A DETAILED EXAMINATION OF THE SERIOUS COMMERCIAL AND ENVIRONMENTAL CONSEQUENCES CONCERNING PROPOSALS FOR THE BUILDING OF A MAJOR WASTE INCINERATOR AT ALLERTON PARK IN NORTH YORKSHIRE A LEGACY THAT IF AGREED BY COUNTY COUNCILLORS WILL BLIGHT A GENERATION

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Forward by Dr. Gerald Rolph, Trustee of The Gerald Arthur Rolph Foundation for Historic Preservation and Education, Allerton Castle.

I have personally contributed to the financing of the preparation and publication of this report as I believe the plans by North Yorkshire County Council (NYCC) to build an incinerator at the Allerton Park Quarry in the middle of the North Yorkshire countryside will have grave consequences to the wallets of all taxpayers in North Yorkshire and for the health and well being of those living within a 20 miles radius. I believe you are being misled by AmeyCespa through suspect saving calculations and misleading claims for benefits of incineration while understating or ignoring the negatives and alternatives.

Whilst recognising that landfill cannot continue in the long term due to its effects on the environment, having a kneejerk reaction to the problem and picking an equally bad environment policy, that of building an incinerator which will produce a plume of questionable smoke, is misguided and seems to work on the premise that two wrongs will make a right.

The erection of an incinerator which will include a factory type, electrically illuminated chimney will be hugely detrimental to the area and will blight Allerton Park and the surrounding area for miles around.

I hope after reading this report you will take on-board the commercial and health consequences highlighted and that NYCC will look at the alternatives, namely the use of existing County adjoining recycling facilities, which are already available and could easily process North Yorkshire’s waste.

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1.0 EXECUTIVE SUMMARY

Statement

This document was drafted on behalf of the Friends of Allerton Castle and North Yorkshire in response to the proposed plans to build a municipal waste treatment facility at Allerton Park in North Yorkshire. Its intention is to:

- examine the impact of the proposed waste incineration plant at Allerton Park on the local community and the wider region
- determine if the plans make financial sense for the councils and their taxpayers
- assess whether the proposals are compatible with current expert advice, with the York and North Yorkshire Waste Partnership’s Joint Municipal Waste Management Strategy or with developing UK and EU legislation on waste management
- question whether incineration is a viable, environmentally accountable option for long term waste management
- analyse the consequences on public health, tourism, wildlife and the built environment of the facility itself and of the pollution it will emit
- appeal to County Councillors on behalf of North Yorkshire voters not to vote for the incinerator, which will leave an unnecessary long lasting toxic legacy.
- to encourage County Councillors to examine the alternative waste handling options in the light of planned changes by Parliament and EU.

AmeyCespa claims

Publications and statements issued by AmeyCespa and its supporters on North Yorks County Council and City of York Council (NYCC/CYC) have made various claims about the benefits and capabilities of the proposed facility. However, a more detailed investigation proves that nearly all of these claims are unsubstantiated by the facts.

Existing waste management policies and anticipated changes in legislation mean that, if the proposal is implemented, the two councils will have committed a billion pounds of taxpayers’ money to a facility that is technically, environmentally and economically redundant even before achieving planning permission.

Though AmeyCespa promote the other facilities at the plant, including mechanical treatment and anaerobic digestion, the incinerator will be the dominant operation. Of the 320,000 tonnes of waste that will be transported by road to Allerton Park, over 80% will be incinerated with and only about 5% recycled¹.

¹ http://www.marton-cum-grafton.org/incinerator.htm
Viability of incineration

Incineration of waste is not a viable or acceptable form of waste management both in principle and for the specific circumstances of North Yorkshire.

NYCC/CYC and the district councils currently have some of the lowest recycling rates in the country. Without any ambition to improve recycling and establish the county as a market leader in this field, the Councils have extrapolated future waste volumes from embarrassingly archaic ten year recycling targets that fall far short of what other shires and international cities are achieving even now. The justification for commissioning this incinerator is therefore based on erroneous calculations that suggest a net increase in the amount of municipal waste we will produce.

NYCC/CYC has presumed, by 2039, a municipal waste supply of 208,000 tonnes per year whereas in reality it could be as little as half of that. Plant capacity at Allerton Park will be 320,000 tonnes so there is already a shortfall which is likely to be made up by importing waste, which North Yorkshire taxpayers will have to pay for, or accepting commercial waste from shops, offices, restaurants and even abattoirs or hospitals, some of which would be dangerous or lead to dangerous emissions.

By the end of the term of this contract commercial waste could constitute up to 50% of the incinerator fuel, not the “small” amount claimed in AmeyCespa’s literature.

Not only is this a backward approach to raising levels of recycling but it is also in opposition to the Government’s position on waste management, which calls for a “zero waste” strategy, to developing EU policy and to recent Defra guidelines. Moreover, incineration destroys valuable resources which must then be produced from virgin materials, with the associated costs in terms of pollution and energy.

A government review of waste policy in England due next year is anticipated to recommend further waste reductions, better recycling initiatives and working with local communities to make the best decisions.

These are obviously principles that NYCC/CYC should already be adhering to but would it also not be far wiser management of taxpayer and PFI money to wait until the results of that review are published, and future strategies for waste management more determined, before committing to the largest and riskiest financial contract NYCC has ever undertaken.

Financially, the entire project is an enormous gamble with taxpayers’ money. For NYCC/CYC to make a 25 year (or potentially more) commitment based on uncertain presumptions about future waste management policies. The Friends of Allerton Castle and North Yorkshire are very concerned that unwittingly, County Councillors and York Councillors could leave a legacy of blighted health and a massive financial burden.
The only winner will be AmeyCespa which estimates an annual turnover between £35m and £40m. In order to support this, NYCC/CYC will have to guarantee a level of waste supply which it simply cannot achieve and any penalties from its failure to do so will only add to the profits for AmeyCespa and, its Spanish parent company, Ferrovial.

A failed technology

Waste disposal is a huge challenge. The ideal situation is to create no waste but that is unachievable as things stand. The next best solution is to divert waste from landfill through reuse and recycling. Accepting that the remaining waste has to be disposed of, we cannot continue to use landfill as it is no longer economically viable and is certainly not environmentally or socially acceptable - but incineration is not the only alternative.

Far from it being the universally proven technology claimed by its promoters, the incineration of municipal trash with energy recovery has been an experiment which has left a legacy of unacceptably high levels of dioxins and related compounds in their food, their tissues, their babies and in wild life. The Friends of Allerton Castle and North Yorkshire cannot believe that Councillors would want to take this risk with residents of the County.

There are other options for waste disposal. Existing incinerators in other parts of Yorkshire and further afield are already under capacity and the transport infrastructure is easily developed to move residual waste, after primary disposal methods are completed, to these facilities.

More fundamentally, better systems to “to reduce the amount of waste produced in York and North Yorkshire” are needed and effort should be put in to structuring a more efficient, comprehensive waste management system rather than paying someone else to burn the evidence.

More energy can be saved by reusing and recycling than can be generated by burning and recycling mitigates some of the huge energy costs involved in manufacturing and fabrication rather than having to start from scratch.

Incinerators, by the nature of their operation, act as massive disincentives to adopting better systems of recycling. The centralisation of waste disposal at the Allerton Park site will cause irreparable damage to the nascent waste management industry in North Yorkshire.

Alternative, local solutions and management technologies would generate up to 700 new jobs for the region whereas Allerton Park has promised just 70.

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3 Dr Paul Connett, Professor of Chemistry at St. Lawrence University.
Neither is overall reduction of waste encouraged or enabled by guaranteeing a significant and constant level of waste supply over the next 25 years in order to satisfy a commercial contract with AmeyCespa.

A Danger to Public Health

Incineration of waste causes a range of health problems and can shorten lifespan by up to 12 years by increasing a range of diseases, especially heart attacks and cancers, both through direct contact with pollutants and through ingestion as part of the food chain. The Friends of Allerton Castle and North Yorkshire are confident this is not what the County Councillors and York Councillors desire and therefore urges them to reconsider.

