



HOUSE OF COMMONS

LONDON SW1A 0AA

The Rt Hon Kwasi Kwarteng MP
Secretary of State for Business, Energy
and Industrial Strategy
1 Victoria Street,
London
SW1H 0ET

Tuesday 18 May 2021

Dear *Kwasi*,

RE: Cory Energy Ltd - Riverside Optimisation Project Application

I am writing to you today on behalf of my constituents regarding the above application, details of which can be found here: <https://www.coryenergy.com/news/rop-application/>

Following a two-year battle against a second Energy from Waste facility on this site, which was unfortunately unsuccessful, I am fundamentally opposed to this new application to expand operations at the Belvedere waste incineration facility.

Whilst I appreciate that the application clearly states it does not seek to alter the physical footprint of the existing site, which is welcome, I have a number of concerns relating to the increase of waste intake and subsequent emission outputs. More specifically I want to raise my concerns about the health impacts this proposed operations expansion will have on my constituents.

The proposal seeks to increase energy generation from 'up to 72MW' to 'up to 80.5MW' which would be attained by an increase to the maximum waste throughput from 785,000tpa to 850,000tpa. The Air Quality Standards Regulations 2010 state that waste incineration plants should not exceed outputs of 200mg/Nm³ Nitrogen Oxides (NO and NO₂) over a 24hr period.

The output of the existing plant is 150mg/Nm³ with the 'Riverside Energy Park' due to emit 120mg/Nm³ on the adjacent land when completed, a project approved by the Secretary of State on 14 April 2020 despite wide public opposition. In the Environmental Impact Assessment, it states that whilst the AQSRs have been amended to reflect the UK's departure from the EU, the numerical thresholds for emissions have not been altered.

Considering that the combined output of both facilities will already exceed the legislated 200mg/Nm³ when completed, I find it difficult to believe that an increase in 65,000tpa of processed waste will not fall foul of Emission Limit Values. I fully understand that both facilities will be operating as individual EfW plants and as such are not subject to combined scrutiny. However, it is impossible to ignore the reality that even without the approval of this fresh application, the facilities located on the banks of the Thames are producing the highest concentration of EfW resultant emissions in London.

Jon Cruddas MP

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As the Member of Parliament for Dagenham and Rainham I implore you to consider this application and its health implications with great care. The boroughs that I represent already suffer from some of the poorest air quality in London, specifically emissions as a direct result of waste incineration.

A report into Energy from Waste commissioned by the GLA in May 2020 found that Barking and Dagenham and Havering have the highest mortality rate, respiratory and cardiovascular hospital admissions, and concentration of Nitrogen Dioxide in London. See figs 1-4.

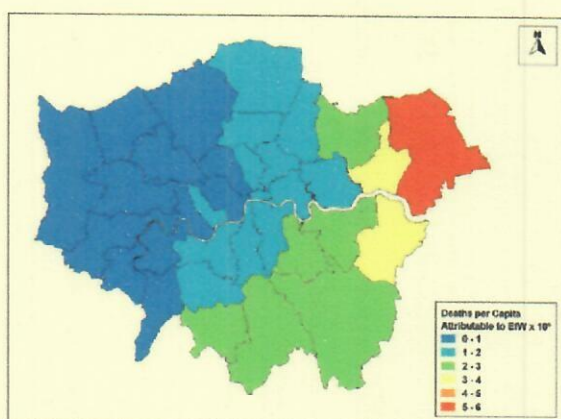


Fig.1 Annual Mortality Attributable to Air Pollution from Five EW Facilities per Capita by London Borough (deaths brought forward per year)

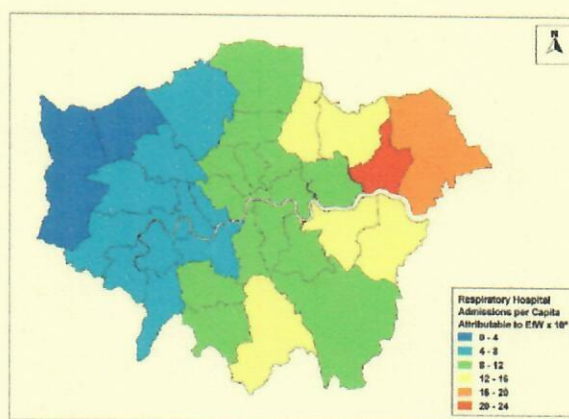


Fig.2 Annual Respiratory Hospital Admissions per Capita Attributable to PM₁₀ from Five EW Facilities by London Borough

