

Aire Valley Incinerator Project

Report to Shipley Constituency Labour Party February 2017

This report has been put together by a working group who were asked by Shipley Constituency Labour Party to investigate the building of a waste incinerator south of Keighley. Although the incinerator would be north of our constituency there is a potential impact on our community.

The working group was made up of interested volunteers and project was built on a few “tea and biscuits” project meetings and individual research. The key areas we investigated are detailed further on in the report. The primary aim is to provide other Labour Party members with some information on a project which is not well explained by the developers or the council. We have given a recommendation but recognize we collected the data as amateurs and would welcome any professional views available.

Resources used included:

- Trade Union officials
- District and Town Councillors
- Local community members
- Ex-energy engineers
- Town council public meetings
- Companies House Resources
- Bradford Council Planning Permission website
- Waste industry journals and blogs

Outcome

The working group investigated the incinerator with a positive mindset and discovered on the following positive points:-

- Energy for Waste (EFW) is becoming an accepted and safe method for disposal of non-recyclable domestic waste
- EFW significantly reduces the financial pressure on hard pressed councils. Councils still have the responsibility for our waste, whether we would hope for more recycling, and we cannot close our minds to the financial burden on the council
- There would be the creation of 61 good quality engineering jobs. These are permanent, full time, well paid jobs

However, in this case we cannot support the Keighley Clean Energy Project:

- The operator, Endless Energy, is not an experienced plant operator. It is well understood that EFW plants must be run well to minimize pollution.
- The EFW plant is for commercial waste for which the council has no responsibility so there is no financial benefit to the community (other than jobs).
- RDF is not controlled for chlorine – there is significantly higher opportunity for pollution than with a normal EFW facility.

Background Detail

Facility

- Keighley Clean Energy Project proposed by Endless Energy Ltd
- Endless Energy Ltd are nominally an electricians in Chester. Further investigation suggest it may be a shell company. It is not a waste or power company and has no experience running a facility of this size. There may be the naïve belief that all they have to do is round up an experienced team of engineers and they can run it. Anyone who has worked on energy or chemical plants knows this never works. Additionally EfW plants are going up all over the country so there is a massive shortage of experienced plant managers. After six months of investigation we still cannot see how they think they will run this plant safely.
- Keighley Clean Energy Ltd existed until September 2016. This was the company which initiated the planning process. It was owned by the local domestic property developer, Halton Group. They have an anecdotal reputation for aggressive planning applications. This project is way outside their experience and seems a very odd fit with their current portfolio. It's also not clear why they dissolved the company before it is built.
- Sited next to the gasworks on the A650 just south of Keighley. The site needs significant remediation. It is heavily contaminated and will be expensive to make safe. It could not be used for normal domestic development without prohibitive investment
- Built to process commercial and industrial sources of non-recyclable general waste and non-recyclable plastic waste.
- RDF (Refuse Derived Fuel) plant (Polymer processing plant)
 - Converting non recyclable plastics to liquid fuel for replacement of coal in power stations. The likely destination is Ferrybridge.
 - 30kmt waste processed to make 28m litres
 - Source of waste plastic – “Bradford Area” not otherwise specified
- EfW (Energy from Waste) plant (Incinerator)
 - 90kmt mixed non-recyclable waste from commercial and industrial sources diverted from landfill
- 80 megawatt output to the National Grid
 - Moving grate technology – similar technology used in SITA EFW plant in Calderdale.
 - Not a CHP (combined heat and power plant) which is an issue for the Environment Agency permit. The planning application is based on it being CHP ready and the “heat” element to be used in the new office block.
- Visitor Centre
- Office Building
 - This looks like a separate commercial venture to the EfW plant. It has caused problems on the application and it isn't clear when it will be built or what it will actually be used for. There are several references to the operating company moving their head office into the building. There are also references to it being a data storage facility. All very unclear and no guarantee of new jobs.
 - CNIM, a French engineering company, will provide the plant
 - Clugston Construction will build the plant

Employment

2016-2019 Construction Phase

- **300 jobs**
- Unite have had problems on construction of the Wilton facility. It's the same contractor (Clugston) who will be used for the Keighley Clean Energy plant. However the Union have identified this on the Keighley site and have a better agreement. Problems they will look to control are :-
 - Below average wages
 - High levels of agency labour
 - Migrants workers used preferentially
 - Apprenticeship agreements not being honoured

2019 Operational Phase

- **61** permanent operations and maintenance technicians (3 x 17 shifts)
- Salaries being offered for operations and maintenance technicians in similar facilities across Northern England are at £30k- £40k
 - However, jobs are being offered nationally so it may not all be locals
 - 3-8 management and admin positions
 - 5 workers in the Visitors centre – very likely to be zero hour contracts
 - Office building/Data Storage facility has been built for 99 personnel max. This isn't a business yet and it is being advertised as "Capital investment required". It may not happen.