In particular the emission of Dioxins from the flue gases and in the fly ash, that is produced as a by-product of incineration, can result in skin lesions and altered liver function. Epidemiological studies in a number of countries (see Appendix I) have shown excess deaths and morbidity due to proximity to incinerator sites and long-term exposure is linked to impairment of the immune system, the nervous system, the endocrine system and reproductive functions.\(^5\)

Despite AmeyCespa’s reassurances, no substantial analysis of the full effect of the emissions from incinerator plants has yet been undertaken. However, wind patterns suggest that pollution from the 76 metre tall incinerator chimney at Allerton Park would have a drop zone covering a 50 mile radius. This would spread it fully over the Vale of York jeopardising the health of people in the City of York as well as more locally. Surely this not a legacy Councillors wished to be remembered for?

Damage to local heritage and tourism

The impact on the landscape, buildings and wildlife of the local environment would also be devastating. The location is at the gateway to some of the regions tourist gems and would be seen from the A1 by millions of visitors each year.

Allerton Castle, adjacent to the plant, is an extraordinary Grade I listed building that harbours further Grade II and II\(^*\) structures in the grounds of its park. These and other local landmarks would be severely blighted by the 38 metre tall incinerator building (the equivalent of a 13 storey block of flats) and its chimney at double that height billowing fumes, including corrosive acid gases (NO\(_x\)), across a unique landscape.

As a significant part of the £6 billion per year tourist industry in North Yorkshire, these significant heritage assets must be protected.

What now?

NYCC/CYC have called for “a new way of thinking... to deal with our wastes more sustainably”6 but the proposal for an incinerator is not a new way of thinking. It is an archaic solution dressed up in state of the art technology being sold to the public on the basis of unsustainable evidence and financial misinformation.

A decision is due in December on whether the contract for the waste management plant should be awarded to AmeyCespa. We ask that County Councillors urgently address the issues raised in this report before we become locked into a 25 year financial deal that will have to be paid regardless of whatever changes occur in the future. The Friends of Allerton Castle and North Yorkshire ask Councillors to reconsider their plans until the serious health and financial concerns highlighted in this report have all been properly addressed.

Instead of promoting the value of waste as a natural and viable resource, with this proposal NYCC/CYC risks squandering taxpayers’ money, wasting £65 million of PFI grant, and blighting the health and heritage of a generation with a dangerous, outdated and expensive incinerator.

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6 NYCC/CYC - Waste PFI information leaflet: Let’s talk less rubbish
2.0 MONEY FROM WASTE

2.1 Why AmeyCespa?

AmeyCespa is a 50/50 joint venture between Amey and Cespa, both wholly owned subsidiaries of the Spanish company Ferrovial.

Ferrovial has a background in establishing joint ventures in various parts of Europe and beyond. In Northern Ireland a joint venture by Lagan Ferrovial angered Newry anglers during work on the A1 for the damage that was allegedly done to the local river and were requested to pay compensation. It was further alleged that newts, frogs and bat habitats had all been damaged by the works. It is not clear whether the owners of AmeyCespa intend to incorporate the firm if its bid is successful and, if so, whether the parent companies will underwrite any subsequent claims for damages.

Should the business be unable to meet its liabilities or a major action be brought against the venture for pollution, it is likely the taxpayers of North Yorkshire will have to cover the costs.

AmeyCespa or its parent company do not operate any other EfW sites in the UK and of its 95 waste management operations overseas only one is an incinerator similar to that proposed for Allerton Park.

Bill Jarvis, Amey Bid Director for the Allerton Waste Recovery Park, is worryingly, rather reticent about his background. LinkedIn simply records him as the Bid Director at Amey, location Bath, not that there’s going to be much risk of chimney pollution in Bath, because their local Council has an excellent recycling record.

A search of Companies House records for Amey PLC does not list any Jarvis as a director and therefore legitimate questions must be raised as to what authority Mr Jarvis has to negotiate and, perhaps more importantly, give binding commitments on behalf of Amey PLC or AmeyCespa?

Despite Bill Jarvis’s assertion of a “proven track record”, prior to its acquisition of Donbardon less than two months ago, AmeyCespa had little experience of managing a similar facility. Neither has it experience of the rigorous operating standards required to obtain a permit from the Environment Agency.

The lack of transparency in the procurement process means that there is no information available on the criteria that led to AmeyCespa’s selection as preferred bidder or on which other companies responded to the call for tender, what their proposed solutions were and why these were rejected.

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7 Carlingford and Mourne Catchment Stakeholder Group, minutes, Tuesday 25 November 2008
8 Marton cum Grafton Parish Council- NYCC/CYC Waste PFI: Due diligence report.
9 https://secure.creditgate.com check against directors names and recognised AmeyCespa parent companies 8.10.10
North Yorkshire Council (NYCC) has extended the period of public consultation until December the 15th 2010 which is welcomed, however if this is a genuine consultation process why won’t the authority reveal existing alternative options to allow informed consideration and why are they not looking at alternatives presented by the public as part of this consultation?

In its waste PFI information leaflet, Let’s Talk Less Rubbish, NYCC reveals that 12 companies expressed an interest in the contract with 4 being selected to develop detailed tenders. AmeyCespa and Earthtech Skanska were selected to submit final tenders and, regardless of Earthtech Skanska’s considerable experience in this field, the preferred bidder status was awarded to AmeyCespa.

Despite the published selection criteria\(^{10}\), the AmeyCespa proposal does not “support the councils’ waste strategy aims”, is not “capable of responding to changes in legislation; economic conditions and waste volumes”, does not improve efficiency or give value for money, and most certainly does not “reduce any effects on local communities”. These shortcomings on the 60% scoring for technical, quality and environmental criteria suggest that the perceived financial benefits must have been persuasive.

### 2.2 Financial Risk

The Waste PFI contract does not represent value for money, is not equitable and carries significant long-term financial risk for North Yorkshire County Council and the City of York Council (NYCC/CYC).

This contract will cost £1.4 billion, the largest contract Councillors will have ever entered into. Do Councillors have the necessary financial and commercial experience to commit to such a large project?

The Council will be locked in to a long term, inflexible contract that does not allow for changes in recycling levels or improved legislation on waste disposal.

With the full contract financial details being deemed confidential, there is no way to judge the full financial risk to local taxpayers, let alone the “cost certainty” claimed in the Waste PFI business case, or the likely profits for AmeyCespa.

The £65 million PFI funding allocated to NYCC by the previous Government was provided to help the county reduce landfill, although this has been interpreted by NYCC as part payment for the incinerator.

Should the proposal not go ahead, this grant would still be available to the county, without incurring any financial penalties from the change in plans, and could be better used on more acceptable strategies for diverting waste from landfill.

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\(^{10}\) NYCC/CYC - Waste PFI information leaflet: Let’s talk less rubbish.
Additionally, interest rates from banks lending on PFI contracts are already unprecedentedly high, more than tripling since the PFI outline business case was issued in 2006. In context of this continuing economic uncertainty committing to a high rate loan is a reckless use of public money, something

2.3 Unsubstantiated Economics

The main argument for moving to incinerating waste has been financial. NYCC/CYC claim that ‘doing nothing’ will cost far more in terms of landfill than signing up to the EfW plant.

The figure given is a saving of £320 million\(^{11}\). However, this number is based upon some very tenuous economic assumptions regarding the future cost of landfill and could only be validated if the county was foolhardy enough to continue to rely on landfill for the next 30 years.

NYCC/CYC has presumed landfill costs will rise to £175 per tonne by 2039. Currently, landfill taxes are £48 per ton. The UK government has said that the tax will increase annually by £8 per ton until April 2014, and that future landfill costs will not be below £80 per ton, which is about half the figure predicted by NYCC. No-one knows exactly what these costs will be after 2014, let alone in 2039, which does not provide a sound basis for such an extravagant claim.

