnes calling the difference due to a typo.!(That needs questioning more deeply. Even the lower amount annually would add seriously to climate change with its growing consequences).

Incineration building has impacts lasting for a generation. The Environment Agency's mission statement is to improve health and the environment, not to licence it for a risky experiment with a region's health, given what we now know about particulates penetrating the blood stream carrying toxic heavy metals. In environmental terms **the "right process** is working for a circular economy, following the waste hierarchy, and using void-fill to supplement land-fill.

4. The shape and use of the land around the site in terms of its potential impact, whether than impact is acceptable and what pollution controls or abatement may be required.

The shape of a valley has a potential impact to cause temperature inversion. When there were brickworks in Marston Vale this was experienced up to 30 days a year (see Central Beds evidence to this effect already submitted) This inversion resulted in the chimneys failing to send their plumes safely into the atmosphere, as the warm air above trapped pollution increasing asthma and lung disease. Brick making has limited pollution effects compared with the burning of what the permit introduction describes as nonhazardous waste. (The 3 page permit list of what can be burnt lists plastic five times, and that is known to be hazardous.) Covanta was following the precautionary principle in requesting a long list of allowable emissions in its application. The Environment Agency should adopt the precautionary principle more strongly in its judgement of potential risk. People need jobs, but once this is built there will be only 70 or so jobs. And the profit will go to a foreign company. A temperature inversion impact is unacceptable .Covanta ducks the inversion issue by air modelling based on evidence from Luton, Cranfield and Thurleigh airports. Since none of these are in a vale , the modelling is irrelevant. They would have done better drawing on Cardington Hanger statistics and the experience of the brickworks. The permit does not acknowledge this error. For an incinerator that wants to work nonstop, the environmental answer is that the site chosen by the Development Consent Order was environmentally inappropriate. Temperature inversion could only be averted by impossibly high chimneys.

5 The impact of noise and odour from traffic on site.

Covanta since the application earlier this year have come up with the idea of "negative air pressure" on site as a means of minimising noise and odour from leaving the site. "Negative air pressure" would be uncomfortable for the workers and that could crucially affect their concentration and judgement. What would the fall back procedure be if negative air pressure failed?

6 Information that we have not been made aware of in the application, and incorrect information. (in brief)

The effect of negative air pressure on workers (topic 5)

The ducking of the issue of air pollution under temperature inversion (topic 4)

320,000 tonnes of CO2e as a typo for 176,000 tonnes as incorrect information? (topic 3)

176,000 tonnes of CO2e emissions regarded as acceptable because energy from waste is seen as a sort of carbon credit. The IPCC now takes the line that climate change requires the actual reduction of burnt carbon for sustainable survival. (topic 3)

A growing population with 5 primary schools close to the proposed incinerator related to the issue of particulates is not taken sufficiently seriously (2)

The Bunyan Trail makes Marston Vale a sensitive site.(2)

The logic of scale is missing from the permit, though the EA booklet *Energy from waste* (on display at the EA consultation at the Forest Centre Sept 20) stated that waste should be "disposed of or treated near to where it is produced". (That statement is about justice. Where the waste is produced is where it should be dealt with.) (topic 1)

The last point in the list of what could not be taken account of implied that a permit could not be refused "if the operator can demonstrate that they can carry out the activity without significant risk to the environment or human health" Noting what Covanta has actually "demonstrated" in its other facilities, and the incorrect information given, and the information missed out of their application, " demonstrates" unreliability. It would be very trusting to grant the draft environmental permit to Covanta as it stands.