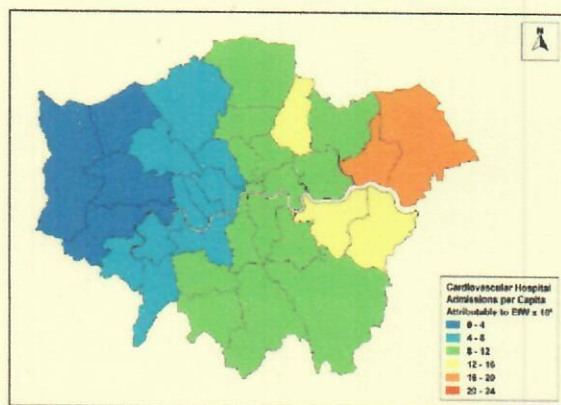


Fig.3 Annual Cardiovascular Hospital Admissions per Capita Attributable to PM₁₀ from Five EW Facilities by London Borough

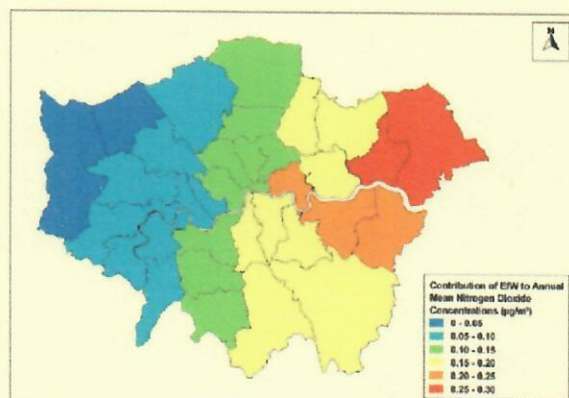


Fig.4 Contribution of Five EW Facilities to Population-Weighted Annual Mean NO₂ Concentrations in Each London Borough

Furthermore, I find it a matter of concern that Appendix B.4 of the EIA, Sections 2.1 and 2.2 quote outdated research from 2010 and 2012 into 'Energy Recovery Facilities and Health'. In light of the above research on annual health outcomes for areas in close proximity to EfW facilities, the selected quote from Public Health England which states: "*any potential damage to the health of those living close-by is likely to be very small, if detectable.*" is misleading at best and should not be used as a basis to rule out potential negative health impacts when considering this application.

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It is also a matter of concern that the EIA section on health outcomes relies heavily on the '*Ghosh et al (2018)*' study into 'foetal growth, stillbirth, infant mortality and other birth outcomes near UK municipal waste incinerators.' The study draws on data from 2003-2010 and takes account of the impact of '*MWI [Municipal Waste Incinerators] operating to the current EU waste incinerator regulations in Great Britain.*' which found no evidence for increased health risk in relation to EfW emissions.

However, as I have already explained Cory have benefitted from a loophole whereby when the Riverside Energy Park is completed, two facilities, both independently operating under regulations will be contributing to a concentration of harmful emissions well above the Emission Limit Values.

As the Member of Parliament for Dagenham and Rainham I cannot in good conscience allow this application to go unchallenged. As such I am urging the Mayor of London and the Greater London Authority (cc'd into this letter) to submit an official appeal against its approval within the timeframe, by Monday 21 June 2021, and expect that this letter be accepted as my official opposition.

I understand that as infrastructure such as transport moves to an electrified model London will require more energy to meet growing demand, but there is a wealth of evidence which cautions against the use of Energy from Waste to meet these needs.

I urge you to reject this application and would welcome a response from your department that I can relay to my constituents on this important matter.

Yours sincerely

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