The rising landfill costs are driven by EU measures designed to encourage sustainability and recycling. However, if we respond to the higher landfill costs by building incinerators then the policy would be producing exactly the opposite effect to that which was intended. A waste contract lasting a quarter of century is an enormously risky undertaking. We will be left with a financial imperative to keep feeding the Allerton incinerator, and be unable to change course.

The Friends of Allerton Castle and North Yorkshire therefore urge Councillors to reassess the situation as we believe this is not what they had intended.

2.4 Who Profits?

AmeyCespa estimates an annual turnover between £35m and £40m\(^{12}\) from the council’s £1.4 billion contract commitment alone, not taking into account any profits from electricity sales or other arrangements, which guarantees the company substantial profits for the next 25-30 years plus a contract rollover option for a further five years.

The payment mechanism is structured around mitigating the two councils’ exposure to costs such as landfill taxes rather than getting the best solution to reducing and disposing of waste and this misguided approach has created inherent uncertainty regarding the councils’ financial commitment.

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11 NYCC/CYC - Waste PFI information leaflet: Let’s talk less rubbish.
A substantial proportion of the profits from the facility will come from gate fees charged to take in the waste. However, gate fees for incineration are £20 higher than for Mechanical Biological Treatment\(^{13}\) and neither NYCC/CYC nor AmeyCespa is willing to provide information on what the gate fees for this facility will be. Based on NYCC’s claims for the tonnage of waste that the plant will process the extra cost for incinerating rather than recycling could be as high as £200 million over the term of the contract.

Although AmeyCespa claim that “the money we use from commercial waste will be used to offset the cost of dealing with household waste, creating yet another saving for local taxpayers”\(^{14}\) most of the money invested in the incinerator will leave the North Yorkshire community. AmeyCespa is owned by the Spanish multinational Ferrovial so profits from this facility will feed their shareholders rather than supporting the community in which it operates.

### 2.5 Interested Parties

Edward Stourton, Baron (Lord) Mowbray, who has freehold on the quarry site, will significantly benefit if the project to build the incinerator goes ahead. Should we be told how much Baron Mowbray will make from the sale or lease of this site?

Hanson Quarry Products Europe Ltd, part of the Heidelberg Cement Group since 2007, are the current leaseholders on the site. This lease runs until at least 2015 which is beyond the time for which Hanson has planning permission for quarrying at Allerton Park. Additionally, Hanson is a previous owner of Amey prior to its acquisition by Ferrovial. As leaseholder on the site, will Hanson be compensated by NYCC if this project proceeds or will it be making its profit from sale of the lease to AmeyCespa?

The financial arguments against this proposal are dealt with elsewhere in this document but do the Northallerton based Officers of NYCC see this as a means to secure their own employment in the face of sweeping budget cuts? If the income generated is to go into the executives’ coffers rather than be offset against budgeted costs then this should be made apparent to the Council members and the public.

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3.0 STRATEGIC MISMANAGEMENT

3.1 Lack of Vision

NYCC/CYC claim commitment to waste and LATS strategies aimed at improving waste management performance and minimising the future volume of residual waste, but show a disappointing lack of ambition in the level of that commitment.

In 2005/06 the NYCC was responsible for the management of 384,620 tonnes of municipal waste, achieving a recycling rate of 29.5%\(^{15}\). Though this has now risen to around 44%, it still compares poorly with other local authorities such as South Oxfordshire which is currently achieving 70%.

York and North Yorkshire households produce around 470,000 tonnes of waste a year of which 55% currently ends up in landfill. By cutting the amount going to landfill, Allerton Waste Recovery Park claims it will help NYCC/CYC to exceed Government and EU targets on landfill diversion but this smokescreen only avoids the problem of appropriate waste management and offers no encouragement to increase recycling rates. North Yorkshire should be at the leading edge in adopting new practices and technologies for recycling waste, not lagging behind by employing out-dated and inefficient incineration solutions.

Neither NYCC nor CYC has properly considered any alternatives such as rapidly ramping up the recycling rate, reducing waste, more composting, or smaller multi-site facilities. NYCC’s unassuming target of 50% recycling by 2020 is not even in line with Defra’s recent recommendations of 60% by 2015.

3.2 A Hasty Decision

Since the Allerton Park site was first granted planning permission in 1988, a condition of that consent was a clear commitment to the progressive restoration of the site. Successive planning consents have also reinforced this obligation, the intention being to recover the soil resources removed during quarrying and restore the area back to agricultural best and most versatile (BMV) land.

The Allerton Park site is located within an area graded as 3 under the Agricultural Land Classification (ALC) system and all of the previous permissions granted for this site have been time-limited according to the expected volume of mineral deposits available from the site.

The presumption has always been that the site would be returned to agricultural use but there is no indication in the current proposals that this planning commitment will now be upheld.

The current planning permission for the quarry site, granted by NYCC in October 2008, only allows for extraction of sand and gravel up until 31.03.11, less than six months time. The current owners are therefore legally obliged to initiate remediation strategies once that permission has expired and also to maintain a five year aftercare period to ensure that the intended after-use is successfully established.

Rather than allow time for full consultation, and investigate the many alternative solutions, the decision on this project is being rushed through in order to meet next year’s deadline when the current planning permission expires.

It is in the current owners’ interest to hand over the land prior to having to fulfil their obligation to restore it, it is in NYCC’s interest not to have a hiatus in the industrial usage of the site and it would be a distinct advantage to AmeyCespa’s building plans to have a pre-stripped and cleared site.

3.2 Premature Judgement

The YNYWP strategy document, on which the justification for incineration as an appropriate and necessary means of waste management and hence the appointment of Amey Cespa was based, was published in 2006.

The forecast of future municipal waste arisings and the assumptions on target levels of recycling were therefore made on outdated figures that do not take into account more recent changes in manufacturers’ and the public’s attitudes to packaging reduction and recycling.

Initiatives adopted by manufacturers and retailers, such as the Courtauld Commitments 1 & 2 and the encouragement and facilitation from organisations such as WRAP, since the publication of the YNYWP strategy document mean that there will be less material entering the waste management system and hence less requiring disposal.

How can sensible Councillors make an informed decision based on out-dated figures and worst case scenario recycling levels? The incinerator at Allerton Park is not designed to vary its waste intake according to current best practice in managing and recycling waste and, by the time the PFI contract for this plant reaches its term, it will be operating at levels dictated by figures more than 40 years old.

A government review of waste policy in England is due next Spring with the aim of reducing waste, maximizing the money to be made from recycling and working with local communities to make the best decisions. Until the results of that review are published, a decision to invest in incineration technology remains a big risk for the two Councils and the County Councillors must not allow this to be railroaded through.
There is also no guarantee of planning permission for the current proposals and no guarantee that amendments required to achieve this will not further skew the contract to NYCC/CYC’s disadvantage. A previous application for a similar facility in nearby Tockwith was refused for lacking sufficient information on its sustainability credentials and for being “wholly inconsistent with the general thrust of sustainable development principles and the drive to move waste up the hierarchy... and is therefore not compliant with the national, regional and municipal waste strategies and planning policy”.16

Surely it would be a more responsible management of public finances and a significant amelioration of the risks involved to delay any decision on this contract until the Government review is published and the site has achieved full planning permission.

3.3 Over Capacity

County Council corporate director for business and environmental services David Bowe said: "Energy from Waste (EfW) is a tried and tested technology and widely used today. EfW is included in AmeyCespa’s waste management solution because, no matter how high our recycling rates can become, there will still be some waste left that needs disposal or treatment.”17

There may always be some waste that cannot be recycled but NYCC has based its calculations for this contract on a target of 50% recycled waste material by 2020. The reality is that recycling rates will continue to rise as legislation forces change, manufacturers reduce packaging volume and consumer demand more environmentally acceptable practices.

