

**SCRUTINY PANEL REVIEW OF WALLEY'S QUARRY LANDFILL SITE QUESTIONS TO LOCAL COMMUNITY GROUPS**

NAME **Henryk Adamczuk** REPRESENTING **Silverdale Parish Council**

1 How many people does your group represent?

**Silverdale Parish Council 5,000 residents living in 2,700 households and 100 businesses.**

2 What is the geographical area covered by your group?

**Silverdale Parish (coterminous with the Silverdale Ward Boundary).**

3 What topics would you like to speak to the Panel on?

**3.1 Red Industries' relationship with the Environment Agency in 2019 to allow the maximum tonnage to increase to 400,000 temporarily and whether this decision pre-empts the current variation application.**

**3.2 Red Industries Liaison Committee's role and applicability of additional scientific and Public Health expertise to help it work better.**

**3.3 Public Relations generally with Red Industries; 'believing' the complainants and their staff unwilling to attend public meetings.**

**3.4 Whether the Environment Agency has been complacent in the testing process: specific WHO limits for Odour and Particulates may have actually failed. The testing station was moved to a different position in February 2019 which raises questions about how WHO data was interpreted.**

**3.5 Whether the Environment Agency has been complacent in terms of Air Quality and Public Health in excluding HGV pollution from outside the site from comments in the tonnage variation consultation and how these factors must to be brought together as a public health issue locally.**

4 Are these issues better or worse at different times of the day/year or in different weather conditions?

**Yes; 2 published Air Quality Reports provided profiles for the 250,000 tonnes limit. Page 3 and 4 below are excerpts on the Hydrogen Sulphide Gas emission. We don't yet know how much addition pollution will result from the variation (as no modelling was done).**

5 Do you know how to raise issues about operations on site, and who to raise those issues with?

**Yes. I am a consultee on the Liaison Committee and hear residents' complaints.**

6 Have you raised any issues about operations on site, who with, and what was the outcome?

**Damage to the pavements and greens next to Silverdale Cemetery by HGV manoeuvres opposite the site entrance raised which is still outstanding. I questioned the interpretation of air pollution data from the air quality report and return to that in this submission. I**

recorded the Reg. Numbers of 6 HGV's parking in a line overnight in Silverdale Road near a care home then dispersing at dawn. I sent these details to the Managing Director of Red Industries and to Newcastle Police. The problem abated to some extent but HGV parking is very difficult to police and could be eliminated by a system of appointments for drivers.

7 What do you think RED Industries does well?

Red Industries has an efficient system for funding community activities. Examples are Miner's Wheel (Silverdale) and a skate area at Silverdale Park (Western Communities LAP).

Until February 2020 Walley's Quarry Liaison Committees functioned as a useful public forum for reviewing the site's management. Issues could be fed into other resident committee cycles. The Borough Council has been represented by both Planning and Environmental Health and councillors. It was important to have 'a big hitter' as Chair of the Liaison Committee. I was pleased when the current council leader took on that responsibility. Councillors also are present and Silverdale PC and Thistleberry but businesses and local residents are absent. See below.

There has been a regular presence on the Liaison Committee from the County Council.

8 What do you think the RED Industries could do better?

Public Relations. The company should re-boot the Liaison Committee using remote technology as a start to engage with its stakeholders. It should 'dip its toes' in to public meetings and listen to residents and trust their comments about pollution. It should consider how to introduce an HGV appointments system. These would be 'easy wins'.

It should engage in science by expanding the Liaison Committee into a more strategic forum. For example, assess the possibility for electronic noses for environmental odour (Laura Capelli, Licinia Dentoni, Selena Sironi and Renato Del Rosso 2014) in real time on site. It might consider HGV emission (diesel) controls by banning older, high emission vehicles travelling to the site. Those are harder goals to achieve but would make a longer term perceptual difference that the company were taking its social role further than the mere statutory level.

