

RESIDENTS AGAINST THE CF3 INCINERATOR – DNS APPLICATION 3236340
HEARING STATEMENT SESSION 2
EFFECTS ON SENSITIVE HUMAN RECEPTOR LOCATIONS

INTRODUCTION

This document is the Residents against the CF3 Incinerator’s Hearing Statement for Session 2 – Effects on Sensitive Human Receptor Locations.

The topics of Air Quality, Visual Impact and Traffic are serious and primary concerns of the communities impacted by the applicant’s proposal.

The technical nature of the assessments carried out by the applicant’s consultants, in accordance with their processes and guidance, are not very easily understood other than by experts in these topic areas.

We are not qualified to discuss the technical nature of these assessments. However, we have raised a number of concerns about the way some of the assessments were carried out, how some of the receptors were selected and the conclusions of the assessments.

With respect to this hearing, we would like to provide the following in response to the Inspector’s Initial questions/Discussion points for this session.

1. Air Quality and Odours

Question 1

We defer to NRW on this topic, as we are not experts, but this is a significant concern to all of the communities, in the local and wider areas, impacted by the applicant’s proposal.

We recognise the Air Quality assessment has provided cumulative impact effects of other nearby facilities, which are also a source of pollution and health risk emissions.

However, what we do not find reassuring is the Air Quality assessment modelling, which recognises there is a certain level of pollutants emitted, but is calibrated to assimilate that the modelled emissions are within permitted ranges.

We are aware that Cardiff has extended periods of air pollution arising from transport and industrial emissions.

High levels of air pollution have now, sadly, shown they contributed to the death of a child. This has now established a legal precedent.

The awareness of the risks of air pollution to public health are increasingly becoming more heightened.

To us it seems that the technical assessments are not keeping up.

We question if they should be considered as fit for purpose, particularly in light of the recent legislative changes to ban certain recyclable materials from landfill and incineration.

As recycling improves, the carbon intensity of Energy from Waste is set to increase over time as the proportion of plastics in the residual waste feedstock increases, resulting in higher concentrations of pollutants and emissions.

Incineration will become more carbon-intensive and contribute to more air pollution than landfill by 2035, according to a new [report](#) by Eunomia Research and Consulting, commissioned by ClientEarth.

Question 2 & 3

No comment.

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2. Noise and Vibration.

Question 1

We have read the applicant's assessment and do not understand why there is not a straight answer to the question about whether percussive piling methods will be used or not.

If there is no answer then we are of the opinion the CEMP is deficient.

Question 2

We note Pinewood Studio are not invited to this session. We understand their operations are very sensitive to high levels of external noise and vibration.

We understand they have commented separately but, on their behalf, we request this is taken into consideration and they are asked to submit a response to this question, which might assist with determining an appropriate condition if applicable.

3. External Appearance and Visual Impact

Question 1

We recognise and appreciate the additional work carried out to provide the additional photomontages (viewpoints 9,11,14 and 19).

We find it disappointing that despite this additional work the scope does not provide an adequate assessment for the residents of St Mellons.

However, the new photomontages (viewpoints 9 and 11) do now provide evidence of the impact on the residents of Rumney, which we find unacceptable. We are of the opinion photomontage 14 is non-representative and 19 is incorrect, as discussed in our response to DOC 104.

We find nothing to alter our position on the visual impact of the proposed development.

Question 2

We observe the wind turbine and Viridor chimney have aviation warning lights. That said we have no further comments to make.

4. Traffic Effects

Questions 1

We have highlighted in our response to DOC 103, Transport Assessment, the B4239 coastal road, is increasingly being used by HGV traffic to access the industrial/business parks and waste processing sites in the local area.

We request this question is broadened out to include this route as well as residential areas.

CONCLUSION

We are not technical experts in the session's topics. Our view is the technical assessments do not consider all the effects on the sensitive human receptors impacted by the proposed development. The residents have serious concerns, which are outside the scope of any technical assessment. They do not consider their "real life" knowledge is given any weight.

We also note a disconnect between Welsh Government strategies, policies and targets and technical assessments that do not reflect or incorporate these into their models.