Regional population growth of 0.5% per year will have little impact as waste volumes reduce to balance this and even the PFI Outline Business Case predicts 0% growth in waste from 2012/13 onwards18.

Taken in the context of the Government’s 2007 Waste Strategy key objective to “decouple waste growth from economic growth”, these indicators suggest that agreeing to this incinerator would tie the region in to a 25 year waste provision commitment that it will not be able to fulfil.

The UK already has 25 waste incinerators and a further 65 planned including one at the edge of York. Though Amey Cespa cites the number of incinerators in use on the continent as justification for their being an environmentally friendly option in the UK, the reality is that there is already significant overcapacity in Germany and the Netherlands19 (two of the leading ‘green’ states) and incineration is no longer blindly accepted as a suitable solution.

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16 NYCC Corporate Director for Business and Environmental Services, Richard Flinton.
17 Yorkshire Post 21.09.10.
19 Gill Weeks, Environmental Services Association - The Independent, 1.08.10.
To meet burning demand of these relentless facilities the UK will need to import waste\footnote{The Independent, 01.08.10} and as NYCC/CYC has guaranteed to fulfil 80% capacity for Allerton Park it will need to look for other solutions to avoid the possibility of incurring financial penalties.

Although AmeyCespa quotes national figures, rather than regional, for their capacity calculations for the incinerator, at the same time its website reassures that the facility “is not intended to deal with waste from outside the area”\footnote{http://www.allerton-waste-recovery-park.co.uk/}.

If the overcapacity in this plan will not be supplied from outside the region and there is not enough municipal waste to feed the incinerator then the only option would be for the plant to take on a higher percentage of commercial waste which may include toxic industrial materials such as paint and fibreboard and animal waste.

However, this solution would have two major hurdles to overcome. Firstly, although AmeyCespa admits that “some” commercial waste (60,000 tonnes per year) will be taken in, the inclusion of commercial waste is a major deviation from NYCC strategy and the Council is currently forbidden by EU law from signing a contract that requires a significant element of commercial waste.

Additionally, the terms of the advertised contract (OJEU tender notice) specifically state that “the Private Sector Partner will be responsible for residual municipal waste” so any deviation from this could require a renegotiation of the PFI contract.

AmeyCespa claims this will reduce to almost nothing but the reality of the figures suggest that it could grow to as much as 50% of the total intake. This should not be funded by taxpayers of Yorkshire.

Secondly, there are various regional alternatives for commercial waste disposal most of which would be considerably cheaper in terms of gate fees than at Allerton Park. Commercial organisations will be able to shop around for the best deal so there would still be no guarantee that this facility would take in enough waste to keep the incinerator going.

However, if overcapacity at the plant is intended to cater for commercial waste in the future then this should be made clear now so that taxpayers and councillors can make an informed judgement on the cost, necessity and likelihood of success of this facility.
3.4 **Job Losses**

Amey Cespa claims 70 jobs will be created for the Waste Recovery Park but is not specific about how many the incinerator alone will support.

However research from Friends of the Earth demonstrates that more jobs can be created through recycling initiatives than through the operation of incinerators. Jobs in recycling are created at a level of between 59 & 112 per 10,000 tonnes of waste arisings compared with just 11 for landfill and only 10 for incineration\(^{22}\).

On AmeyCespa's own figures this could mean a further 700 full-time employees plus the wider employment induced by the economic activity of these new positions. In the US figures indicate that for every direct job created in the recycling industry an additional 1.2 indirect jobs are created and in Germany the waste and recycling sector is now bigger than either steel or telecommunications.

For the United Kingdom, if an ambitious but achievable recycling target of 70% for municipal waste was set and achieved by 2025, then conservative estimates suggest that across the UK this could create 29,400 new direct jobs in recycling, 14,700 indirect jobs in supply chains and 7,300 induced jobs in the wider economy relative to 2006.

The significance of recycling and related activities in creating more jobs at higher skill levels, relative to incineration as a form of waste treatment, and the pattern of steady growth in the recycling sector and its supply chain has been completely overlooked in the assessment of the value of this contract to the local economy.

At a time when the recent Comprehensive Spending Review has imposed a 28% cut in grants to local authorities with a 10% fall in LEA jobs, NYCC and York City Council will have less money to spare for this hyper-expensive solution. The question facing Councillors is whose jobs and which services will have to go to pay for it?

3.5 **A Short-Sighted Strategy**

NYCC/CYC Councillors have taken a short term view on resolving issues of future waste management by paying a commercial organisation to take responsibility. This is an extremely risky, and potentially expensive, policy that is based on flawed assumptions regarding recycling levels that are not in line with current EU or UK Government policies or recognise cultural changes.

The two councils have significantly overestimated the amount of municipal waste over the next 25 years predicting that arisings of municipal waste will grow to 283,000 tonnes by 2039, whereas in reality it may fall to as little as 103,000, though this still falls 40,000 tonnes short of the plant capacity.

\(^{22}\) Quoted in More Jobs less waste- Potential for job creation through higher rates of recycling in the UK and EU. FoE Report September 2010. Source Murray, R., 1999, *Creating wealth from waste*, DEMOS.
NYCC/CYC assumption that waste levels will rise in line with economic indicators is erroneous as waste arisings have been falling since 2006 and Government aspirations are to further reduce household residual waste.

The lack of flexibility in this contract means that NYCC/CYC is forced to rely on prediction to judge the gains over the full 25 year period. Over the last 25 years there have been various changes in legislation affecting waste management, such as the Waste and Emissions Trading Act and the Landfill Allowance Trading Scheme.

Landfill and incineration bans on recyclable materials are a valuable policy tool in driving recycling performance upward, increasing resource efficiency and reducing carbon emissions and the potential for further policy change over coming years could make the incinerator redundant but leave local residents with a 25 year millstone to pay for, is this the legacy Councillors really want to leave for the history books?

The 2007 Government Waste Strategy committed the UK to cutting household waste by 50% per household by 2020 compared to 2000. The likelihood is that the overall amount of municipal waste produced in the region will fall substantially. Even accounting for population increases, it is likely that the amount of future household waste which is not recycled or re-used locally will be significantly lower than the capacity of the Allerton Park incinerator.

Once the incinerator is commissioned it will dictate the future strategy for waste management in the region. The site is so large that it predisposes this strategy, soaking up all the available expenditure and leaving little for developing more financially and environmentally sustainable approaches and starving the recycling industry in the region.

This may well be a state of the art facility but developments in the incineration industry are swiftly rendered obsolescent by new scientific discoveries and new environmental priorities and concerns. The solution to one pollutant problem often becomes the catalyst for another.

A 25 year plus commitment to the current best system may mean that within five or ten years we are lumbered with an inadequate facility that does not address the environmental or waste management priorities of the day.

Waste incinerators built in the UK during the 1970s, 80s and 90s have been unable to meet current European dioxin standards without major, and expensive, retrofits. When this happens at Allerton Park it will be NYCC and the taxpayers that will have to bear the cost, unless Councillors are prepared to rethink!
4.0 INCINERATION AND THE DANGER TO PUBLIC HEALTH

4.1 A Perverse and Wasteful Solution

Incineration is not financially or environmentally viable. Far from it being the universally proven technology claimed by its promoters, the incineration of municipal trash with energy recovery has been an experiment which after 20 years has left the citizens of industrialised countries with a legacy of unacceptably high levels of dioxins and related compounds in their food, their tissues, their babies and in wildlife.  

The proposal for an incinerator is also fundamentally in conflict with the vision statement of the Municipal Waste Management Strategy to “work with the community and stakeholders of York and North Yorkshire to meet their waste needs and deliver a high quality, sustainable, customer-focused and cost effective waste management service”. Reduction of waste is not encouraged or enabled by committing to guarantee a significant and constant level of waste provision over the next 30 years in order to satisfy a commercial contract with AmeyCespa.