The tonnage application process from the onset raised uncomfortable questions about the relationship between the Environment Agency and the Company. The original application sought to increase the tonnage from 250,000 to 300,000 but a new application was made in May 2019 for an additional 100,000. The decision to boost tonnage by 60% rather than the original 20% meant some of the documentation was 'out of sync' and lead to confusion for Silverdale Parish as consultees, not knowing what figure to work on.

Then before the final outcome of the application, by giving a temporary permission to vary the tonnage to 400,000 tonnes per annum for 12 months, the Environment Agency gave the impression that matters were being discussed behind closed doors, with the company. This was communicated to the Liaison Committee on 19 November 2019.

9 What do you think the Environment Agency, the Borough Council or the County Council do well?

The Environment Agency website handled the mechanics of the Variation Application well so it was relatively easy for members of the public to comment-but there's a big caveat see 10. The Council and stakeholders have supported the Liaison Meetings. See 7.

10 What do you think the Environment Agency, the Borough Council or the County Council could do better?

The second Air Quality report contained systematic inconsistencies in analysis because the detection point was moved in mid-February 2019. This was a significant change and meant data could be interpreted differently for Hydrogen Sulphide as follows:

- (1) There were 76 occasions between 15 January 2019 and 12 February 2019 (28 days), on 12 separate days where the 30-minute mean value exceeded the WHO guide value of  $7\mu\text{g.m}^{-3}$ . (Report 2 pp14-15)
- (2) There were 67 occasions between 28 February to 25 June, on 26 separate days, where a 30-minute mean value exceeded the WHO guide level of  $7\mu\text{g.m}^{-3}$ . (Report 2 pp12-13)
- (3) (MY POINT) *Therefore there were 143 occasions between 15 January and 25 June 2019 where a 30-minute mean value exceeded the WHO guide level of  $7\mu\text{g.m}^{-3}$ . As there were no records between 13 and 27 February, the estimate where a 30-minute mean value exceeded the WHO guide level of  $7\mu\text{g.m}^{-3}$  including the missing data is...(a higher value)*

The change in the position of the direction point meant that the extrapolation of other findings relied on a specific interpretation and a choice in the data sequence. This interpretation may have worked for the benefit of the company.

The complaint system is not fit for purpose. Documentation and monitoring is very patchy. The timely reporting of the complaint and pinpointing the location are crucial. That system needs to function for the user including regular monitoring of complaints. Residents should be believed if they reported bad odours. My preference would be to change it for a system like Staffs County Council for reporting road defects; smartphone and website app with map info and automatic analysis.

The expertise of the Environment Agency is subject to considerable pressure round the country so their role on the Liaison Committee is crucial. The decision making has been obscure over the temporary variation. Health effects are an issue on the local population from diesel emissions during the transportation prior to delivery to the landfill. Standard Cost Benefit Analysis demonstrates this principle for public and private costs and benefits.

The Borough Council should not be complacent as the 2 Air Quality Reports ignored issues about vulnerable populations living close to the landfill, and Public Health England is the body that publishes health statistics down to Ward level. So medical expertise needs to be brought in to gauge the effects of the landfill operation on the populations of Cross Heath, Knutton, Silverdale and Thistlebery. Data from the last Census and subsequent PHE figures indicate deprivation and lower scores on health in some wards (cross Heath, Knutton and Silverdale) but more should be done to analyse health deficits because boundaries have changed; something for the Borough Council to implement with its partners.

**It intensely frustrating that analysis of health data at wards level near to the landfill are difficult to find, following from the decision to change the ward boundaries in Newcastle under Lyme. This raises the Health Inequalities angle on the landfill and experience with Covid19 is relevant in the importance of health monitoring at ward and smaller levels.**

**The policy of Staffordshire County Council should be clearly defined in its landfill responsibility.**

11 The Panel has been asked to specifically consider your thoughts on the proposal to increase the amount of waste that RED Industries is allowed to import to the site from 250,000 per year to 400,000 tonnes per year up until 2024. RED Industries made an application to the Environment Agency (EA) in 2019 to allow this increase under their Environmental Permit. The EA consulted on this application and more information is available here:-

<https://consult.environment-agency.gov.uk/psc/st5-6dh-red-industries-limited/>

10 Whilst the importation limits are a matter for the Environment Agency, please let us know if your answers to any of the questions above would be different under the varied Environmental Permit.