Public Concerns

- **Pollution (Cancer risk, The Keighley Cough, impact on local habitats)**
 - NOx
 - Key pollutant from transport etc and the cause of the yellow smog line
 - Key measure of the plant for the Environment Agency Permit
 - Plant designed to have lower NOx emissions than other similar plants so even the spikes of inefficient production are below the EA guidelines
 - In practice power plants of all descriptions go over the EA limits regularly – the design parameters may help but are unlikely to be reflected in practice
 - Geology of the valley. There are many sources pointing to the valley "collecting pollution" and it "capping" above. This doesn't seem to be covered in any of the planning submissions.
 - Increasing sources of NOx is against Bradford Council's own pollution abatement plan.
 - The local community is already concerned about the high number of chest problems in the area – the Keighley Cough.
 - Carbon dioxide
 - The plant will generate the same amount of this greenhouse gas as a coal fired power station.
 - The gas generated is considered "better" weight for weight than normal fossil fuels:-
 - The fuel has been used first before burning for energy
 - It reduces our dependence on fossil fuels
 - The plant can therefore be used for offsetting which is likely to be a significant commercial stream for Halton.
 - Carbon monoxide
 - Deadly gas but will not be in high enough proportions at any time to cause death or injury and it has no long term effects
 - Dioxins/Furans
 - The major cancer scare of incinerators
 - Dioxin release is measured continually. This doesn't mean they won't be released into the environment if the scrubbers aren't well maintained and any sanctions from the EA will be after the fact.
 - Recent studies of the Seveso site indicate the concerns over dioxins from the 1960s are possibly unfounded. Seveso was the Italian chemical plant disaster (spewing tonnes of dioxins into the local area) which brought about the EU Seveso Directive – control of hazardous chemicals. 30 years of analysis of humans and habitat have shown no increase in cancers or mutations. Dioxins are carcinogenic but we may have misunderstood the mechanism, route or impact levels. This is an ongoing study so still at the causation vs correlation stage.
 - Chlorine
 - There is still limited regulation and control over chlorine levels in RDF waste streams so it isn't clear what limits the EA can, legally, put on the plant.
 - RDF will be burnt in cement plants so this chlorine will be released into the

environment. Given this goes back into the dioxin argument

- The planning documents suggest there will be no emissions at all from the RDF plant – the EA has already stated this will be studied in depth before the permit is given.
- o Mercury
 - Lethal (Mad Hatters disease) and cumulative (all the mercury you consume in life stays with you. So the longer you live the more mercury there will be inside you to damage your central nervous system).
 - There is still limited regulation on the mercury levels in RDF. There is very little to no reference to expected mercury levels in the waste stream and no reference to how it will be disposed of or managed.
 - Mercury does have a commercial resale value and it is a focus for the EA.
- **Traffic**
 - o 58 HGVs per day, 6 days per week
 - o >70% through Saltaire
 - o 3% increase on current HGV traffic by 2019
 - o Further 2% increase by 2024
- **Visual Amenity**
 - o Local residents
 - Obviously very upsetting for the residents overlooking the site. The original planning application was for retail space and there is a plan to remove the gas works so their environment may have been improved. It may also have been worse – having a big retail shed outside would not be better. The main argument of the developer is that this is an industrial space and has been for a 100 years. However there appears to have been a lack of public consultation with local residents so there hasn't been significant accommodation of their needs (noise abatement measures, sensitive planting etc).
 - o East Riddlesden Hall
 - National Trust and English Heritage have both objected strongly to the siting of the plant across the road from the Hall. The developers have committed to planting more trees on the estate but the plant will still be visible during the winter. The plume will be visible on all cool days.
- **Noise**
 - o The plant itself will not be noisy but the HGVs will be. There are no plans for night collections or deliveries so the majority of the noise impact will be on residents at home during the day.
 - o The developer is putting in 3.5m abatement fencing. This doesn't help residents whose houses are on higher ground.
- **Flooding**
 - o The focus on waterways has been on outfall from the plant into the local rivers.
 - o We haven't found any data on whether the increase in concrete foot print of this site will cause more flooding problems for Bingley and Saltaire.
 - o The plant itself is raised above the flood line so there is no risk of it flooding regularly (and subsequent pollution downstream).
- **Impact on recycling**
 - o The concern is that the plant will be contractually obliged to run hot at all times so will need to pull recyclable waste at times to maintain the correct calorific value of the waste stream. This is a big issue in an EfW plant being commissioned in Cardiff currently. Recycling rates have plummeted. However that is a domestic facility so in a different supply chain – it doesn't look as if domestic waste can be funneled into this plant.
 - o The advantage of this plant having an RDF plant means it can use its own RDF to add to low calorific waste for the EfW plant so, theoretically, it is less likely to pull recyclable waste
 - o However in comparable industrial waste supply chains this is a real concern. Plants do pull recyclable material from the supply chain to run efficiently.

- **International Waste Source**

- Internationally sourced waste travelling huge distance to the plant
 - The UK is a net exporter of waste because we have to meet the EU requirement to limit use of landfill and we have very few EfW plants. We export to the Netherlands and China, in particular. The EU as a group is also a net exporter – mainly to China. There has been a change in China’s waste policy so more low grade waste must now be processed in Europe. This won’t be imported to the UK. France and Benelux have many more EfW plants than the UK (The waste would be driven past plants to get to us. This will cost money so it won’t happen)
- Nationally sourced waste travelling through our communities
 - This is more of a concern since this plant is only for commercial and industrial waste. The Aire Valley is an industrial cluster but we can’t find any evidence that all of the waste (particularly the plastics for the RDF plant) can be sourced within 20 miles at all times.
 - This doesn’t change the 58 extra HGVs a day but it means they are travelling longer distances. This added pollution impact hasn’t been included anywhere in the application

Political

- This plant is part of the national policy to
 - Decrease the percentage of energy derived from virgin fossil fuels
 - Decrease the use of landfill
- Therefore, it is very likely Bradford Council had absolutely no option but to approve this plant unless there was a very clear case why this was the wrong site.
- Unite are very supportive of the site development – good quality jobs in the community
- The local Conservative MP, Kris Hopkins, is supportive. Philip Davies is against. As usual.
- The Greens are campaigning hard against it on “visual amenity”, pollution and HGV impact on Saltaire.
- Bingley Town Council (Labour) are fighting against it
- Keighley Council are divided – they get the benefit of the jobs and remediation of current problem site. However their locals are up in arms.

Note: This report was received by the Shipley Constituency Labour Party Executive in February 2017, the meeting voted to accept its findings and recommend to the All Member Meeting that the CLP oppose the planning application for the Aire Valley Incinerator.