4.2 Burning Public Money

Waste incinerators are the only kind of power stations that get paid to take the fuel it burns. However, they produce very little energy for the costs involved and there are far better alternatives for efficient, low-carbon energy. According to a Government sponsored WRAP survey, the cost of incineration is higher than any other form of waste management, with the highest year-on-year cost increases for new incinerators.

There has been no calculation of the potential monetary value of the key recyclable resources that are currently destined to be incinerated. Friends of the Earth Europe estimates that, in the UK, 55% (28 million tonnes) of key recyclables in the MSW and C&I waste streams are being sent for disposal through landfill and incineration and that the estimated material market value for these materials is £890 million.

On a generous readjustment for the NYCC figures of 470,000 tonnes of waste produced each year, this would amount to more than £8.2 million per annum in recoupable costs (totalling nearly £250 million over the anticipated 30 year life of the incinerator), more than enough to cover the cost of commissioning appropriate recycling facilities and perhaps even turn a profit for the ratepayers.

Burning this waste is just burning that money, something the Friends of Allerton Castle and North Yorkshire believe that the Councillors must question.

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23 Dr Paul Connett, Professor of Chemistry at St. Lawrence University.
25 Gone to Waste: The valuable resources that European Countries bury and burn. FoE report, October 2009
4.3 Negligible Energy Production

Electricity produced from burning waste produces 33% more fuel-derived CO$_2$ per unit of energy generated than a gas-fired power station. By 2020 with increases in recycling and improved technology, these incinerators will be almost as polluting in terms of CO$_2$ emissions as a new or refitted coal-fired power station and 78% worse than new gas power stations. Do our normally sensible Councillors really want to remembered for imposing a new mini-Drax in the middle of the North Yorkshire countryside?

According to AmeyCespa’s own website, 24MW of electricity will be produced by the incinerator, enough power to supply 40,000 homes (based on Office of National Statistics data for the region) which could make around £1 million pounds of profit for the company.

At the Drax power station, plans for three dedicated biomass fired power plants each generating 290MW is budgeted at £2 billion which suggests that £1.4 billion for 24MW is a poor deal and that incinerating waste is not an efficient method of energy production. Admittedly the Allerton Park figure includes the cost of running the whole facility but as there is no breakdown of construction or operating costs available it is impossible to get a more accurate comparison.

Despite the megawatt output levels and ability to supply 40,000 households claimed by this facility a detailed life-cycle analysis of similar plants reveals that incinerators waste more energy than they produce.

Incineration destroys valuable resources with the associated costs in terms of pollution and energy. Products that are incinerated must be replaced with new ones which takes much more energy, extracting and processing virgin materials, and causes more environmental damage than would reuse or manufacturing from recycled materials. Do Councillors really want to impose another Drax in North Yorkshire?

4.4 Hazardous Emissions

AmeyCespa’s claim to be following Environment Agency emission monitoring standards may be true but the company is relying on the inadequacy of those guidelines. Emissions monitoring of waste incinerators is not continuous but conducted via spot checks with the operator given advance notice and therefore able to ensure acceptable standards. This data is then extrapolated to provide an overall emission figure.

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26 Friends of the Earth: Dirty Truths, Incineration and Climate Change.
27 Drax Group Plc - Biomass: The fourth energy source.
If the incinerator has a period of bad operation, and consequent high emission levels, this will not necessarily be reflected in the published reports leading to misinformation about the dangers involved.

Even when the incinerator is operating efficiently it is adding more of these pollutants to the atmosphere with the prevalent winds spreading them in a 50 mile radius across the City of York, is this what Councillors really want to be remembered for achieving?

If there is already a threat from local traffic pollution and food chain contamination why would we want to exacerbate the situation by increasing background levels?

Incineration of waste vaporises heavy metals so that tiny particles, containing lead, barium, chromate and iron, penetrate easily through body membranes, in particular the lungs, are absorbed by the blood, accumulate in body fat and can cross over into the brain. Incinerators produce a variety of toxic emissions including:\(^\text{28}\)

**Hydrogen chloride** - Most of the chlorine in the waste stream is converted into hydrogen chloride; a strong acid gas which at high temperatures will attack most metals it meets.

**Nitric oxide** - At the high temperatures of combustion nitrogen and oxygen in the air combine to form nitric oxide (NO) which cannot easily be removed. Any nitric oxide not removed is later converted by sunlight into nitrogen dioxide (NO\(_2\)) which contributes to photochemical smog and acid rain.

**Toxic metals** - At the temperatures of combustion many of the toxic metals such as lead, cadmium, arsenic, mercury and chromium are liberated from otherwise fairly stable matrices like plastics. They are liberated in the form of tiny particles or gases which can penetrate deep into human lungs, where they are rapidly exchanged with the bloodstream.

**Mercury** - A particularly problematic metal has been mercury. At the temperature of combustion mercury is a gas which can evade simple particulate control measures. Waste incineration has been a major source of mercury going into the environment where it enters the food chain.

**Dioxins, Furans, PCBs** - These are highly toxic pollutants that will be present in both the gaseous emissions from the incinerator and the fly ash produced (see further details following). Dioxins can form both during combustion and in the post combustion phase after the flue gases have left the chamber. Both dioxins and furans are categorised as Persistent Organic Pollutants under the Stockholm Convention which aims to eliminate their production.

\(^{28}\) Dr Paul Connett - Municipal Waste Incineration, a poor solution for the 21st century.
The current UK standard for emission monitoring is for particle sizes between 10 and 4 microns only (PM10). Emissions from the incinerator will be far smaller nanoparticles down to less than 1 micron in diameter (PM2.5) which can easily pass through the abatement equipment which is supposed to guarantee the emitted air quality.

### 4.5 Danger to Public Health

Dust particles between one and five microns in size, like the irritant gases emitted from an incinerator, are too small to be visible but are easily inhaled. Dangerous chemical elements also adhere to these dust particles which, when smaller than five microns, escape being trapped by mucus and are deposited in the smaller airways and minute terminal air sacs (alveoli) where oxygen is absorbed. These dust particles cause inflammation of the small airways and initiate gradual destruction of the walls of the alveoli, leading to their enlargement and reduced ability to absorb oxygen (emphysema).

Lung fibrosis arises from the abnormal formation of fibrous or scar tissue and is another response of lung tissue to the deposition of inhaled agents such as mineral or other dusts and irritants. Small bundles of fibrous tissue ultimately join together and lead to progressive massive fibrosis and loss of lung function.

Chemical compounds adhering to the dust particles can be transferred to other parts of the body and give rise to other diseases. The different types of fibrosis, caused by various types of dust exposure, can take 20 to 50 years to develop.

The illnesses caused by inhaling PM2.5 particulates from waste burning include:

- Birth defects, miscarriages, low birth weight babies
- Premature deaths of babies, infants and adults (in London the infant mortality in zones downwind of the incinerators is 7 times higher than in wards upwind)
- T-lymphocyte diversion causing SIDS, cot deaths, autism, MS, GBS
- Attention deficit and other behaviour problems
- Asthma, Chronic Obstructive Pulmonary Disease, viral and bacterial respiratory infections
- Coronary heart disease, heart attacks, arteriosclerosis, strokes
- Diabetes type 2, endometriosis and other hormone disruption.
- Multiple chemical sensitivity with allergies & arthritis
- ME, CFS, hypothyroidism (adding to obesity)
- Clinical depression and suicides
- Cancers: non-Hodgkins lymphoma, brain, breast, colon, lung, prostate, kidney and liver

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29 Taken from letter to Knaresborough Post 15.10.10 from Dr Keith Rothwell.
30 Dr Dick van Steenis MBBS - Lecture at Beare Green, February 2008.
The total annual cost to the NHS of this unregulated UK industrial air pollution is estimated at £36 billion plus losses to education and productivity.