**If the regulator approves the Company variation request, NBC should commissioned a long term scientific study of air pollution from the landfill and impacts on the health conditions of the local population. Additional scientific members in the Liaison Group could support this initiative which would consider whether WHO Levels of emissions are safe in the context of a facility so close to large populations, including several primary schools and recreation grounds (such as Orme Road) and the special weather and topography applicable. An opportunity therefore arises to influence new Environmental Air Quality and Landfill legislation post Brexit.**

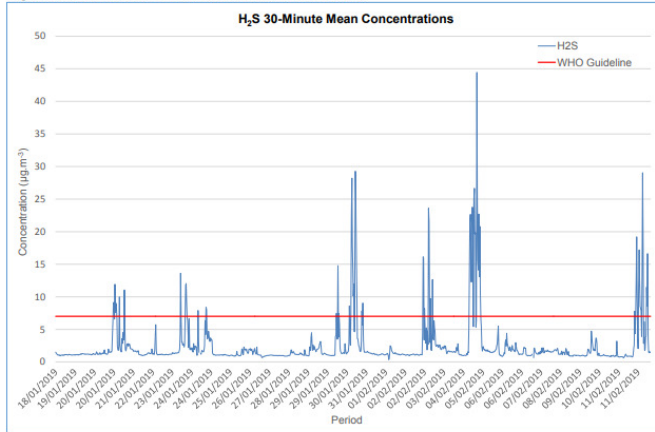
### **Two Excerpts from the 2019 Air Quality Report pp14 –15 and pp12-13**

A time series plot of 30-minute mean H<sub>2</sub>S concentrations measured between 15 January 2019 and 12 February 2019 (28 days) is shown in Figure 3.2.5. The highest recorded 30-minute mean between 15 January 2019 and 12 February 2019 (28 days) was 44.5µg.m<sup>-3</sup> .

There were 76 occasions during this short monitoring period, on 12 separate days where the 30-minute mean value exceeded the WHO guide value of 7µg.m<sup>-3</sup> .

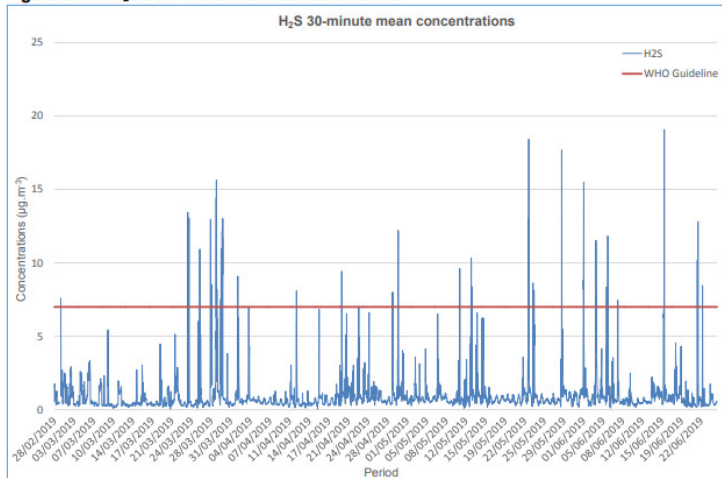
Study of Ambient Air Quality at Silverdale  
15 January 2019 – 25 June 19

Figure 3.2.5: H<sub>2</sub>S 30-minute mean concentrations



Study of Ambient Air Quality at Silverdale  
15 January 2019 – 25 June 19

Figure 3.2.3: H<sub>2</sub>S 30-minute mean concentrations



A time series plot of 30-minute mean H<sub>2</sub>S concentrations measured over the period is shown in Figure 3.2.3. The highest recorded 30-minute mean during the monitoring period was 19.1µg.m<sup>-3</sup>.

There were 67 occasions between 28 February to 25 June, on 26 separate days, where a 30-minute mean value exceeded the WHO guide level of 7µg.m<sup>-3</sup>.