To: MWPlanning@Cumberland.gov.uk

I submit the following objections regarding planning application 1/23/9005:

1. Carlisle's and Cumbria's approved incineration capacity already far exceeds Carlisle and Cumbria's need, Scotland have a moratorium to prevent further excess capacity there and there is excess incineration capacity in England (ukwin.org.uk/overcapacity). SRF from North West Recycling already goes to energy recovery. The proposed gasification incinerator is therefore not needed. The proposal would frustrate the government's residual waste reduction target to halve the waste going to incineration and landfill by 2042. The proposal would further distort the waste market away from the sustainable activities at the top of the waste hierarchy, both encouraging waste and the environmentally unsustainable destruction of resources with the releasing of harmful greenhouse gases and other pollutants.
2. The visual impact would be unacceptable and mar the enjoyment of the countryside. The visual impact would be widespread including, for example, from much of the footpath along the River Eden from Cargo to Rockcliffe and beyond.
3. Planning application for a pelleting plant (1/21/9002) was withdrawn. According to the North West Recycling website, SRF is made into pellets elsewhere so pellets would have to be brought to the site by HGV. The narrow roads, which are also used by cyclists and pedestrians, are unsuitable for more HGVs.
4. The proposal claims the proposal would allow the "'switching off' and removal of the existing diesel-powered generators" but an adequate connection to the national grid would be a much better, less-polluting and long-term sustainable way to avoid using diesel generators. It is unclear from the diagrams whether the proposal includes the electricity cabling and infrastructure to feed both the wider North West Recycling site and the national grid. It is also doubtful that any planning permission conditions would be able to prevent the use of diesel generators on land outside the permission boundary or require installation of electrical cabling or infrastructure outside the permission boundary. In addition, the air quality gains assumed by the switching off of diesel generators may be exaggerated because diesel generators producing less than their maximum electrical load have been assumed to produce maximum emissions.
5. The fuel can be expected to contain a significant proportion of plastics derived from fossil fuels. The proposal would result in almost all of the carbon in those fossil fuels being released as greenhouse gases worsening climate change. The reduction in greenhouse gas emissions from diesel generators may not be realised, but, even it was, the combustion of the fossil carbon in 24,000 tonnes of SRF (the amount of SRF to be burnt in a year) can be expected to far exceed the fossil carbon in just 1,270 tonnes of diesel per year (the weight of 1,500,000 litres of diesel). Furthermore, the additional capacity to burn SRF can be expected to encourage the production of SRF (and the waste materials SRF is made from).
6. The proposal would release significant quantities of air pollutants that have no known safe level, including pollutants that already exceed WHO Air Quality levels. There is no doubt that the air pollution from the plant would harm health (see ukwin.org.uk/health for evidence).
7. The proposal includes almost no information about air emissions during plant startup and shutdown raising concerns that air pollution during startup and shutdown could be even more harmful.

8. The location is unsuitable for a predicted increase in local dioxin air concentrations up to threefold. There is no level of dioxins below which harmful effects do not occur. The proposal includes no assessment of the impact of these emissions on human health. Dioxins from the plant would be persistent in nearby agricultural land and would likely continue to enter the human food chain for decades.

9. The proposal does not appear to include readily available catalytic pollution abatement nor any other type of NOx pollution abatement. The excessive throughput for the proposed stack height, together with a lack of techniques to minimise emissions, make the proximity of the proposed site to dwellings and agricultural land completely unsuitable.

10. The proposal's emissions are predicted to result in significant nitrogen and acid deposition at the River Eden SAC/SSSI adding to loads that already exceed critical limits. They are therefore likely to cause unacceptable ecological harm to an ecological site of international importance. The diesel generators are outside the proposal boundary so it is incorrect to consider their uncertain decommissioning to be "an intrinsic element of the Proposed Development".

11. The proposal includes no assessment of the harm the proposal would cause to becks and other small waterways near the site that flow into the River Eden and how harm to these habitats may affect the SAC/SSSI.

12. The application predicts significant pollution loads at Harker Moss and Rockcliffe Moss. Critical loads are exceeded so significant ecological harm is to be expected. The proposal includes no assessment of the harm the proposal would cause to the Kingmoor Nature Reserves. Natural England have a policy of not commenting on local nature reserves and wildlife sites. The Council must assess the likely harm and act to protect wildlife and habitats at these sites.

13. The diagrams include no apparent means for heat to be transferred to the wider site and it is not clear that the wider site has the means to utilise such heat. This calls into question the claim that the proposal is Combined Heat and Power (CHP).

14. The diagrams do not show how many materials will be safely stored, materials such as diesel (for the thermal oxidiser), lime, spent carbon, process condensate and hazardous fly ash.

15. It is unclear whether there is sufficient access for emergency vehicles after storage for all necessary materials and wastes have been added.

16. The applicant failed to provide the anticipated noise levels emissions to the author of the noise assessment raising concerns whether the applicant understands the impact of what they are proposing to build. A noise assessment based on potentially unrepresentative noise emissions provides little assurance that noise levels will not cause disturbance to nearby residents.

17. There is an unacceptable risk of odour from the stack.

18. Whilst the wider site has a weighbridge, the proposal itself does not include a weighbridge. It is therefore unclear that the proposal has the means to ensure the quantity of fuel gasified and incinerated does not exceed the proposed 24,000 per year.

Please acknowledge receipt of this objection.

SIGNED

NAME

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