Though AmeyCespa and the NYCC cite the Defra statement that “all the research carried out to date shows no credible evidence of adverse health impacts for people living near incinerators”31 this is yet another misleading and obfuscating claim.

We cannot presume that long term exposure will not be damaging. The risk is the same as it was for asbestosis, which took up to 40 years to manifest, caused enormous damage to health and wellbeing and resulted in class actions that continue today.

A letter from Justin McCracken, Chief Executive Health Protection Agency, exposes this contradiction stating that “the number of people around an incinerator is too small to detect whether or not the incinerator is having an impact on health”32.

The effects are undeterminable not because they are known to be minimal, as claimed by AmeyCespa, but because the population near the incinerator is not large enough to ensure an accurate interpretation of any data collected. Therefore no detailed health risk assessment has been undertaken.

Just because the evidence is unobtainable it does not follow that there is no danger. Emissions from this incinerator will spread across a 50 mile radius risking the health of the population in the City of York as well as more locally.

4.6 Dioxins

Dioxins, or polychlorinated dibenzodioxins (PCDDs), are produced by the incineration of chlorine-containing organic substances (e.g. PVC). Dioxins are highly toxic pollutants that will be present in both the gaseous emissions from the incinerator and the fly ash produced. Once dioxins have entered the body, they endure a long time because of their chemical stability and their ability to be absorbed by fat tissue, where they are then stored in the body.

Short-term exposure to high levels of dioxins may result in skin lesions, such as chloracne, and altered liver function. Long-term exposure is linked to impairment of the immune system, the developing nervous system, the endocrine system and reproductive functions33.

The researched evidence for AmeyCespa’s comparative safety claims regarding dioxin emissions from incineration are woefully inadequate.

32 Justin McCracken, Chief Executive Health Protection Agency in letter to Mr Michael Ryan 8.06.09.
NYCC chief executive, Richard Flinton’s claim that the level of dioxin emissions is equivalent to that produced by a 7 mile stretch of the adjacent A1 gives no indication of how this comparison was calculated. If it was calculated based on PM10 particles then it is misleading in not including the more intrusive nanoparticles.

Additionally the levels of dioxins produced by vehicles varies enormously dependant on the fuel type. Lead-free petrol engines produce one third of the dioxins of leaded petrol, while diesel engines produce one tenth - which engine type was used to justify this claim?

Dioxin is considered to be one of the most dangerous compounds that pollute our environment. The Seveso disaster, in Italy in 1976, exposed the population, livestock and surface soil of the region to levels of dioxins that were still causing adverse health effects more than five years later. More than 500 people were found to suffer from skin lesions or chloracne and over 80,000 animals were destroyed.

Even apart from incidents on the scale of Seveso, excessive levels of dioxins continue to be accidentally released into the environment from incinerator plants. Covanta Energy, the operator of waste-to-energy plants in the US and UK, is being sued, for the second time in three years, by the Connecticut State Attorney General for emitting excessive levels of dioxins at one of its waste-to-energy plants.

Despite the safety assurances given by AmeyCespa we cannot guarantee that dioxin emission levels currently deemed acceptable will not be exceeded nor can we be certain that those levels will not, in future, be recognised as dangerously high.

Due to the omnipresence of dioxins, all people have background exposure, which is not expected to affect human health. However, due to their highly toxic potential, efforts to prevent or reduce human exposure are best taken via source-directed measures, such as strict control of industrial processes, to reduce formation of dioxins as much as possible.

As long as chlorinated plastics, such as PVC, are present in the waste stream and are disposed of through incineration, dioxins are going to be generated and will pose a threat to public health. The Friends of Allerton Castle and North Yorkshire ask Councillors to search their conscience. Is this what you were elected into office to achieve?

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34 Northern Echo. 29.06.10.
4.7 Toxic Impact on the Food Chain

Protecting the safety of our food supply is critical and is threatened by this incinerator. The massive chimney at Allerton Park would spread pollution for up to 50 miles into the surrounding countryside. From here it would not only directly effect local residents but would enter the food chain through grazing livestock.

To date there has been no assessment made of the potential impact of this pollution on the food chain but it is dangerous and irresponsible to presume a zero risk without any data to support this. Approximately 80% of the total dioxin exposure in the human general population is via fats in fish, meat, eggs, milk and dairy products. A high level of local environmental contamination, for example from a local waste incinerator, will contribute to this contamination.

In the environment, dioxins tend to accumulate in the food chain. The higher in the animal food chain one goes, the higher the concentration of dioxins and humans are at the top of this chain. The risk to health comes from eating food with high levels of dioxins over a long period as they accumulate in the body fat.

The only way to expel these poisons is during pregnancy. Dioxins move from the mother’s fat into the foetus where, what may have been a harmless concentration in the mother, becomes a danger to hormone regulation and foetal development.

4.8 Fly Ash

There are two kinds of ash generated by an incinerator: the incinerator bottom ash (IBA) which falls through the grate system in the furnace (about 90% of the ash), and the fly ash, or pulverised fuel ash (PFA), which is the very fine material collected in the boilers, the heat exchangers and the air pollution control devices.

When air pollution control equipment does function, it removes pollutants from the air and concentrates them in the fly ash, creating a hazardous waste stream that needs further treatment.

Fly ash can contain sufficient dioxins and metals to require it to be treated as an integrated pollution control (IPC) regime and a hundred times more dioxin may leave the facility on the fly ash, than from the air emissions.

The Allerton Waste Recovery Park Scoping Report from July this year makes no mention of how this hazardous waste will be dealt with. Common practices are for the ash to be used as an admixture to concrete and asphalt or disposed through landfill, often as a capping layer where it is most exposed to leaching into the environment.

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36 European Commission Directorate General - Fact Sheet on dioxin in feed and food, 20.07.01.
37 Integrated Pollution Control (IPC) is a system established, under Part I of the Environmental Protection Act 1990 to control pollution from industry. It applies to the most potentially polluting or technologically complex processes in England and Wales and is enforced by the Environment Agency.
If the fly ash is treated as hazardous waste, as it should due to its lime content and the concentrations of heavy metals, it will be disposed of in special waste landfills and incur a far lower landfill tax of only £2.50 per tonne (compared to £48/tonne for general waste). In some other countries stabilisation of the fly ash is managed through either cementation or vitrification.

At the Allington Quarry Waste Management Facility (Kent), a similar incinerator in operation since 2008, residual ash accounts for 25% by weight of the waste burnt. On NYCC’s predictions of 280,000 tonnes being processed at Allerton Park by 2039 this would result in the facility generating 70,000 tonnes of ash per year. AmeyCespa claims this ash will be used as aggregate in road construction, enough for 140 miles of road per year\(^{38}\). No doubt AmeyCespa, and not NYCC, will make a good profit from selling this hazardous waste.

However, if all 65 proposed incinerators in the UK produce a similar volume of ash they would be chasing a limited market which could drive the price down and cause a higher proportion to go to landfill.

The aggregate solution for disposing of this ash also completely ignores the hazardous nature of the material and its potential for releasing pollutants into the environment during construction, demolition, and under ordinary wear and tear.

5.0 DAMAGE TO THE LOCAL HERITAGE AND ENVIRONMENT

5.1 Allerton Castle and its Environs

AmeyCespa gives the impression from their literature that the proposed Allerton Waste Recovery Park will be a modern ‘state of the art recycling’ plant.

The reality is that the vast bulk of waste will be incinerated which will produce a white, potentially toxic cloud plume that will travel in a 20 miles radius and, depending on wind speed, could cover up to 50 miles before it falls to the ground.

The Friends of Allerton Castle and North Yorkshire believe that Councillors are not only putting the population of North Yorkshire but also themselves at major risk from toxic ash.

The proposed development will have an unacceptable impact on the character and setting of local landmarks.

Burning the waste will also produce acid gases, carbon dioxide and toxic chemicals which create acid rain, ozone depletion and air pollution causing fabric damage to the adjacent Allerton Castle, various Grade I, II and II* buildings in the nearby villages of Marton, Arkendale and Coneythorpe and to other historic buildings in the North Yorkshire area.

Allerton Park consists of a number of significant heritage assets including Allerton Castle (listed at Grade I), Allerton Chapel (Grade II*) and The Temple of Victory (Grade II*). It is a registered Grade II park and garden and also contains a number of additional built elements such as the Ice House, Rustic Bridge and Lady’s Cave.

The Castle is a unique building, being the only Tudor-Gothic design of its kind in the UK, and is an irreplaceable part of the county’s heritage. The Castle, Temple and Church were all designed to be prominent features on the landscape and the incinerator building and 76 metre high chimney will have a significant detrimental impact on the viewing corridors to and from these buildings.

English Heritage, in its scoping report, advised that, without confirmation of mitigation proposals, “the proposed facility will have an adverse impact on the setting of the historic assets affecting their significance and special interest”.

At 38 metres high (the equivalent of a 13 storey block of flats) the massing and dominance of the main facility building will certainly make it a “landmark feature” as AmeyCespa have designed it to be but a feature completely lacking any architectural, aesthetic or cultural resonance.

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39 Pre-application advice letter from Neil Redfern, Team Leader English Heritage to Bill Jarvis, AmeyCespa.
5.2 Visual Impact of the Incinerator

The chimney itself will be up to 81 metres high (a height yet to be finalised in conjunction with the Environment Agency) which would make it tower more than 20 metres above York Minster and, together with the main building, it will dwarf its more immediate neighbours.

At night the chimney will also be lit with garish red lights as a warning to aircraft. There are active RAF stations in the area (at Church Fenton, Leeming, Linton-on-Ouse, Staxton Wold and Dishforth) known for low-flying aircraft. The chimney would be an added risk to these as well as for domestic flights from small local airfields, such as Tockwith, and for the gliders that come off Sutton Bank.

The photomontages that AmeyCespa have provided to demonstrate the visual impact of the incinerator and its chimney are deliberately misleading and fail to show that the site will come up to the boundaries of a number of existing houses. Not only do these images show the facility obscured by thick foliage, which would only be evident for part of the year, but they do not include the plume of smoke that would mark its location so forcefully.

Alternative images are included in the appendix in order to redress this imbalance.

5.3 Discouraging Tourism

Tourism in North Yorkshire is worth over £6 billion per year but little consideration seems to have been given to planting this eyesore on the gateway to some of the regions tourist gems such as Fountains Abbey (a World Heritage site) and the historic market towns of Ripon, Thirsk, Knaresborough, Boroughbridge and Wetherby.

The owners of the Flaxby County Resort on the opposite side of the A1 have already expressed their concern over the incinerator’s impact on their £100 million development plans and warned that locating this huge plant in such a sensitive area is likely to impinge detrimentally on the region’s tourism industry.

5.4 Risk to Wildlife

Two Sites of Importance for Nature Conservation (SINC) are located within 1km of Allerton Park including an area of ancient woodland, Shepherd’s Wood, lying to the east of the site.

Despite best intentions, there is also always the risk of environmental damage from leakage or accidents at the plant itself. The environmental damage caused by the disastrous fire at Tockwith in August this year has still not been remediated and toxic waste continues to leak into the watercourse.
5.5 Traffic Impact

To sustain the site there will be a significant increase in vehicles carrying waste to the facility and carrying sorted recyclables, compost from the Anaerobic Digester (AD) and residual ash from the incinerator away for disposal.

“We expect, once operational, lorry movements would be very similar to those currently taking place at the site for quarry and landfill operations.” - AmeyCespa

AmeyCespa have not yet confirmed the road access requirements for this facility, nor has there been a detailed noise and vibration assessment, either in the immediate vicinity or of the wider road network. As part of the planning application the predicted vehicle numbers arising from the development proposals will be reviewed and a Transport Assessment undertaken so any comparisons made with existing operations at the quarry site are totally without foundation.

NYCC/CYC estimates that 120 vehicle movements will be made per day however it is worth noting that operations at the facility are likely to be run 7 days a week, with the incinerator running day and night. The quarry is currently only open 5½ days so the traffic impact of these proposals on the local area will be unalleviated at weekends or on public holidays.

Centralising the waste disposal for the whole of North Yorkshire and the City of York at Allerton Park will also increase HGV traffic across the county, contributing towards environmental costs, such as localised air and noise pollution, road accidents and a growing cost burden for the wear and tear on our transport infrastructure.

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40 http://www.allerton-waste-recovery-park.co.uk/faq.aspx
6.0 ALTERNATIVE OPTIONS

6.1 Better Recycling

Incinerators, by the nature of their operation, remove any incentive to adopt better systems of recycling. Neither is overall reduction of waste encouraged or enabled by guaranteeing a significant and constant level of waste supply over the next 25 years in order to satisfy a commercial contract with AmeyCespa.

This proposal for an incinerator is also in conflict with published aim of the Joint Municipal Waste Management Strategy to “reduce the amount of waste produced in York and North Yorkshire”42.

To live up to its stated ambitions, NYCC/CYC must develop solutions which are environmentally, economically and socially sustainable and in particular realise the value of waste as a natural resource. We should not be improving techniques to burn waste but finding better ways to avoid making it.

More energy can be saved by reusing and recycling than can be generated by burning and recycling mitigates some of the huge energy costs involved in manufacturing and fabrication rather than having to start from scratch.

The Environment Agency concedes that it may be appropriate for local authorities to include energy from waste in their strategies and plans but stipulates that this should not undermine preventing or minimising waste, re-use, recycling or composting43.

If NYCC/CYC implemented a sound, comprehensive waste management system, prevention and minimisation would be given priority over recycling, and recycling systems would be developed with the aim of zero waste in mind. Waste materials could be segregated at source as much as possible, to improve the quality of materials for reuse and recycling (including organics for composting), and also to reduce energy used in collection and transportation.

Landfill and incineration would be at the very bottom of this hierarchy but as AmeyCespa is paid for the amount of waste it disposes of there is no incentive for the company to adopt these principles. Rather than enable this inflexible approach, perhaps the Councils should apply a “polluter pays” principle, where fixed penalties are imposed for the amount of waste that is not recycled, in order to discourage incineration.

European and UK policy changes and cultural momentum are moving towards better and more recycling meaning that an incinerator which is unnecessary at the time of its construction will become an albatross within a few years. The Friends of Allerton Castle and North Yorkshire ask Councillors to reconsider in the light of this new policy changes.

43 The Environment Agency - Energy from Waste position statement.
6.2 Existing Solutions

Disposing of municipal waste through incineration is hazardous, outdated and inflexible. Better recycling and the zero waste option is the ideal scenario but even should a lesser level of incineration be deemed necessary there are far better options than the plant currently on offer.

There is already excess capacity within the overall regional waste management system. Seamer Carr mechanical treatment facility now imports waste from Lincolnshire and the anaerobic digestion plant at Selby is able to take more waste for composting.

Incinerators are already in operation in Sheffield and Kirklees with further large incinerators planned for Leeds (Ferrybridge), Bradford, Barnsley, and Doncaster.

If these facilities get the go-ahead there could potentially be market saturation in the region with none of them able to be entirely supported by their own catchment area.

The Haverton Hill incinerator in the North East near Middlesborough also has the underused capacity to handle the waste volumes predicted for Allerton Park. The Potter Group has confirmed that, using dedicated rail containers, it could transport non-hazardous household waste from its rail terminal at Selby, and other secondary terminals throughout North Yorkshire, to Haverton Hill or other waste burning facilities adjoining the county.

For the waste that cannot be disposed of except through incineration there are more financially and environmentally sensible options than building a new facility at Allerton Park, solutions that put no burden on the taxpayers and free up £65 million of PFI money that could be saved or invested elsewhere by NYCC or the Government. The Friends of Allerton Castle and North Yorkshire calls upon the Councillors to reconsider the public purse, in the interests of the Country.

6.3 A Better Choice

The decision by NYCC to determine the biggest ever single county investment, totalling nearly a billion pounds, later this year is based on woefully inadequate medical research and also highly questionable environmental facts. Pending the outcome of a new waste management report commissioned by Defra, which will be published next spring, the councils should not gamble with the £65 million PFI credits allocated, nor should central government allocate this grant in the light of a possible new nationwide policy on waste management.
Whilst this report does not question the integrity of any of the County Councillors who we believe are all trying to act in good faith, we do believe that the Councillors are unaware of the serious health, environmental and financial risks associated with the Allerton Park project.

It is highly likely on the evidence collated in this report that a generation of North Yorkshire citizens will be inflicted with a financial burden and poor health as a consequence of proceeding ahead with building an incinerator in this county.

In addition, little practical work seems to have been done at the site to check for wind directions and, given the persistent wind changes and often high speeds associated with the Allerton Park area, hazardous emissions are likely to blight much of North Yorkshire from just below Catterick to the borders with Leeds and from York to Bolton Abbey, leading to increased health risks and potential (Tort) Class Actions by groups of affected citizens against the County Council and individual County Councillors who voted for Allerton Park.

The financial costs of the NYCC incinerator programme is still not proven and depends on electricity generating subsidies, an assumed increase in landfill taxes and the recycling rates in NYCC not increasing at the same level as other comparable areas.

As this report demonstrates, most of the figures are open to question and building the incinerator on the data that is available, is like building a house on sand, the only certainty that can be concluded is that it will fail.

As this report also clearly demonstrates, the UK will shortly have an overcapacity of rubbish incinerators all of which need to be kept burning 24/7, which will act as a disincentive to introducing further recycling both here in North Yorkshire and elsewhere. As a minimum it is likely that questionable (risky) trade waste will also be burnt (which the proposed AmeyCespa contract permits) just to keep the incinerator operational, presenting yet more health risks.

Building yet a further incinerator in the midst of rural North Yorkshire, next door to a Grade 1 listed building, when there is ample capacity to process waste from North Yorkshire in at least two of the adjacent Counties, will be the biggest mistake ever made by County Councillors and is likely to cost the existing ruling group control of the Council.

This report therefore urges County Councillors to reconsider the decision to proceed ahead in December with the Allerton Park site or any other sites in North Yorkshire. Instead we urge NYCC to look at the alternatives, such as the transport of waste by environmentally friendly rail for processing at existing recycling facilities adjoining North Yorkshire.
The veil of silence from County Councillors considering the alternatives does neither their case nor that of NYCC any good and adds to the feeling that the current public consultation process is simply a token exercise and that the Allerton Park Waste recycling facility is a done deal.

This report therefore urges all of the County Councillors to take into account public opinion, which has been vocally consistently opposed to the building of an incinerator in North Yorkshire, since the idea was first floated some years ago.

In the interests of North Yorkshire, The Friends of Allerton Castle and North Yorkshire call upon North Yorkshire and York City Councillors to:

- Immediately ditch the idea of any incinerator within the North Yorkshire County
- Examine the alternative existing facilities adjoining North Yorkshire
- Consider carefully the 2011 report from Defra before making any financial investments
- Not impose on the inhabitants of North Yorkshire a financial burden for unproven technology that will blight a generation with the financial repayments and also poor health.
9.0 APPENDIX I - EPIDEMIOLOGICAL STUDIES

Environmental Risks, Ch 6 of Annual Report 2006 —French Institute for Public Health Surveillance: Example of municipal solid waste incinerators

The French Institute for Public Health Surveillance analyzed the relation between cancer risk and past exposure to MSW Incinerators (MSWI) for the populations living near them. Dioxin emissions from a solid waste incinerator and risk of non-Hodgkins lymphoma showed an excess risk of non-Hodgkins lymphoma in the cantons (rural administrative subdivisions) exposed to emissions from the local incinerator. This was the rationale for further study of exposure through incinerator dust and gases to dioxins and of the long-term effect of low doses on local residents, especially as previous (French) studies had been inconclusive. The authors recognised that other pollutants emitted by incinerators might also be involved, including heavy metals, PAHs (polycyclic aromatic hydrocarbons), and dust.


The British Society for Ecological Medicine BSEM cites numerous studies into the health effect of particulates which come from a range of sources from around the world. They show that fine particulates have been associated with both respiratory and cardiovascular disease and with lung cancer. They BSEM also report studies that show that ultrafine particles:

- Have a more marked effect on cardiovascular mortality than fine particulates, with a time lag of 4-5 days. Stroke mortality has been positively associated with current and previous day levels of ultrafine particulates and this has occurred in an area of low pollution suggesting there may be no threshold for this effect.

- Are more potent than other particulates on a per mass basis in inducing oxidative stress in cells and they have the ability to cross the blood-brain barrier and lodge in brain tissue.

These results led BSEM to conclude that ultrafine particles represent another largely unknown and unexplored danger of incineration.

BSEM cite studies in Japan that showed a higher incidence of asthma with increasing NO\(_2\) levels and that it synergistically increases lung cancer mortality rates and other studies that report it aids the spread of tumours.


Knox found results for childhood cancers around municipal incinerators which were similar to those found earlier for adult cancers and also around hospital incinerators and other large combustion sources.

Ohta S, Kuriyama S, Nakao et al. Levels of PCDDs, PCDFs and non-ortho coplanar PCBs in soil collected from high cancer-causing area close to batch-type municipal solid waste incinerator in Japan. Organohalogen Compounds 1997; 32: 155-60.


Zambon P, Ricci P, Bovo E et al. Sarcoma risk and dioxin emissions from incinerators and industrial plants: a population-based case-control study (Italy). Environ Health 2007; 6

The following images are taken from the AmeyCespa documents submitted to NYCC Planning Department as part of the Scoping Information Request NYCC/NY/2010/0314/SCO.

Initial 3D representation - aerial view

Site section looking West
Initial 3D representation

Site section looking South
Initial 3D representation

Site section looking East
9.0 APPENDIX III - CORRECTED PHOTOMONTAGES

The following images include a representation of the smoke issuing from the chimney at Allerton Park. For illustrative purposes the smoke is shown darker than may be during actual operation of the incinerator.

View from Clareton Lane, Coneythorpe

View from The Granary, Wall’s Close House
View from Lidget Lane, Coneythorpe

View from Wall's Close House
View from Allerton Castle, ground floor

View from A59 lay by, West of A1(M)
10.0 APPENDIX III - COUNCILLORS’ CONTACT DETAILS

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### 11.0 APPENDIX V - GLOSSARY

<table>
<thead>
<tr>
<th>Acronym</th>
<th>Description</th>
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<tbody>
<tr>
<td>NYCC</td>
<td>North Yorks County Council</td>
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<tr>
<td>CYC</td>
<td>City of York Council</td>
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<tr>
<td>YNYWP</td>
<td>York and North Yorkshire Waste Partnership</td>
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<td>JMWMS</td>
<td>Joint Municipal Waste Management Strategy</td>
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<tr>
<td>WRAP</td>
<td>Waste &amp; Resources Action Programme</td>
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<tr>
<td>MSW</td>
<td>Municipal Solid Waste</td>
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<tr>
<td>C&amp;I</td>
<td>Commercial and Industrial (waste)</td>
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<tr>
<td>IBA</td>
<td>Incinerator Bottom Ash</td>
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<tr>
<td>PFA</td>
<td>Pulverised Fuel Ash</td>
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<tr>
<td>MBY</td>
<td>Mechanical biological treatments</td>
</tr>
<tr>
<td>MBT</td>
<td>Mechanical Biological Treatment</td>
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<tr>
<td>LATS</td>
<td>Landfill Allowance Trading Scheme</td>
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<tr>
<td>EfW</td>
<td>Energy from Waste</td>
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